

Offa House Offchurch Warwickshire

ARCHAEOLOGICAL DESK-BASED ASSESSMENT



EXPERTISE WHERE YOU NEED IT

Archaeology Warwickshire Report No 1846.3
MAY 2021



*Working for
Warwickshire*

Project: Offa House, Offchurch, Warwickshire
Commissioned by: Louise Hartog
Project Report No: 1846.3
Site Code: OOH18
Planning Authority: Warwick District Council
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National Grid Reference: SP 35760 65690
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Date: May 2021
Report reference: Hayman, R, and Rann, C, 2021 *Offa House, Offchurch, Warwickshire: Heritage Impact Assessment*, Archaeology Warwickshire Report 1846.3



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SUMMARY

Archaeology Warwickshire has been commissioned by Louise Hartog to produce an Archaeological Desk-Based Assessment in respect of a proposed development at Offa House, Offchurch, Warwickshire, CV33 9AS. Proposals include for modifications and extensions to the existing Offa House, an early 18th century Grade II Listed Building (listed as The Retreat House), and the construction two new dwellings within its garden.

An initial assessment undertaken in June 2018 comprised a site visit, documentary research, record office search and HER search. This May 2021 revision, based on a revised set of plans, has evaluated the potential for buried archaeological remains to occur within the site and the extent to which the proposed development will impact on any remains present.

This assessment has identified that the likelihood of remains dating from the prehistoric period to be present is unknown. A few finds of Roman pottery found near to the Church indicates a low-moderate potential for remains of activity of that date in the vicinity. The adjacent Church of Saint Gregory dates from the 11th or 12th century and it is likely that the site was within the boundaries of the medieval settlement ensuring a moderate-high potential for the proposed development to disturb archaeological remains relating to the medieval occupation of Offchurch.

There is high potential for buried structural remains associated with Offa House and its numerous former outbuildings, which are depicted on historic mapping, to lie buried within the site. Such remains would retain little evidential and historic value and would accordingly be of limited heritage significance. However, any such buried structural remains identified in the site would have the potential to inform further about the use, status and development of Offa House.

1 INTRODUCTION

- 1.1 Archaeology Warwickshire have been commissioned by Louise Hartog to produce an Archaeological Desk-Based Assessment in respect of proposed development at Offa House, Offchurch, Warwickshire, hereafter referred to as 'the site'. The development proposals comprise modifications and extensions to the existing Offa House, a Grade II Listed Building (listed as The Retreat House) and the construction two new dwellings within its garden.
- 1.2 This report will assess the potential of the site to include buried archaeological remains, and any impact upon these as a result of the proposals, in accordance with NPPF and the Warwick District Council Local Plan 2011-2029. The scope of this report specifically excludes consideration of the built heritage resource within the site which includes the Grade II Listed Building Offa House (listed as The Retreat House, National Heritage List for England: 1035087) and the Offchurch Conservation Area. This is discussed in a separate report.
- 1.3 This report has been guided in its composition by the appropriate standards and guidance, including the *Standard and Guidance for Historic Environment Desk-Based Assessment* published by ClfA (2020), *Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment* (Historic England 2015), and *Statements of Heritage Significance: Analysing Significance in Heritage Assets* (Historic England 2019).

Site location and geology

- 1.4 The site (Photo 1) is centred on National Grid Reference SP 35760 65690 in the village of Offchurch. The site comprises the Grade II Offa House, its grounds, Coach House and attached garden wall. The house is a former Diocesan retreat which is currently used as a dwelling and it is positioned in the north-east of the site. A drive runs southwards from the house towards Village Street, to where The Lodge Cottage is positioned, just to the south of the site. St. Gregory's Church is situated to the east of the site, residential properties face the site from the opposite side of Village Street and open land extends to the north and west.
- 1.5 The British Geological Society (BGS 2021) records the underlying geology of the site as Mercia Mudstone Group, with superficial deposits of Dunsmore Gravel - sand and gravel.



1: Offa House principal elevation



2: The garden, looking west from the rear of Offa House



3: South side of garden wall with Coach House to right



4: View towards south-west corner of the garden

2 POLICY AND GUIDANCE

- 2.1 This assessment has been undertaken with reference to relevant legislation, national planning policy and guidance, and regional and local planning policy relating to heritage.

Legislation

- 2.2 Scheduled Monuments and Listed Buildings are protected by statute. Legislation regarding Scheduled Monuments is contained within 'The Ancient Monuments and Archaeological Areas Act 1979'. Under this legislation it is an offence to carry out works which affect the fabric of a Scheduled Monument without the prior written consent of the Secretary of State. Legislation regarding Listed Buildings is contained in 'The Planning (Listed Buildings and Conservation Areas) Act 1990'.

National Planning Policy Framework

- 2.3 The National Planning Policy Framework (NPPF) was published in March 2012 and updated in February 2019. The NPPF has the core principal that there should be presumption in favour of sustainable development, which includes the environmental objective 'to contribute to protecting and enhancing our natural, built and historic environment'.
- 2.4 Section 16 provides guidance on the conservation and enhancement of the historic environment. Paragraph 189 states that applicants should 'describe the significance of any heritage assets affected, including any contribution made by their setting' in order that the planning authority can determine the application. It further states that 'the level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance'. Local authorities are required to 'assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset)' (paragraph 190).
- 2.5 Heritage assets are defined as buildings, monuments, sites, places, areas or landscape positively identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. They include designated heritage assets identified by the local planning authority and archaeological sites which hold or potentially could hold, evidence of past human activity worthy of expert investigation.

2.6 The NPPF therefore aims to protect nationally important designated Heritage Assets (which include World Heritage Sites, Scheduled Ancient Monuments, Listed Buildings, Protected Wreck Sites, Registered Parks and Gardens, Registered Battlefields or Conservation Areas); protects the settings of such designations; and requires that adequate information (from desk based assessment and field evaluation where necessary) be obtained to inform decisions and provides for the excavation and investigation of sites not significant enough to merit in-situ preservation.

Guidance and standards

2.7 Historic England's *Managing Significance in Decision-Taking in the Historic Environment* (2015) provides information on the significance of heritage assets. Significance is defined as: the value of a heritage asset to this and future generations because of its heritage interest. This interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. The idea of 'significance' lies at the core of *Conservation Principles, Policies and Guidance* (English Heritage 2008) which sets out a method for thinking systematically and consistently about the heritage values that can be ascribed to a place. People value historic places in many different ways; *Conservation Principles* shows how they can be grouped into four categories:

Significance	Description
Evidential value	the potential of a place to yield evidence about past human activity
Historical value	the ways in which past people, events and aspects of life can be connected through a place to the present - it tends to be illustrative or associative
Aesthetic value	the ways in which people draw sensory and intellectual stimulation from a place
Communal value	the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory

2.8 Value of historic environment assets may be ascribed according to the following criteria (not all of which are applicable in the present instance):

Level	Description
Very High	Internationally important assets, eg World Heritage Sites
High	Nationally important heritage assets, eg Grade I and II* Listed Buildings, Grade I and II* Registered Parks and Gardens, Scheduled Monuments, and undesignated assets of equivalent significance

Medium	Nationally or regionally important heritage assets, eg Grade II Listed Buildings, Grade II Registered Parks and Gardens, undesignated assets of regional and national importance including archaeological remains which relate to regional research objectives or can otherwise provide important information relating to the region
Low	Assets of interest at a local level for their contribution to the local historic environment eg undesignated heritage assets including locally listed buildings, undesignated archaeological sites, undesignated historic parks and gardens
Negligible	Elements of historic environment of insufficient significance or historic interest to merit consideration in planning decisions
Unknown	Importance of asset not ascertained

2.9 The scale of change may be assessed according to the following criteria:

Impact	Description
Substantial harm	Substantial harm to, or loss of, an asset's significance as a result of changes to its physical form or setting, eg demolition or removal of attributes critical to its significance, archaeological interest or setting in a way that fundamentally compromises its ability to be understood
Less than substantial harm (higher end)	Less than substantial harm, eg alterations which remove some elements of significance or alterations to its setting that compromises understanding or appreciation
Less than substantial harm (lower end)	Limited harm to significance, eg physical changes to some elements of the asset or its setting which do not noticeably alter its overall significance
Negligible harm	Very minor changes to form or setting which are scarcely noticeable
No harm	
Minor beneficial	Slight improvement to an asset's significance, eg by revealing some elements of significance or small-scale alterations to its setting which enhance the ability to understand or appreciate it
Moderate beneficial	Notable enhancement of an asset's significance consequent upon changes to its physical form or setting, eg conservation/restoration of elements of significance, or enhancements to its setting which increase understanding or appreciation
Major beneficial	Substantial enhancement of an asset's significance consequent upon changes to its physical form or setting, eg conservation/restoration of elements of high significance, or enhancements to its setting which substantially increase understanding or appreciation

Local Planning Policy

- 2.10 The Warwick District Council Local Plan 2011-2029, was adopted in September 2017, and is the Development Plan for the district. Policies HE1 and HE4 describe the council's approach to archaeological heritage assets:

HE1 Designated Heritage Assets and their setting

Development will not be permitted if it would lead to substantial harm to or total loss of the significance of a designated heritage asset, unless it is demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or it is demonstrated that all of the following apply:

- a) The nature of the heritage asset prevents all reasonable uses of the site; and*
- b) No viable use of the heritage asset itself can be found that will enable its conservation; and*
- c) Conservation by grant funding or charitable or public ownership is not possible; and*
- d) The harm or loss is outweighed by the benefit of bringing the site back into use.*

Where development would lead to less than substantial harm to the significance of a designated heritage asset, this harm will be weighed against the public benefits of the proposal, including securing its optimum viable use.

HE4 Archaeology

Development will not be permitted that results in substantial harm to Scheduled Monuments or other archaeological remains of national importance, and their settings unless in wholly exceptional circumstances.

There will be a presumption in favour of the preservation of locally and regionally important sites, except where the applicant can demonstrate that the benefits of development will outweigh the harm to archaeological remains.

The Council will require that any remains of archaeological value are properly evaluated prior to the determination of the planning application.

Where planning permission is granted for development which will have an adverse effect on archaeological remains, the Council will require that an agreed programme of archaeological investigation and recording precedes development.

ClfA - Standard for historic environment desk-based assessment (2020)

- 2.11 *Desk-based assessment will determine, as far as is reasonably possible from existing records, the nature, extent and significance of the historic environment within a specified area. Desk-based assessment will be undertaken using appropriate methods and practices which satisfy the stated aims of the project, and which comply with the Code of conduct and other relevant regulations of ClfA. In a development context desk-based assessment will establish the impact of the proposed development on the significance of the historic environment (or will identify the need for further evaluation to do so), and will enable reasoned proposals and decisions to be made whether to mitigate, offset or accept without further intervention that impact.*

3 AIMS & OBJECTIVES

- 3.1 The purpose of this Archaeological Desk-Based Assessment is to gain an understanding of the historic environment resource in order to:
1. identify the potential for archaeological remains to occur within the site;
 2. assess the significance of the known or potential archaeological remains; and
 3. assess the impact of the proposed development on these archaeological remains.

This approach is consistent with the Chartered Institute for Archaeologist's *Standards and guidance for desk-based assessment* (CIfA 2014).

Methodology

- 3.2 This assessment has been informed by a proportionate level of information sufficient to understand the archaeological potential of the site, the significance of identified heritage assets, and any potential development effects. Sources consulted for this assessment include Warwickshire Historic Environment Record (HER) (a 500m search), National Heritage List for England (NHLE), historic Ordnance Survey maps, British Geological Survey (BGS) website, modern aerial photography and the Warwickshire Record Office.
- 3.3 A site visit and study area walkover was undertaken as part of this assessment in June 2018. The main aim of the visit was to assess the site's historic landscape context, including its association with any known or potential heritage assets of archaeological value, and to identify any evidence for previous truncation of the onsite stratigraphy. A visit to the Warwickshire Record Office was carried out during the preparation of this report, in 2018.

4 ARCHAEOLOGICAL AND HISTORICAL BACKGROUND

Prehistoric and Roman

- 4.1 To date, archaeological fieldwork has not taken place in Offchurch. Evidence for activity has therefore come from chance finds or desk-based analysis. The earliest chance finds are a Neolithic or Bronze Age flint scraper which was found by walkers in Offchurch (Warwickshire Historic Environment Record no. MWA 4496) and a Neolithic polished stone axe (MWA 9276).
- 4.2 Work around the church in the 1970s uncovered Romano-British pottery sherds (MWA 2217) and other finds of this date are reported from nearby (MWA 2243). Offchurch is only 1km from the Fosse Way and the Welsh Road is thought to be a well-established routeway (VCH 1951).

Early medieval

- 4.3 Based on place name evidence 'Bury' which could derive from the Anglo-Saxon word for Burgh – a fortified place and the long held associations with King Offa, the 8th century King of Mercia, there is some suggestion that the village has Anglo-Saxon connections (VCH 1951). The lack of mention in Domesday (1086) casts some doubt on this but an antiquarian record from 1875 suggests that an Anglo-Saxon cemetery was discovered to the south of the village (VCH 1951).

Medieval

- 4.4 The site lies within the probable extent of the medieval settlement of Offchurch (MWA 9571), which has been estimated based on the pattern of settlement depicted on the First Edition Ordnance Survey map of 1885. The church of St Gregory dates from the 11th-12th century, with later changes, most notably the 19th century chancel (MWA 2213). The early 12th century nave collapsed and was rebuilt in the 14th century. Pottery from the medieval period was found around the church (MWA 2217). It is also notable that there was a vicarage in Offchurch by 1260 although its location is unknown. A coin of Edward I was found on a public footpath (MWA 4552) and a further coin was reported to the Museum (MWA 6418).
- 4.5 Up to three watermills in Offchurch are mentioned from around 1297 (MWA 2214, MWA 2215, MWA 2225), the locations of which are not necessarily secure.

- 4.6 Earthworks around Manor Farm seem to represent the remains of shrunken medieval settlement (MWA 4625, EWA 261, EWA 5984). There is also an area to the east of the village where earthworks are recorded (MWA 4624).

Post-medieval & modern

- 4.7 Offchurch Bridge is a single arched bridge over the River Leam and may date from 1665 (MWA 2221). Along the main routeway of the Welsh Road, forges or Smithys are recorded (MWA 2227, MWA 7098).
- 4.8 Offchurch Bury Garden is an area of extensive parkland with a kitchen garden and an Ice House (MWA 2224), associated with Offchurch Bury House (National Heritage List for England no 1035085, Grade II*). The grounds are within a loop of the River Leam and bound the western edge of the garden of Offa House. Gardens in the county were visited and reported on by Jonathan Lovie on behalf of English Heritage in the late 1990s. He was not able to fully inspect Offchurch Bury Garden but he recommended that they be included on a local list (MWA 12927/EWA 9810). An earthwork ditch or holloway cuts off the loop in the River (MWA 2228).

Offa House

- 4.9 Both Offa House (then the vicarage or The Retreat House) and the nearby Offchurch House gardens were also considered by Lovie (MWA 12929/EWA 9812, MWA 12928/EWA 9811). He did recommend the garden of The Retreat House for local listing. The house is Grade II listed (NHLE no 1035087) and is a red brick early 18th century construction. It was built probably with a single-depth plan, rear stair wing and perhaps a rear lean-to kitchen. It was extended in the early-19th century by addition of a large bow-fronted bay facing the garden to the south, and service rooms on the north side, to create a double-depth plan. The bow-fronted bay is dated 1807 on a stamped brick, with the initials HW. This refers to Henry Wise, who was vicar of Offchurch between 1805 and 1850.
- 4.10 The house was described in 1829, 'situated on a small eminence most agreeably secluded amid a grove of encircling trees. ... The House itself ... [has] its principal front almost covered with the branches of the luxuriant vine, which is also trailed over the veranda which forms the entrance' (Jones 1829, X4). The print accompanying this description shows the attic with three full two-light dormer windows (Fig 2). It also shows the veranda referred to in the text and the bow-fronted bay in the end wall.

- 4.11 By 1848, when the Offchurch parish Tithe plan (Fig 3) was surveyed, the house had been extended by a long rear wing. Further 19th-century extension was minor. The 1885 Ordnance Survey map (Fig 4) shows a porch on the entrance front, although it had been taken down by the time of the 1905 Ordnance Survey (Fig 5).
- 4.12 The building is an early-Georgian style brick house of two storeys and attic. The house has a double-pile tile roof – the front pile is half-hipped behind coped verges, while the rear pile has hipped roofs either side of the original gabled rear wing at right angles to the main range. The five-bay entrance front faces east to the churchyard, and is articulated in early-Georgian style with rusticated quoins, keystones, brick aprons and moulded cornice. It has small-pane hornless sash windows of 19th-century date, except for the central first-floor window, which is a modern replacement 12-pane horned sash window in an original moulded surround. The half-glazed door with overlight is a nineteenth-century replacement, and was originally within the porch shown on the 1885 Ordnance Survey map (Fig 2) which has subsequently been removed. The dormer window is modern, replacing a lunette window shown in a photograph of the early twentieth century, in turn replacing a line of three dormers shown in the 1829 engraving (Fig 2). Set slightly back on the right side is a one-storey brick projection under a hipped roof, with arched opening in the north wall only. This projection had been built by 1885 and is shown on the map of that date (Fig 3).
- 4.13 The (south) garden front is characterised by, offset to the left, a broad full-height bow window with three floor-length sash windows in the ground floor and small-pane windows above. This bay is clearly an addition to the original structure and has a brick stamped with the date 1807.
- 4.14 The west and north fronts have both been altered and are of less architectural interest. In the north front the added bay on the right, under a hipped roof, has altered and inserted windows, and inserted metal fire-escape stairs. The rear (west) side is also altered, with additional ranges of the 20th century, which are of no historical interest.

The Garden

- 4.15 The earliest map of the garden at Offa Church House is the Tithe Survey of 1848 (Fig 3). On this map the present garden was divided into three plots: Plot 41 is the main house and part of the garden, owned and occupied by Henry Wise. Plot 42 was the rear wing of the house and part of the garden, owned by Lord Guernsey (who acquired

- the estate of Offchurch from the Knightley family by marriage in 1846), but let to Wise. It had its own entrance from Village Street, to a drive leading to a coach house (and was originally the entrance to another house?). Plot 44, on the south side of the house, was a smaller house and garden owned by Lord Guernsey but let to Joseph Hinde. In 1848 the grounds of Offa House (plots 41 and 42) were described as orchard and lawn.
- 4.16 The Tithe map and later Ordnance Survey maps indicate that the grounds of Offa House formerly extended further northwards than they do today (Figs 3-5). Both the Tithe map and the 1885 Ordnance Survey map show the garden extending as far as a pond. There was also an entrance on the east side of the site from School Hill. This was opposite the village school and on the north side of the churchyard. The garden was described in the Tithe apportionment and lawn and orchard – the orchard was probably the ground on the north side of the house. By 1885 the present Lodge Cottage had replaced the house marked here in 1848, while its former garden had been incorporated into the garden of Offa House (Fig 4). The 1885 and 1905 Ordnance Survey maps indicate an informal garden comprising coniferous and deciduous trees around open spaces, presumably laid with grass. No specific garden structures are indicated on the Ordnance Survey maps, except for the coach house west of the main house, and garden walls.
- 4.17 As it exists today, the garden is therefore a creation of the 20th century, but its planting, a mixture of coniferous and deciduous trees around lawns, belongs to the 19th century. Ground on the north side of the house has been lost, the entrance from the School Hill is obsolete, while the entrance on the south-west side is no longer part of the property and the associated driveway is covered by vegetation. The present extent of the garden is shown on the 1968 Ordnance Survey map (Fig 7). However, there are structures in the garden which are shown on the 1848 map. These are the coach house, with attached walls, and the wall facing Village Street, with gateway at the west end (although this is no longer part of the property). These structures can be considered as curtilage listed, as all of them are shown on the 1848 Tithe map and 1885 Ordnance Survey map.
- 4.18 The coach house is a simple brick structure under a gabled tile. The main entrance is on the north side under a round brick arch, but the details are otherwise replaced. Attached to the coach house are garden walls. On the west side the wall is a high curving wall, with pilaster buttresses and a later arched entrance, with a short return

section on the west side, where it terminates with a square pier. The wall on the east side is a dwarf wall and less well preserved, but it was attached to the former long 19th-century rear wing of the house (Photograph 8).

- 4.19 The other brick wall is along the front of the property, facing Village Street. There is a gap in the wall, currently infilled with a wooden fence, which is of the 20th century, its purpose unknown. Further west is the other, now disused, entrance, which is marked on the 19th-century maps as part of the garden. It has 19-century double cast-iron gates. At the eastern end, next to Lodge Cottage and the main entrance, the wall has been rebuilt in a redder brick. Lodge Cottage is altered but retains some 19th-century architectural character, although it is in separate ownership.

5 POTENTIAL ARCHAEOLOGICAL REMAINS AND THEIR SIGNIFICANCE

Potential for archaeological remains on the site

- 5.1 The likelihood of remains dating from the prehistoric period to be present is unknown. A few finds of Roman pottery found near to the Church indicate a low-moderate potential for remains of activity of that date in the vicinity. Any such remains are likely to be of local significance.
- 5.2 The site lies adjacent to the 11th or 12th century Church of Saint Gregory, which is likely to have been within the boundaries of the medieval settlement. There is moderate-high potential for the proposed development to disturb archaeological remains relating to the medieval occupation of Offchurch, such as structural remains, boundary features or rubbish pits. The origins of medieval small towns, their rates of growth, patterns of expansion and decline are all identified as areas in need of further research in *The West Midlands Archaeological Framework* (Hunt 2011). Therefore, if medieval remains such as those identified were identified within the site, they could contribute towards these regional research agendas.
- 5.3 There is high potential for buried structural remains associated with Offa House and its numerous former outbuildings, which are depicted on historic mapping, to lie buried within the site. Such remains would retain little evidential and historic value and would accordingly be of limited heritage significance. However, any such buried structural remains identified in the site would have the potential to inform further about the use, status and development of the Listed Building.

PREVIOUS IMPACTS

- 5.4 The construction of Offa House and any extensions to it has most likely led to disturbance of any archaeological remains within their footprint. As well as Offa House, this assessment has identified there have been a number of small structures / outbuildings in the site since at least the mid-19th century. It is possible that these outbuildings were light-weight structures with minimal or no foundations. Therefore, within the footprint of the structures, truncation may only have impacted the upper horizon, and potential earlier archaeological remains may survive at deeper levels.

- 5.5 In the garden, where there have been limited or no previous impacts, undisturbed archaeological horizons may be present within the site where minimal disturbance has occurred.

POTENTIAL DEVELOPMENT EFFECTS

- 5.6 The development proposal includes modifications and extensions to the existing Offa House and the erection of two new dwellings within the grounds.
- 5.7 Although no significant archaeological remains have been identified within the site, the development is at a scale that has the potential to have a significant impact on any archaeological remains present.

6 CONCLUSION

- 6.1 This assessment has evaluated the potential for buried remains to occur within the site and the extent to which the proposed development will impact on these remains.
- 6.2 This assessment had identified that the likelihood of remains dating from the prehistoric period to be present is unknown. A few finds of Roman pottery found near to the Church indicate a low-moderate potential for remains of activity of that date in the vicinity. The adjacent Church of Saint Gregory dates from the 11th or 12th century and is likely to have been within the extent of the medieval settlement rather than the surrounding open fields. There is therefore a moderate-high potential for the proposed development to disturb archaeological remains relating to the medieval occupation of Offchurch.
- 6.3 There is high potential for buried structural remains associated with Offa House and its numerous former outbuildings, which are depicted on historic mapping, to lie buried within the site. Such remains would retain little evidential and historic value and would accordingly be of limited heritage significance. However, any such buried structural remains identified in the site would have the potential to inform further about the use, status and development of Offa House.
- 6.4 Although no significant archaeological remains have been identified within the site, the development is at a scale that has the potential to have a significant impact on any archaeological remains present.

ACKNOWLEDGEMENTS

Archaeology Warwickshire would like to thank Louise Hartog for commissioning the project.

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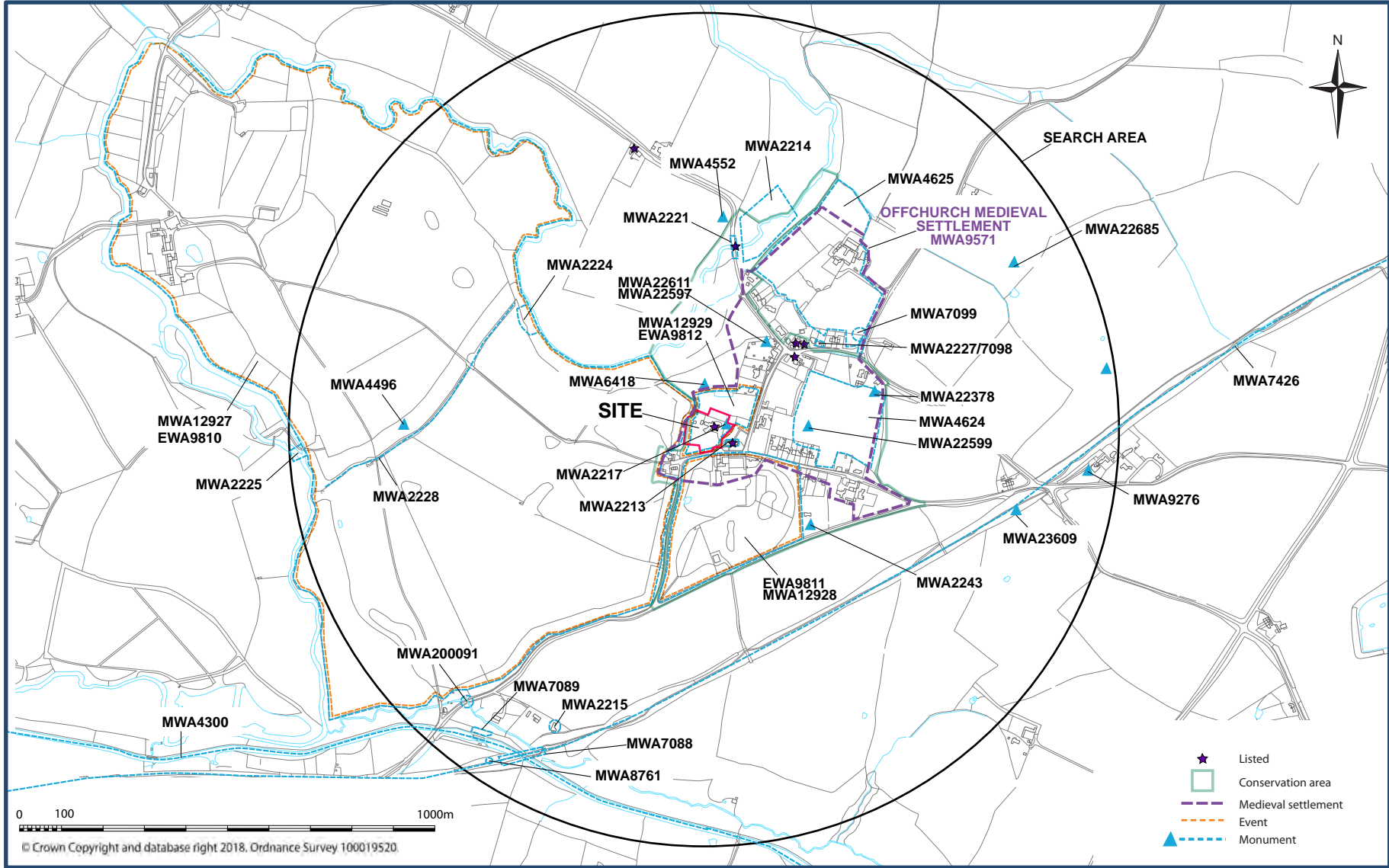


Fig 1: Location of site and Historic Environment information



Fig 2: Offchurch Vicarage in 1829



Fig 3: Detail from Tithe map of 1848 (WRO CR569/87)

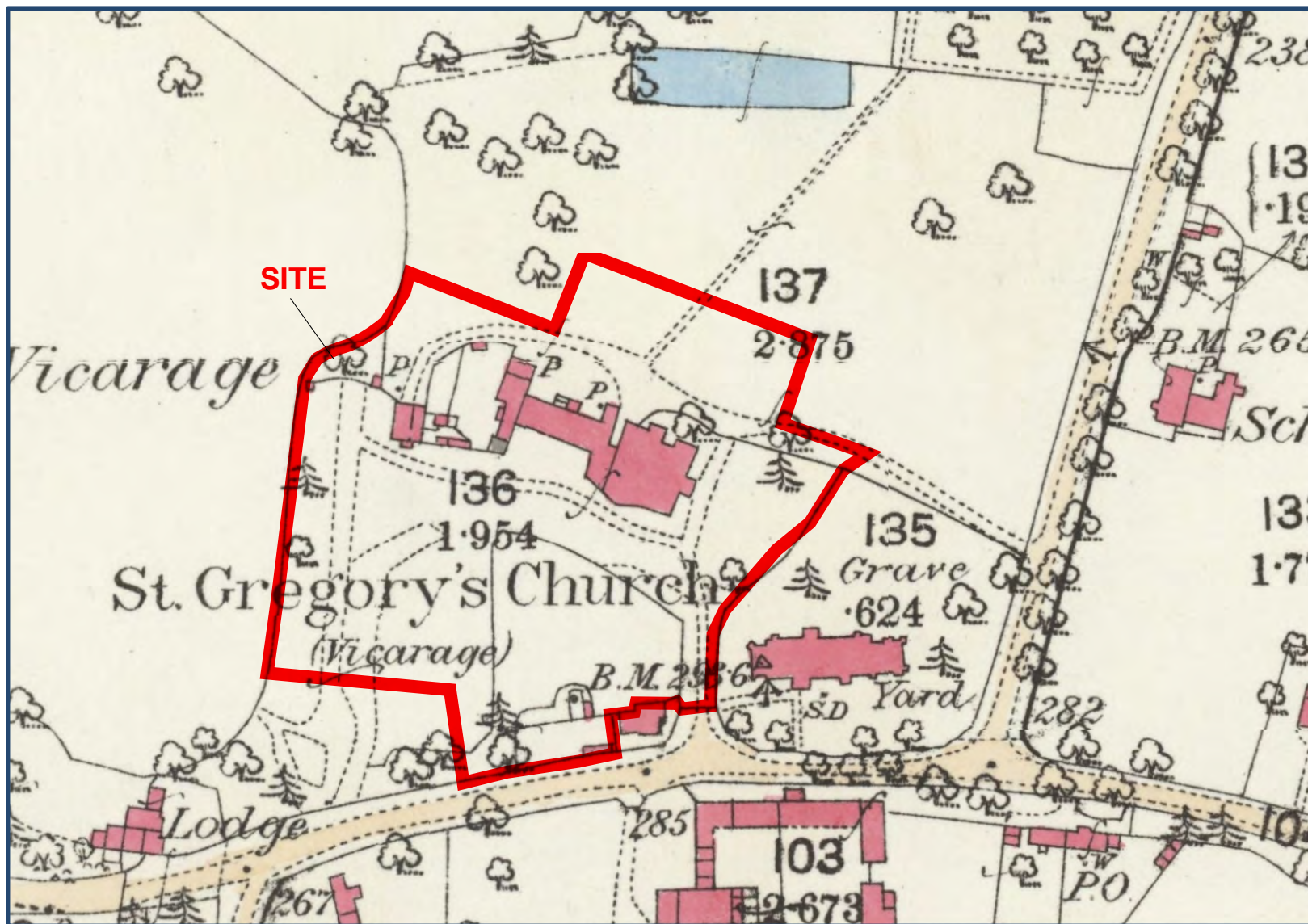


Fig 4: Detail from First Edition Ordnance Survey map of 1885



Fig 5: Detail from Second Edition Ordnance Survey map of 1905



Fig 6: Offa House in the early 20th century (WRO PH, 352/136/8, img:2000)

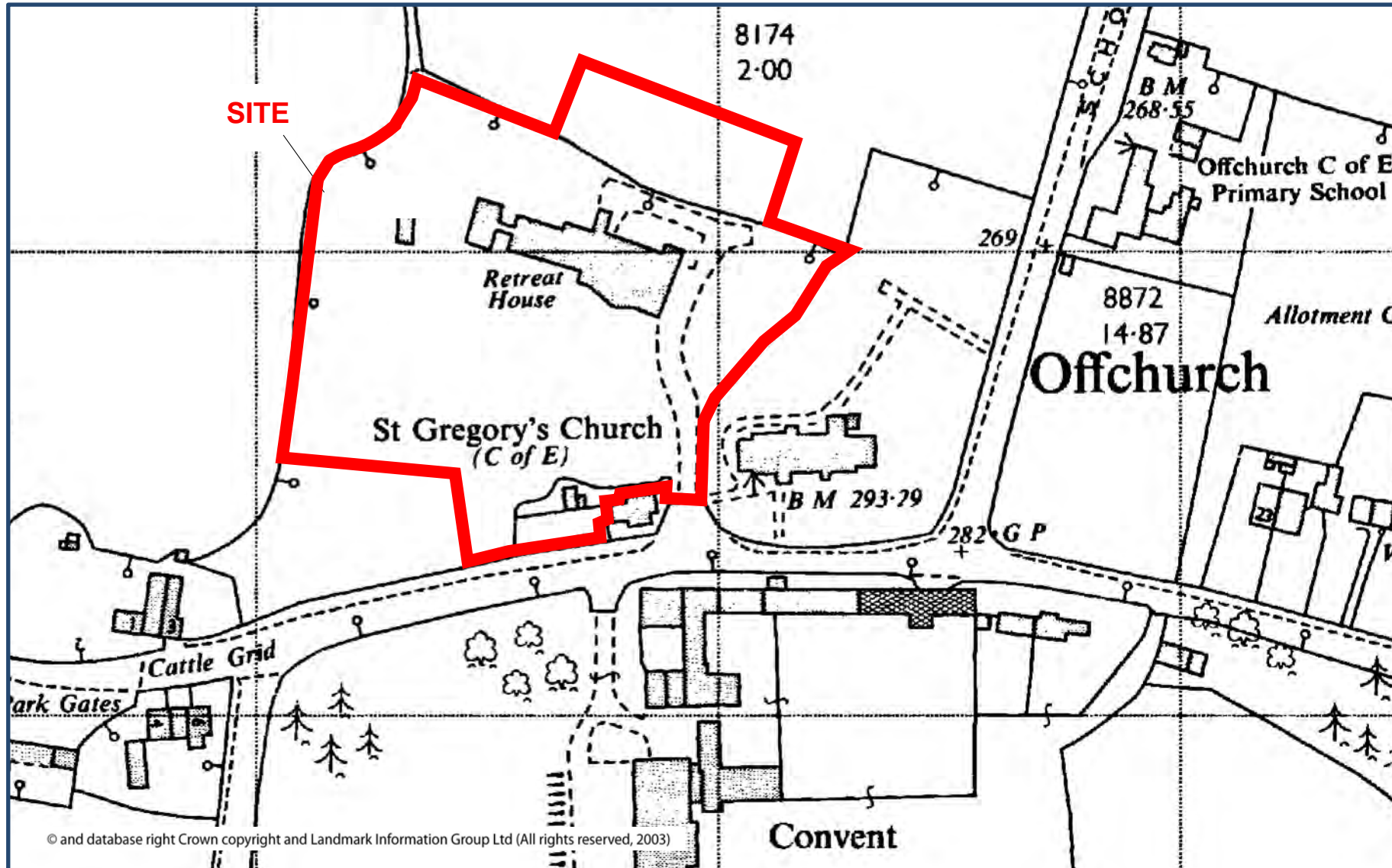


Fig 7: Detail from Ordnance Survey map of 1968

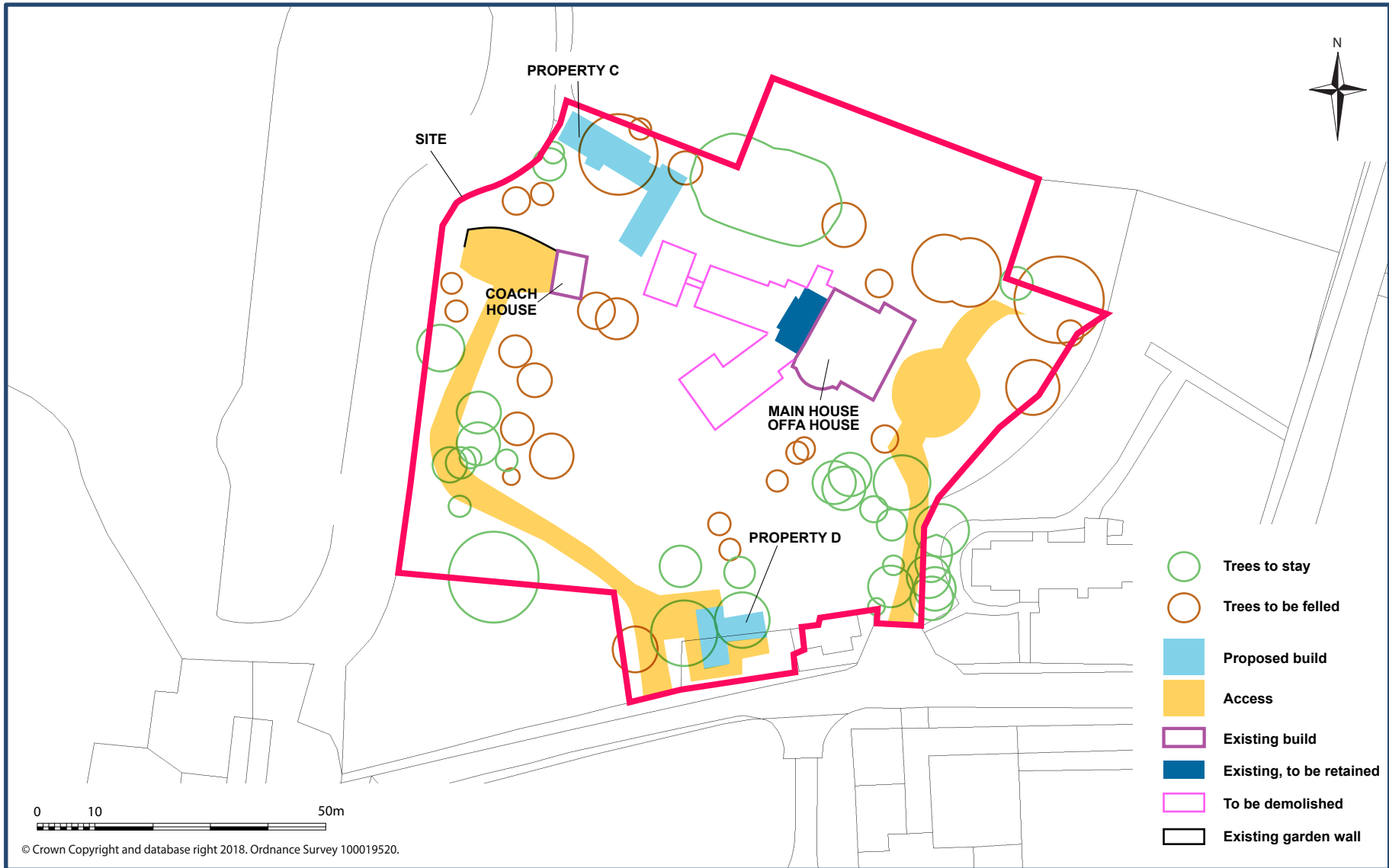


Fig 8: Plan of site as existing with proposed development