



Historic England

Ms Samantha Taylor
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Direct Dial: 0207 973 3644

Our ref: P01516196

2 August 2022

Dear Ms Taylor,

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND SOUTH OF PERDISWELL FARM , SHIPTON ROAD , SHIPTON ON
CHERWELL
Application No. 22/01715/OUT**

Thank you for your letter of 1 July 2022 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

Historic England has concerns about one element of this development on heritage grounds. The applicant's assessment of moderate adverse impact on the scheduled Blenheim Roman villa may be correct but is not sufficiently supported by predicted views or full consideration of cumulative impact (see detail in main body of letter). I can advise that any harm will be less than substantial (National Planning Policy Framework 2021 (NPPF), para. 202). It is the degree of less than substantial harm that is unclear. The extra information is required in order to comply with the NPPF, paras 194, 195.

The applicant has offered a number of potential benefits to the villa site which we welcome. When the additional information on adverse impact is available (see above) it will be possible to fully assess the balance between adverse and positive impacts on the villa, as part of the balancing exercise required by the NPPF para. 202. Please consult us again when this information is available.

Should you decide to grant planning permission without requesting further information we advise that the positive benefits be secured through appropriate planning conditions. We would be happy to advise further on wording.

With regard to the World Heritage Site (WHS) of Blenheim Palace including its Grade I Registered Park and Garden, Listed Buildings within the WHS, and the Woodstock



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Conservation Area, Historic England does not object to this development on heritage grounds. We advise that the significance of these heritage assets would be conserved. The NPPF para. 199 requires that great weight should be given to the conservation of such assets. We welcome as a positive effect the commitment of funds to the upkeep of the World Heritage Site, subject to understanding the extent of this commitment.

Historic England Advice

Introduction

I understand that this is an outline planning application for up to 510 housing units.

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;

The Woodstock Conservation Area;

Undesignated archaeological remains.

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.

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.

Romano-British villas were extensive rural estates at the focus of which were groups of domestic, agricultural and occasionally industrial buildings. The term "villa" is now commonly used to describe either the estate or the buildings themselves. The buildings usually include a well-appointed dwelling house, the design of which varies considerably according to the needs, taste and prosperity of the occupier.



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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 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 west boundary of the site is on the line of and illustrates the Saxon route known in the late Saxon period as Heh Straet; it runs roughly parallel to the enclosures within which the villa sits, suggesting historic continuity within the landscape. The setting of the villa thus makes a modest contribution to the significance of the site, illustrating its original outlook and surroundings. It also illustrates the agricultural estate 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

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 (45 m from the scheduled area at their closest) would be screened and softened by clumps of new tree planting and by green wedges breaking up the built edge of the housing. Housing would be up to 9 m high at the edge nearest to the villa, rising to 10 m and then 11.5 m further back. New tree planting would be up to 3.5 m high initially, growing to 9 m in maturity.

Road access would run well north of the scheduled area which would be accessible only on paths. The road access will cut across the historic alignment of Heh Straet but the alignment will still be appreciable in the area of the villa and beyond it to the north and south. The villa site and the historic outlook of the villa to the east and south-east





would be open public green space. There would be further public green space to the north, between the villa site and the new access road.

The applicant's assessment is that the impact of the development will be moderate adverse without mitigation (ES, Ch5, 5.138), caused by the change to the villa's setting. While this may be the case, I have two concerns about the information submitted to back up this judgement.

Firstly, the applicant has not submitted predicted views of the housing development from the villa, as we advised in our pre-application advice. Even the wireframe photographic views within the Landscape and Visual chapter (ES fig. 6.7) do not include any views from the villa site.

Secondly, the ES should be clearer on the cumulative impact from change to the setting, taking into account the ongoing Park View development immediately west of the site (5.168). At present the ES rather suggests the new development is more acceptable for being an addition to Park View. *'...the general suburbanisation of what is currently an agricultural field will result in a change to the present setting, albeit a continuation of the residential context currently experienced as a result of the proximity of Park View to the west'* (5.138). I advise the applicant should be asked for a revision which fully considers the cumulative negative impact of the two developments - it is not sufficient to say that Park View is part of a 'future baseline' (5.100).

This information should be requested from the application and assessed before a decision is made on the planning application. Please consult us again when it is available. The extra information is required in order to comply with the NPPF, paras 194 and 195.

I welcome the positive steps proposed in the application which are:

Keeping the eastern / south eastern aspect of the villa open and changing it from an agricultural field to green public open space with a few trees;

Securing the future of the villa as a green public area with an appropriate conservation management plan;

Measures for interpretation of the villa for the public, and a programme of public engagement to foster understanding, a sense of 'ownership' of the monument, and making a contribution to the sense of place.

For clarification, I was in error when I advised the applicant at pre-application stage that the site was on the Heritage at Risk register due to the threat from ongoing ploughing. The site was recently removed from the register following agreement with the landowner not to plough the site in the period 2021 - 2025. However, the measures outlined above will secure the longer-term future of the scheduled monument, including protecting it from future ploughing, and they are still of considerable potential benefit.





When the additional information on adverse impact is available (see above) it will be possible to fully assess the balance between adverse and positive impacts on the villa.

Should you decide to grant planning permission without requesting further information we advise that the positive benefits be secured through appropriate planning conditions. We would be happy to advise further on wording.

The Blenheim Palace World Heritage Site and Grade I Registered Park and Garden

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 listed stone park 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.

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 sections 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 significance 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 developed to being glimpsed views of green space with possible distant glimpses or housing behind new green screening. The effect of this change on the communal significance of the WHS will be negligible.

The site does not form part of the setting for any designated heritage assets within the WHS. The nearest assets, the Grade II listed Cowyards and Eagle Lodge, are set within or behind mature woodland.

I agree with the applicant's assessment that: *The changed character and appearance of the site as part of the setting of the Blenheim Park RPG, and the increase in built development perceptible will be a negligible change to an asset of high importance, which will be a permanent slight effect that is not significant. (5.150).* I also agree, based on my discussion above, that the same assessment of a permanent slight effect that is not significant applies to the WHS.

With regard to positive benefits we welcome the commitment of funds to the upkeep of the World Heritage Site (5.152), subject to understanding the amount that will be committed. I am less convinced that changing parts of the site to public green space is a positive slight beneficial effect on the World Heritage Site (which is not really experienced from the site), however the applicant is not claiming that this is a significant effect.

Significance of the Woodstock Conservation Area

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



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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. The impact on the significance of the conservation evidence would be negligible, given that the housing itself would not be at the roadside, but a considerable distance to the north, screened by a hedge and the new screening proposed.

In 5.146 the applicant assesses the impact as a permanent slight to negligible change which will be permanent. I agree with this assessment.

Undesignated heritage assets

For the buried archaeological remains which lie outside of the scheduled monument, I defer to and support the advice provided by the Oxfordshire County Council Archaeology Team.

Legislation and guidance

National Planning Policy Framework 2021, particularly but not limited to, paragraphs 194-5, 197, 200 (for setting), 202, 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

Historic England have concerns on heritage grounds about one aspect of this development which is the predicted impact on the scheduled Blenheim Roman villa.

With regard to the World Heritage Site (WHS) of Blenheim Palace including its Grade I Registered Park and Garden, Listed Buildings within the WHS, and the Woodstock





Historic England

Conservation Area, Historic England does not object to this development on heritage grounds.

Recommendation

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely,

David Wilkinson

David Wilkinson

Inspector of Ancient Monuments

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cc: Victoria Green, Planning Archaeologist, Oxfordshire County Archaeological Service.



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