



Historic England

Minerals & Waste Core Strategy Consultation  
Environment & Economy  
Planning Regulation (Minerals & Waste)  
Oxfordshire County Council  
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16<sup>th</sup> June 2016

Dear Sir or Madam,

### **Oxfordshire Minerals and Waste Core Strategy – Consultation on Additional Documents**

Thank you for your e-mail of 29<sup>th</sup> April advising Historic England of the consultation on the additional documents in support of the Minerals and Waste Local Plan: Part 1 – Core Strategy. We have considered the two documents we believe to be most relevant to our remit, the Preliminary Assessment of Minerals Site Options and the Preliminary Assessment of Waste Site Options, and are pleased to make the following comments.

We welcome the recognition of heritage assets as one of the considerations in assessing the suitability of potential minerals and waste sites in both documents. However, non-designated heritage assets of local importance (not just those assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments) should also be considered, in the same way as locally-designated areas of nature conservation are (paragraph 2.14 of the Minerals document notes that a similar rationale is applied to the assessment of locally designated sites as for SSSIs).

Particularly important here are the very rich archaeological resources of the Lower Windrush Valley and at a number of locations within the Thames and Lower Thames Valleys (Oxford to Cholsey), to which reference is made in paragraph 4.35 of the Core Strategy, and any other known archaeologically sensitive areas.

You are, of course, aware of the Oxfordshire Aggregates and Archaeology Assessment (OARA), which should form an important part of the evidence base (together with other studies and assessments e.g. relevant Historic Environment Records, the Oxfordshire Historic Landscape Character Assessment and Conservation Area Character Appraisals) for the Local Plan as required by the National Planning Policy Framework..

Other relevant non-designated assets include any parks and gardens on local lists or a County list: historic parks and gardens are particularly under-represented on the National Heritage List for England.



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In addition, the assessment of sites “adjoining” heritage assets as “Amber” and sites not “within/adjoining” heritage assets as “Green” is crude and does not recognise the true concept of “setting” as defined in the National Planning Policy Framework, which extends beyond land immediately adjacent to an asset. Paragraph 132 of the Framework recognises that the significance of a heritage asset can be harmed or lost through development within its setting.

We have published advice on setting: setting of heritage assets (<https://www.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>). For potential sites within the setting of Conservation Areas, the relevant Conservation Area Character Appraisal (if there is one) should be consulted.

We understand that the assessment undertaken for, and contained within, the Minerals and Waste Options documents is only preliminary, and we note that it is stated that a further, detailed assessment of site nominations will take place later in the preparation of the Plan, when sites are being considered for inclusion in the Minerals and Waste Local Plan Part 2 – Site Allocations (we look forward to being consulted on the methodology for this further assessment in due course).

However, either greater consideration should be given to the potential impact of minerals or waste sites within the setting of heritage assets (not just those adjacent to such assets) on the significance of those assets at this stage, with a consequent potential adjustment in the RAG assessment, or the further assessment should be undertaken of sites with a “Green” assessment at this preliminary stage which are within the setting of a heritage asset. Either way (and preferably both), it should not be assumed that sites with a “Green” assessment at this preliminary stage will necessarily be suitable for minerals or waste development when further assessment has been undertaken.

We have the following comments on some of the sites identified in the Minerals and Waste Options documents (based on the information currently available for a desk-based assessment – we have not visited any of the sites at this stage. The scale of the map in the document makes it difficult to be sure of precise location and extent of proposed sites. It should also be noted that a lack of objection at this stage is not confirmation that we consider a site suitable – our comments below are without prejudice to any further comments we may wish to make when further assessment has been undertaken).

*b) SG-09 Land North of Drayton St. Leonard and Berinsfield*

We note and welcome the recognition that this site contains a monument equivalent to a Scheduled Monument and is therefore afforded the same protection (by the National Planning Policy Framework). Paragraph 144 of the Framework states that local planning authorities should, as far as practical, provide for the maintenance of landbanks of non-energy minerals from outside Scheduled Monuments (which would include those sites of equivalent significance). In addition, paragraph 4.44 of the Core Strategy explains that working within Scheduled Monuments is not necessary.



Therefore, the monument should be excluded from any potential area for mineral extraction but, although the monument occurs in the western area of the site and covers only a small area, consideration should also be given to the setting of the monument in determining what area of the site, if any, may be suitable for mineral extraction. The site may also be within the setting of the grade I Registered Historic Park and Garden of Nuneham Courtenay and/or the Nuneham Courtenay Conservation Area, the potential impact on which also needs to be considered.

*c) SG-11 Land east of Spring Lane, Sonning Eye, (Caversham “C”)*

Site SG-11 is likely to be within the setting of the Sonning Eye Conservation Area, the potential impact on which should be taken into account in deciding whether or not this site, or part of it, is suitable for mineral extraction.

*d) SG-13 Land at Shillingford*

Site SG-13 appears to indeed contain three Scheduled Monuments and potentially other archaeological assets that are demonstrably equivalent to a Scheduled Monument. We therefore agree that this does preclude this site from being delivered and the consequent “Red” assessment.

*e) SG-17 Land at Culham*

Site SG-17 appears to include part of the round barrow cemetery at Fullamoor Plantation Scheduled Monument, or at least be within its setting. That, plus the indication that archaeological remains on this site are dependent on water acting as a preservative, means that we consider it unlikely that this site is deliverable. It is quite possible that the archaeological interest of the site extends beyond the scheduled area, the setting of the Monument needs to be conserved and the dewatering potentially needed to extract minerals could lead to the deterioration and/or loss of waterlogged deposits. The likely impact of mineral working at this site would therefore appear likely to be unacceptable.

*f) SG-19 Bridge Farm, Appleford*

Site SG-19 might be within the setting of the Sutton Courtenay Conservation Area, the potential impact which should be taken into account in deciding whether or not this site, or part of it, is suitable for mineral extraction

*h) SG-41 N of Lower Radley*

Site SG-41 may be within the setting of the Nuneham Courtenay Conservation Area and the grade I Registered Historic Park and Garden of Nuneham Courtenay, the potential impact which should be taken into account in deciding whether or not this site, or part of it, is suitable for mineral extraction.

*i) SG-42 Nuneham Courtenay*

Site SG-42, as shown on the map of nominated minerals sites, does not appear to include part of the Nuneham Courtenay Conservation Area, but if it does, then this area should be excluded from the site (in accordance with paragraph 144 of the National Planning Policy Framework and paragraph 4.44 of the Core Strategy).



It will also be within the setting of the Conservation Area and the grade I Registered Historic Park and Garden of Nuneham Courtenay, the potential impact which should also be taken into account in deciding whether or not this site, or part of it, is suitable for mineral extraction.

*j) SG-59 Stadhampton*

Site SG-59 may be within the setting of the grade II listed Camoys Court and/or the grade II listed Chiselhampton Bridge, the potential impact on which should be taken into account in deciding whether or not this site, or part of it, is suitable for mineral extraction.

*k) SG-60 White Cross Farm, Wallingford*

Site SG-60, as shown on the map of nominated minerals sites, does not appear to adjoin listed buildings, but if it does, then the potential impact on the setting of these buildings should be taken into account in deciding whether or not this site, or part of it, is suitable for mineral extraction.

*l) SG-62 Appleford, Didcot*

Site SG-62, as shown on the map of nominated minerals sites, does not appear to be adjacent to a Scheduled Monument, but if it is, then the potential impact on setting of that Monument, and the fact that it is possible that the archaeological interest extends beyond the scheduled area, need to be considered in determining what area, if any, of the site is suitable for mineral extraction.

*m) SG-08 Land at Lower Road*

If Site SG-08 does include a small part of the Church Hanborough Conservation Area then this part should be excluded from the site (in accordance with paragraph 144 of the National Planning Policy Framework and paragraph 4.44 of the Core Strategy). The potential impact on setting of the Conservation Area also needs to be considered in determining what area, if any, of the site is suitable for mineral extraction.

*n) SG-18 Land at Standlake*

The OARA notes that this site lies within a rich archaeological landscape, and that significant archaeological remains might be masked by alluvium. However, the site is some distance from the 'core' area identified above, and given the absence of other evidence, we consider an Amber assessment to be justified.

*p) SG20a Wharf Farm, Cassington and q) SG20b Land at Eynsham*

Sites SG20a and SG20b are within the setting of the Eynsham Conservation Area, the potential impact on which needs to be considered in determining what area, if any, of the sites is suitable for mineral extraction.

*r) SG-23 Windrush North, Gill Mill*

Site SG-23 appears to be within the setting of the Stanton Harcourt and Sutton Conservation Area, the potential impact on the setting of which should be taken into account in deciding whether or not this site, or part of it, is suitable for mineral extraction.



*s) SG-27 Vicarage Pit, Cogges Lane*

Site SG-27 does indeed adjoin two grade II listed buildings at Beard Mill, the setting of which should be taken into account in deciding whether or not this site, or part of it, is suitable for mineral extraction.

In addition, this site has previously been identified as being adjacent to an area to the south which has produced a large amount of archaeological evidence, including a barrow cemetery, a Neolithic enclosure and a Roman settlement. In this particular case, the cropmark evidence does suggest that the archaeological remains might be restricted to the south east margin of the nominated site. The site is immediately adjacent to the 'core' area identified above and may well contain the later prehistoric settlements clustered around it. The possibility should be considered of identifying an exclusion strip within it which preserves the significant archaeological remains in the south eastern section. Subject to that, we consider an Amber assessment to be justified.

*t) SG-28 Guy Lakes North, adjB4449*

Site SG-28 lies within an area that has been extensively quarried and which the OARA identifies as being of high potential. Any archaeological remains here will be masked by extensive alluvial cover, and might be associated with the important discoveries made in the immediate area. It lies close to the edge of the 'core' area.

There is a likelihood that significant archaeological remains might exist in this area, which could be of importance in their own right and with respect to their association with the important remains found within the previously quarried areas. This area should not be subject to further consideration unless it can be shown that such remains do not exist here. Subject to that, we consider an Amber assessment to be justified.

*u) SG-29 Sutton Farm, Sutton*

Site SG-29 adjoins the Stanton Harcourt and Sutton Conservation Area, the potential impact on the setting of which should be taken into account in deciding whether or not this site, or part of it, is suitable for mineral extraction.

*v) SG-30 Home Farm, Brighthampton*

Site SG-30 is in an area that the OARA notes that the remains of a prehistoric and Roman settlement complex are known to extend, and a barrow cemetery and other enclosures lie close by. Given the potential evidential value of the archaeological remains here, we consider that this site should be assessed as red.

*w) SG-31 Land east of Sutton*

Site SG-31 is within the setting of the Stanton Harcourt and Sutton Conservation Area, the potential impact on which should be taken into account in deciding whether or not this site, or part of it, is suitable for mineral extraction.

*a) SS-01 Tubworth Barn*

Site SS-01 is possibly within the setting of the Fyfield and Netherton Conservation Area. The potential impact on the setting of the Conservation Area should be taken into account in deciding whether or not this site, or part of it, is suitable for mineral extraction

*c) SS-04 Land at Pinewoods Road*

The grade II listed Manor Farmhouse lies just to the north and the grade II Registered Historic Park and Garden of Hinton Manor just beyond that. The potential impact on setting of these heritage assets should be taken into account in deciding whether or not this site, or part of it, is suitable for mineral extraction.

*f) SS-07 Home Farm, Shellingford*

Site SS-07 appears likely to be within the setting of the Shellingford Conservation Area. The potential impact on the setting of this Conservation Area should be taken into account in deciding whether or not this site, or part of it, is suitable for mineral extraction

*h) SS-12 (CR-12) Land at Chinham Farm*

This site is potentially within the setting of the Earthwork in Ewedown Copse Scheduled Monument. The potential impact on the setting of this Monument should be taken into account in deciding whether or not this site, or part of it, is suitable for mineral extraction.

*c) CR-10 Burford Quarry SW extension*

The grade II listed Stonelands is located to the north of the quarry. The potential impact on the setting of this Conservation Area should be taken into account in deciding whether or not this site, or part of it, is suitable for mineral extraction.

*e) CR-12 (SS-12) Land at Chinham Farm*

CR-12 as shown on the map lies opposite the Faringdon Conservation Area. The potential impact on the setting of this Conservation Area should be taken into account in deciding whether or not this site, or part of it, is suitable for mineral extraction.

Waste Sites

*h) 236 Dix Pit Complex*

Further development on this site could be within the setting of the Devil's Quoits Scheduled Monument, the potential impact on which should be taken into account in deciding whether or not this site, or part of it, is suitable for waste management.

*d) 217 Culham No.4 site, Clifton Hampden*

The site is also possibly within the setting of the grade I Registered Historic Park and Garden of Nuneham Courtenay, the potential impact on which should be taken into account in deciding whether or not this site, or part of it, is suitable for waste management.



*b) 249A High Cogges Farm, Witney and c) 249B High Cogges Farm, Witney*

These sites are within the setting of the grade II listed High Cogges Farmhouse, the potential impact on which should be taken into account in deciding whether or not these sites, or part of them, are suitable for waste management.

*a) 001 Shipton Hill, Fulbrook*

The site is possibly within the setting of a number of listed buildings in Fulbrook, the potential impact on which should be taken into account in deciding whether or not this site, or part of it, is suitable for waste management.

*j) 020B Wicklesham Quarry (extension), Faringdon*

Further development at this site would be within the setting of the grade II listed barn and adjacent granary at Wicklesham Lodge Farm, the potential impact on which should be taken into account in deciding whether or not this site, or part of it, is suitable for waste management.

*t) 265 Woodeaton Quarry*

This site is within the setting of complex of listed buildings at Water Eaton Manor, the potential impact on which should be taken into account in deciding whether or not this site, or part of it, is suitable for waste management.

*y) 279 R/o Ford Garage, Rycote Lane, Thame*

This site is potentially within setting of listed buildings at Manor Farm, the potential impact on which should be taken into account in deciding whether or not this site, or part of it, is suitable for waste management.

*a) 232 Banbury Sewage Treatment Works*

This site is within the setting of the Oxford Canal Conservation Area, the potential impact on which should be taken into account in deciding whether or not this site, or part of it, is suitable for waste management.

We hope these comments are helpful. Please contact me if you have any queries.

Thank you again for consulting Historic England.

Yours faithfully,

Martin Small

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(Bucks, Oxon, Berks, Hampshire, IoW, South Downs National Park and Chichester)

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