



Historic England

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by email only

Our ref: 2017.02.10
Your ref: Radley NP
Pre-
submission
RLS
Comments
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10 February 2017

To whom it may concern:

Radley Neighbourhood Plan Pre-submission Version

Thank you for consulting Historic England on the pre-submission version of the Radley Neighbourhood Plan. As the government's advisor on planning for the historic environment, Historic England's remit is to support the conservation of heritage assets and to champion good design principles in historic places. As such we have restricted our comments to those areas of the plan they fall within our areas of interest.

It is up to the community to determine their own agenda for neighbourhood planning, which can either supplement policy in the local plan or even replace non-strategic policy. The local plan's strategic policies for the quality of design, local distinctiveness and the historic environment provide a strong basis for managing the design of new development to ensure that the value of these aspects of the environment area sustained. This is well supported by their Design Guidance SPD. As such we are not concerned that the plan does not provide a strong direction on these matters, which will nevertheless be given consideration in decision-making.

It is not clear whether preparation of the plan has included review of the area's historic environment. We note that the substantial scheduled monuments in the south of the plan area are shown on Map 9 but it is necessary to determine whether any heritage assets, including non-designated assets (i.e. not on the National List or a conservation area) would be affected by proposals in the plan. If this hasn't been done, we advise that the consideration of the choice of sites should include review of any potential for sites of archaeological interest recorded on the County's Historic Environment Record that their development would affect. This is a requirement set out in the National Planning Practice Guidance for Neighbourhood Plans.



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If there is any potential for a site allocation to affect such an asset, we recommend consulting the Council's archaeological advisor or conservation officer (as appropriate) to ensure that site allocation choice and policy wording seeks to avoid or minimise harm to heritage assets, or secures public benefit that could not otherwise be delivered and that clearly outweighs any unavoidable harm. In most cases affecting archaeological remains this should necessitate the inclusion of a requirement to undertake investigation of the site's archaeological potential prior to the submission of a planning application to provide understanding of the importance of any remains that may be present and inform the sensitive design of development. This should be undertaken according to a written scheme of investigation agreed with the Council's archaeological advisors (it is helpful to state this in the policy).

We note that the Old Coal Yard site lies adjacent to and partly within the scheduled monument "North of Wick Hall" also known as Radley Barrow Hills. Development of this site that would affect the scheduled monument will be required to secure scheduled monument consent from the Secretary of State. We strongly advise consulting our Inspector of Ancient Monuments for this county to discuss the potential implications for development of the site. Nevertheless, we believe that some quarrying activity on the site in the past may have reduced the archaeological potential of this part of the monument. We would also caution that the limits of a scheduled monument are often drawn according to administrative or property ownership boundaries and do not necessarily reflect the limits of the presence of archaeological remains. Even where remains of nationally importance are not present, related remains of regional or local importance may be found within land near to scheduled monuments.

Given these considerations we would expect that, before it is presented for submission to the examiner, the plan will need to be amended to clearly demonstrate that the archaeological interest of the scheduled monument has been understood and the potential impact of the allocation on it and any potential associated remains have been given appropriate consideration. Unfortunately we feel the present policy requirement to protect the monument provides insufficient clarity on the appropriate way forward. As above we would recommend that the policy include a requirement to undertake investigation of the site's archaeological potential according to a written scheme agreed with the County Archaeologist and that proposals should seek to retain any remains that may be present in-situ. Nevertheless we recognise the importance of providing a clear guide for future use of the site and finding a new use for previously developed land and a derelict site within the green belt. As such, we would welcome further dialogue with the Parish Council concerning this site prior to the preparation of the submission version of the plan. A more positive angle might be to state that proposals that include a conservation management plan that will contribute to the future conservation of the monument and increase public awareness and appreciation of its significance will be supported.



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Please do not hesitate to contact me if you have any queries relating to our comments or would like to discuss the plan's proposals and evidence needs further.

Yours faithfully

Robert Lloyd-Sweet

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