

Reviewed Long Wittenham
Neighbourhood Development Plan
2018-2035

EVIDENCE PAPER ARCHAEOLOGY AND POLICY LW1

November
2021

Submission Draft (new)

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1. This Evidence Paper considers archaeological matters raised by Historic England with regard to the site allocation in RLWNDP Policy LW1. It sets out the progress made on the site allocation, comments on the allocation methodology as this relates to archaeology, and provides an explanation how the RLWNDP has been modified accordingly.
2. The Site Allocation methodology drafted in 2018 considered the available sites based on initial conclusions drawn by the Local Planning Authority (LPA) from the South Oxfordshire District Council *Strategic Housing and Economic Land Availability Assessment* (SHELAA), published in October 2017, and locally derived assessment criteria which related to the viability of the overall scheme, taking account of the inter-relationship between three sites (the hub site, the school site and the Village Hall). Other determining criteria related to local criteria for the development and are based on the policies in the made LWNDP.
3. Following the first Regulation 14 consultation in 2018, an objection to the site selection methodology and supporting Strategic Environmental Assessment was lodged by Historic England (HE) on the grounds that insufficient regard had been paid to archaeology on the hub site in LW1. This letter is copied in Annex 2.
4. The 2018 HE response was critical overall for the lack of consideration of archaeological evidence. The Steering Group did not have capacity to commission external historic environment consultants, the LPA was not able to provide support, and it was left to the Strategic Environmental Assessment (SEA), produced by AECOM as part of Locality's support package, to deal with this issue. Despite best efforts and best utilization of available resources, HE remained dissatisfied with the approach taken in the SEA and the RLWNDP.
5. In the 2018 letter, HE made note of the "significant archaeological interest of the proposed allocation site (LW1). The letter indicated that a "detailed archeological assessment" was required. This was beyond the financial means of the Parish Council and Steering Group who subsequently argued that the policy changes suggested in HE's second option would be sufficient and that detailed archeological assessment should be undertaken at the planning application stage where the cost for archaeological evaluation would be borne by the developer.
6. The 2018 representation from HE provided two options as a means of overcoming the objection.
7. In the first option, another site would be found for the hub proposal in policy LW1. However, this option was rejected by the Steering Group because there was no alternative site available at that land price (which was significantly below market value) and that met other criteria. To take HE's preferred option would mean that the village would not have a new school, a more functional village hall, and necessary affordable housing. This option would have prevented the village from helping itself become more sustainable.

8. The second option was to retain the allocation site but to introduce new policy safeguards set out by HE. This second option was taken and the 2018 submission version sought to fully incorporate HE's suggested policy changes.
9. HE sustained its objections to the SEA at Regulation 16 consultation stage.
10. The dilemma was considered by the LPA in a letter in 2019, copied in Annex 3, Issue 2. It stated:

...the council recommends that a fuller assessment with HE's involvement preferably be carried out in respect of likely archaeological remains and their importance be carried out and for that assessment to be fed into the SEA process. The Environmental Report is therefore likely to need to be updated and indeed the LWNDPR ??RLWNDP may well have to be the subject of proposed amendments. If the Environmental Report is to be updated on this basis then it should be consulted upon under Regulation 16 of the SEA Regulations.

If the Environmental Report is to be updated and consulted upon on this basis then it would clearly be sensible to amend the minerals section as well although as noted above on its own, we do not consider it would have been necessary otherwise.

11. The NDP Examiner, in his preliminary findings in September 2019 (copied in Annex 4) concluded that in its current state, the NDP did not meet its basic conditions.
12. The Steering Group then sought support from their preferred developer who funded the archaeological report that accompanies this draft RLWNDP which is included in the evidence base as a separate document. This report was published in May 2021, prepared by Cotswold Archaeology, entitled "**Land Off Didcot Road Long Wittenham Oxfordshire Archaeological Evaluation**".
13. In March 2020, HE listed part of the proposed allocation site (LW1) as a Scheduled Monument. The full listing is copied in Annex 1.
14. In July 2020, HE again wrote to the Steering Group. This letter is copied in Annex 5. In this letter, HE advised the Steering Group to reconsider its site assessment process and demonstrate that the need to conserve heritage assets is incorporated into the decisions made. "This also needs to demonstrate a genuine openness to alternative sites, rather than a post-fact justification of a decision already made."
15. This statement from HE is highly problematic and does not pay regard to the other issues discussed in the site assessment, namely the price of the land and overall scheme viability, and other aspects of site selection. As the site assessment has demonstrated, to provide the necessary community infrastructure of a hub, school and additional housing on land at market values, it would have been necessary to build at least 100 houses rather than the 45 houses proposed in LW1. The community would not support 100 houses, and this had been set out as a basic principle since the original discussions in the community in 2010.

The Evidence for the made plan, page 28, shows that 74% of the villagers who took part in engagement for the made plan supported the site allocated in LW1. This was the most supported site in the village. The principles in the review LWNDP simply carry this preference forward and build upon the previous work.

16. In addition to the preference for land at Didcot Road being set out in the made NDP, it was also the reason why the Parish Council provided evidence at the planning inquiry for a proposal at the site immediately to the north of the current site proposal (planning inquiry held in November 2017, APP/Q3115/W/17/3169755). That scheme was deemed to threaten the delivery of the hub scheme.
17. There are therefore no reasonable alternatives to the site and the community and its Parish Council have worked hard over many years to protect and develop the site in LW1. For this reason, the current site allocation process set out in the 2018 Regulation 14 draft and the 2018 Submission draft is still fit for purpose because none of the considerations have changed.
18. Therefore, it is not reasonable to undertake a new site assessment as requested by HE in July 2020. However, HE's concerns are acknowledged by the Steering Group, and it is hoped that the archaeological assessment by Cotswold Archaeology, as well as a revised site boundary, will be sufficient to ameliorate HE's concerns in this regard.
19. The 2020 HE letter went on to state (emphasis added):

*If it is considered that the impact on the setting of the scheduled monument, in combination with other factors does not rule out the site's allocation in favour of another location, we would expect a requirement in the allocation policy that sets out a specific need for "... **the layout, landscaping and scale, materials and form of buildings to be designed to minimise harm to the setting of the monument through as well as exploring opportunities to emphasise the importance of this as a site of national archaeological interest with evidence of the origins of Long Wittenham as a settlement**".*

20. HE's suggested policy wording is accepted and will be included in LW1. Additional text and policy wording has been included in the 2021 Regulation 15 draft RLWNDP to provide further clarification to inform development design and decisions regarding LW1.
21. HE also noted:

determining the potential effects of development proposals and the need for a responsive layout would require further archaeological investigation prior to submission of a planning application. If the site is still considered suitable for allocation through the plan we would expect this pre-application investigation and responsive layout options to be secured

through the allocation policy to demonstrate that there is no conflict between the neighbourhood plan and the local plan and NPPF.

22. The Cotswold Archaeology report (May 2021) has been agreed by the County Archaeologist.. Additional support was provided by Paul Clark, Senior Associate Director, Archaeology and Heritage, RPS Consulting.
23. The HE letter concludes with a discussion of urban design considerations questioning the layout and suggesting that more public open space would be beneficial as part of the LW1 scheme. These comments consider a draft scheme that is not part of the site allocation policy, and as such are premature. It would be more appropriate for HE to comment at the planning application stage of the scheme.
24. The HE advice goes on to suggest that it's perceived deficit of public open space could be met by converting the scheduled monument into public open space , to which a management regime that supports the conservation of the monument can also be applied.
25. The developers of the proposed scheme sought pre-application advice on a potential layout from HE. The full response from HE is set out in Annex 6. The advice concluded:

The level of harm to designated heritage assets would be less than substantial and should not rise above minor harm provided the development is sensitively designed as discussed above. We would be happy to advise further as designs are developed.

There would be harm to the undesignated archaeological deposits on the site. I do not consider these assets to be of national significance. Were planning consent to be granted for a development, I am content that the impact on archaeological deposits could be mitigated through conditions on planning consent, pertaining to preservation in situ by careful design, and / or archaeological investigation before or during development.

26. On 16 September 2021, an online meeting was held between the Local Planning Authority, HE and the NDP Steering Group. In this meeting, it was decided that the best way forward towards a resolution would be to update the SEA ER The Historic Environment Records should be obtained from Oxfordshire County Council and this evidence should be assessed in the revised ER by a suitably qualified archaeologist. HE agreed to review the ER.
27. The ER was accordingly reviewed and the policies in the RLW NDP were modified.

ANNEX 1: SCHEDULING ANGLO-SAXON GREAT HALL COMPLEX AND ROMAN SETTLEMENT FEATURES AT LONG WITTENHAM

Source: [Anglo-Saxon great hall complex and Roman settlement features at Long Wittenham, Long Wittenham - 1468510 | Historic England](#)

Overview

Heritage Category: Scheduled Monument

List Entry Number: 1468510

Date first listed: 11-Mar-2020

Location Description:

Statutory Address: Opposite Fieldside Track, Long Wittenham, Oxfordshire, OX14
4PZ

Map



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Location

Statutory Address: Opposite Fieldside Track, Long Wittenham, Oxfordshire, OX14
4PZ

The building or site itself may lie within the boundary of more than one authority.

Location Description:

County: Oxfordshire

District: South Oxfordshire (District Authority)

Parish: Long Wittenham

National Grid Reference: SU5489493649

Reasons for Designation

28. The remains at Long Wittenham of an Anglo-Saxon Great Hall Complex, Roman Linear Village and associated trackway are scheduled for the following principal reasons:

Historic interest:

* for its role as an administrative centre within a broader socio-economic and politico-religious network during the Anglo-Saxon period;

* the Roman linear village and trackway attest to the nature of rural settlements and associated routeways during this period, and their co-location with the Anglo-Saxon remains demonstrates continuity of occupation of the site over an extended period of time.

Survival:

* cropmark, geophysical and archaeological investigation revealed a high level of survival for remains related to the Anglo-Saxon halls and associated features, the Roman linear village and trackway.

Documentation:

* antiquarian reports combined with modern archaeological assessments, academic articles and aerial photographs provide information and data regarding the nature, extent and significance of the archaeological features on the site.

Rarity:

* it has only been in the last 30 years that survey work has successfully located rural settlements of the period 400-1066, and identified sites with known archaeological potential remain relatively rare. Positively identified Anglo-Saxon great hall complexes of the 7th century are also rare.

Potential:

* archaeological investigations of the site have been targeted to proving the nature and survival of settlement activity and have demonstrated significant potential remains for further data to be recovered from buried archaeological features in the event of future investigation.

Period:

* hall complex sites of this nature are a distinct feature of the Anglo-Saxon period.

Diversity:

* the range of diverse features is significant and includes trackways, settlements, halls and Grubenhäuser from multiple phases of occupation.

Group value:

* the interrelation of settlement activity on the site between the Roman and Anglo-Saxon period offer a cumulative group value;

* the site has further group value with neighbouring scheduled monuments: Sinodun Hill camp; Dike Hills; Settlement site SE of Church; Round barrow cemetery at Fullamoor Plantation; Settlement site N of Thames; and Settlement site at Northfield Farm.

History

29. ANGLO-SAXON SETTLEMENT

High status Anglo-Saxon occupation sites often comprise one or more large structures assumed to be halls, together with associated buildings, sometimes enclosed by an earthwork. Such sites can encompass a wide variety of functions and, as a consequence, a wide range of nomenclature have been associated with them including 'palace', 'estate centre', 'royal vil', etc. 'Great Hall Complex', as used here, which as a term is neutral and assumes neither centralised functions or royal status, can describe settlement activity of a specific period for particular

sites displaying certain characteristics. Few surface features remain from these sites; they have been discovered predominantly through air photography and excavation, defining large halls, often axially or coaxially aligned, with associated buildings, earthworks and burials. Such Anglo-Saxon settlements have been dated both by archaeological evidence such as architectural comparison, stratigraphic relationships, associated artefactual material and in some cases radiocarbon dating, and by the use of documentary sources, to between the 5th century AD and the Norman Conquest, although many have continued in use after this date. These methods have dated the use of individual sites quite accurately within this time span; Yeavering, Northumberland (National Heritage List for England 1006519), for example, was an Early Anglo-Saxon palace site, dating to the 6th and 7th centuries AD, as was Cowdery's Down, Hampshire and Cowage Farm, Wiltshire (NHLE 1018389) and Sutton Courtenay, Oxfordshire (NHLE 1004853). Evidence from excavated sites suggests that individual examples were in use as royal sites or 'palaces', but not continuously during the whole Anglo-Saxon period. For instance the royal site at Cheddar, Somerset (NHLE 1017290), dates from the 9th century and continues in use after the Norman Conquest. During their occupation the structures underwent phases of development and rebuilding; at Yeavering for example the site was burnt down and completely rebuilt in the mid-7th century. It is generally accepted, from present available evidence that 'Great Hall Complexes' were, with some minor exceptions, a predominantly 7th century phenomenon.

The most prominent components of such sites are the large and elaborately built timber halls. References to these structures appear prominently in documentary evidence, in particular Anglo-Saxon literature. The hall is a recurrent theme in Old English poetry, most explicitly in 'Beowulf' and also in shorter compositions such as 'The Wanderer' and 'The Battle of Maldon'. They provide valuable information concerning the physical characteristics of the buildings confirming, for instance, that they were tall and constructed of timber with wide gables and featured gold decoration. They were structurally reinforced with iron bands and featured a reinforced external door and separate internal door. The interior contained mead-benches and were furnished with tapestries and decorative flooring. Contemporary poetry indicates that the wider complex included ancillary structures which presumably functioned as private residences and guesthouses. These sites are also mentioned in other documentary and legal sources including the 'Anglo Saxon Chronicle' and land charters. The governance of many, if not all,

kingdoms included a periodic Witenagemot ('meeting of wise men') also known as the Witan (more properly the title of its members). Presumably such assemblies were normally accommodated in the large halls known at Great Hall complexes.

Archaeological evidence suggests that the hall buildings were typically between 12m and 30m in length and between 5m and 10m in width (dependant on the nature of the site), although some were much larger as at Hatton Rock, Warwickshire (NHLE 100574) where one building appears to measure 50m x 9m. In common with timber buildings from other Anglo-Saxon sites, most halls were rectangular, often with simple length: width ratios (often 2:1 or 4:1); the use of the square, often in pairs, was very common. The archaeological evidence for these buildings comprises the foundation trenches and postholes from which may be inferred the methods of construction and the basic superstructure of the building. Construction methods varied both between sites and within sites. The most common method was the 'post in trench' technique which comprised foundation trenches, in general up to 1m deep, although in the case of one hall at Yeavinger between 2 and 3m deep, dug to hold the upright timbers. The impressions or "ghosts" of the posts left in the trenches show that the walls were either of solid vertical planks or of posts spaced apart and probably infilled with panels of wattle and daub. Another method of construction was the 'post in pit' method as used in the 10th century halls at Cheddar; here square posts 0.30-0.60m across were set 2.3m apart into pits averaging 0.94m in depth, and the superstructure was probably either wattle and daub panelling or horizontal planks. The halls had between one and four entrances with two usually set symmetrically in the centre of the long walls. In several cases the halls had annexes at one or both ends of the main building, or partitions within the building to create antechambers. Internal postholes suggest that some halls were aisled and timber walls and other internal timbers probably supported a thatched roof, in some cases strengthened by supporting buttresses.

It has been noted that there lies a distinction between great halls and long halls, the latter being architecturally distinct from the former, being narrower and slightly bowed in form and featuring neither external raking posts nor 'Yeavinger style' annexes. In addition, great hall complexes appear to have been part of a general shift towards more permanent constructional techniques. Documentary and archaeological evidence suggest these halls served a number of functions including consumption, particularly in terms of feasting and drinking rituals, accompanied by music, games and the exchange of stories and news. As well as

the halls there are also smaller timber-framed buildings. These are either of the "timber in trench" type or of posthole/stakehole construction. Some of these buildings were similar to the great halls although on a smaller scale, others were of much lighter and less elaborate construction. The associated artefactual material from some buildings comprises general occupation debris suggesting that they were dwellings; others have produced evidence that they housed a specialised function, such as iron smelting and forging residue from a building at Cheddar. Another component of high status Anglo-Saxon sites, but not confined to them, are the sunken featured buildings (SFB's). These have been recognised at a number of palace sites but vary a great deal in size, shape and function. One such building at Northampton (NHLE 1003628) measures 3m x 2.6m, at Yeavinger 12m x 5.7m and a possible SFB at Hatton Rock measured 24m x 9m. At most sites there are ritual or religious buildings. These have been identified by their association with later churches and chapels or burials, and had several phases of rebuilding and development. An additional structure observed at Yeavinger comprises a wood 'theatre', comprising a tiered seating structure with a 'totemic' pole and wooden screen position behind a central dais or 'high seat'. The same site also features a monumental timber palisade.

The status of the site at Long Wittenham was first indicated in the C19 when two Anglo-Saxon cemeteries were excavated by antiquarian John Yonge Akerman. Akerman was first alerted to the presence of burials in the area following an account of a discovery of human bone, by Reverend James C Clutterbuck, in 1848. Those remains, uncovered by labourers excavating foundations for the construction of a cottage, were accompanied by a spear-head, sword, dagger and the remains of a shield boss. Further excavations in 1859 and 1860 revealed a total of 46 cremations and 188 inhumations, a number of which contained further examples of weaponry and imports from Northern Gaul, including a remarkable late fifth century bronze bound bucket, or 'stoup', decorated with biblical scenes. Although the precise location of the cemetery was not recorded, it is believed to be located on the present day 'Saxon's Heath' estate, west of Didcot Road. Subsequent to this, aerial photography undertaken in 1975 and 1986 revealed a series of cropmarks indicating the presence of three large rectangular buildings and what was tentatively identified as a number of SFB's. It was soon suggested that, due to the building size, the settlement may represent a 'royal vil' similar in scale and arrangement to nearby Sutton Courtney.

A 2013 study by Helena Hamerow which combined more recent aerial photograph with LiDAR data clearly indicates the layout and location of structures in relation to earlier rectangular enclosures and a track way running north-east by south-west to the south of the complex. In 2015 the University of Oxford, under the guidance of Helena Hamerow, undertook a magnetometer survey covering 8ha of land revealing the location of what was believed to be a great hall to the east of an L shaped arrangement of halls, a further hall immediately to the east and a smaller isolated hall about 250m to the east. Subsequent archaeological investigation of the 'great hall' in the same year, demonstrated this feature to be a late Roman enclosure believed to be part of a larger Romano-British linear village settlement. In 2016 the University undertook an excavation of the small isolated hall to the east, revealing a post-in-trench timber building with substantial foundations which was found on the basis of radiocarbon dating to have been constructed in the 7th century. All of the foundation trenches were excavated as part of the investigation. In 2019 planning permission was granted to erect a reconstruction of the hall (partially offset from the location of the originally hall) as part of a HLF funded project led by the Sylva Foundation who own the land. Also in 2019, an archaeological evaluation undertaken by Oxford Archaeology, targeted on the results of an earlier geophysical survey by SUMO Geophysics, confirmed the presence of the L-shaped arrangement of hall buildings, dated by pottery to the 5th-7th century.

An archaeological evaluation of land off Didcot Road, located adjacent to and outside of the north-west boundary of the scheduled area, was undertaken in 2015, followed by an on-going excavation which commenced in 2019. The results of these investigations appear to reveal the eastern limit of the Anglo-Saxon cemetery encountered by antiquarians in the C19. A total of 40 burials comprising inhumations and cremations have been excavated, with the eastern boundary ditch having also been identified. To the east of the cemetery one SFB was also observed along with an undated rectangular open sided structure. A number of ditches dating from the Roman to the medieval period have also been recorded. The results of this investigation appear to confirm that the centre of the Saxon settlement is sited further to the east of the cemetery, in the vicinity of the L-shaped arrangement of halls.

Such Anglo-Saxon settlements are often associated with earlier settlement activity, as part of a broader process of political legitimisation and

institutionalisation. The settlement at Long Wittenham is close to a scheduled round barrow cemetery, sited to the north-west (NHLE 1421606), Sinodun Hill Iron Age encampment (NHLE: 1006302) situated a short distance to the south-east and an undesignated Iron Age enclosure and roundhouse located on the northern edge of Neptune Woods.

ROMAN LINEAR VILLAGE AND TRACKWAY

A linear village (also known as a ladder settlement) is a series of three or more, adjacent, rectilinear enclosed farmsteads, lying to one or both sides of at least one defined track or roadway. It shows up on aerial photographic and large-scale field survey as sequences of low, rectilinear earthworks or crop/soilmarks which are aligned along a common axis or axes. Geophysical survey reveals the same pattern by highlighting below-ground remains such as enclosure ditches. Linear villages are generally dated by pottery or coins found in stratified contexts. Most recorded sites are securely dated to the Roman period but few are precisely dated within that. The tradition of construction spans the 1st to 3rd centuries AD. Linear villages were primarily agricultural. The available evidence suggests mixed farming with a strong pastoral element in certain localities, eg the Fenlands. Craft production was varied, being heavily dependent upon local materials, but was usually small-scale and sufficient only for the needs of the community. There may have been some social and functional differentiation within the settlement but this remains to be demonstrated convincingly. Although the lifestyle of the inhabitants was not luxurious neither was it utterly poverty stricken. Building materials and skilled construction techniques suggest a community of individuals with some surplus wealth. The styli and writing tablets which have been found on several sites also suggest a degree of literacy or, at least, regular contact with the Roman administration.

During the Roman period the present day county of Oxfordshire was divided politically between three late Iron Age tribes: the Catuvellauni, the Atrebates, and the Dobunni. Although several small towns were established there was no central administrative centre and no major towns present. However, Dorchester-on-Thames was an extensive settlement surrounded by earthen defences by the late second century AD, later reinforced in stone, and an altar shows that there was an official working for the Governor in the town in the early 3rd century AD. The

scheduled sites east and west of the scheduled area comprise Iron Age and Roman enclosures and/or settlements alongside a system of trackways and the recent investigations on land of Didcot Road has revealed further Roman activity in the form of a series of ditches.

The cropmark evidence and subsequent geophysical investigations that have been undertaken across the site have confirmed the presence of a series of rectangular enclosures located to the east of what appears to be a north-west by south-east aligned droveway. This droveway, in turn, extends from a significant north-east by south-west aligned track which runs through the scheduled area appearing to link Sutton Courtney with Dorchester-on-Thames. The latter track was archaeologically investigated as part of the works undertaken in Neptune Woods in 2006 and was seen to comprise a series of parallel ditches, which had been recut during their lifespan. Roman pottery was recovered from one of the ditches, indicating that they silted up during the 2nd to 4th centuries AD. No surviving trackway surface was observed during the investigations and it is believed that this represents a minor track as opposed to a major route way. Part of the north-west by south-east aligned droveway was investigated during the 2019 evaluation of the site and was dated by two base sherds derived from separate pedestal beakers of fine Oxfordshire reduced ware. One of the enclosures pertaining to the ladder settlement was investigated by the University of Oxford in 2015. It was concluded that the settlement was late Roman and may have been of relatively high status, based on the proportion of fine wares recovered. It is suggested, based on the presence of Early Saxon pottery in the top fills of the Late Roman ditches, that the gap between the latest Roman occupation and earliest post-Roman activity was likely short.

Details

30. PRINCIPAL ELEMENTS

The monument includes an Anglo-Saxon Great Hall complex comprising four post-in-trench timber hall buildings and a sample of numerous putative sunken featured buildings (also known as grubenhauser) centred at SU 54828 93665, SU 54902 93770 and SU 54961 93571: a sample of enclosures and associated droveway representing the remains of a Roman ladder settlement centred at SU

54883 93756, and a portion of Roman trackway centred at SU 54953 93511. The area is situated at a height of approximately 50.00-55.00m AOD (Above Ordnance Datum) and comprises four separate plots of land which are bounded overall by hedgerows, and post and wire fencing. Didcot Road runs parallel to the west and Neptune Wood encroaches to the south-east.

ANGLO-SAXON GREAT HALL COMPLEX

Cropmark, geophysical and archaeological evidence for the monument at Long Wittenham suggests the presence of at least five separate hall buildings representing part of a great hall complex and probably grubenhauser. To the eastern and central portions of the monument lies an L-shaped arrangement of hall buildings whose presence has been confirmed by a combination of aerial and geophysical surveys and an archaeological evaluation undertaken by Oxford Archaeology in 2019. The geophysical data indicates that the northernmost hall measures approximately 12m (north-south) by 5m (east-west). Archaeological investigation revealed the foundation trenches or beam slots to measure between 0.85-1.40m in width by 0.14-30m in depth. A posthole measuring 0.70m in diameter with a depth of 0.56m was recorded cutting one of the beam slots, containing two sherds of pottery dating to the 5th-7th century. A pit measuring 1.40m in diameter by 0.54m deep was observed outside and to the west of the hall which appears to be located on a line of discrete geophysical and cropmark anomalies thought to represent a pit alignment or, more likely, a fence line. This alignment appears to extend for a length of 110m in a roughly north-south orientation until meeting a semi-circular feature to the south. A second hall which appears much larger on cropmark evidence but was not picked up on the geophysical survey is located approximately 12m to the south of the first. It measures about 18m (north-south) by 7m (east-west) and was represented in the 2019 archaeological evaluation by a single beam slot measuring 1.76m in width by 0.60m in depth. Its projected size places it within the parameters for consideration as a 'great hall' building. The third hall completing the L-shaped arrangement is located approximately 22m to the south-east of the second hall and measures 12m (east-west) by 8m (north-south) as indicated by the geophysical survey. Two confirmed beam slots were investigated during the archaeological evaluation measuring between 0.50-64m in width and 0.28-32m in depth. A posthole with a diameter of 0.40m and depth of 0.11m was observed cutting one of the beam slots.

Cropmark data and a geophysical survey undertaken for the University of Oxford in 2015 indicate the presence of a further east-west orientated hall building about 115m north-east of the centre of the L-shaped arrangement of halls, measuring 16m (east-west) by 7m (north-south). Its size and location in relation to the other halls indicate this to be a further potential 'great hall' building, although this is yet to be confirmed by archaeological investigation. A smaller structure was also identified by the same means approximately 160m to the east of this and was the subject of an archaeological investigation by the University of Oxford in 2016. The fieldwork fully uncovered the remains of a post-in-trench timber building measuring 11.6m (east-west) by 6.1m (north-south). The foundation trenches or beam slots were observed cutting the natural gravel horizon by 0.70m in depth (about 1m below the present day ground surface) and exhibited vertical or near-vertical sides and a sub-flat base. The walls of the structure appeared to be primarily comprised of 0.10-0.12m wide rectangular planks, placed centrally within the wall trenches. It was observed that the east and west halves of the hall were not perfectly aligned and there was a break in the north and south wall trenches, coinciding with the north and south entrances, subdividing the hall into two halves. It was also noted that the foundations of the western side of the structure were less regular, that the western half of the north wall bowed outwards, and the edges of the wall trench were disturbed in several places. It is posited that these features may be due to an episode of rebuilding, or it may be a consequence of the building's construction, which appeared to have taken place in several successive stages.

A series of possible post pipes were visible extending from the north-west and south-west corners of the hall and within the wall trenches. One certain and three possible entrances were identified in plan, one in the middle of each wall along with a number of internal features including two possible partition walls and a series of postholes. Small external bulges and posts were also observed along with squared corner posts. The hall is believed to have had a gable roof, supported by a ridge beam running along the longitudinal axis of the building, based on the identification of two ridge posts in the centre of each end wall. There was also evidence for repair, rebuilding and possible dismantling after use. The investigation of the building typically produced very little material culture, but what was recovered comprised one sherd of Early Saxon pottery and eight sherds of Roman pottery from the foundation trenches. A number of fragments of animal bone, mostly sheep/goat with some cow, pig and red deer, were also recovered.

Radiocarbon analysis of the bone has dated the building to the 7th century AD, with the architectural styles consistent with high status buildings of this period seen at Sutton Courtenay and Yeavinger.

Numerous possible sunken-feature buildings (SFB's or Grubenhäuser) have been identified at Long Wittenham from aerial photographs. A significant number of these (in excess of 60) appear as cropmarks to the south of the hall complex buildings and appear clustered to the north of the junction of the north-east by south-west trackway and the north-west by south-east droveway. These features are yet to be archaeologically investigated. Further evidence of Anglo-Saxon activity was observed in the 2019 evaluation including a large pit containing 5th-7th century pottery westwards of the L-shaped arrangement of halls. A rectangular feature, indicated by a geophysical survey prior to the evaluation was investigated and comprised a very shallow linear feature measuring 0.30m wide by 0.06m deep with a flared concave profile. This feature was postulated to be a sixth hall building but the evaluation results throw doubt on this interpretation and it is likely it represents an enclosure. Present evidence indicates the scheduled area takes in the heart of the Anglo-Saxon activity.

ROMAN LINEAR VILLAGE AND TRACKWAY

A substantial linear trackway has been identified from aerial photography running north-east by south-west across the southern portion of the monument. Cropmarks delineating the trackway indicate that it survives for around 100m across the scheduled area, although it continues beyond this into neighbouring fields to the east and to the west. Sections of the trackway were investigated in Neptune Woods by Oxford Archaeology in 2006, with at least two ditches on the appropriate alignment being observed in a majority of the trenches. Investigations there revealed four ditches, the most substantial of which were 3.70m-4m apart, both between 1.5m-3m wide by 0.25m-0.5m deep. A number of the ditches had steeply sloping sides and flat bases. Roman pottery and one residual prehistoric sherd were recovered from the fills, lying above the primary erosion deposit. Towards the centre of the southern end of the monument a junction appears visible in the cropmarks with a north-west by south-east alignment track or droveway extending north and south of the main route. A northern portion of this droveway was investigated in the 2019 evaluation by Oxford Archaeology. Two

parallel linear features were observed orientated north-west to south-east. The easternmost of the pair exhibited a broad 'V' shaped profile, with a steeper side to the south-west. The lower fill contained two sherds of Roman pottery of about AD 100-410 date. The second ditch was not excavated.

The above trackways appear to correspond a Roman linear village or ladder settlement. This comprises a series of rectangular enclosures, seen as cropmarks and confirmed with geophysics, sited to the eastern side of the north-west by south-east track or driveway. The enclosures start to be visible about 120m north of the main north-east by south-west trackway, but intensify after approximately 200m. The northernmost enclosures appear to measure between 45-48m in length (east-west) by 14-17m wide (north-south), with some smaller square shaped cropmarks backing onto these to the east measuring between about 12m (east-west) by 11-14m (north-south). Two larger southern enclosures are evident measuring between 30-40m (north-south) by about 45m (east-west). In 2015 the University of Oxford undertook an excavation targeting a geophysical anomaly believed to represent an Anglo-Saxon long hall. The subsequent excavation demonstrated that the feature in question represented one of the Roman enclosures. The ditches that formed the enclosure were bowl shaped and measured 1.30-66m wide by about 0.60m deep. Roman pottery sherds recovered from the fills were predominantly 3rd-4th Century, with the exception of a near complete 2nd-4th Century beaker. Two putative pits/postholes, measuring 0.33m wide by 0.05-2.7m deep were observed within the fill of one of the ditches. Despite containing 7 sherds of Roman pottery dated to the 2nd-4th centuries, their precise nature is uncertain.

EXCLUSIONS

Modern gates and post and wire fencing are excluded from the scheduling although the ground beneath them is included.

Sources

31. **Books and journals**

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Other

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- Sims, M. & Thacker, G. 2015. Land off Didcot Road, Long Wittenham, Oxfordshire. CgMs Consulting.
- Thacker, G. 2019. Rosehurst Farm, Long Wittenham, Oxfordshire: Archaeological Evaluation Report. Oxford Archaeology.

Legal

32. This monument is scheduled under the Ancient Monuments and Archaeological Areas Act 1979 as amended as it appears to the Secretary of State to be of national importance. This entry is a copy, the original is held by the Department for Digital, Culture, Media and Sport.

33.End of official listing

Your Contributions

Annex 2: Historic England response to Regulation 14 Draft RLWNDP (2018)



Clerk to Long Wittenham Parish Council
5, Churchill Road
Didcot
OX11 7BU

Our ref:
Your ref:

Telephone: 01483 252040
Fax:

7th September 2018

Dear Sir or Madam,

Revised Long Wittenham Neighbourhood Plan Regulation 14 Consultation

Thank you for your e-mail of 4th August advising Historic England of the consultation on your revised Neighbourhood Plan. We are pleased to make the following general and detailed comments in line with our remit for the historic environment.

We welcome the excellent history of the parish in paragraphs 15 – 32. We also welcome the reference to the Conservation Area and listed buildings within the Area in paragraph 40.

We note that there is no reference to the historic environment in the section of the revised Plan entitled "Our Challenges". Naturally, we would hope that there are no issues with the historic environment in the parish, but the two scheduled monuments partly in the parish (Settlement site south east of church Appleford-on-Thames/ Long Wittenham and Settlement site at Northfield Farm, Long Wittenham/Little Wittenham) are, in fact, on the Historic England Heritage at Risk Register.

In addition, the Register does not include Grade II listed secular buildings outside London. Has a survey of the condition of Grade II buildings in the Plan area been undertaken? If not, this could be another project to further add to the evidence base for the Plan.

Has there been any or is there any ongoing other loss of character, particularly in the Conservation Areas, e.g. through inappropriate development, inappropriate alterations to properties under permitted development rights, loss of vegetation, insensitive streetworks etc that affect local character?

We note the Vision for Long Wittenham which is consistent with paragraph 29 of the National Planning Policy Framework: "*Neighbourhood planning gives communities the power to develop a shared vision for their area*". We welcome the reference to character. However, we are disappointed that the Vision does not include any reference specifically to the historic environment, which is an important component of that character – we hoped to see something like "*the historic environment will be conserved, enhanced, appreciated and valued*".

We also welcome the reference to the character of the village in paragraph 70, although we prefer “conserve” rather than “preserve” in this context as terminology more consistent with the National Planning Policy Framework and as recognising that change can take place that maintains or even enhances character (and the significance and special interest of heritage assets). (See also our comments on Part 4 of the Plan).

We note that Policy LW1 of the Plan allocates the site off Didcot Road for development. We have previously commented that we are not aware if any archaeological assessment has been undertaken of this site but if not, there would appear to be the potential for significant effects on archaeological remains from the development of this site for a community hub and some 35-40 houses.

It would appear that the assessment of the site in the Site Allocation Document, which gives this site a green rating, has not considered the potential impact on archaeology – the assessment criteria explicitly exclude archaeology, although no explanation is given as to why that is.

In addition, the Evidence Paper Screening Report completely fails to acknowledge the archaeological sensitivity of this site (despite including my e-mail raising this issue); indeed, it omits any reference to cultural heritage at all, despite this being specifically identified in clause 2.(f) (i) of Schedule 1 (criteria for determining the likely significance of effects on the environment) of The Environmental Assessment of Plans and Programmes Regulations 2004.

The SEA Environmental Report also fails to acknowledge the archaeological sensitivity of this site and the consequent potential conflict with the protection provided to heritage assets by the “*higher level policy framework*”. These omissions are, in our view, major flaws in the selection process for this site.

Given this lack of assessment, the potential significant archaeological interest of the site and the extent of the proposed development, Historic England **objects** to the allocation of this site for development without any detailed archaeological assessment. Such an assessment should be undertaken to establish whether or not it is appropriate to take the site forward to the next stage of the Plan.

If that assessment identifies archaeological remains that would be harmed by the development of this site, the Parish Council should not progress the allocation of this site unless, exceptionally, there is clear and convincing justification in the form of overriding public benefits in accordance with paragraphs 194 - 195 of the National Planning Policy Framework.

If the remains are of national importance demonstrably equivalent to scheduled monuments, then they should be considered to be subject to the same policies in the National Planning Policy Framework as scheduled monuments and designated heritage assets in accordance with footnote 63 on page 56 of the Framework.



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This would mean that substantial harm to or loss of the remains should be wholly exceptional and only justified if it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss (and which cannot be achieved in any other way), or all of the circumstances in paragraph 195 of the Framework apply. Even then, the development of the site, in this scenario, would mean that criterion B.e. could not be satisfied as a development that would harm the site's archaeological remains could not maximise their value.

Whilst we consider that archaeological assessment/investigation of the site should be undertaken to establish whether or not it is appropriate to take the site forward to the next stage of the Plan, a less satisfactory alternative, if the Council still wishes to take it forward, would be to include a revised section B of the policy:

“Development will only be permitted on the site if it can be demonstrated that development can be achieved on the site without harm to or loss of any significant archaeological remains or any such harm or loss is considered to be clearly and convincingly justified by the public benefits of the development that could not otherwise be delivered.

Accordingly proposals for development of this site must be informed by an archaeological assessment according to a written scheme of investigation agreed in writing by the local planning authority's archaeological advisor(s). Where archaeological remains are identified, the development scheme should be designed to preserve any remains of archaeological interest in situ with the greatest weight given to preserving any remains of national importance.

Where harm to or loss of such archaeological remains is considered to be justified with reference to public benefits, it will be necessary to make a record of the remains before they are destroyed and to make this record available to the public.

We would suggest that the requirement for the masterplan be a new section C, reworded as follows:

If it is concluded after consideration of the archaeological assessment that development of the site is appropriate, the development scheme shall be subject to a masterplan and design brief to be agreed with the local planning authority, the parish council and all relevant partners including Historic England”.

Criterion B.e. should then be C.e and reworded as *“Proposals will maximise the site's biodiversity and landscape value and both the preservation of any remains of archaeological interest in situ and the understanding of those remains.*

We welcome and support the principle of clause I of Policy LW4. However, we are not clear if it is intended solely to relate to the countryside outside the current built-up area or allocated sites as it refers to listed buildings within the village. It is a principle that we consider should apply to the whole Plan area, and worthy of a separate policy in its own right, referring to both designated and non-designated heritage assets,



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We welcome Part 4 of the Plan. However, we would like to see a reference to the 39 listed buildings (according to the National Heritage List for England) within the whole parish (including the Grade I listed Church of St Mary) and two scheduled monuments partly within the parish. It is the current historic environment, including the heritage assets therein, that is most relevant to the Neighbourhood Plan.

We also consider that it would be useful to explain more about the Conservation Area in this Part e.g. when it was designated, what its special interest (the reason for its designation) is and whether or not there is a Character Appraisal and/or Management Plan (and, if so, when it was produced and whether or not it has been reviewed since).

Is there a list of locally-important buildings and features? Non-designated heritage assets, such as locally important buildings, can make an important contribution to creating a sense of place and local identity. If not, then the preparation of such a list could be an excellent community project to add to the evidence base for the Plan. We have published a Good Practice Guide on local listing: <http://www.historicengland.org.uk/images-books/publications/good-practice-local-heritage-listing/> and we would be pleased to advise further.

National Planning Practice Guidance states “... *where it is relevant, neighbourhood plans need to include enough information about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale. ... In addition, and where relevant, neighbourhood plans need to include enough information about local non-designated heritage assets including sites of archaeological interest to guide decisions*”.

Long Wittenham is known to be an area of particularly high archaeological potential documented both through finds of significant remains of Anglo-Saxon funerary remains excavated during the 19th and 20th centuries as well as through recording of crop marks seen in aerial photographs suggesting an area of historic settlement (shown through excavations in 2015 and 2016 to be a multi-period site including elements of both Romano-British and Anglo-Saxon character) on the southern edge of the present settlement, as well as earlier prehistoric settlement and trackway remains seen elsewhere in the area. Some of these areas have been designated as scheduled monuments, but other non-designated areas may yet be of equal national archaeological interest.

Have the Oxfordshire Historic Environment Record and Oxfordshire Historic Landscape Character Assessment been consulted, the former for non-scheduled archaeological sites, some of which may be of national importance? National Planning Practice Guidance notes that “*The local historic environment record and any local list will be important sources of information on non-designated heritage assets*”.

We trust that the Council is aware of “*A short review of the archaeology of the Oxfordshire parishes of Didcot (north of the railway line), Appleford-on-Thames, Long Wittenham, Clifton Hampden, Berinsfield, Dorchester-on-Thames, Warborough and Shillingford, Brightwell-cum-Sotwell, and Little Wittenham*” commissioned from Oxford



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Archaeology by Historic England in 2016, although we note that it is not identified as part of the evidence base for the Plan.

We consider that Neighbourhood Development Plans should be underpinned by a thorough understanding of the character and special qualities of the area covered by the Plan. We believe that characterisation studies can help inform locations and detailed design of proposed new development, identify possible townscape improvements and establish a baseline against which to measure change.

We therefore welcome the 2016 Character Assessment and Policy LW7, which we consider to be consistent with paragraph 125 of the National Planning Policy Framework:

Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development.

However, clause B.d. implies that all "identified assets of value" are those listed in the policy. Is that intended to be the case? We suggest that the word "identified" is omitted to allow for the possibility that further assets of value are identified during the life of the Plan and that the list be expanded to include non-designated but locally important heritage assets (see our comment above about local listing) or the words "including not not limited to" added after ".....or not". We would prefer "conservation" to "preservation" in this context for the reasons we explain earlier in these comments.

We welcome the use of a policy (Policy LW8) to protect important views such as to and from the heritage assets of Wittenham Clumps. However, are there any important views to or from the conservation area that contribute to its special interest, character or appearance the should be identified in Policy LW8?

Finally, the preparation of the Neighbourhood Plan offers the opportunity to harness a community's interest in the historic environment by getting the community to help add to the evidence base perhaps by, as noted in our comments above, the preparation of a local list of locally important buildings and features or a survey of Grade II listed buildings to see if any are at risk from neglect, decay or other threats.

We hope you find these comments helpful. Should you wish to discuss any points within this letter, or if there are particular issues with the historic environment in Long Wittenham, please do not hesitate to contact us.

Thank you again for consulting Historic England.



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Yours faithfully,



Martin Small
Principal Adviser, Historic Environment Planning
(Bucks, Oxon, Berks, Hampshire, IoW, South Downs National Park and Chichester)

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Annex 3: Response from South Oxfordshire Local Planning Authority

Planning services

HEAD OF SERVICE: ADRIAN DUFFIELD



Contact officer: Ricardo Rios

Ricardo.Rios@southandvale.gov.uk

Tel: 01235 422600

30 August 2019

Long Wittenham Neighbourhood Plan Review – South Oxfordshire District Council’s Response to the Examiner’s Further Clarification Note.

Issue 1 - Minerals Safeguarding

Does the District Council have any comments on the observations of the County Council?

The County Council has highlighted that the updated Environmental Report (March 2019) identifies the wrong mineral resource. The County Council does not suggest that the assessment of likely impact upon mineral resources within the SEA is flawed and has made it clear that it does not object to the Long Wittenham Neighbourhood Plan Review (LWNDPR) clearly though the error needs to be addressed.

Provided that correcting this error would not lead to any further or different conclusion within the SEA or indeed the RNDP, the matter could be quite safely addressed by drawing it to the Examiner’s attention and for an undertaking to be made that such amendment to the SEA will be made following the Examiner’s report and in the event that the LWNDPR goes through to referendum .

In the council’s opinion, the updated Environmental Report would not on this basis alone need to be the subject of further consultation and therefore simple publication under Regulation 16 of the Strategic Environmental Assessment of Plans and Programmes (SEA) Regulations would be sufficient to comply with the relevant European Union Directive and the SEA Regulations.

Issue 2 - Archaeology

Does the District Council have any comments on the observations of Historic England?

The concerns raised by Historic England (HE) raises more complex issues. What is at the heart of HE's representations is a wish to ensure that whatever archaeology is found to be present is protected. What is of concern as we understand it is that if the site is allocated without knowing fully what lies beneath and its historic value, HE believes that means the site will be developed in any event without addressing or seeking to preserve and protect it.

Secondly, HE relies upon an acknowledgement within the March 2019 Environmental Report (incorporating HE's concerns and representations) [9.23] that "*appropriate archaeological assessment is undertaken prior to allocation of the site*". That is of course not the only proposed solution because the Environmental Report then goes on to say that the alternative to this is to amend the LWNDPR policy provisions "*to reflect the need for archaeological assessment at the site – in line with Historic England advice.*"

Neither of these recommendations have been taken forward yet although we note that draft policy LW1 C states "*Heritage Appraisal and Impact Assessment proportionate to the significance of the designated and non-designated assets and archaeological remains should inform proposals in accordance with national policy.*"

On the one hand the PPG clearly advises that the SEA "*does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the neighbourhood plan*" on the other hand it is required to "*identify, describe and evaluate the likely significant effects on the environment of implementing the neighbourhood plan policies and of the reasonable alternatives taking into account the objectives and geographical scope of the neighbourhood plan. The environmental report must clearly show how these requirements have been met*"

On the one hand, HE might appear to be asking the impossible or unnecessary because it cannot assert that there are important heritage assets that may or may not be significantly affected or affected at all as a consequence of the allocation of the site within the LWNDPR. It can only surmise base on the evidence it has to date. It is also the case that there is policy protection in place for heritage assets.

On the other hand, however (and the council consider this ultimately to be of some weight) the Environmental Report (March 2019) does recommend that an assessment be carried out "*prior to allocation*" not prior to development.

This indicates that if HE had responded at the scoping stage AECOM would have had the opportunity then to consider whether an assessment of the type recommended be carried out as part of the preparation of the Environmental Report.

In the council's opinion there is a clear risk that it cannot be safely concluded that the Environmental Report does "*identify, describe and evaluate the likely significant effects*" on archaeology of "*implementing the neighbourhood plan policies and of the reasonable alternatives.*" . This is because the Environmental Report appears to accept that there is insufficient information upon which to draw its conclusions about

“*likely significant effects*” upon heritage and that further assessment is required before the site is actually allocated within the LWNDPR.

Such assessment can only be carried out as part of the Environmental Report. It is not something the Examiner can recommend as some form of ‘standalone’ requirement.

We recognise that the LWNDPR has reached a significant stage and further delay may be unwelcome, however it is clearly still early enough for further assessments and evidence to be obtained as well as any necessary updates to the Environmental Report and the LWNDP be obtained and placed before the Examiner. We also accept that the consequence of any further assessment may well reveal that there are no issues arising however it is clearly better to be able to draw clear conclusions based on the best information and to ‘close’ any possible gap.

To this end, the council recommends that a fuller assessment with HE’s involvement preferably be carried out in respect of likely archaeological remains and their importance be carried out and for that assessment to be fed into the SEA process. The Environmental Report is therefore likely to need to be updated and indeed the LWNDPR may well have to be the subject of proposed amendments. If the Environmental Report is to be updated on this basis then it should be consulted upon under Regulation 16 of the SEA Regulations.

If the Environmental Report is to be updated and consulted upon on this basis then it would clearly be sensible to amend the minerals section as well although as noted above on its own, we do not consider it would have been necessary otherwise.

Ricardo Rios
Planning Policy Team Leader (Neighbourhood)

ANNEX 4: EXAMINER'S PRELIMINARY FINDINGS

Long Wittenham NDP Review

Independent Examiner's Update and Preliminary Findings

Context

This note provides a position statement on the examination.

In particular it takes account of the responses of the Parish Council and the District Council to the further clarification note. Comments were also received on the archaeological issues relating to the community hub site (Policy LW1) from Historic England

Findings

I have considered the various comments received on both the additional clarification note and on the additional consultation undertaken on the updated environmental statements.

On the minerals issue I am satisfied that the submitted Environmental Report is now satisfactory subject to its incorporation of changes to remedy a factual error. The County Council has highlighted that the updated Environmental Report (March 2019) identifies the incorrect mineral resource. However, it does not suggest that the assessment of likely impact upon mineral resources within the Report is flawed and has made it clear that it does not object to the submitted Plan

On the archaeological issue I am not satisfied that the Environmental Report has addressed this matter in a way that is proportionate to the potential significance of the proposed site for the community hub on this important matter. I have come to this view for the following reasons:

The protection of whatever archaeological remains exist within the boundary of the proposed community hub

The proposed site is being allocated without a full understand of its archaeological significance.

The processes followed

The Environmental Report includes commentary that there is insufficient information upon which to draw its conclusions about likely significant effects upon heritage and that further assessment is required before the site is actually allocated in the Plan. In addition, the Report is not supported by Historic England in its capacity as the government's advisory body on heritage matters.

Development Plan clarity

Plainly there will be judgement involved in the amount of information needed in order to provide clarity that a site allocated in an emerging development plan can proceed with confidence through the development management process. However, in this case I do not consider that Policy LW1 and its supporting information meet the basic conditions. In its current state the Plan fails to address this matter satisfactorily. It effectively defers a detailed consideration of the matter to any future planning application stage.

Summary

In these circumstances I cannot be satisfied that the Plan meets the basic conditions. As such, on the basis of the evidence before me, I cannot recommend that it should proceed to referendum.

The Next Steps

Plainly the examination has been underway for some time and has addressed a series of issues in significant detail.

I acknowledge that there are different views about the engagement of statutory bodies in the plan-making process in general, and on the initial phases of the Environmental Report in particular. However, my role is to examine the Plan based on the information available to me at the time of the examination rather than to scrutinise the evolution of the Plan.

In these circumstances I suggest that there are three options for the Parish Council as follows:

Option 1

My report would be finalised and sent to the District Council and the Parish Council on the basis of the Summary set out above.

Option 2

The Parish Council withdraws the Plan.

Option 3

The Parish Council undertakes further work on the archaeological significance of the community Hub site and produces further updates to the Environmental Report.

This option would require additional consultation on the further updates to the Environmental Report

Timescale

November 2021

I would be grateful if the Parish Council would advise the District Council by Monday 16 September 2019 on how it considers the examination should now proceed. This decision should be based on the three identified options (or indeed any other option which it may consider appropriate). Please let the District Council know if more time is needed.

In the event that it wishes to pursue Option 3 the Parish Council should also provide by 16 September an indicative timetable for the work to be undertaken.

Andrew Ashcroft

Independent Examiner

Long Wittenham NDP Review

2 September 2019

Annex 5: Further response from Historic England, 2020

November 2021



Historic England

Peter Rose Esq

pwrose@gmail.com
by email only

CC Ricardo Rios (SODC), Marion Brinton (HE)

Our ref:
Your ref:

2020.07.01 Long
Wittenham NP
Informal
consultation RLS
Comments

Telephone

07825 907288

1st July 2020

Dear Mr. Rose

Re: Long Wittenham Neighbourhood Plan informal consultation

Thank you for contacting me about this matter. I am the lead officer responsible for neighbourhood planning consultations in the South East, so this would come to me in time and it is helpful to contribute at this point.

When it comes to assessing the plan Historic England's focus is its effects for and the use made of heritage assets (these include sites of archaeological interest, as well as buildings and conservation areas and include both listed or scheduled areas as well as 'non-designated' sites that have been recorded by District or County Council but do not have a formal protected status) and the wider historic environment. We do also take into account the aspirations and needs of the community that the plan will seek to deliver and the public benefits that will be provided. The questions I will ask start with:

1. Does the plan or individual proposals within it have effects for heritage assets or sites/buildings etc. that could potentially be identified as heritage assets?;
2. Would these effects be harmful to the heritage assets' conservation and are the planners (in this case the steering group) aware of that potential for harm?;
3. Is it clear that options that could avoid or minimise that harm have been given proper consideration (including using alternative sites) in the process of choosing the preferred options (including where to build), giving the right level of priority to conservation of heritage assets depending on whether they are of local, regional or national interest?;
4. If there is uncertainty about the potential for harm has anything been done to reduce that uncertainty (such as research or fieldwork)?;
5. Are there public benefits, including benefits for the heritage assets that clearly outweigh the harm remaining after measures to avoid or minimise it have been



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taken?;

6. Could any benefits be delivered by using the heritage assets positively, including by raising wider awareness of their interest within the community that would help, on balance, to reduce the impact of any harm? (in these cases the need to record the asset before or as it is being destroyed is not counted as a benefit);
7. If, after this process, it is clear that the site is best placed to deliver the benefits of development and that the harm resulting would be outweighed by the benefits does the allocation policy a) clearly secure the measures identified to reduce or minimise harm and/or b) secure the benefits that justify the harm, so that harm could not occur without the benefits being delivered?

This, in an abbreviated form, is the process set out for considering site allocations in local plans in our Advice Note on that subject, which you can find online at: <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>. This advice is also relevant to Neighbourhood Plans and conforms with the processes set out in the NPPF and NPPG.

Looking at the Long Wittenham Plan and its previous consultation versions, we were concerned in 2016 that the plan's consideration of sites for the primary school, community hub and enabling development, had not had proper regard for the potential for impacts on the archaeological remains thought to be present. That concern remained with the regulation 16 version of the reviewed plan, which was mirrored in our concern that the consideration in the Strategic Environmental Assessment was also inadequately informed by this understanding.

Given that, at present, the basis of the proposed site allocation in the submission version of the plan remains based on that problematic site assessment process our first recommendation is that the steering group need to review the site assessment and demonstrate that the need to conserve heritage assets "in a manner appropriate to their significance" (NPPF para. 184) has been duly incorporated in the decisions made. This also needs to demonstrate a genuine openness to alternative sites, rather than a post-fact justification of a decision already made.

In considering the land east of Didcot Road it will be important to consider the following factors:

What will the impact will be on the understanding of the scheduled monument in its landscape setting?

Given that some development is already permitted directly to the north, this is likely to further contribute to enclosure of the scheduled monument. This may be considered to be a form of minor harm through impact on the setting of the heritage asset that will require mitigation, potentially through design and landscaping of the new development, by increasing public awareness of the monument or through enhanced management of the monument to better secure its conservation.



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If it is considered that the impact on the setting of the scheduled monument, in combination with other factors does not rule out the site's allocation in favour of another location, we would expect a requirement in the allocation policy that sets out a specific need for "... the layout, landscaping and scale, materials and form of buildings to be designed to minimise harm to the setting of the monument through as well as exploring opportunities to emphasise the importance of this as a site of national archaeological interest with evidence of the origins of Long Wittenham as a settlement".

How will the archaeological remains outside the scheduled area be affected?

The scheduled monument has been defined to preserve a sample of the 'sunken featured building' features in the southern part of the monument. However a number of these features lie outside the monument in the eastern part of the proposed development site. In defining the site to be scheduled, a decision was made to afford the protection as a scheduled monument to a sample of these features, but those outside that protected area still receive a level of protection and need for consideration through the requirements of the NPPF and local plan policies. It is likely that these features will be harmed to an extent by construction works as part of the development. This would be considered to be, at least, a moderate harm to the wider site of archaeological interest requiring some form of mitigation to the heritage asset where possible, in addition to the justification of the public benefits to be delivered.

Again, if it is still considered that this site is the most suitable in spite of the probable loss of some of this non-designated archaeological resource, in the first instance mitigation should involve trying to avoid harm through the layout of development or use of sensitive construction techniques. This would require further archaeological investigation by the developers to inform their proposed layout before they submit a planning application. Where the limitations of the site mean that avoiding damage to archaeological remains will not be possible, the developer should be required to provide a compensatory benefit through improved conservation and awareness of the site's archaeological interest elsewhere. As such, we would expect the site allocation policy to require "... a programme of pre-application archaeological investigation to be undertaken by the applicant to inform the layout of development, preserving archaeological remains of interest in-situ where possible, and to inform a strategy of enhancement of the monument and the wider heritage asset". To ensure this process of investigation is suitable we would expect that the policy require "... that this is undertaken according to a written scheme of investigation agreed in writing with the council's archaeological advisors". As it is expected that, should the site be developed, harm to archaeological remains will result the allocation policy will also need to be clear that developers will be required to make suitable record of those remains before they are lost. These are standard site allocation policy elements used in numerous neighbourhood plans and follow the process of the applicant providing the necessary information to inform the decision regarding their



application that is set out in the NPPF.

Is there potential for other archaeological remains to be located within this site that could be affected by the development proposals?

The proposal site now lies between three areas of archaeological interest, including the area of early medieval burials identified during the evaluation of the land directly to the north. The eastern limit of the cemetery excavated at what is now Saxon Heath may not have been as well defined as previously thought and, as such, there is a high potential for further remains, including burials on the land adjacent to Didcot Road.

Again, determining the potential effects of development proposals and the need for a responsive layout would require further archaeological investigation prior to submission of a planning application. If the site is still considered suitable for allocation through the plan we would expect this pre-application investigation and responsive layout options to be secured through the allocation policy to demonstrate that there is no conflict between the neighbourhood plan and the local plan and NPPF.

How will the benefits that justify any unavoidable harm be secured in the allocation policy?

To ensure that the housing development does not take place without delivering the public benefit of the school and community hub we recommend that a provision is placed in the allocation policy that a suitably high proportion of this should not be occupied until the school buildings and land are constructed and handed over to the relevant authority. For reference, a similar requirement was placed on Policy NP3 of the Newport Pagnell Neighbourhood Plan that no more than 50% of any housing provided on the site should be occupied prior to making good and ready for occupation three historic buildings on that allocation site (the former Aston Martin Car Works). It is a common issue that developers do not need to build all of the development that is permitted via a planning application unless such a requirement is specifically placed on them.

As I hope this shows, whilst the definition of the scheduled monument has helped to define an area that is now understood to be of national importance and represents a strategy for preserving a sample of the known archaeological resource, this still leaves some unanswered questions for the plan making process and site allocation.

This requires a) a review of the site assessment process for the plan and b) if the proposed site remains the preferred option, to draft a policy that provides appropriate guidance for applicants to secure a sensitive development proposal and that secures the public benefits and mitigation that make any harm to heritage acceptable.

We recommend discussing this process of consideration with both the District Council's planners and conservation advisors and the officers of the County Council's archaeological service, who have experience in undertaking site assessments for



both local plans and neighbourhood plans. They may recommend that you ask a qualified planning consultant with heritage expertise to advise you.

Including the suggested layout in the neighbourhood plan

Whilst the suggested site layout provided by your preferred developer suggests there may be space to deliver the amount of development desired, we would not support a plan that included this layout where it might not be considered suitable to enable preservation of important archaeological remains in-situ if and where these are identified by pre-application investigation.

Should the revised site assessment conclude that this site remains the best placed to deliver the proposed development, we would still expect the allocation policy to provide certainty that the expected harm to heritage assets will be mitigated through an informed process of design, including consideration of layout, with a basis in the findings of further archaeological investigation.

Urban design considerations – will this achieve a high quality development?

Finally, looking at the suggested layout, we would comment that, in urban design terms, this would not be considered an example of high quality design and has a number of areas that are likely to fail to meet commonly accepted standards, such as Building for Life 12, including issues of overlooking, exposed side and rear boundaries, the dominance of car parking and the highly suburban character in a rural location. One particular area of concern is the low level of public open space within the development and the location of what is provided. The layout creates a cluster of larger houses within more spacious grounds surrounding an open green, whereas the majority of smaller houses have relatively small gardens and limited access to other open space, effectively creating a 'them and us' situation where only the wealthiest residents receive the benefits of open space. We feel that including this layout in the plan would be detrimental to the District Council's role in securing a high quality development through the planning application process where it establishes an expectation of what will be acceptable.

One option to consider, relieving the demand for open space, would be for some land within the scheduled monument to form a public open space allocation for the development, to which a management regime that supports the conservation of the monument can also be applied. This might help to provide a better quality environment for the development, whilst also securing benefits for the conservation of the heritage assets that could help mitigate harm that may arise elsewhere. We have recently seen such an approach taken through the Ashington Neighbourhood Plan in Horsham District where the allocation assessment process revealed the remains of a large Roman villa in a preferred site for housing development. The Parish Council there have managed to negotiate the transfer of the 'villa land' to provide public open space for the village with the intended housing being provided within another, adjacent allocation site belonging to a different landowner.



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I hope these comments are helpful to the Parish Council and have copied in Mr. Rios of the District Council so that he is aware of them. Please don't hesitate to contact me if you would like to discuss these comments.

Yours sincerely

Robert Lloyd-Sweet
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ANNEX 6: Pre-application advice from historic england



Mr Paul Clark
RPS Group
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Nottinghamshire
NG24 1QQ

Direct Dial: 0207 973 3644

Our ref: PA01151945

14 September 2021

Dear Mr Clark,

Pre-application Advice

LONG WITTENHAM , OXFORDSHIRE, OX14 4QU

This letter provides the requested pre-application advice on the proposed development of a site south of Long Wittenham and east of Didcot Road. You provided a draft plan showing an indicative layout of the proposed development showing a community hub and sports pitches to the south, and housing to the north.

This letter is limited to advice on proposed development but this matter is linked to the proposed allocation of this site in the draft Long Wittenham neighbourhood plan. The advice given below should be read as being contingent on the allocation being approved.

Context of the site, including surrounding heritage assets

Approximately 100 m to the north, and separated from the site by a housing development currently under construction, is the Long Wittenham conservation area (CA). The southern boundary of the CA is marked by Fieldside, a track which is a 'byway open to all traffic' (Ordnance Survey). There are a number of Grade II listed buildings just north of Fieldside.

East of the site and immediately adjacent is the scheduled monument *Anglo-Saxon great hall complex and Roman settlement features at Long Wittenham*. HA no.1468510. This monument consists mainly of below-ground archaeological features.

West of the site on the other side of Didcot Road a large Saxon cemetery was excavated and further burials have been found immediately north of the site (on the site now under construction). Saxon structures and a well were also found, and one late prehistoric or early Roman burial.

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Wittenham Clumps lies 1.8 km to the south-east. Castle Hill is a scheduled Iron Age hillfort. Round Hill, next to the hillfort, has commanding views including towards Long Wittenham.

The site lies within an archaeologically rich area of landscape, known from aerial photography and archaeological investigation. Two further scheduled monuments consisting of below-ground archaeological remains lie north-east and west of the site. These are at some distance and have little or no intervisibility with the site therefore they are not discussed further.

Significance and impact.

For all of the surrounding heritage assets it is necessary to consider whether the site as it is now contributes in any way to their significance, and if so, whether that will be altered by development.

The presence of new buildings on the site would, in relation to the Long Wittenham conservation area, be experienced from the track known as Fieldside and particularly from the public footpath running southwards across the fields from Fieldside. From both these locations the rural surroundings which contribute to the significance of the conservation area will appear reduced by the new development. This is also a cumulative effect with the development currently in progress. The magnitude of the impact will depend on the final design of the development including height, associated infrastructure (eg lighting and fencing for sports pitches, and on boundary treatment and screening. With sensitive design it should be feasible to ensure low impact from the development, ie minor impact which is at the lower end of the spectrum for less than substantial harm (NPPF, paragraph 202).

The Wittenham Clumps complex including the scheduled Castle Hill Iron Age hillfort undoubtedly gain significance from the rural surroundings which illustrate how the hillfort was built in, and dominated a rural hinterland. Views into the site are however mainly restricted by intervening tree growth and I would assess the impact as negligible.

Turning to the adjacent scheduled monument, the monument description summarises this as: *a high status Anglo-Saxon settlement comprising four post-in-trench timber hall buildings and a sample of numerous putative sunken featured buildings; a sample of enclosures and associated droveway representing the remains of a Roman ladder settlement and a portion of Roman trackway centred at SU 54953 93511*. As with the conservation area, the monument area would mainly be experienced from Fieldside and the public footpath. There is at least one slight possible earthwork within the monument but it is otherwise below ground.



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Experience of the monument is therefore quite limited but it clearly lies within mainly rural surroundings, with fields and hedges. The surroundings are illustrative of the rural enclosures and fields which make up parts of the monument and therefore do make a modest contribution to its significance. This would be impacted by a development. The magnitude of the impact will depend on the final design of the development including height, associated infrastructure (eg lighting and fencing for sports pitches, and on boundary treatment and screening. With sensitive design it should be feasible to ensure low impact from the development.

Lastly, there is the evidential value of the site itself, i.e. the extent to which archaeological deposits within the site could contribute to our knowledge and understanding of the past. An important consideration is to consider this against the archaeological deposits which have been scheduled adjacent to the site, and are therefore considered to be of national significance.

An archaeological evaluation (trial trenching) has recently been carried out in the southern part of the site (Cotswold Archaeology May 2021) and the northern part was evaluated in 2019 (Oxford Archaeology, October 2019). Both evaluations add to the previous knowledge of the site from aerial photography and geophysical survey.

The evaluation of the northern part of the site can be summarised as:

- a north-west south-east ditch in Trench 4, recut several times, interpreted as a boundary and possibly of Roman date (one sherd of pottery was found). This matches with a long anomaly from the geophysical survey.
- two further undated ditches on the same alignment found in Trenches 3, 16 and 8. These match with linear features found by aerial photography but not confirmed by geophysics.
- a large pit with 5th to 7th century Saxon pottery (Trench 7).
- a possible rectangular structure (Trenches 6 and 18) which showed as a weak anomaly on geophysics. Both trenches found narrow, shallow linear features, undated, matching the line of the anomaly. This feature was previously considered as a possible Saxon hall. While this remains possible, it would have to be very poorly preserved or with highly variable preservation. Only further excavation would clarify this.

In the southern part of the site the evaluation found:

- at least two phases of parallel ditches interpreted as forming a wide trackway or driveway, and dating to the Iron Age and / or Roman periods, with probability perhaps leaning towards the latter. From aerial photographic evidence it is

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clear that this feature is part of much larger layout of trackways and enclosure extending eastwards and northwards to the Thames, and westwards at least as far as Appleford. It could have continued in use into the Saxon period.

- further north-west to south-east linear features coinciding with aerial photograph evidence and / or geophysical survey, but not dated by the evaluation. In the south-west corner of the site these may be part of another trackway at right angles to that discussed above.
- a large cut feature in which a few fragments of Roman brick or tile were found in the lower fill. The feature was recut and this contained Saxon pottery. The feature is interpreted as a Roman waterhole (tentatively in the description, then definitively in the discussion) but there is no hard evidence for this. Neither the dating nor the interpretation seem particularly secure.

A very low number of archaeological finds characterised both evaluations. There was little pottery, brick or tile, and small assemblages of animal bone. The potential for palaeoenvironmental evidence such as seeds and other plant remains is low, unless features were to be found of considerably greater depth than were found in the evaluations.

Overall I would assess the archaeological evidence as being of lesser importance than that found within the scheduled monument to the east. For example, although one possible Saxon hall has not been entirely ruled out, it does not appear to be as well-preserved as the examples within the scheduled area. It is also important to note that some elements such as the trackways were scheduled as samples of what existed, and these samples are not threatened by the development.

The archaeological evidence has considerable potential to contribute to our understanding of the history of the area, and to increase our understanding of the scheduled area through comparison between similar features.

With the site not yet formally allocated, it would be premature to offer detailed comments on a draft development layout. Comments above about good design are relevant, and where tree screening is proposed it would be better to place this outside rather than, as currently shown, inside the scheduled monument. Design of any development, and its construction, should consider referencing the layout of the archaeology and include interpretation of the archaeology for visitors and inhabitants. A thoughtful programme of public engagement, which goes beyond the usual default of installing interpretation panels, could ensure that inhabitants of housing on the site understand its history, and take ownership of it. This is invaluable in creating a sense of place and belonging. It also serves to protect undeveloped areas such as the adjacent scheduled monument. Such a programme could be considered as a heritage benefit.

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Policy

Paragraph 194 of the National planning Policy Framework (2021) states that: *In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.*

I advise that following completion of the most recent evaluation sufficient work has been done for this requirement to be met. The only exception would be if the applicant makes a change in the area covered by the development.

The concept of less than substantial harm appears in paragraph 202 of the NPPF. Were planning permission to be granted for a development on this site, the local authority would be required to balance any harm to heritage assets against public benefit.

I would reiterate the comment made at the start of this letter regarding the allocation of this site within the Long Wittenham Neighbourhood Plan.

Historic England position

The level of harm to designated heritage assets would be less than substantial and should not rise above minor harm provided the development is sensitively designed as discussed above. We would be happy to advise further as designs are developed.

There would be harm to the undesignated archaeological deposits on the site. I do not consider these assets to be of national significance. Were planning consent to be granted for a development, I am content that the impact on archaeological deposits could be mitigated through conditions on planning consent, pertaining to preservation in situ by careful design, and / or archaeological investigation before or during development.

Yours sincerely,

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Historic England

David Wilkinson

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**LONG WITTENHAM , OXFORDSHIRE, OX14 4QU
Pre-application Advice**

List of information on which the above advice is based

1



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