

From: [Oram, Richard - Oxfordshire County Council](#)
To: [Catcheside, Emily - Oxfordshire County Council](#)
Subject: R3.0138/21
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Emily,

The applicant has now submitted the report for the archaeological evaluation we requested on this site. This evaluation report was agreed prior to the submission of this application and in line with paragraph 194 of the NPPF this should have been submitted with the application.

In our previous response to this application, we stated that this report would need to be submitted with the application and the results incorporated into the assessments.

The application has submitted additional information to update the ES based on these findings, but this does not adequately amend the ES and contains a number of errors.

For example the heritage section of this additional information states that a Bronze Age ditch and a number of undated features were recorded in Plot ON196259 relating to Asset 36. The evaluation report however records that no archaeological features were found in this plot which was located adjacent to Culham c3.5km to the north of Asset 36. It is likely that they are referring to Plot ON31674 but this is not clear from their submitted information.

Asset 36 itself relates to a probable Romano British farmstead recorded on the HER as a cropmark site under Primary Reference Number (PRN) 2838. This is listed in the ES appendix 7 as of unknown date but possibly later prehistoric to Roman. These features are wholly within Plot ON198020. The ES also includes that these features may be geological in origin. The evaluation on that plot recorded a number of features related to this site which demonstrate that these are not geological in origin and provide good dating evidence. We would have expected this to have been updated within the ES. We also do not agree that this statement correctly describes and therefore assesses the significance of these features based on the evaluation data.

The BA activity to the west of this Asset, within plot ON31674, is not of the same date as the features recorded as part of Asset 36. The cropmark data which identified Asset 36 does not extend as far as this feature and this archaeological feature was previously unrecorded on the HER. It is therefore unclear why this feature has been linked to the cropmark site identified as Asset 36. It is more likely that these deposits relate to a separate site recorded on the HER, PRN 29790, but this is not mentioned in this additional information. If this feature is considered to be associated with this probable Romano British site identified from cropmarks then it would be clear that this site is considerably larger than previously identified from cropmarks alone. This will need to be included in an addendum to the ES.

There are other errors within this section such as a reference to Plot ON208645 stating that no archaeological features were found in this plot adjacent to Asset

163. The evaluation report however shows that this plot consists of a very small triangular parcel of land which was not subject to any evaluation. This is a misleading statement as the evaluation would not have been expected to record any archaeological deposits in areas that the evaluation did not investigate, and it is not appropriate to draw any conclusions over the lack of recorded features from the evaluation in areas that were not subject to the actual evaluation itself.

The evaluation did record archaeological features within Plot ON237285 which almost certainly relate to a cropmark site. These cropmarks are not mentioned in this additional information or any consideration of whether they relate to the settlement site recorded immediately north of this plot, PRN 2852. The description of what was found within this plot in this additional information does not correspond with the results of the evaluation report.

As such we cannot agree that the ES and this additional information appropriately assesses the impact of this proposed development on the known archaeological interest of the site as recorded by the HER, geophysical survey and the trenched evaluation.

An addendum to the ES will therefore need to be submitted to appropriately incorporate the results of this evaluation in the assessment. This addendum will need to address these, and other errors as well as provide an appropriate description and assessment of the archaeological interest of the site as set out in paragraph 194 of the National Planning Policy Framework (2021) which 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.' NPPF 2021, para 194.

Regards

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