Dear Ms Thompson,


NORTH OF THE A420 BOTLEY ROAD TO SOUTH OF THE A423 RING ROAD, RUNNING PREDOMINANTLY BETWEEN THE A34 TO THE WEST & THE OXFORD TO LONDON RAILWAY LINE TO THE EAST, INCLUDING LAND BETWEEN THE A4144 ABINGDON ROAD TO THE TO THE WEST & THE RIVER THAMES...

Application No. MW.0028/18

Thank you for your letter of 9 May 2018 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

Historic England has no objection to the application on heritage grounds. The proposed scheme will cause a high level of harm to an undesignated section of the historic causeway at Old Abingdon Road, where the archaeological deposits are assessed as being of national significance. The scheme will also cause some harm to the scheduled culverts which form part of the same causeway. In both cases the harm will need to be weighed against public benefit (NPPF paras 134, 139). I concur with and support the advice provided by the Oxford City Archaeological Officer and the Oxfordshire County Council Archaeological Service.

Advice

I understand that this is an application for a major flood alleviation scheme in and around the City of Oxford.
I would draw your attention to Chapter 10 of the Environmental Statement, the Heritage Statement, and the supporting material including the archaeological evaluation reports Appendix J-6, J-7. A very large number of heritage assets are involved and I have confined my comments to a general discussion of non-designated heritage assets, to non-designated assets of national importance, and to designated assets where I have detailed comments to make on their significance and predicted impacts.

Non-designated assets

I concur with and support the advice provided by the Oxford City Archaeologist (David Radford), and the Oxfordshire County Council Archaeological Service (Richard Oram). In particular, I would draw your attention to their advice on the scope of archaeological mitigation work. This should be secured by an appropriately worded planning condition and should not be limited to the scope as set out in the submitted Environmental Statement, which does not reflect detailed pre-application discussions. The scope should include arrangements for an appropriate level of palaeo-environmental and geoarchaeological investigation and analysis carried out during the archaeological mitigation programme with the results then being integrated with those from earlier phases of the scheme. This includes (but is not limited to) mitigation excavations at Old Abingdon Road where the archaeological remains are considered to be of national significance.

Arrangements should also be included for: trial trenching, targeted archaeological excavations and archaeological monitoring, a programme of public outreach, permanent interpretation signage of key heritage features, protection and reconstruction (if needed) of historic earthworks, and full analysis and publication of results from the archaeological programme.

Old Abingdon Road

In this area the new flood channel and road bridges, with attendant infrastructure, will be constructed through the line of an undesignated section of the historic Redbridge causeway, originating in the Saxon or Norman period but on the line of a Roman route. A number of stone culverts within this causeway are scheduled monuments: Old Abingdon Road Culverts, List no. 1408790.

The tables below summarises our advice on significance and impact for the area through which the new channel will pass, and the area of the scheduled culverts. Information on the scheduled culverts is drawn from the Historic England scheduling description https://historicengland.org.uk/listing/the-list/list-entry/1408790 and from reports on previous archaeological work between 2006 and 2009. Significance is expressed in terms of evidential, historic (associative and illustrative), aesthetic and communal value (Historic England, Conservation Principles: policy and guidance for the sustainable management of the historic environment, London, 2008).
### Significance – table of values

<table>
<thead>
<tr>
<th>Value</th>
<th>Area of new channel and road bridge</th>
<th>Area of scheduled culverts</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Evidential</strong></td>
<td>High value. Structures and archaeological deposits contain evidence for the construction, development and surrounding land use (palaeo-environmental evidence) from at least the medieval period onwards. While the evidential value is undoubtedly high, it does have some limitations: elements which can be definitely linked to the pre-Norman crossing have not been shown to be present; later activity has truncated the medieval structure, and removed the relationship between it and the historic road surfaces. This relationship may survive elsewhere as the evaluation covered only a very limited area.</td>
<td>Very high value. Designated structures contain evidence for the construction and development of the very rare stone causeway, from Norman period onwards, including complete arches. Deposits containing further evidence likely to be present including roadway remains above and between the culverts (see note 1 below); palaeo-environmental evidence also very likely to be present. Potential between surviving culverts for evidence of pre-Norman crossing.</td>
</tr>
<tr>
<td><strong>Historic</strong></td>
<td>High associative historical value through documented construction by Robert D’Oilly. Some illustrative value where modern road is on a raised causeway.. Setting makes only a small contribution to significance</td>
<td>High associative historical value through documented construction by Robert D’Oilly. Illustrative value much higher as culverts can be seen. Reasonable contribution to this value from setting – stream running north to south and culvert arches seen within causeway. Appreciable as a causeway raised above the floodplain.</td>
</tr>
<tr>
<td><strong>Aesthetic</strong></td>
<td>No value</td>
<td>Surviving arches have some aesthetic value. Design value of well-built Norman arches is evident.</td>
</tr>
<tr>
<td><strong>Communal</strong></td>
<td>At present, value is mainly limited to specialists.</td>
<td>Value extends beyond specialist historical and archaeological groups. Correspondence received from Kennington residents shows awareness and interest. (Some appreciation of the causeway and culverts is possible from the public road and from Kendall Copse community woodland.)</td>
</tr>
</tbody>
</table>

### Impact on significance values

<table>
<thead>
<tr>
<th>Value</th>
<th>Area of new channel and road bridge</th>
<th>Area of scheduled culverts</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Evidential</strong></td>
<td>High impact – archaeological deposits and structures of high evidential value removed over width of culvert and area of other works (plus any working room required).</td>
<td>No impact</td>
</tr>
<tr>
<td><strong>Historic</strong></td>
<td>Minor to negligible impact..</td>
<td>Introduction of major modern structures (bridge etc) is a</td>
</tr>
</tbody>
</table>

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negative impact on significance as contributed to by setting. See below for discussion.

<table>
<thead>
<tr>
<th>Aspect</th>
<th>Aesthetic</th>
<th>Communal</th>
</tr>
</thead>
<tbody>
<tr>
<td>None</td>
<td>None</td>
<td>Increase in archaeological knowledge and understanding of the crossing as a whole.</td>
</tr>
<tr>
<td></td>
<td>Negligible as aesthetic / design value is within the historic arches which will not be impacted.</td>
<td>Negative impact on communal value, i.e. monuments as experienced from public road or Kendall Copse. Modern structures become far more dominant. See below for discussion.</td>
</tr>
<tr>
<td></td>
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<tr>
<td>Summary</td>
<td>High level of harm, but less than substantial harm, to a non-designated part of a nationally-important heritage asset</td>
<td>Some harm, but not substantial harm, to the scheduled culverts.</td>
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</tbody>
</table>

With regard to impact on the scheduled culverts, the submitted documents (environmental statement, based on the heritage statement) conclude as follows:

…the low-lying floodplain setting, associated channels of the Hinksey Stream and the route of the Old Abingdon Road are considered to make a small positive contribution to the significance of this asset, providing its historical and functional setting. The Scheme forms part of this low-lying floodplain and is considered to make a negligible positive contribution to its overall significance.

I advised the applicant, when these documents were in draft, that this was not an adequate assessment of the impact but it has not been revised. There is no detailed explanation of the proposed ‘negligible positive contribution’ in relation to the construction or operation of the scheme. I advise that the construction and use of the new channel and road bridge, with attendant features such as flood walls, fencing and a telemetry cabinet, will have a negative impact, as set out in the table above. Although there are already modern features in the landscape, the effect of the introduction of major new features can be clearly appreciated from the applicant’s own Landscape and Visual Assessment (ES Appendix I-8, Figure 7.37, Viewpoint 23) shows the significant change to the landscape as seen from the community woodland at Kendall Copse, even with the new bridge largely outside of the view. My advice is therefore that the scheme will cause some harm to the significance of the scheduled culverts but not substantial harm. The National Planning Policy Framework (NPPF) requires that where there is less than substantial harm to a designated heritage asset, this harm should be weighed against the public benefits of the proposal (para. 134)

With regard to the undesignated section of the historic causeway, the archaeological evaluation report describes that a (probable) medieval masonry culvert is present but much of it has been destroyed by later activity. The culvert is likely to have carried the roadway across a channel, now infilled, which was also found by the evaluation work. In contrast to the scheduled examples, the scheduled arch is not intact and
only a few courses of the sides of the culvert (the arch abutments) survive. The evaluation also showed detail of a medieval road with kerb stones, road surfaces and roadside ditch. These deposits relating to the road did not have a direct relationship with the stone culvert, due to the later disturbance. There was also evidence from the post-medieval phases of the causeway. Finally, the evaluation showed that this area has reasonable potential for the preservation of palaeo-environmental evidence which could provide evidence of land use and environment. Although the evaluation work was limited by restrictions on road closures, we consider it is likely to have given a reasonable picture of the archaeological remains in this area.

Our advice is that from the evidence of the archaeological evaluation, there are clearly archaeological remains which are part of the medieval causeway, albeit they are less well preserved than the scheduled remains. Comparison with the entry for the scheduled culverts (referenced above) sets out the reasons for their designation, as follows:

*Rarity: they are a continuation of the already scheduled Grandpont and represent an example of a medieval causeway (possibly with Anglo-Saxon origins), few of which now survive in their original form;*
*Survival: original fabric is visible in the culverts and will survive in those sections of the causeway above each culvert;*
*Potential: no recent disturbance or archaeological excavation has taken place in the vicinity of the culverts and the causeway. There is therefore the potential for the recovery of archaeological information and environmental evidence relating to the causeway and the landscape in which it was built;*
*Documentation: the causeway is considered to have its origins in the Saxon or Norman period and represents an important element in understanding the topography and development of early medieval and medieval Oxford. It is one of the few examples of this type of monument where both archaeological and documentary records are available.*

It can be seen that the evaluated remains meet most of these criteria, with the exception that the survival is not as good. Overall, our advice is that despite this difference the scheduled remains are still of national importance, and the causeway along Old Abingdon Road (and Grandpont) should be regarded as a single nationally-important heritage asset, of which some parts are designated, and others undesignated.

My advice, as summarised in the tables above, is therefore that the scheme would cause a high level of harm, but less than substantial harm, to a non-designated part of a nationally-important heritage asset. The impact is characterised in the Environmental Statement as ‘Large Adverse’ (page 212) and I agree with this assessment. Despite the high level of harm I support this route for the flood channel, as the only alternative viable route would have passed between the scheduled culverts and would, as we advised in pre-application advice to the applicant, have caused substantial harm.

The NPPF (para. 139) states that non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets. This
means that para.134 applies, requiring the harm to be weighed against the public benefits of the proposal.

Given the high level of harm to nationally important archaeological remains, if the scheme goes ahead, every effort should be made to ensure that the archaeological mitigation work is carried out to an appropriate scope and to a high standard (see above).

**Recommendation**

Historic England has no objection to the application on heritage grounds. Key sections of the NPPF are quoted above. Paragraphs 128, 129, 131, 132, 135 and 141 are also relevant.

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

Yours sincerely,

[Signature]

David Wilkinson, MA, MCIfA  
Assistant Inspector of Ancient Monuments

cc. David Radford, Oxford City Council  
Richard Oram, Oxfordshire County Council