



BLenheim ESTATE

HOMES

Land East of
Park View
Woodstock

Environmental Statement Technical Appendix C:
Cultural Heritage

C2

C2

Historic England
pre-application response
letter 12 May 2022



Mr John Trehay
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Direct Dial: 07785 631175

Our ref: PA01178645

Your ref:

12 May 2022

Dear Mr Trehay,

Pre-application Advice LAND EAST OF PARK VIEW, WOODSTOCK

Introduction

Thank you for requesting pre-application advice for this proposed housing development for up to 510 units. You and I met on site to discuss the case on the 20th April. A list of information on which this advice is based appears at the end of the letter.

This advice concentrates on the following heritage assets:

1000434, Blenheim Palace Grade I Registered Park and Garden
Blenheim Palace World Heritage Site

1021367, Blenheim Villa, a Roman villa and associated field system 200m north east of Little Cote. Scheduled Monument

Undesignated archaeological remains which are clearly related to the Blenheim Villa
The Woodstock Conservation Area

The site is bounded to the west by a hedge behind which is a partially completed housing development. The hedge is also the boundary between West Oxford District and Cherwell District within which the site is located. South, east and north are the A44 Oxford Road, the A4095 Upper Campsfield Road and the minor Shipton Road respectively. The site is an arable field mainly lined with hedges and some mature trees.

As part of a review of the Cherwell District Local Plan, the site was put forward as a housing allocation but was not accepted by the Inspector and was therefore removed. This is discussed further below. At the time (2019) Historic England signed a Statement of Common Ground with Cherwell District Council stating HE did not object to the allocation - a condition within the SOCG was for: *A scheme and outline layout for delivery of the required land uses and associated infrastructure which unambiguously responds to, **and conserves or enhances, the significance of the internationally and nationally significant heritage of the Blenheim Palace World Heritage Site, the Grade 1 Registered Park and Garden and the Blenheim Villa***



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Scheduled Ancient Monument, their settings and influences on the historic, built and natural environments.

Throughout this letter, the term setting is intended to mean the surroundings in which the heritage asset is experienced (HE, The Setting of Heritage Assets - Historic Environment GPA 3, 2017). Impact on an asset from development within its setting is a material consideration in planning decisions (NPPF para 200).

Significance of the Blenheim Villa

Significance can be considered as the sum of a heritage asset's evidential, historic, aesthetic and communal values.

The villa remains have high evidential value as shown by geophysical survey and evaluation trenching. A building complex including at least one building with an apsidal feature lies within one of a series of enclosures arranged in a linear fashion. These Roman settlements are sometimes referred to as ladder settlements. A detailed description of the villa is contained in the National Heritage List description and is not repeated here. Evaluation trenches dug in 1985 found well-preserved mortared wall foundations and fallen wall plaster lying face-down within the building. The latter is likely to overlie important evidence relating to the use of the villa and may cover preserved floors. Pottery from the third and fourth centuries was recovered but the ladder enclosures and simplicity of the building suggest an earlier origin is quite possible. The preserved structures and layers have high potential to provide evidence of the use and development of the villa, and its relationship to the surrounding area. The villa is on the national Heritage at Risk Register because of suspected ongoing damage from ploughing, which is reducing evidential value.

The villa site is on a barely discernible rise in the ground, just visible when viewed from the south (A44) and east sides of the development site. Although no remains of the villa are visible above ground, it does derive some significance from its setting in that Roman villas were deliberately designed to have a front (façade) with an outlook. Illustration of villa orientation in Oxfordshire (Henig and Booth 2000, Fig 4.2) shows east, south-east and south to be the most commonly chosen, presumably to benefit from the sun. This would fit with the Blenheim Villa having an ESE outlook across what is currently a large open arable field. The setting of the villa thus makes a modest contribution to the significance of the site, illustrating its original outlook. It also illustrates the agricultural surroundings of the original villa on which its economy would have depended, at least in part.

Aesthetic value is negligible and communal value is currently limited mainly to the interest of specialist groups.

Impact on the Blenheim Villa



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The proposals involve limiting the actual housing to a parcel of land north-east of the scheduled villa site. The edges of the housing area would be softened by clumps of new tree planting. Road access would run well north of the scheduled area which would be accessible only on foot or perhaps bicycle. The villa site and the historic outlook of the villa to the east would be open public green space. Some clumps of planting (native species) would be acceptable within this area as long as the impression of a long, open view is retained - indeed it would look more natural with some planting and arguably be more representative of a Roman landscape. We discussed this at our site meeting.

Overall, the impact on the villa would be positive. The site (including undesignated remains related to the villa) would no longer be ploughed and the scheduled monument could potentially be removed from the HAR register in due course. Securing the future of the villa site could be achieved through an appropriate conservation management plan and by defining its future ownership and funding - you indicated that your clients would be prepared to secure this. The historic outlook would be better illustrated than is currently the case or at very least no worse. The setting of the villa would potentially be improved from its current situation. This would depend on the success of softening the edges of the new housing area, and on general good design, including feathering the development so that it is lower on the edges towards the villa site - again, we discussed this at our site meeting. The predicted views of the housing from the villa should be illustrated in any planning application so the effect can be understood in detail.

Further benefit could be obtained from an appropriate programme of interpretation and public engagement as we discussed at our site meeting. You indicated that your client would like to carry out such a programme which could include, but need not be limited to:

Provision of information about the heritage assets in packs provided to new homeowners (in proposed and neighbouring ongoing developments);
Interpretation panels and / or digital interpretation through means such as QR codes;
engagement with local interest groups and schools.

The above actions would be intended to create a sense of 'ownership' of the Roman villa within the local community so that they cherished and protected it. All of the above could be achieved through the mechanism of an approved conservation management plan. We would prefer that the plan and the necessary actions flowing from it are secured through specific conditions on any planning consent granted, and not through a section 106 agreement. We would advise the local authority of this in the event of a planning application.

The Blenheim Palace World Heritage Site



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The site lies east of the Blenheim Palace World Heritage Site (hereinafter WHS). It does not border the WHS but comes close, corner-to-corner at the north-west corner of the site, separated by the busy A44 Oxford to Woodstock Road. At the corner the stone wall around the WHS is glimpsed across the road but heavily screened by trees. The wall is then separated from the site as it runs south behind Campsfield Wood, a dense triangle covered mainly in mature woodland within which are some screened buildings. There is no other intervisibility between the site and the WHS.

The role of the development site in the setting of the WHS can be considered both in terms of national legislation and guidance, and as set out in the Blenheim Palace World Heritage Site Revised Management Plan (2017, hereinafter WHSMP). The Conservation Management Plan for the Blenheim Palace Gardens (2021, hereinafter CMP) is also relevant. The latter focuses on the more formal gardens at the core of the WHS.

In the WHSMP the section on outstanding universal value include the following:

The integrity of the property is well protected by its enclosing wall but important visual links do exist between the gates, the parkland buildings, buildings in the surrounding villages and landscape, and care needs to be taken to ensure these key visual links are protected. (from para 5.01)

Attribute 7. The park retains a complete, 18th century enclosing stone wall which protects its integrity, but views into and out of the site still provide key linkages between Blenheim Palace and the traditional English countryside and villages surrounding it. (from 5.02 - attributes contributing to outstanding universal value).

Considering the description above of how the site and the WHS relate, it is clear that development of the site with housing screened by existing and new hedges and trees will not affect the outstanding universal value, ie there is no impact on the 'key linkages'.

I advise that the site in its current state makes a very minor contribution to the communal value of the WHS in that many visitors approach the WHS (and are aware that they are nearing it) along the A44 road from the Oxford direction. The site is experienced as an agricultural field glimpsed through a hedge, at the same time as visitors become aware that they are approaching Woodstock. It therefore illustrates how the WHS is set in the countryside on the edge of the market town of Woodstock.

The site is bordered to the north by a minor road (Shipton Rd). There is no experience of the WHS from this road nor is it a direct route to the WHS. It is not therefore considered to be part of the setting of the WHS.

The experience of visitors approaching along the A44 will change if the site is



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developed to being glimpsed views of green space with possible distant glimpses or house roofs behind new green screening. I consider it probable that, with good design, the effect of this change on the communal significance of the WHS will be negligible. The predicted views of the site from the A44 should be appropriately illustrated in the Environmental Statement accompanying a planning application so that this can be confirmed. This exercise would be part of the necessary requirement to demonstrate that all possible efforts have been made to negate or minimise harm to the WHS.

Depending on the final detailed design of the development, paragraph 206 of the NPPF may be relevant. In relation to developments within the setting of world heritage sites, this states: 'Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.'

No designated heritage assets within the WHS would be impacted by the development.

In deciding that the original allocation of the site for housing should not be included in the Local Plan, the Inspector's 'fundamental concern' was the separation of the site from Oxford but he cited a contributing concern as follows:

On top of that, the site itself has difficulties in that as a result of recently approved housing that is under construction, the south east boundary of Woodstock is well-defined. Its further extension in a south-easterly direction would appear incongruous and damage the character and appearance of the area. While not on its own a significant issue, this incongruity would cause some harm to the setting, and thereby the significance of the Blenheim Palace World Heritage Site that lies to the west of the proposed allocation. The challenges of developing the site in an acceptable way are evident in the rather contorted way in which housing on the site would be arranged in relation to green space and the need for screening woodland as shown on the Policy PR10 Policies Map.

While it is true that the south-east boundary of Woodstock will change, my advice is that this is not necessarily harmful to the WHS, as I have detailed above. The description of the arrangement of housing as 'contorting' described an earlier design, and it is also possible that the Inspector did not fully recognise the influence of the Blenheim Roman Villa on the layout. It will of course be for your clients to show that all possible effort has been made to minimise or negate harm to the WHS as required by the NPPF and as set out in our guidance on setting (HE 2017). The information you have provided at this pre-application stage indicates that you are working in this way and this should continue in any planning application.

Significance of the Woodstock Conservation Area

The Woodstock Conservation Area is 950 m away from the site with no intervisibility.



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In advice on previous planning applications we considered the development site as part of the setting of the conservation area in that it formed part of a green approach to the town with the historic town proper beginning near the main gate of Blenheim Estate. This remains the case although the green approach has been to some extent impacted upon by the new development immediately west of the site along the A44. Nevertheless, as that development is set back and partially screened, there is still a sense of a green approach to the town and the site is therefore considered to make a modest contribution to the significance of the Conservation Area, as contributed to by its setting.

Impact on the Woodstock Conservation Area

The proposed development would impact in a similar way to that discussed for the WHS above. With appropriate design and screening, the impact on the significance of the conservation evidence should be negligible, given that the housing itself would not be at the roadside, but a considerable distance to the north.

Legislation and guidance

National Planning Policy Framework 2021, particularly but not limited to, paragraphs 194-5, 197, 200 (for setting), 203, 206, Footnote 68.

The Setting of Heritage Assets - Historic Environment Good Practice Advice in Planning: 3, 2017.

Conservation Principles, Policies and Guidance, Historic England 2008.

While not part of the legislative framework, the UNESCO Convention Concerning the Protection of the World Cultural and National Heritage, 1972 (to which the UK is a signatory) makes provision for the World Heritage List, which is a list of cultural and/or natural heritage sites of outstanding universal value. Otherwise, England protects its World Heritage Sites and their settings, including any buffer zones or equivalent, through the statutory designation process and through the planning system.

Historic England position

Subject to the detailed points raised above being satisfactorily addressed through further detail, either prior to or as part of a planning application, it is likely that Historic England would consider the proposal as a development it would not object to, and possibly as a development it could support. It remains Historic England's position, as in 2019, that we would wish the development to deliver: A scheme and outline layout for delivery of the required land uses and associated infrastructure which unambiguously responds to, and conserves or enhances, the significance of the internationally and nationally significant heritage of the Blenheim Palace World



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Heritage Site, the Grade 1 Registered Park and Garden and the Blenheim Villa Scheduled Ancient Monument, their settings and influences on the historic, built and natural environments.

Next Steps

Thank you for involving us at the pre-application stage. Your scheme may benefit from our continued engagement; if so, we would welcome the opportunity to continue discussions through our Extended Pre-application service, details of which can be found on our website at www.HistoricEngland.org.uk/EAS. If you would like to discuss this option further, or anything raised in this letter, please do contact me.

Yours sincerely,

David Wilkinson

David Wilkinson
Inspector of Ancient Monuments
E-mail: david.wilkinson@HistoricEngland.org.uk

List of information on which the above advice is based

Land east of Park View, site review February 2022. Pre-application presentation. Terence O'Rourke for Blenheim Estate.

Report to Cherwell District Council on the Examination of the Cherwell Local Plan 2011-2031 (Part 1) Partial Review-Oxford's Unmet Housing Need, by Paul Griffiths, 6/8/2020

Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxford's Unmet Housing Need Examination Hearings STATEMENT OF COMMON GROUND ADDENDUM Between Cherwell District Council and Historic England, 8th February 2019

Blenheim Palace World Heritage Site Revised Management Plan 2017.

Blenheim Palace Gardens Conservation Management Plan, May 2021.

Land at Shipton Road, Woodstock, Oxfordshire. Archaeological Evaluation Report, Thames Valley Archaeological Services, October 2014.

