



Historic England

Ms Emily Catcheside
Planning Officer

Direct Dial: 0207 973 3644

Oxfordshire County Council
County Hall, New Road
Oxford OX1 1ND

Our ref: P01446145

9 December 2021

Dear Ms Catcheside,

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

**A LINEAR SITE COMPRISING A CORRIDOR BETWEEN THE A34 MILTON
INTERCHANGE AND THE B4015 NORTH OF CLIFTON HAMPDEN
Application No. R3.0138/21**

Thank you for your letter of 11 November 2021 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 does not object to this scheme on heritage grounds.

With regard to undesignated heritage assets we support the advice provided by the Oxfordshire County Council Archaeological Service that the ES should have included the results of the archaeological trench evaluations. These evaluations have been completed and reported on. Please reconsult Historic England when this information is available. Conclusions in the ES that the effect on undesignated archaeological remains will be 'slight adverse not significant' are premature until the evaluation results are considered.

We advise that the adverse effect of the scheme on the scheduled monument known



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.



as Settlement Site North of Thames (HA1006345; A117 in the Environmental Statement (ES)) will be moderate adverse and not 'slight adverse not significant' as assessed in the ES. This monument consists of the archaeological remains of enclosures, pits and trackways which are of probable prehistoric and Roman date, and are known from aerial photographs.

We advise that suitable species are planted and maintained to minimise the impact that lighting the by-pass could have on the experience of the rural settlement of Clifton Hampden and registered landscape Nuneham Courtenay.

The new road may increase and change noise levels to the Clifton Hampden Conservation Area through sound carried on prevailing westerly winds. However, we expect the road would also reduce the amount of traffic that travels directly through Clifton Hampden, which would improve the experience of the Conservation Area.

Other than the points made above the Cultural Heritage Chapter (7) of the Environmental Statement submitted is a reasonable assessment of significance of heritage assets and the predicted impacts on them, whether adverse or beneficial. The application is therefore broadly compliant with para. 194 of the National Planning Policy Framework (NPPF) 2021.

In determining the application, your planning authority should balance the less than substantial harm from the scheme against public benefit, as required by the NPPF, para. 202.

Historic England Advice

We understand that this application is for a road scheme from Milton junction to Clifton Hampden, including a new crossing over the river Thames, to the east of Culham. Our detailed advice is as follows.

Scheduled monuments

The new Thames crossing and the new road will be near to the scheduled monument known as Settlement Site North of Thames (HA1006345, A117 in the Environmental Statement (ES)).

This monument consists of the archaeological remains of enclosures, pits and trackways which are known from aerial photographs. Most of the enclosures are rectangular but there are a few circular or penannular features which could indicate roundhouses. The form of the cropmarks, particularly on the east side of the complex, suggests the remains are of probable prehistoric and Roman date, and not prehistoric as described in the ES (7.10.12; Appendix 7.1 Gazetteer, no A117).



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk





The significance of the scheduled monument lies in its evidential value and is also contributed to by its setting (the surroundings in which it is experienced). The evidential value is the potential of the archaeological remains to contribute to our understanding of how people lived and worked the land in this area, including how this changed through time up to the Roman period. The setting contributes in that the relationship of the river to the monument can be understood, and in the rural / agricultural land to the west and north which illustrates the original rural surroundings of the prehistoric and Roman features. To the east the setting is compromised by the railway embankment and bridge. There are modern quarries to the south of the river. It is untrue, as asserted in the ES (7.10.12) that there is modern development to the west of the scheduled monument.

The new road will run approximately 250 m west of the scheduled monument, with the new Thames crossing to the south-west. It will not change the evidential value of the monument.

The monument would be affected by light pollution and noise (near constant as opposed to intermittent railway noise that exists at present) from the road, visibility of the road / bridge and infrastructure. It will mean that the site feels enclosed on two sides by modern features - the impact is cumulative to that of the railway line. The ES assesses the impact magnitude as minor adverse on an asset of high significance. The significance of the effect on the monument is assessed as slight, permanent and 'not significant'. Using Table 7.4 in the ES the significance of effect could be either slight or moderate.

I advise that the change to the setting is such that the significance of effect is moderate, and not slight. This is less than substantial harm as in the NPPF Para. 202, but a higher level of that harm. The lower assessment in the ES may have arisen from the mistaken understanding that there was already modern development west of the monument. It is not clear why the ES describes this and other judgements of effect as 'not significant'. These judgements are summarised in Table 7.4 which defines degrees of significance of effect. Unless it is neutral, the effect cannot be 'not significant'.

Other Heritage Assets

With regard to above ground heritage assets, overall we are content that Chapter 7 of the ES considers the relevant historical features fairly and reaches reasonable conclusions about the impact the proposed road would have, which is generally a low level of harm. The illumination of the road at night time in proximity to Clifton Hampden Conservation Area would, when first constructed, appear likely to result in some negative change to the dark, rural setting that helps reinforce the rural character of the settlement. Likewise, lighting from the road may be seen from within the Grade I



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk





Nuneham Courtenay landscape albeit to a limited degree. The landscaping proposals indicate that, in proximity to these assets, woodland planting to the east, south and north of the new road and connecting roads would provide screening to limit light spill. We recommend that suitable species are planted and maintained to minimise the impact that lighting the by-pass could have on the experience of the rural settlement of Clifton Hampden and registered landscape Nuneham Courtenay.

The new road may increase and change noise levels to the Clifton Hampden Conservation Area through sound carried on the prevailing westerly winds, which could affect the experience of the rural settlement qualities of the village which are a feature of the Conservation Area's character. However, we expect the road would also reduce the amount of traffic that travels directly to Clifton Hampden, which will reduce the noise this generates, and when combined with the reduction in vehicles movements would improve the experience of the Conservation Area.

Undesignated heritage assets

With regard to undesignated heritage assets we support the advice provided by the Oxfordshire County Council Archaeological Service that the ES should have included the results of the archaeological trench evaluations that have been completed and reported on. Please reconsult us when this information is available. Conclusions in the ES that impacts on undesignated archaeological remains are 'slight adverse not significant' are premature until the evaluation results are considered. As discussed above in relation to the scheduled monument, it is unclear why the slight adverse effect is considered as 'not significant'. In revising the ES to include the evaluation results, consideration should also be given to whether any undesignated archaeological remains are of equivalent (national) significance to designated remains. Footnote 68 of the NPPF requires such assets to be assessed as if they were designated.

Policy

Paras 194, 195, 197, 199, 200, 202 and 203 of the NPPF are relevant. Where specifically applicable these have been referenced in the discussion above. Paras. 199 (give great weight to conservation of designated assets regardless of level of harm) and 200 (any harm to a designated asset must have clear and convincing justification) are particularly important.

Recommendation

Historic England has no objection to the application on heritage grounds.

Your authority should take these representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact us. Please advise us of the decision in due course.



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk





Historic England

Yours sincerely,

David Wilkinson

David Wilkinson

Inspector of Ancient Monuments

E-mail: david.wilkinson@HistoricEngland.org.uk

cc: Richard Oram, Lead Archaeologist, Oxfordshire County Council



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.