

Annual Monitoring Statement for Archaeological Assets 2020



Oxford City Council, Urban Design and Heritage Team
Annual Monitoring Statement for Archaeological Assets 2020



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Cover photographs- Top- yard and well belonging to a Tudor period workshop on Market Street. Middle- a medieval oven in the Mitre yard. Bottom- a display board at the Westgate.

Executive summary

The following report provides an overview of the impact of development on archaeological assets in the Oxford Local Authority Area in 2020.

The beginning of the year saw the completion of college driven projects at New College School and Jesus College (Northgate House) that impacted on significant urban assets (Roman, Civil War, medieval). After March the impact of the Covid 19 led to a reduction in the planned amount of fieldwork. The pattern for the remainder of the year comprised of a series of small scale projects and also a distinctive pattern of pre-determination trenching for larger housing developments around the periphery of Oxford.

This report highlights the development pressure being faced by assets across Oxford and provides a statistical summary of the archaeological advice provided and projects undertaken. The report also summarises the public outreach work undertaken and relates the archaeological discoveries made back to the city archaeological research agenda.

Introduction

The National Planning Policy Framework requires that local planning authorities should make information about the significance of the historic environment, gathered as part the development management process, publicly accessible. The Oxford Archaeological Action Plan (2013-2018)* established the objective of producing an annual monitoring statement for archaeological heritage assets and this is the fifth such report. The aim being to capture data about the patterns of development impacts across the years and also monitor the effectiveness of heritage management processes.

The following report provides a short overview of the scope and impact of development led archaeology in Oxford in 2020. It records the number of planning applications submitted over the calendar year and the number assessed to have likely archaeological implications. It records the types of archaeological fieldwork undertaken and summarises how development and archaeological mitigation have impacted on known archaeological heritage assets. Furthermore it relates the year's archaeological discoveries to an evolving research agenda to show how our knowledge and understanding of Oxford and its people is developing and expanding over time. The annual statement also provides a basis for monitoring the on-going cumulative impact of both development and asset management on the city's archaeological resource.

(*[Link to Oxford Archaeological Plan](#))

The asset base

The designated assets within the Oxford City local authority area comprise:

- Over 1,500 listed buildings (this number relates to the number of buildings rather than designations as these can encompass multiple buildings. At the end of 2020 the National Heritage List recorded 1185 listed building designations for Oxford) The list includes:
 - 12% grade I listed buildings (the national average is 2%)
 - 8% grade II* listed buildings (the national average is 4%)
- 18 Conservation Areas – representing 20% of the city area
- 10 Scheduled Ancient Monuments (NB The National Heritage List now records ten monuments rather than the previously stated 12 because the Bridge West of Godstow Abbey (County No 173) and the extension to Port Meadow (County No 120003) are amalgamated with Godstow Abbey (County Number 35542) and Port Meadow (County Number 143) respectively.
- 15 Registered Parks and Gardens

In addition to these designated assets further archaeological monuments are recorded on archaeological databases covering the city. The monument database includes extant and documented monuments (i.e. those which may no longer survive).

At present two complementary archaeological data sets are maintained for Oxford: the Urban Archaeological Database (UAD) which covers the historic core of Oxford and the Oxford Historic Environment Record (HER) which covers the area outside the UAD. These two sets of data are both now maintained by the City Council and have been recently combined into the City of Oxford Urban Historic Environment Record (COUHER).

The combined monument database (which includes a number of duplicate records that need revision) totals 3254 records (Oxford District Search). This number is likely to decline in the short term as duplicates are removed.

Planning advice and fieldwork statistics

The tables below provide data about the number of applications assessed and commented on by the City Council Archaeologist and the number of archaeological recording events undertaken by archaeological contractors in Oxford in 2020. Additional data is provided on the number of Scheduled Monument Consent notices issued by Historic England over the course of the year.

Table 1: Planning applications to Oxford City Council

Number of applications assessed for heritage interest (excluding renewals and amended schemes):	2385 (including full, outline, pre-applications, major applications, listed building applications)
Number of applications with archaeological implications in 2020:	60
Number of applications with archaeological implications as a % of planning applications	2015 (for comparison) 3.3% 2016 4% 2017 4.5% 2018 3.1% 2019 3.6% 2020 2.6%

Table 2: Archaeological Fieldwork undertaken in 2019	2016	2017	2018	2019	2020
Evaluation trenching	8	15	8	13	9
Trial trenching (key hole investigation secured through a planning condition, usually because of pre-existing site constraints)	8	6	8	7	2
Archaeological excavations	8	5	6	9	2
Archaeological watching briefs (observation of ground works by a qualified archaeologist)	26	17	19	21	23
Historic building recording	11	4	11	9	9
Geophysical survey	2	2	1	4	8
Salvage record (reactive recording of an asset either because of non-compliance with a condition or because activity is outside planning control)	0	0	1	0	2

Table 3 Impacts on Scheduled Monuments within the Local Authority Area	2016	2017	2018	2019	2020
Number of cases requiring Scheduled Monument Consent	1	4	0	5	1
Number of Scheduled Monument consents for complete or partial loss of fabric or character requiring mitigation of damage	0	0	0	1	0
Number of Scheduled Monument consents for minor works without significant implications	1	1	0	4	1
Number of Scheduled Monument consents for repair and restoration of monuments	0	3	0	1	0

Outcomes from previous planning advice

The tables below provide data on the outcomes of development on archaeological assets and an assessment of impact based on definitions provided by the National Planning Policy Framework.

Table 4 Monitoring outcomes from previous planning advice	2016	2017	2018	2019	2020
Number of significant breaches of planning condition or damage cases recorded over the year	0	0	2	0	0
Non-compliance with an archaeological condition with unknown impact on asset/s	1	0	2	0	0
Non-compliance with archaeological condition with subsequent mitigation undertaken	0	0	0	0	2
Number of appeals allowed where archaeological policies are cited as a reason for refusal	0	0	0	0	0
Number of developments in 2019 within the City Centre Archaeological Area (defined in the Local Plan) that required a full excavation more than 25m ²	4	2	3	4	2
Number of developments in 2019 outside the City Centre Archaeological Area (defined in the Local Plan) that required an excavation more than 100m ²	3	2	0	4	0
Number of major archaeological excavations awaiting publication more than two years after the completion of fieldwork	6	10	13	13	9
Number of fieldwork events that did not encounter archaeologically significant assets (these may include sites where archaeological monitoring has been required to ensure that consented development does not impact on significant remains)	10	16	7	11	14
Number of cases in City Centre Archaeological Area (defined in the Local Plan) where design was agreed, or design changes made, to avoid or achieve significant reduction in harm to or achieve significant preservation in situ of archaeological assets	2	3	2	2	3

Table 4 Monitoring outcomes from previous planning advice	2016	2017	2018	2019	2020
Number of cases outside City Centre Archaeological Area (defined in the Local Plan) where design was agreed, or design changes made, to avoid or achieve significant reduction in harm/significant preservation in situ to archaeological assets	0	1	1	1	0

Table 5: Summary of archaeological assets impacted by development in 2020 (blank page below)

Site Name	Type of Asset	Loss of asset without	Loss of asset with mitigation	Substantial loss of asset without mitigation	Substantial loss of asset with mitigation	Less than substantial loss of asset without mitigation	Less than substantial loss of asset with mitigation	Further characterisation of asset with limited intervention	New asset identified with limited intervention	Notes
Nos 1-3 Golden Cross, Cornmarket	17 th century building (south range)							•		Building recording of exposed joists, chimney breasts and fireplaces prior to refit.
Castle Hill House, New Rd	Castle bailey ditch							•		A borehole transect established that the base of the ditch preserves 12 th century deposits that had not been scoured/cleared out during later recuts.
Jesus College, Northgate House	16 th (?) c artisans workshop comprising ovens wall, external cobbled area and well.						•			Excavation exposed well-preserved medieval building remains (floors and ovens) and secured substantive preservation in situ.
Headington School	Roman settlement							•		Watching brief revealed further Roman pits along service route to new school building.
Threshing Barn, South Park	18 th c threshing barn							•		Recording by Oxfordshire Building Record prior to refit for use as micro-brewery.

No 38 Pembroke Street	17 th c townhouse (with possible 16 th c elements).							•		Recording by Oxfordshire Building Record prior to refurbishment and repair works.
St John's College, Porter's Lodge	15 th c lodge in west range of main quad.							•		Recording prior to refit and wall breach for disabled access. Internal detail recorded.
No 28 Cornmarket	14 th c former shops.									Historic building recording undertaken prior to refit. Remains of a buttress possibly forming a foundation arch was identified within the cellar.
Land Adj No 7 Barton Village Rd	Wall that may belong to a medieval building and a medieval boundary ditch.									Building recording of standing wall and watching brief on groundworks to rear of property.
Oxford North, land south of Park and Ride	Medieval (?) ridge and furrow.							•		Test pit survey and contour survey of ridge and furrow prior to development (limited retention of ridge and furrow conditioned)
Peckwater Quad, Stair No	Medieval street								•	Medieval street surface recorded.

9, Christ Church										
Exeter College Library	Medieval college layers and chancel								•	Limited test pitting revealed chancel, medieval layers and a post medieval cobbled surface.
Meadow Larkins, Headington	Medieval settlement remains								•	Evaluation trenching revealed a medieval pit.
Cherwell College	Post-medieval channel in floodplain							•		Possible post-medieval channel (not fully reported yet).
St Edmund's Hall	College quadrangle								•	Watching brief revealed a cobbled surface.
Port Meadow	WWI airfield and Iron Age enclosures							•		Magnetometer and resistivity survey revealed detailed layout of WWI airfield.
Deaf Centre, St Ebbes	Medieval Blackfriars							•		Depth and density of church burials established and church building sequence refined.
Dyson Perrins Laboratory	20 th c teaching laboratory							•		Record of 19 th c teaching laboratory produced prior to refit
Pillbox on A40	WWII Pillbox		•							Pillbox removed for road widening, subject to building recording.
TOTAL			1	0	1	0	2	9	4	

An overview of the patterns of archaeological fieldwork in 2020

The sites assessed in table 5 are mapped below in order to show the broad pattern of investigation.



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Fig 1. The historic core of Oxford with sites mentioned in table 5 marked in red.



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Fig 2. The wider Oxford area with sites mentioned in table 5 marked in red

Current archaeological planning policy and the preservation of archaeological remains

The new Oxford Local Plan Policy DH4 is reproduced below, it introduces a new emphasis on assessment of cumulative impacts on specific heritage asset types and community involvement (where feasible).

Within the City Centre Archaeological Area, on allocated sites where identified, or elsewhere where archaeological deposits and features are suspected to be present (including upstanding remains), applications should include sufficient information to define the character, significance and extent of such deposits so far as reasonably practical. This information should generally include:

a) a Heritage Assessment that includes a description of the impacted archaeological deposit or feature (including where relevant its setting), an assessment of its significance and the impact of the proposed development on its significance, in all cases using a proportionate level of detail that is sufficient to understand the potential impact of the proposal. The Statement should reference appropriate records (including the information held on the Oxford Historic Environment Record); and

b) If appropriate, a full archaeological desk-based assessment and the results of evaluation by fieldwork (produced by an appropriately qualified contractor. Pre-application discussion is encouraged to establish requirements). In the City Centre Archaeological Area where significant archaeological asset types can be shown to be subject to cumulative impact from development, the desk-based assessment should contain appropriate contextual assessment of this impact.

Development proposals that affect archaeological features and deposits will be supported where they are designed to enhance or to better reveal the significance of the asset and will help secure a sustainable future for it.

Proposals which would or may affect archaeological remains or features which are designated as heritage assets will be considered against the policy approach as set out in policy DH4 DH3 above.

Archaeological remains or features which are equivalent in terms of their significance as to a scheduled monument are given the same policy protection as designated heritage assets. Proposals which affect the significance of such assets will be considered against the policy test for designated heritage assets set out in policy DH4 above.

Subject to the above, proposals that will lead to harm to the significance of non-designed archaeological remains or features will be resisted unless a clear and convincing justification through public benefit can be demonstrated to outweigh that harm, having regard to the significance of the remains or feature and the extent of harm.

Where harm to an archaeological asset has been convincingly justified and is unavoidable, mitigation should be agreed with Oxford City Council and should be proportionate to the significance of the asset and impact. The aim of mitigation should be where possible to preserve archaeological remains in situ, to promote public enjoyment of heritage and to record and advance knowledge. Appropriate provision should be made for investigation, recording, analysis, publication, archive deposition and community involvement.

Overview of 2020

The beginning of the year saw the completion of college driven projects at New College School and Jesus College (Northgate House) that impacted on significant urban assets, including a potentially 'lost' Late Saxon or medieval urban defensive line (though this may yet prove to be Civil War in date), Roman settlement remains and the remains of a Tudor period artisans workshop to the rear of Market Street.

After March the impact of Covid 19 led to a reduction in the planned amount of fieldwork. The pattern for the remainder of the year comprised of a series of small scale projects (including a notable number of building recording projects) and also a number of sizable evaluation projects on green field sites (North Oxford, Iffley, Old Marston). These form part of a distinctive episode of pre-determination trenching for larger infill housing developments around the periphery of Oxford that relates to the housing allocations made in the recent City Local Plan. In terms of archaeological results only one of these sites identified a previously unknown archaeological asset (a Roman settlement at Iffley) which is unlikely to be significantly impacted by the proposed development. At present this wave of infill development, whilst forming a distinctive pattern of historical development, cannot be assessed to be placing pressure on identified archaeological assets or asset types. The main threat to the sustainability of Oxford's archaeological resource remains the pressure of development on urban deposits within the historic core.

Public engagement with archaeological heritage

The Oxford Archaeological Action Plan 2013-2018 sets out the aspiration of the Urban Design and Heritage a Team to maintain a programme of public outreach including talks, walks and media engagement. Below a selection of outcomes related to archaeological outreach work in 2020 are highlighted:

- Outreach activities of The City Council Archaeologist (CCA) included a talk on recent archaeological work in Oxford for the Festival of Archaeology (Organised by Oxford Archaeological Trust).
- The CCA released a video diary reporting on the Trinity College excavations: <https://www.facebook.com/OxfordCityCouncil/videos/trinity-college-excavation/667066030669597/>
- A new notice board was added to the Greyfriars Place open space at the Westgate reporting on the 2015 archaeological excavation results.
- A major European wide study on Viking DNA featured an Oxford skeleton which was found to be related to another burial from Denmark (potentially a half-brother).
- Archaeological education leaflets were produced on the archaeological work at No 7 Barton Village Road and excavation adjacent to Littlemore Hospital.
- A major new volume bringing together the results of eleven Oxford excavations and with overview chapters by the CCA and other was released in December 2020 by the Oxfordshire Architectural and Archaeological Society: <https://www.oahs.org.uk/pdf/radford.pdf>

Further information on the results of archaeological fieldwork in the City can be found in the regularly produced Oxford City and County Archaeological Forum reports which are posted onto the archaeological page of the council website: [Link to City Council archaeology webpage](#)

Developing an archaeological research agenda for Oxford

In 2012 the City Council completed an English Heritage funded project to produce a synthesis of the available archaeological information for Oxford and set out a research agenda to inform future investigations. These reports formed part of the Oxford Archaeological Plan and can be viewed on the council website: [Link to Oxford Archaeological Plan webpage](#).

The archaeological investigations undertaken in 2020 have produced significant new data relevant to the 2012 research agenda and the table below seeks to illustrate how the various investigations fit into the agenda. It should be noted that many of the larger sites investigated in 2020 have not yet been subject to a detailed post-excavation study and therefore the full results are not yet known. The statements below are therefore provisional.

Site	Notes	Research Question	Period
Headington School	Roman domestic settlement site excavated (high ground on crest of Headington Hill).	4.5.6 Can patterns of landscape re-organisation, migration of boundaries and patterns of disuse be further characterised? 4.5.7 To what extent is the general regional pattern of 2nd century relocation and re-organisation of settlement patterns reflected within the LAA? There is some suggestion that Oxford was not as significantly affected as other areas. Why might this be? 4.5.9 Is there a distinction between the material culture of settlements on the Dorchester-Alchester Road and rural settlement on the gravels?	Roman
New College School	Roman settlement (dispersed village on gravel terrace in vicinity of University Science Area). Well preserved Roman settlement remains sealed below Civil War bank (oven, drip gullies?) and low status burials recorded.	4.5.6 Can patterns of landscape re-organisation, migration of boundaries and patterns of disuse be further characterised? 4.5.7 To what extent is the general regional pattern of 2nd century relocation and re-organisation of settlement patterns reflected within the LAA? There is some suggestion that Oxford was not as significantly affected as other areas. Why might this be?	Roman
Castle Hill House	Castle bailey ditch subject to borehole study which has demonstrated preservation of waterlogged Norman fills.	6.6.5 The potential of cess pits, Thames channels and the Castle precinct to preserve further evidence for leatherworking, woodworking and cordwainery should be highlighted.	Norman

Site	Notes	Research Question	Period
		6.11.1 The character and extent of the early Norman Castle precinct and its impact on the west end of the burh require further investigation. How did the Castle precinct develop?	
Christ Church, Peckwater Quad, Staircase 9	Medieval road surface (identified)	7.11.1 How and where was the street grid amended and repaired during the medieval period?	Medieval
Land adjacent to Barton Manor	Further extant walls of likely medieval date identified.	7.5.3 The development of hinterland villages around Oxford is poorly understood. Less well-developed village cores may provide the best opportunities to study patterns of expansion and contraction and obtain representative rural assemblages.	
Jesus College, Northgate House	Walls, ovens and floors belonging to possible Tudor artisan's workshop.	7.9.2.2 The location and study of workshop spaces has great potential to enhance our understanding of craft industries, the social relations of production, social practices and production techniques.	
St John's College Porter's Lodge	15 th c lodge on west range on main quad. Further internal detail recorded.	7.10.4 What can structural evidence, artefacts and ecofacts tell us about the lifestyle and function of early colleges and the comparative wealth and status of institutions?	
No 28 Cornmarket	14 th c and later former shops. Further internal detail recorded.	7.6.2 Can we further record patterns of changing building techniques in timber, stone and brick; chronology and distribution of different materials (Roof tiles, floor tiles, earliest use of brick)? What can the quality of building materials (e.g. cobb, wattle and daub, stone), framing/roof types etc tell us about class/status in medieval Oxford (Munby 2008)?	
Exeter College Library Test pits	Medieval college layers and charnel recorded. Further characterisation of the college's archaeological assets.	7.10.4 What can structural evidence, artefacts and ecofacts tell us about the lifestyle and function of early colleges and the comparative wealth and status of institutions?	
Meadow Larkins Headington	Medieval pits belonging to settlement within the poorly understood historic core of the village.	7.5.3 The development of hinterland villages around Oxford is poorly understood. Less well-developed village cores may provide the best opportunities to study patterns of expansion and contraction and obtain representative rural assemblages.	

Site	Notes	Research Question	Period
Deaf and Hard of Hearing Centre	The Blackfriars (Dominican Studium Generale). Information on building sequence, architectural detail and density and location of burials.	7.7.1 The plan-form of a number of friaries and abbeys have been archaeologically investigated; can we learn more about the daily life within religious institutions – the diet and health, daily routine? 7.7.10 Do the early ecclesiastical sites preserve any material culture or structural elements that can be associated with the development of learning (styli, book clasps, lamps, libraries etc)? Such features and objects would be of particular interest.	
North Oxford (Northern Gateway)	Ridge and furrow recorded.	7.4.3 The phasing and extent of open fields across the LAA, their expansion and contraction over time and patterns of piecemeal early enclosure are of considerable interest	
Nos 1-3 Golden Cross	17 th century southern range. Further internal detail recorded.	8.8.1 A greater emphasis on the investigation and recording of post medieval structures within the district is required from domestic to civic to industrial structures because of the greater pressures on these structures. There is an increasing need to document in detail nationally important listed buildings as well as those structures of a more local interest. In looking at the research potential for the built environment, a number of key factors should be considered:	Post Med
Threshing Barn South Park	18 th c threshing barn. Further internal detail recorded.	See above	
No 38 Pembroke Street	17 th c townhouse (with possible 16 th c elements). Further internal detail recorded.	See above	
Cherwell College	Water course examined, previously hypothesised as route of possible Western Saxon approach to the town (not fully reported yet).	8.11.17 Can we further establish the character and survival of canal and river transport infrastructure? How were waterways improved? Can the survival of wharves and related infrastructure be mapped? Also relates to theory of Late Saxon western approach to the town along this route.	

Site	Notes	Research Question	Period
WWI Port Meadow Airfield	Detail of layout revealed.	9.4.11 There is considerable scope for the further cataloguing and recording of public, commercial, leisure and utility buildings from this period (e.g. bakeries, laundries, butchers, brewing and malting structures, market gardening buildings, schools, courtrooms, prisons, police stations, fire stations, warehouses, factories, hospital structures, sports facilities and entertainment structures).	Modern
Dyson Perrins Laboratory	Victorian teaching library. Architectural detail recorded.	9.4.12 Collegiate architecture: Despite the volume of literature on the architecture of the colleges there is considerable scope for previously undocumented features to be uncovered during development work (fixtures, fittings, wallpapers, paintings, doors, cellars, panelling etc.). Further work is required to catalogue and assess the full extent of Early Modern architectural features across the colleges in order to establish their significance both to the college and wider townscape	
Oxford North A40 Pill Box	Type 26 Pill Box (fw3/26) recorded.	<p>9.7.1 Further work is required to catalogue and assess structures associated with military activity in the LAA (e.g. field checking of military structures referenced in the period assessment).</p> <p>9.7.2 There is considerable scope for the further field survey and cataloguing of remnant WWII structures (e.g. hard standings and tank traps at Shotover Park, the air raid shelter at Lewis Nature Reserve, miscellaneous private air raid shelters etc., remnant infrastructure from the military use of the colleges during the war, e.g. the RAF at Magdalen College).</p>	

Other available monitoring data on the historic environment of Oxford

Additional monitoring indicators on the historic environment can be found in the Local Development Framework Annual Monitoring Report available on the council website:

[Link to Oxford City Council annual monitoring report](#)

This records the following:

- The number of heritage assets at risk in the Local Authority Area as assessed by Historic England. Target: a decrease in Heritage Assets at risk or no net increase in Heritage Assets at risk (target derived from the Oxford Core Strategy).
- The number of applications involving the total, substantial or partial demolition of a listed building. Target: 0% Listed Building Consents or planning permissions approved by the City Council (target derived from the Oxford Core Strategy).
- The number of applications involving the demolition of a building that contributes to the character and appearance of a conservation area. Target: 0% Conservation Area Consents approved by the City Council contrary to officers' and Historic England's recommendation (target derived from the Oxford Core Strategy)
- The number of appeals allowed where conservation policies are as a reason for refusal. Target: 80% of appeals dismissed (target derived from the Oxford Core Strategy).

Glossary and definitions

Archaeological interest: There will be archaeological interest in a heritage asset if it holds, or potentially may hold, evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them.*

Conservation (for heritage policy): The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

Evaluation: Archaeological trench or trenches excavated before the determination of a planning application in order to characterise and understand any archaeological remains that may be present rather than fully record them.

Evidential value: Value deriving from the potential of a place to yield evidence about past human activity.

Geophysical survey: Non-intrusive ground-based physical sensing techniques used for archaeological imaging or mapping.

Heritage asset: A building, monument, site, place, area or landscape identified as having a degree of Significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including through the local heritage asset register).

Historic environment: All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.*

Historic environment record: An information service that seeks to provide access to comprehensive and dynamic resources relating to the historic environment of a defined geographic area for public benefit and use.*

National Planning Policy Framework: The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. The NPPF states that Local planning authorities should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance.

Mitigation: An archaeological mitigation strategy is a statement of proposals for reducing the overall effect of a development on archaeological remains within the site. The strategy will normally consist of one or more of the following: Preservation in-situ, modifications to the development design proposals and archaeological recording (excavation, watching brief etc.).

Research agenda: Research questions that we would like to answer by investigating archaeological remains.

Resource assessment: A summary of the information produced by previous archaeological fieldwork.

Significance (for heritage policy): The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.

Substantial harm: The NPPF practice guidance states that what matters in assessing if a proposal causes substantial harm is the impact on the significance of the asset. Significance derives not only from a heritage asset's physical presence, but also from its setting. While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm i.e. the scale of the works is not necessarily determinative of whether any harm caused is substantial or less than substantial. A key factor in determining whether the works constitute substantial (i.e. serious) harm is if the adverse impact goes to the heart of why the place is worthy of designation – why it is important enough to justify special protection.

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