

# UFFINGTON HERITAGE WATCH

COMMUNITY BENEFIT SOCIETY



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The Rt Hon Greg Clark MP, Secretary of State for Communities and Local Government  
The Rt Hon John Whittingdale MP, Secretary of State for Culture, Media and Sport  
Rob Wilson MP, Minister for Civil Society

Dear Sirs,

I am an archaeologist and specialist in ancient iron technology. I write to you as chairman of Uffington Heritage Watch, a community benefit society dedicated to promoting and conserving heritage and the historic environment in Oxfordshire, Wiltshire, and Gloucestershire.

We believe that a red line has been crossed with the grant of planning permission to build a speculative, unsustainable housing estate on Uffington Common, destroying Iron Age and Roman settlement evidence beneath the iconic White Horse. Developers in pursuit of profit are riding roughshod over the Treaty of Florence, 2000 on Heritage in Planning and Sustainable Development (also known as the European Landscape Convention, ratified by Parliament and in force since 2007).

Planning permission was granted on 29 May 2015 by the Vale of White Horse District Council to build an unsustainable 36 house suburban-style commuter estate directly on top of and therefore destroying the archaeology on the medieval Common of the village of Uffington, Oxfordshire. This was a hostile and speculative application, opposed by the residents and Parish Council. The development does not form part of the Local Plan; it is neither a Strategic Allocation site, nor does it fit the definition of a Windfall Site under the NPPF.

Uffington Heritage Watch appeals to the Secretary of State for Communities and Local Government to “call-in” and reconsider the planning consent to build a housing estate on Uffington Common.



Uffington residents submitted a petition in time for the planning committee meeting of March 2014, asking for the District Council to “Save our Historic Common Land”. The Petition read:

“We have signed this petition because we OBJECT to the proposal to build an unsustainable high-density housing estate on Uffington's medieval Common Land, off Station Road (VWHDC planning application P13/V1870/FUL). The proposed development would destroy an irreplaceable part of our historic environment and damage the character of our village. The development would mean that the decision on how Uffington grows and progresses over the next 20 years has been made by one man alone: the landowner. The residents have not been adequately informed or consulted in this anti-democratic "planning process". Uffington's Community Led/Neighbourhood Plan committee must be allowed to complete its work of consulting the residents and determining appropriate sites, numbers, and types of new housing for the village. This is our right under the Localism Act (2011). We demand that development in our beautiful, historic village be demonstrably sustainable.” (Uffington Residents Petition, February 2014)

The developers did not at the time of the application or ever since provide Uffington residents with an indication of where the required sustainable drainage (SUDS) would be or what form it would take, or how they would deal with the sewerage, or how they will provide usable open green space (clearly, the development only detracts from the green space in the village, by building on part of the Common), or how the development would be sustainable in transport or local employment terms, or how the design and layout of the houses enhances the well-being & quality of life of existing householders. These are all aspects of Sustainability. Around 11% of the established homes in the village are directly affected by this development: the properties at 1 to 32 White Horse and 1 to 5 Foxcover View form a semi-circle, skirting the edges of the Common, and the proposed estate is to be built in the centre of that semi-circle, with all existing residents to look directly into the walls, windows, tiny garden areas and parking of the new houses.

We ask the Secretary of State for Communities and Local Government to consider these immediate threats to the Landscape of the White Horse:

- The developers appear to have made no significant or relevant amendments to their plans of March 2014 and made no offer to mitigate damage to the heritage by, for example, preserving the area with the concentration of Iron Age settlement features as public open space, or by allowing full excavation and scientific study of the Iron Age and Roman industrial remains.



- The District Council's interpretation of the NPPF as presuming in favour of development generally, rather than sustainable development, presents a threat to the site. Heritage is an aspect of sustainability; in this local area, heritage is potentially a significant contributor to the economy.

- The Vale of White Horse District Council's 5-year land supply strategy presents a threat to the site, as provision of the 5-year supply appears to take precedence over safeguarding the historic environment. The District Council and Oxfordshire Local Enterprise Partnership's economic 'growth' strategy represents a threat to the site. The growth strategy seems to be based on residential house-building on greenfield sites.

- The District Council's failure to put in place a Local Plan during the previous full 4-year term 2011-15 presents a threat to this site and all other heritage - including Green Belt sites - in the Vale, as speculative, unsustainable developments are being approved on greenfield sites where prior to the NPPF 2012, they would not have been approved.

- The interpretation of the NPPF as protecting only Designated and not Undesignated heritage represents a threat to the site. An application for Historic England to Schedule the site was necessitated by the County Archaeology Team Leader's interpretation that the NPPF only provides protection for heritage that is worthy of Designation. This is contrary to the European Landscape Convention.

Uffington Heritage Watch has welcomed the 23 July 2015 ResPublica report, "A Community Right to Beauty", that supports the fundamental premise of the European Landscape Convention: that being surrounded by beauty enhances health & well-being, and should be a right for all.

The landscape can be urban or rural, old or recent, maintained or previously neglected. It is the surroundings of where we live. The landscape around us was shaped by previous generations, and is our legacy to future generations. The landscape is our heritage.

Uffington Heritage Watch appeals to the Secretary of State for Culture, Media, and Sport to protect our heritage from unsustainable, speculative development, by either respecting the European Landscape Convention and the NPPF, both of which recognise the importance of undesignated heritage, or by designating the Uffington Common site.



The Secretary of State for Culture, Media, and Sport is asked to consider that:

- The landscape of the Uffington White Horse is iconic and of local, national, and international importance.

- The Iron Age and Roman settlement evidence in Uffington is not within the hillfort, but around 2 miles away, in what is also the modern village of Uffington. This evidence provides the **archaeological** context, meaning, and 'setting' (as opposed to simply the immediate **spatial** context and setting) of the landscape.

- The outcome of archaeology is **the narrative**. If you destroy the material evidence, you not only run counter to the fundamental premise of science – repeatability (future testing of the excavator's hypothesis) - but you also deny to all those who come after, the legacy of those who went before.

- The combination of an iron ore deposit, quarry pits, and Iron Age, Roman, and Late Roman primary production slag on the Uffington Common site is exceptional.

- The site provides the opportunity to test the trace-element 'fingerprint' method of iron provenancing that has so often been proposed in the literature but never conclusively demonstrated, due to incomplete sets of evidence.

- Recent research on the Iron Age to Roman transition in the Vale of White Horse suggested that the nearby Woolstone Roman villa "may be the richest and largest in the Vale". The Uffington Common industrial site sits well within the expected 5-mile radius of 'economic resource activity' of that Roman villa.

- The majority of the iron production residues from Uffington Common are Iron Age and earlier Roman (43-200 AD), so it is incorrect that the OASIS entry for the site identifies all the industrial activity on the site as "Late Roman".

- It is absolutely not essential to recover a furnace in order to define smelting technology. Iron production is defined from the various waste residues. In fact practically all of what we know about early iron production comes from slag analysis, not furnaces.

- The inadequate extent of the excavation, lack of geophysical survey, and apparently arbitrary nature of the sampling, make it unlikely that definitive conclusions can currently be drawn regarding this site.

- Uffington Heritage Watch is preparing a UNESCO World Heritage Site bid for the parish of Uffington. Destruction of the Uffington Common site, without further investigation, will destroy evidence for this bid.



Finally, we would like to call to the attention of the Minister for Civil Society the fact that Uffington Heritage Watch is a Third Sector, democratically controlled, not-for-profit enterprise, trading for the social and environmental benefit of the community. As such, our organisation is in full accord with the aims of the Cabinet Office to promote the development of “new models” such as employee-led mutuals. We welcomed the Minister’s recent commitment to “support and empower local communities to take control and shape their future”.

We believe that the future of the heritage industry, in particular development and utilisation of archaeological material archives and Historic Environment Records, lies in close collaboration between local heritage co-operatives such as ours and Local Government Museum & Archaeology services that are adequately funded and independent from private property-developer and Planning office influence.

There is an unfortunate history of damage to the archaeological record in our local area. Designation of the Uffington Common site will represent a positive step forward and allow both researchers and the community to form a more constructive relationship with their historic environment. The people of Uffington and Woolstone remain, after all, the stewards of the White Horse.

Yours sincerely,

Dr Evelyne Godfrey

Cc Mr Ed Vaizey MP, Wantage