Heritage Impact Assessments – Local Plan 2040

Overview

The following note sets out the process of Heritage Impact Assessment that has been used to inform and refine a number of site allocations identified as being of concern by Historic England (HE) during the Regulation 19 consultation process on the draft submission Local Plan. Whilst the City Council has undertaken a detailed assessment of impacts on heritage assets as part of the allocation process, this document brings together the previous findings along with additional analysis to respond to HE's concerns. Each assessment addresses the potential impacts from allocated sites on designated and non-designated assets and the wider significance of the historic environment and includes consideration as to how such impacts should be addressed/mitigated as part of any proposal coming forward on those sites.

For each allocation, an overview of the area and the site is presented which includes a contextual overview of extant heritage assets. A table then presents an assessment of potential impacts of new development on the key heritage assets on the site or in the surrounding area. Recommendations are then provided for each allocation policy, which may already be identified in the policy, or else will be proposed as modifications for submission based upon the additional analysis that has accompanied these assessments – changes are flagged in bold and specific wording has been reflected in the overarching table of responses to the Reg 19 comments (against the applicable allocation).

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Allocations SPS2 and SPS5 – Kassam Stadium/Ozone Leisure Park and Oxford Science Park

Regulation 19 consultation feedback from HE:

Currently the proposed policy commitment to consider impacts of development on the setting of the listed building indicates there has been insufficient consideration of how to conserve the building's future within any planned scheme and bring it back into use. The approach to Minchery Farmhouse risks not only failing to align with national policy on the conservation of heritage assets, but also the Planning (Listed Buildings and Conservation Areas) Act 1990.

To support a positive response, we believe that heritage impact assessment of the site is needed, in accordance with the NPPF paragraph 31 (assuming that the boundaries are amended as suggested). Clearly such assessment may result in further changes to the policy and supporting text. Reference should be made to policies HD9, given the site lies within an Area of Greater Potential for high buildings. Finally, given the site's complexity from a heritage and design perspective (especially regarding Minchery Farmhouse but also the remains of Littlemore Priory), we recommend a requirement for a masterplan within policy. Complimenting these changes to policy, we recommend relevant additional supporting text (adapting paragraph 8.96 as appropriate)

Site overview and heritage context

The sites are within the Littlemore and Northfield Brook, and currently comprise of a football stadium with related conference facilities, and car parking (SPS2) and the Oxford Science Park which is an employment site of regional, national and global importance and one of the most influential science, technology, and business environments in Europe (SPS5). The sites are largely flat, with few topography changes. Northfield Brook runs along the northern edge of SPS2, and feeds into the Littlemore Brook in the northwest corner of the site. This waterbody continues

westward through the northern section of the Science Park site. The fragments of the rural landscape that weave through the area are characteristic and make it relatively sensitive to change. Grenoble Road is at the southern edge of the sites, and to the south of this a large new development site in South Oxfordshire which is allocated in their Local Plan, both of which will likely change the character of the area in future.

Both the Kassam site and Science Park are outside of any locally designated view cones or high buildings areas and are also outside of any conservation areas, although they are within proximity to the south-east boundary of Littlemore Conservation Area. There are no recorded assets of local heritage significance recorded on the Oxford Heritage Asset Register within the area.

The listed 15th Century Benedictine Priory (Nunnery) Dormitory Range (remodeled as a Farmhouse around 1600 – and referred to as Minchery Farmhouse) is Grade II* and located within the boundary of Oxford Science Park in the eastern portion of the site, adjoining the Kassam site in the southwest corner by the edge of the Ozone complex. The Farmhouse is currently identified on Historic England's <u>Heritage at Risk Register</u> and is noted to have suffered from 'heritage crime and longstanding lack of maintenance' with no solutions for its future currently in place.

The Dormitory range sits within a walled precinct, the remains of which are now buried, and therefore has an archaeological setting. Both of the sites, including the other Kassam site (SPS3), have potential for prehistoric, Roman and medieval archaeology. The former Minchery Paddock Area has revealed extensive archaeological remains belonging to the Nunnery precinct and these require substantive preservation in situ.

The presence of archaeological features on the Kassam site were evaluated in 1996 but the mitigation was never completed. The archaeology is dispersed and mostly focused around the fringes of the car park and includes peat with potential for prehistoric pollen sequences near northwestern corner of the Ozone, as well as dispersed Roman pottery manufacturing activity, burials and other features to the east and north of the standing Nunnery dormitory range.

Heritage Asset(s) Affected by Allocation	Listed Grade/ Signif. Value	Contributing Elements to Significance	Potential impacts from allocation on the asset
Minchery Farmhouse	Grade II*	Built in the 15 th century, and reconstructed c.1600, the farmhouse was originally a dormitory for Littlemore Priory. The exterior of the farmhouse consists of limestone rubble with squared dressings; old plain-tile roof with stone and brick ridge stacks.	There is potential for development to further isolate the asset where it is not appropriately considered as part of the overall future of the area. Poor quality design could negatively impact significance and setting of the listed building such as in the following ways:

Heritage Impact Assessment table

		The Grade II* listed building possesses more than special historic, architectural and archaeological interest as the last remaining upstanding part (the Dormitory Range) of an exemplar 'poor' Benedictine Nunnery. The small mid-15 th century windows on the east facade illustrate the change of culture from open dormitories to individual cells amongst such communities in the medieval period. The Kassam car park forms an important part of the setting of this listed building insofar as there are views of the range – including the highly significant windows – from across the car park to the east. The building sits within a walled precint and the wall likely survives below ground to the east and north and south (the western extent is now better understood as a result of recent trenching). The building therefore has an archaeological setting as well as an above ground setting, which should be taken into account by	Any built form in close proximity to the Grade II* listed building, or of a large scale, has the potential to dominate views of the asset and detract from the ability to appreciate its more than special historic and architectural special interest, as evidenced by the existing unsympathetic buildings to the north. Development of the site also has the potential to obscure or reduce views of the asset that are currently available from the Kassam car park, eroding the ability to appreciate the significance of the asset, and in particular the ability to appreciate the highly significant dormitory windows on the east facade.
Prehistoric, Roman and medieval archaeological remains	Likely to vary in value	any new development. Remains that are associated with different periods of history including potential for prehistoric pollen sequences as part of peat deposits, as well as Roman and medieval remains. Potential remains associated with the Priory. The Nunnery Remains and long pollen sequences within Minchery Farm Peat Fen can be assessed as of high significance.	Development could disturb and negatively impact archaeological remains, for example, there is potential for harm to occur to these underlying archaeological features where development is proposed directly atop or in close proximity and it will be important for the applicants to be guided by the requirements of policy HD5 – Archaeology in order to ensure Policy HD5 is already explicitly cross-referenced

			in the allocations to ensure applicants are aware to consider them in conjunction.
Littlemore Conservation Area	Designated Conservation Area	The special character of Littlemore derives from its retention within the modern settlement of a village atmosphere and its traditional buildings surviving in much of the original street pattern with representative types of structures from several centuries that are archetypal to an evolved village settlement. During the twentieth century the agricultural fields that once surrounded the historic settlement were developed, and the village subsumed into the City's suburbs. However, because of the relatively low rise nature of this	The sites are not within the conservation area but lie close to its south-east boundary. Where tall buildings come forward on the site, there is the potential that these could be visible from within the Conservation Area and this will need to be considered in relation to any harm to the conservation area. The fact that the 20 th century development that surrounds the Conservation Area is not currently readily perceptible from within the Conservation Area contributes positively to the asset's legibility as an historic agricultural
		surrounding development there is relatively little perception of it from within much of the Conservation Area. This contributes positively to its continued legibility as a distinct, historic agricultural settlement.	settlement.

Conclusions including identified amendments to Local Plan

The sites lie in proximity to the Littlemore Conservation Area to the north, which has retained its atmosphere as a rural village, from which much of its significance is derived However, the greatest potential for impacts upon heritage assets is on those assets within the site boundaries, in particular the Grade II* Minchery Farmhouse as well as the varied archaeological remains that are present.

In relation to the Minchery Farmhouse, the asset is located in an area of SPS5 which is fairly isolated to the remainder of the Science Park site. There is potential for development to further isolate the asset, as is also possible via development coming forward within the adjoining Kassam allocation to the west. There is also the potential for development to adversely affect views of the asset in which its historic and architectural special interest is appreciated if it is of an inappropriate scale, proximity to the asset, or poor quality design detailing and materials, as is evidenced by existing development to the north of the listed building. The strategic policies of the Local Plan (e.g. policy HD1 – Listed Buildings,

HD7 – design) will play an important role in ensuring that new development appropriately considers the significance and setting of the Farmhouse and mitigates potential impacts that could arise, these are already explicitly cross-referenced in the allocations to ensure applicants are aware to consider them in conjunction.

The Heritage at Risk register identified a key risk to the Farmhouse is a lack of ongoing maintenance and this could be exacerbated where a lack of long-term solution for the asset's future is secured and it is effectively forgotten about. Discussions with Historic England have flagged that new development on the allocations could provide an opportunity for securing a more positive future for the asset by ensuring that new development not only respond to its presence and consider its impacts, but also by taking a more active role in securing a sustainable future as part of the design of new proposals. The Council has identified modifications to policy wording and supporting text for SPS5 and SPS2 in liaison with Historic England which would help to set out more explicit expectations in this regard to ensure they are considered as part of any application.

The Heritage Impact Assessment also identifies the presence of a varied array of archaeological remains spanning the prehistoric, Roman and medieval periods, as well as archaeological remains specifically relating to the medieval Benedictine Priory. There is potential for harm to occur to these underlying archaeological features where development is proposed directly atop or in close proximity and it will be important for the applicants to be guided by the requirements of policy HD5 – Archaeology in order to ensure Policy HD5 is already explicitly cross-referenced in the allocations to ensure applicants are aware to consider them in conjunction.



Allocation SPE17 – Jesus and Lincoln College Sports Ground

Regulation 19 feedback from Historic England

While we welcome encouragement in the policy for small-scale buildings, the section of policy that helps to protect the view cone might inadvertently encourage taller buildings closest to the Chapel (Grade I) and Bartlemas House (Grade II*), potentially harming their significance. To address this concern, we recommend:

a) Minor amendment to policy wording to refer to eastern, rather than north-eastern as shown in the adjacent column; and

b) heritage impact assessment to ensure the policy is underpinned by relevant proportionate evidence, in accordance with paragraph 31 of the NPPF.

The approach to the Chapel and Bartlemas House risks not only failing to align with national policy on the conservation of heritage assets, but also the Planning (Listed Buildings and Conservation Areas) Act 1990.

Site overview and heritage context

The site is situated to the north-eastern side of Cowley Road, to the north of Barracks Lane and currently consists of two adjoining private openair sports facilities (for Lincoln College and Jesus College). Access to both Jesus College's and Lincoln College's sports facility is from Bartlemas Close, whilst Jesus College's existing graduate accommodation and grass tennis courts are accessed from Herbert Close.

The western part of the site is adjacent to the Bartlemas Conservation Area and is within its setting, bordered by residential development on the southern side of Barracks Lane, and within the setting of the Grade I listed St Bartholomew's Chapel, Grade II* listed Bartlemas House and the Grade II* listed St Bartholomew's Farmhouse (all located on the north/west side of Bartlemas Close). The chapel, former almshouse, farmhouse and cottage together with the masonry walls form the historic core of the conservation area. The southern part of the site also lies partially within the Crescent Road view cone, which runs parallel along the southern boundary.

The conservation area is predominantly rural in character, adjacent to open land to the north and north-east whilst containing a sizeable area of green space within its boundaries. The site also adjoins Oriel College Playing Fields in the north-west corner, locally listed on the Oxford Heritage Asset Register (OHAR) as an area of green space that contributes to Oxford's identity as a 'green' city while also helping to preserve the rural character, appearance and special interest of the Bartlemas Conservation Area and setting of the listed buildings within it.

The cluster of historic buildings is otherwise surrounded by suburban residential development, which dominates the character of this part of Oxford and therefore the openness that remains helps preserve the original sense of historic isolation and rural character of the hamlet.

Heritage Asset(s) Affected by Allocation	Listed Grade/ Signif. Value	Contributing Elements to Significance	Potential impacts from allocation on the asset
Bartlemas	Designated	Prior to the 19th century development of	The origin of Bartlemas as first an isolation
Conservation Area	Conservation Area	east Oxford, the leper hospital and associated buildings sat in open countryside with far reaching views. Now it is a small hamlet of a farmhouse and cottage, with a former medieval leper hospital and chapel that has retained its own isolated identity inside the suburbs of the city. The chapel, former almshouse, farmhouse and cottage together with the masonry walls form the historic core of the conservation	hospital and then a rural, farming hamlet can still clearly be read because it is still relatively complete and has a green setting that still reflects its farming origins. It is not read as an urban park. The heritage assets surrounding the site are mainly relating to this rural hamlet. Development of the site must therefore be sensitive to this because there is potential for new development that encroaches too far or appears too hard against this green setting to 'urbanise' the character of the setting and the

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		area. It is predominantly rural in character,	'undeveloped' character of Bartlemas, which is
		adjacent to open land to the north and	paramount to the area's significance. New
		north-east whilst containing a sizeable area	development that encroaches on this has the
		of green space within its boundaries.	potential to substantially harm or cause loss to
			that significance in following ways:
		The cluster of historic buildings is otherwise	
		surrounded by the suburban residential	Location and siting of development: With the
		development which dominates the character	sports ground being adjacent to Bartlemas
		of this part of Oxford and accentuates the	Conservation Area and within the Bartlemas
		sense of historic isolation and 'quarantine'.	Historic Hamlet, development that is sited too
			close to it could negatively affect the
		The trees throughout the site are recognized	'undeveloped' character or Bartlemas which is
		as making a positive contribution to the	paramount to the area's significance,
		verdant and rural character and appearance	encroaching upon the open nature of the
		of the area. The Links Allotment enclose and	wider setting and bringing the surrounding
		shield the historic hamlet from the urban	urbanization closer to the boundaries of the
		nature of Cowley Road and are reminiscent	historic settlement. A substantial buffer of
		of medieval strip farming.	open space along the boundary with Bartlemas
			Close would be necessary to retain a good
		The stone wall bordering the lane to the	degree of separation to avoid the view and
		hamlet is an important feature of the area,	perception of development eroding the
		strengthening the rural nature of the	current degree of openness provided by the
		Conservation Area.	playing fields. The appropriate distance will
Bartlemas Farm	Grade II*		need to be tested through scenarios and views
House		To the west of the chapel is Bartlemas	from the conservation area and heritage
		Farmhouse. The core of the house dates	assets.
and Bartlemas		from the 14th and 15th centuries, the	
House		medieval survival of the chaplain's dwelling	Development too close to the boundary with
		(Warden's House), with later additions dating	Bartlemas Close and/or development that
		from the 17th, 18th and 19th centuries.	would be visible from the lane in the hamlet:
		House is predominantly constructed from	this could impact on the currently retained
		rubble stone with red brick chimney-stacks	character and appearance of a rural lane.
		and rendered and limewashed end sections.	
		It is characterised by its stepped roof heights	
			1

and benefits from sitting in a large plot with	Views into and out of the conservation area
mature gardens and is Grade II* listed. The	are limited. Whilst it is important to have views
rambling rural form of the house, which sits	into the conservation area, this must be
behind an ivy clad brickwall, is enhanced by	balanced with retaining the area's sense of
an area of cobbled paving to the front while	seclusion.
to the north stands a stone and pantile	
roofed outbuilding set gable end to the lane.	The location, grain, density and siting of new
The large garden extends to the south,	development will need to be informed by a
enclosed by a stonewall and hedging	strategy that seeks to preserve the significance
alongside the lane.	of the conservation area and this should
	include maintaining a sense of openness in key
Bartlemas House to the north of the chapel	views out to preserve the significance of those
was constructed in 1649 following the end of	views out and setting of the heritage assets
the Civil War. It was built on the site of the	and conservation area as a whole.
earlier almshouses/hospital that had been	
destroyed by fire with a new long rectangular	The form, height, roof profiles and appearance
plan building providing four tenements. The	of development in terms of scale and massing
house today is a single dwelling over two	will need to respond sensitively to the above.
storeys with attics, and adjoins the grounds	There will clearly need to be a transition from
of the chapel. The stone wall in the rear	in building heights, with only very low buildings
garden forms part of the northern boundary	being appropriate closest to the conservation
of the conservation area. The garden to the	area.
east of the house contains a well, a feature	
which has historically been associated with	Lighting will also need to take account of the
the site. The house is predominantly	need to preserve the sense of isolation for the
constructed from rubble stone, and	conservation area. To mitigate this,
characterised by its stepped roof heights.	development should be set away from the
	Bartlemas Close boundary to offer as much
The significance derives from the history of	separation as possible, as well as careful siting
these buildings in connection with the	and orientation of lighting and windows and
isolation hospital and latterly, farming.	the inclusion/preservation of trees between
	the site and conservation area.

St Bartholomew	Grade I	1 Ath contumy store shared with 17th contumy	
	Grade I	14th century stone chapel with 17th century	
Chapel		slate roof, sited within own grounds with	The siting of the vehicular access into the site
		remnants of an orchard and other planting.	needs to take into account the proximity to the
			hamlet and avoid causing a noticeable change
Crescent Road View	Protected view	Views from the hills south east of city are	in character as a result of traffic movements,
Cone		rare, due to the mixture of dense urban	headlights and noise.
		development and tall vegetation. As a result	
		the opportunity to see the city from this	Where the view cone crosses part of the site,
		angle is significant even though the view	there is potential for inappropriate heights to
		from the original assessment point recorded	interrupt and degrade this protected view. The
		in the local plan is currently screened by	four tests set out in the High Buildings TAN will
		foreground trees. The view makes an	need to inform the location and height of
		unexceptional suburban street part of a	proposed development and any areas that may
		world renowned historic city.	need to remain open or have height limits.
Oriel College Playing	Locally designated	Former farmland associated with the hamlet.	Deveopment sited too close to Oriel College
Fields	site included in the	Having been retained as open land, they help	Playing Field would have potential to affect its
	Oxford Heritage	to preserve our understanding of the historic	character by it appearing more as an urban
	Assets Register	relationship between the rural hamlet and	green space, leading to the degradation of the
		surrounding farmland.	ability to understand its historic use as part of
			a farming field system.
		Nominated as an area of green space that	
		contributes to Oxford's identity as a 'green'	A buffer of open space should be kept around
		city while also helping to preserve the rural	this playing field so that it can still be read as
		character, appearance and special interest of	sitting within the former agricultural
		the Bartlemas Conservation Area and setting	landscape, which also recognises the role it
		of the listed buildings within it.	plays in helping to protect the setting of
		C C	Bartlemas.
		In its current undeveloped state, the site	
		reinforces the contribution that the Oriel	
		College playing fields make to Oxford's	
		identity as a 'green city' that would likely be	
		lost as a result of their development.	
Bartlemas Cottage	Non Designated	C19 stone cottage that lies below Bartlemas	Key to the significance of this asset is its group
	Hertiage Asset	Farmhouse, originally built for the Oriel	value with the other historic buildings in the

		College Gardener but now privately owned with modest C20 extensions. Its gardens originally extended to the Cowley Road. A rubble stone wall defines its garden, and the mature trees in the verge make a positive contribution to the character of the lane. There is an attractive, rubble stone and Isate roofed outbuilding in the garden that is visible from the lane. The significance derives from the historical use of this building in connection with the surrounding rural landscape, its vernacular architecture and materials and group value with the rest of the historic buildings in the hamlet.	hamlet, which together can still clearly be read as part of the ancient rural landscape. Therefore, anything that encroaches on the remaining 'rural' or green setting of these assets has potential to harm the understaning and significance of the assets.
The Old Pavillion,	Non Designated	Attractive, red brick and render cricket	New development should take account of the
Jesus College	Hertiage Asset	pavillion built in the 1930s.	character and appearance of this building and how it was designed to sit in this landscape
		Marks the entrance into the sports field and	and take inspiration from this in terms of
		reflects the use of the former farmland as a cricket pitch	undertaking a contextual analysis.

Conclusions/Recommendations

Whilst there are not sensitive built assets within the site itself, development on this site has the potential to negatively impact upon the nationally and locally important features in proximity and, as such, development will need to consider and mitigate any impacts through careful and sensitive design decisions. There are particular sensitivities in relation to retaining the natural setting which development will need to consider and there is an opportunity to further emphasize this via modifications to the supporting text of the allocation.

The presence of listed buildings close to the western boundary of the site including the Grade I listed St Bartholomew Chapel, the Grade II* listed St Bartholomew's Farm House, and the Grade II* listed Bartlemas House will need to be a consideration that informs the design and layout of

any development proposed and this has already been picked up through the wording of the policy allocation. Equally, the presence of the protected view along the southern boundary brings additional sensitivities which will need to guide decisions about building heights and wider design.

These were factors that had already guided the drafting of the site allocation policy and the policy clearly sets out the need for considering impacts on the Listed Buildings and the protected view through explicit cross references to the relevant strategic policies (HD1 and HD9). Subsequent discussions with Historic England following the Reg 19 consultation have flagged that the wording for the allocation might inadvertently encourage taller buildings closest to the Chapel (Grade I) and Bartlemas House (Grade II*), potentially harming their significance. To rectify this potential risk, it is agreed that a modification would be useful to clarify that a graduation of height, that is lower on the southwestern edge and highest on the eastern edge, would best respond to the context of the Crescent Road view cone as well as the nearby listed buildings.

In addition, the Heritage Impact Assessment highlights that Oriel College Playing Fields – currently identified as a 'supporting space' within the GI network – clearly holds value in terms of local heritage designation and contribution to setting and **we would also propose for it to therefore be** reclassified as core in line with other green spaces.



Allocation SPCW3 – Manor Place

Regulation 19 feedback from Historic England

While the policy does include welcome detail on heritage considerations, we recommend heritage impact assessment to ensure the policy is underpinned by relevant proportionate evidence, in accordance with paragraph 31 of the NPPF.

The Sustainability Appraisal acknowledges the site is sensitive (on page 57); however, the supporting text for this allocation does not reflect the degree of its sensitivity, taking into account the site's proximity to two Grade I listed buildings, the Grade I landscape at St Catherine's College, Grade I Magdalen College Registered Park and Garden and its Grade II* boundary wall.

Further changes to the policy and supporting text may be needed, informed by such an assessment.

The approach to adjacent highly graded assets risks not only failing to align with national policy on the conservation of heritage assets, but also the Planning (Listed Buildings and Conservation Areas) Act 1990.

Site overview and heritage context

This site consists of a mix of disused hard and grass tennis courts, abandoned private allotments and an orchard. The area is characterised by hedged boundaries and several mature/ semi mature trees established on the site, particularly at the northern and southern corners. The site itself contains various types of natural ground cover including grass, scrub and scattered trees. Part of the site forms the tree lined edge of the River Cherwell. The fauna contributes to the green, semi-rural character of the setting which includes Holywell Cemetery, St Cross Annex and the Magdalen College Deer Park and likely has high biodiversity value.

The northern half of the site sits in the Holywell Manor and St Cross Church Historic Urban Character Area, part of the historic suburb of Holywell that retains medieval, post-medieval and later residential character. The open space reflects the historic separation of the walled town and northern medieval suburb. The southern half of the site is within the Holywell and North East Expansion – Modern Colleges Historic Urban Character Area. This broad character zone encompasses part of the former medieval suburb of Holywell and its subsequent expansion resulting from the development of new colleges and the University Science Area in the 19th and 20th centuries.

The site is a sensitive location falling within the Central Conservation Area. Manor Place sits within the Historic Core Area of the city and is viewable from the Elsfield, Doris Field and Headington Hill Allotments View Cones that extend in from the north-east of the city, and may be viewable from other view cones also.

The site forms part of the setting of several listed buildings and the Holywell Cemetery. It is also adjacent to numerous listed buildings and other structures including Holywell Ford to the south-east, Magdalen College Park and Garden, and its boundary wall to the south, as well as the ground and associated structures of St Catherine's College to the east, and St Cross College on the south-west boundary.

The site also sits towards the edge of the city centre archaeological area which is known to have an exceptionally high concentration of archaeological remains. In particular, there have been noted deposits relating to Civil War defences having been identified in previous excavations in the area within the site which would warrant substantive preservation in situ

Heritage Asset(s) Affected by Allocation	Listed Grade/ Signif. Value	Contributing Elements to Significance	Potential impacts from allocation on the asset
Central City	Designated	A harmonious and picturesque balance of, on	Development could affect the
University	Conservation Area	the one hand, commonality - materials, plan	character/wider setting of the
Conservation Area		form, lawns and gardens – and, on the other,	conservation area where it is not
		variety – age, style, scale, detail. Magdalen	appropriately designed.
		College to the south sits within sub-zone 2,	
		recognised for its early foundations outside the	Development of the site has the
		medieval walls, while St Catherine's College in	potential to erode the ability to
		sub-zone 3 is defined by its modern foundations	understand the historic separation of the
		from the mid-nineteenth century onwards.	walled town and northern medieval suburbs, causing harm to the
		The site contributes to the historic interest of	Conservation Area, depending on the
		the Conservation Area as the open space reflects	extent of the loss of this open space.
		the separation of the walled town and northern	
		medieval suburbs.	Development of the site is likely to
			impact on the undesignated heritage
		In addition, the Holywell Cemetery is a heritage	asset of the Holywell Cemetery.
		asset in its own right, and is a heriage asset that	
		could be most directly affected by development	
		on this site.	
Holywell Ford	Grade II	Holywell Ford lies in close proximity to the	The development of the site has the
		south-east boundary of the site. The building	potential to erode the verdant and rural
		was constructed in 1888 to the designs of the	character of the setting of Holywell Ford,
		English Gothic Revival architect C C Rolfe, whose	which contributes to its picturesque
		practice was based in Oxford. Typical of the	nature/the high level of aesthetic value

Heritage Impact Assessment table

from C Rolf design conte buildi on ac locati The v asset aesth relatio site's	significance of the listed building is derived its historic association with the architect C life and its late-19 th century vernacular gn which is of a high quality and reflects emporary architectural fashions. The ling may also possess some evidential value ccount of the site's earlier use as the ion of a mill. Verdant nature and rural character of the t's setting contributes to the considerable netic value the asset possesses, and its ionship to the watercourse speaks of the e earlier use.	planting along the eastern boundary of the site (along the banks of the River Cherwell) the development of the site is considered unlikely to have a significant impact on the Grade I listed buildings and landscape at St Catherine's College due to a lack of intervisibility; although views of Jacobsen's campanile that are currently seen from the cemetery across the site could be lost, which would result in a low level of less than substantial harm to the asset.
Catherine's College, All Buildings Upon It; ninete	teenth century colleges, built in the 1960s at	
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aesth relatio site's	netic value the asset possesses, and its ionship to the watercourse speaks of the searlier use.	

	Courts); Grade I	Jacobsen's designs for the College are a strong	
	••		
	Registered	manifestation of his interest in controlling all	
	Landscape; Grade II	elements of the physical environment,	
	(Boat House).	integrating architecture, interior furnishings, and	
		utilitarian objects. Jacobsen believed that the	
		design of every element of a building had to be	
		harmonious, and he insisted on adding a clause	
		to his contract for the College stating that	
		"Professor Jacobsen should undertake as much	
		as possible of the landscape design and the	
		design of fixtures and fittings". The result is a	
		completely coherent, perfectly proportioned and	
		elegant campus, the design of which has	
		remained largely unchanged since its completion	
		in 1963. The College complex is celebrated	
		internationally as a uniquely complete work of	
		art, and many of the fixtures and furnishings	
		Jacobsen designed for the College are classics of	
		modern design.	
St Cross College	Grade II	C.1857 1-2 storey School and Master's House	
		combined, built of rubble stone with ashlar	
		dressings.	
Magdalen College	Park and Garden -	The Grove lies immediately north of the college	Similar to the above, poorly designed
Grove, and Boundary	Grade I	buildings, a small park laid to pasture with trees	development has the potential to impact
Wall	Boundary Wall -	informally planted throughout, containing a herd	upon the setting of the registered park
	Grade II*	of around forty deer. The deer are first	and garden or the listed boundary wall.
		mentioned in college records 1706-7. It is	
		bounded to the west and north by the C15,	
		castellated stone boundary wall, to the east by	
		an iron fence standing immediately above the	
		stone-walled west bank of the river, and to the	
		south by an iron fence and the ha-ha adjacent to	

		New Building lawn, together with the New Building itself.	
Church of St Cross	Grade I listed building and (walls)	The Grade I listed Church dates from the 11 th - 12 th Century (the chancel), with later additions	As the Cemetary forms part of the immediate setting of the church,
and Churchyard Wall	Grade II listed building	and alterations, including the mid 13h Century West Tower. The wall on the east side of the	development has potential to impact on the character of that setting.
of the Church of St		church is a 19 th century rubble plinth wallk with cast-iron railings and 2 pairs of gates, and itself is	
Cross		Grade II listed. The Cemetery forms part of the immediate setting of the listed church and the	
Elsfield, Doris Field and Headington Hill Allotments View Cones	Protected view	The colleges contain most of the fabled towers and steeples that are part of the identity of the city, and contribute so fundamentally to the skyline in long views from outside the city and close views within it.	Inappropriate development in the area has the potential to infringe upon and negatively impact multiple views into the area (including those listed here as well as potentially others). Potential impacts could result in loss of visibility of the historic high buildings or competition for prominence in the skyline.
Potential for valuable archaeological remains related to the City Centre Archaeological Area.	Likely to vary in value	The City Centre Archaeological Area has an exceptionally high concentration of archaeological remains. In this area, previous excavations have identified Civil War defences in particular.	Development could disturb and negatively impact archaeological remains.

Conclusions/Recommendations

The presence of various listed buildings, the registered park and the setting within the Central Conservation Area means that proposals will need to take into account various heritage sensitivities in informing the design of new development. There is an opportunity to more explicitly flag the range of assets in the area via a modification to the supporting text of the policy.

Development close to the boundaries will need to particularly consider impacts upon the significance and setting of nearby listed buildings such as Holywell Ford close to the south-east boundary and the Buildings at St Catherine's College, and Landscape at St Catherine's College, as well as the cemetery and ensure that impacts are mitigated in line with the requirements of the strategic policies HD1 (Listed Buildings) and HD2

(Conservation Areas) as the allocation already identifies. Across the entire site however, it is likely that development will need to consider potential for impacts through careful design of heights and massing which could otherwise impact views of these buildings.

The setting of the nearby Magdalen College Grove, and Boundary Wall to the north will also need to be considered with development. The allocation identifies that proposals should seek to preserve the secluded character of the park as well as the adjacent cemetery, but it will also be important that any potential impacts that could negatively impact the significance of the space e.g. its setting, will need to be mitigated in accordance with HD3. Engagement with Historic England has identified an opportunity to explicitly cross reference to strategic policy HD3 (Registered Parks and Gardens) as with other polices and it is agreed would be beneficial to ensure applicants are clear.

The height of any future development will need to be carefully considered in order to sensitively fit into the context of the Historic Core Area and not to harm the protected views that look into the site. As HD9 already sets out, the aim of any design within the historic core area should be to maintain the unique character and significance of views of the spires and to ensure that variability and interest in the skyline is maintained. As well as not intruding through height, the design of foreground buildings should aid appreciation of view of the spires, rather than harming it. The allocation already flags that applicants will need to design with consideration of impacts on the setting of the view in compliance with policy HD9.

With the site's location within the City Centre Archaeological area and the previously identified presence of Civil War related deposits in the area. It will be important for new development to investigate and appropriately address any remains in accordance with policy HD5, as is already highlighted in the policy too. The Allocation flags that in particular, proposals must preserve the Royalist Civil War rampart and ditch line, previously located by archaeological evaluation, in situ.

Allocation SPCW6 – Nuffield Sites



Regulation 19 feedback from Historic England

More detail is needed on the spread of dwellings between the 3 sites that comprise the Nuffield sites to establish the acceptability or not of this allocation, rather than simply state a headline minimum figure of 59 dwellings across all three sites. The evidence supporting how this headline figure would be achieved needs to be made clear.

It is our understanding that South of Frideswide Square is a new allocation within the Central Conservation Area. Clearly this is in a sensitive location and merits proportionate heritage assessment. The detail in the text is insufficient in our opinion. Indeed, paragraph 8.379 is somewhat colloquial in tone, and is poorly integrated with earlier supporting text in paragraph 8.371. Furthermore, in our view the other two parts of the site (the island and Worcester Street car park) merit heritage assessment to ensure the policy for their development is clear and effective and informed by appropriate evidence.

The approach to heritage assets risks not only failing to align with national policy on the conservation of heritage assets, but also the Planning (Listed Buildings and Conservation Areas) Act 1990.

The car park is located between Worcester College RPG (Grade II*) and Oxford Castle Scheduled Monument. The view from the Castle currently connects with the floodplain and this makes an important contribution to its significance. Also, the land currently used as a car park itse If is of heritage significance linked with its former use as a Canal Wharf. Heritage impact assessment provides the mechanism through which connections with that past land use can inform the site's future.

Clarity is needed about the buildings that would be retained (or not) across the Nuffield sites.

The supporting text states that a masterplan should be developed, but this has yet to be required in policy. Also, it should be recognised in policy that there is potential for development to impact on Worcester College Registered Park and Garden (Grade II*).

Site overview and heritage context

The Nuffield Sites consist of the Island Site (0.63ha), Worcester Street Car Park (0.52ha) and land south of Frideswide Square (0.26ha).

- The Island Site runs between Park End Street and Hythe Bridge Street. The western edge of the site fronts on to Frideswide Square as the Royal Oxford Hotel. The eastern edge of the site is bounded by Fisher Row with Middle Fisher Row Gardens adjacent to Castle Mill Stream. The Island site contains a range of different uses including ground floor retail, hotel, cafés and bars with other uses (including office accommodation and a back-packers hostel) on the upper floors.
- Worcester Street Car Park is a surface level car park on the site of a former 18th-19th century canal basin. Brick walls and mature trees line the western edge of the car park along Castle Mill Stream. At the northern extent of the car park a retaining wall supports the raised causeway of the Hythe Bridge Crossing. The southern end of the car park retains an entrance pier from the Canal Basin with a 19th century Pub fronting onto Park End Street.
- Land South of Frideswide Square comprises a well preserved late-Victorian group of commercial buildings along the southern edge of the Square with retail uses on the ground floor (but excluding the listed Coopers Marmalade Factory on the corner with Hollybush Row) and a further coherent group of early 20th century town houses along the Becket Street frontage.

Worcester Street Car Park was formely the location of a historic canal wharf and also contained various industrial warehousing related to the wharf. This parcel of land sits within the Castle and Periphery – Former Canal Basin Historic Urban Character Area, defined by the extent of the Norman castle defences and includes part of the former canal basin located to the north. Medieval settlement remains relating to tenements along the former Stockwell Street can be anticipated to the east of the canal basin within the car park site. The Island Site and Land South of Frideswide Square contained various historic industry related uses including garages, which is still reflected in some of the building frontages in the area. Both of these parcels of land are within the Western Suburb – Factories and Offices Character Area. The broad character zone comprises of medieval suburb of St Thomas and related development south of the castle combined with development on the former site of the medieval Rewley Abbey to the north.

Both Worcester Street Car Park and land south of Frideswide Square are within the boundary of the Central (City and University) Conservation Area, specifically within the Western Fringe character zone, The Island site is just adjacent to the boundary of the Conservation Area and forms a part of its immediate setting. The sites sit within the Historic Core of the city and are therefore likely to be viewable from a number of protected views across the city, most directly from the Raleigh and Boars Hill views, but potentially visible from other views including the South Park and Doris Field view cones. There are also local townscape views of importance within the area, for example in relation to Worcester Street Car Park and the views it provides towards the Castle motte and the more distant floodplain which makes an important contribution to its significance, as well as from St. George's Tower or the University Church of St. Mary The Virgin's Tower.

Worcester Street Car Park and the Land South of Frideswide Square form the setting of listed buildings such as Nuffield and Worcester Colleges, and Cooper's Marmalade Factory. Numerous locally designated OHAR listings also closely border all of the sites including The Royal Oxford Hotel at the western end of the Island Site; Bangkok House on Hythe Bridge Street which borders the northern edge of the Island Site; as well as the Former Cantay Depository and Former Castle Hotel on Park End Street to the south. Rewley Abbey Scheduled Monument lies close to the southern edge of the Island Site, while Oxford Castle Scheduled Monument sits close to, and is visible from, Worcester Street Car Park, which effectively sits between the two Monuments.

The sites are entirely within the City Centre Archaeological area, known to have an exceptionally high concentration of archaeological remains. The car park has the potential to preserve medieval tenement archaeology and is also noted to contain fragments of industrial archaeology of significance in relation to the former use as a wharf and industrial area.

Heritage Asset(s) Affected by Allocation	Listed Grade/ Signif. Value	Contributing Elements to Significance	Potential impacts from allocation on the asset
Central City University Conservation Area	Designated Conservation Area	Worcester Street Car Park and the Land South of Frideswide Square are within the Western Fringe Character Zone, while the Island Site sits outside of the Conservation Area but within its setting The Western Fringe character zone comprises the areas west and south- west of the city Centre along the Castle Mill Steam. St Thomas' and the Oxford Canal. The area was dominated by	Whilst only two of the three parcels of this site are directly within the Conservation Area, the other is located directly adjacent. Poorly designed development could potentially impact on the setting and character of the area, detracting from the special qualities for which it has been designated.

Heritage Impact Assessment table

		religious houses in the medieval period	
		and later by industry, which was fueled	
		by the presence of the Thames for	
		transport power and water, and later	
		the arrival of a turnpike road, the Oxford	
		Canal, and the Greater Western Railway.	
		The wider Conservation Area underwent	
		significant redevelopment in the 1960s	
		and 1970s, but its intimate network of	
		historic streets and paths, as well as	
		surviving industrial buildings, fragments	
		of religious buildings and pockets of	
		post-medieval character, are of	
		considerable historical, architectural,	
		townscape or social significance, and	
		contribute positively to the conservation	
		area.	
Late-	Non-designated	The late-Victorian/Edwardian	Any development proposals need to consider
Victorian/Edwardian		commercial properties on the south side	the character and appearance of the Central
buildings to south		of Frideswide Square comprise one of	Conservation Area, and any impact on adjacent
side of Frideswide		several groups of buildings in the wider	listed buildings as well as the buildings
Square		area which illustrate the industrial	themselves.
- The former		history and transformative impact the	
Castle		canal and subsequently the railway had	
Temperence		on this part of the city.	
Hotel, 23			
Park End		The group is identified as a positive	
Street		contributor to the character,	
		appearance and significance of the	
- 18-22 Park		Conservation Area in the Conservation	
End Street		Area Appraisal. They retain some	
and 24-26		original shopfronts, a lively roofline and	
		characterful central turret.	

Doub Find			
Park End			
Street			
- 1-5 Becket			
Street			
Cooper's Marmalade	Grade II	Frank Cooper's four storey factory built	Inappropriate development on surrounding
Factory		in 1902. Recognised as a landmark in the	sites has the potential to negatively harm the
		Western Fringe Character Zone, being a	significance and setting of this listed building.
		surviving fragment of the area's	
		industrial heritage. It has a landmark	
		quality.	
St Thomas Vicarage	Grade II	St Thomas' Church and Vicarage are the	Inappropriate development on surreounding
		most notable surviving remnants of the	sites has the potential to negatively harm the
		historic extra-mural settlement of St	significance and setting of this listed building.
		Thomas. Two-storey built in 1893 by C C	
		Rolfe, using red brick with stone	
		dressings and bands.	
Nuffield College	Grade II	Limestone built from 1949-1960.	Inappropriate development on surrounding
		Bookstack Tower and Harrison's Steeple	sites has the potential to negatively harm the
		represent the best of modern college	significance and setting of this listed building.
		estates, carefully detailed and	
		presenting traditional Oxford college	
		architecture in a new way. The copper	
		spire also forms a focal point at the	
		gateway to the city centre from the	
		station.	
Buildings at	Grade I (entrance	Worcester College was one founded	The Registered Park is well screened with
Worcester College	screen and gates on	outside the medieval walls, occupying	buildings and a wall. As such, it is considered
and Landscape at	Beaumont Street;	more extensive grounds with larger	unlikely that development would have an
Worcester College	Main Block; South	gardens and more open aspect. Key	impact on the significance of the garden,
-	Range; North Range;	characteristics include an architectural	although this will need to be considered.
	Gateway on Walton	set piece as the building entrance range	
	Street); Grade II	and imposing institutional buildings with	Worcester Street Car Park lies in the setting of
	(Boudary walls);	a formal principal frontage to the street,	these designated heritage assets and
		but otherwise facing inwards.	development there needs to be appropriate

	Grade II* Registered Park and Garden		and not detract from the ability to appreciate their historic and architectural special interest.
Oxford Castle and earlier settlement remains, including the Mound and St George's Tower	Scheduled Monument	Oxford's Saxon, Norman and medieval past are discernible in the surviving structures in the Castle complex and in the surrounding street pattern. The domed green banks of the motte are a distinctive landmark which define this part of the city.	Inappropriate development has the potential to negatively harm the significance and setting of the scheduled monuments, including local views associated with them.
Rewley Abbey		The Mound and St George's Tower, which form part of the scheduled site are two of the publicly accessible high- level panoramic views points within the city. From these positions, the public can experience and appreciate the historical form and architectural character of central Oxford and its relationship to its landscape setting, something that is otherwise difficult in a dense and largely flat city centre.	
		The views from the motte and St George's Tower of Oxford Castle were designed to command all of their surroundings, for the purposes of surveillance and defensive action. Therefore, maintaining these panoramas is essential to conserving the significance of the Castle. The site of Rewley Abbey has been investigated since the 1960s; this has	

		yielded significant information about	
		this important monastic foundation.	
Potential for	Likely to vary in	The City Centre Archaeological Area has	Development could disturb and negatively
valuable	value	an exceptionally high concentration of	impact archaeological remains.
archaeological		archaeological remains. There is	
remains related to		potential for fragments of industrial	
the City Centre		archaeology of significant interest at the	
Archaeological Area		car park site.	
Various OHAR	Locally designated	Nominated due to their architectural	Inappropriate development has the potential
listings:		and historic interest, these buildings	to negatively harm the significance and setting
 Royal Oxford 		contribute to the setting and character	of these assets.
Hotel;		at the western entrance to Oxford City	
 Bangkok House; 		Centre. They are often well preserved	
Former Cantay		and represent the late 19 th /early 20 th	
Depository;		century railway and commercial	
Former Castle		development.	
Hotel.			
Early-to-mid-20 th	Non-designated	These buildings possess historic and	Inappropriate development has the potential
century buildings on		architectural interest as further	to negatively harm the significance and setting
the Island Site (non-		examples of early to mid-20 th century	of these assets.
OHAR)		development constructed either to cater	
- The		to Oxford historic tourist market arriving	
Lighthouse		by rail or for commercial use, with	
Pub		several relating to the expansion of	
 4-6 Park End 		Oxford's motor trades. They contribute	
Street		to our understanding of the industrial	
 11-12 Park 		and commercial development of this	
End Street		part of the city into the twentieth	
 - 14 Park End 		century. They include rare examples of	
Street		the use of the Art Deco architectural	
- Former		style in Oxford.	
Hartwells			
Garage and			
Showroom			

Boars Hill and	Protected view	The Boars Hill view is one of the most	Inappropriate development in the area has the
Raleigh View Cones		famous and unspoiled views of Oxford.	potential to infringe upon and negatively
		Nuffield College's Tower is among the	impact multiple views into the area (including
		historic high buildings rising in a line	those listed here as well as potentially others).
		across the central part of the view with	Potential impacts could result in loss of
		a broad area to either side without high	visibility of the historic high buildings or
		features visible. As a group the buildings	competition for prominence in the skyline.
		share a common palette of materials	
		and a vertical emphasis contributing to	
		the famous spiky skyline interrupted by	
		the curvaceous forms of domes.	

Conclusions/Recommendations

There are clearly a number of heritage sensitivities which will need to guide the design of new development coming forward across the three parcels of land that comprise the allocation. The sites' location within and adjacent to the City Centre Conservation Area means that proposals will need to have regard to the special qualities for which the area is designated and ensure that any potential harm is sufficiently mitigated through careful design in accordance with the strategic policy HD1 which is already referenced in the allocation policy.

The site's location within the Historic Core Area of the city means that new development will need to be informed by careful consideration of its impact upon views, particularly in relation to the view cones that it sits in direct line of (like Boars Hill and Raleigh) but potentially other protected view cones. These considerations will necessitate additional analysis and supporting evidence, as is already set out in the policy along with a cross reference to HD9, and will necessitate careful thought around aspects of buildings such as heights, massing and roof design. The Heritage Impact Assessment also flags the importance of more local, townscape views such as the views from Worcester Street Car Park towards/from the Castle Motte or from St. George's Tower. **This assessment indicates that it could be beneficial to supplement the supporting text of the policy to flag the importance of these considerations in informing design.**

There is the potential for poorly designed development to impact upon the significance and setting of the various listed buildings in the area, such as Nuffield College and the Marmalade Factory. As such, proposals will need to follow the considerations and mitigate impacts in line with strategic policies HD2 which is also already flagged in the policy. However, these considerations will also apply to non-designated features such as the locally important heritage assets identified on the OHAR, as well as the scheduled monuments and **it is proposed that a cross reference to HD4 and HD6 is also added into the policy via a modification to make sure these considerations are picked up by applicants**.

Part of the site is within proximity of the Worcester College Registered Park and Garden (Grade II*), however the RPG is well screened via a wall, buildings and trees, as such it is considered unlikely that development of the site would have risks to the significance of this asset. The presence of the RPG will need to be considered by any applicants in order to ensure no impacts in accordance with the overarching strategic policy HD3; **a cross reference in the policy can also be added to make this consideration explicit**.

Whilst the policy sets out a high level overview of some of the more notable heritage assets as well as expectations for how their significance/setting should be preserved through careful design and appropriate mitigations, there are potentially opportunities for enhancement of these assets which could be secured via the development process. For example, as acknowledged at paragraph 8.371, redevelopment of Worcester Street Car Park presents an opportunity to enhance the setting of the adjacent listed buildings at Nuffield College. **An addition to paragraph 8.370 can be made along the same lines.**

As with allocation SPCW3, the sites are entirely within the City Centre Archaeological area, known to have an exceptionally high concentration of archaeological remains. The car park is noted to contain fragments of industrial archaeology of significant interest. It will be important for new development to investigate and appropriately address any remains in accordance with policy HD5, as is already highlighted in the policy.