

Part B: Your Response

Please complete a separate **Part B form** for each response that you wish to make. One **Part A form** must be enclosed with your **Part B form(s)**.

To assist in making a response, separate **Guidance** is available on the Council's website. Responses should be returned by **5:00pm on Tuesday 11th June 2024**.

Name and Organisation:	MRS ELIZABETH BODEN, HISTORIC ENGLAND
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Q1. To which document(s) does this response relate?

a. Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	<input type="checkbox"/>
b. Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	<input checked="" type="checkbox"/>
c. Updated Housing and Employment Topic Paper.	<input checked="" type="checkbox"/>
d. Updated Green Belt Topic Paper.	<input type="checkbox"/>

Q2. To which paragraph(s) of the document(s) does this response relate?

Paragraph(s):	b. Updated SA Report – Table 12.5 and paras. 12.95 & 12.97 c. Updated Housing and Employment Topic Paper – paras. 16.153 & 16.154
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Q3. Do you consider the document(s) are:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:

Q4. Please detail your comments on the specified document(s). Please be as precise as possible.

Response of Historic England to Shropshire Local Plan Additional Consultation – May 2024

Updated Housing & Employment Topic Paper, April 2024

- Historic England (HE) notes that for the Shrewsbury Place Plan Area around 45ha is still proposed as a “*dedicated employment allocation to the west of the A49, Shrewsbury (SHR166)*” (para. 16.153) within the Shropshire Local Plan.
- We also note that para.16.154 further explains that this site is “*intended to perform a strategic employment role, being capable of delivering a range of employment uses, including B2 and B8 uses.*” The Topic Paper goes on to explain that “*flexibility to deliver the whole range of employment uses on this site has however subsequently been impacted by heritage considerations raised by Historic England and the designation of the site of a temporary Roman marching camp as a Scheduled Monument. It is acknowledged that this issue is yet to be discussed fully at the Examination and is likely to form part of the considerations for Stage 2 hearing sessions*”.

3. Historic England

allocation Site SHR166 throughout the preparation of the Shropshire Local Plan (the Plan). We refer to our representation to the consultation on the Regulation 19 Plan dated 26/02/21 (attached as **Appendix A**) and to our Hearing Statement to Stage 1, Matter 1 of the Shropshire Local Plan Examination in Public (EiP), May 2022, (attached as **Appendix B**), which details our responses to the various stages of the Plan; setting out our objections to this proposed allocation and our concerns regarding the SA of the Submission Plan in respect of this proposal.

4. Since the Hearing Sessions held in July 2022 in relation to Stage 1, Matter 1 of the EiP, and as referenced in para.16.154 of the Updated Housing and Employment Topic Paper, the part of site SHR166 once occupied by a temporary Roman marching camp, and known as ‘*Uffington Roman Temporary Camp, Shrewsbury*’, has been designated as a Scheduled Monument by the Secretary of State for Culture, Media and Sport, under the Ancient Monuments and Archaeological Areas Act 1979 (as amended). We wrote to inform the EiP Inspectors of this on 5th October 2022 and a copy of this letter is attached at **Appendix C**. The Schedule entry for this monument, as published on the National Heritage List for England as List Entry Number: 1480432, is available through Historic England’s website, via the link below: [Uffington Roman Temporary Camp, Shrewsbury, Uffington - 1480432 | Historic England](https://www.historicengland.org.uk/monuments/uffington-roman-temporary-camp-shrewsbury-uffington-1480432)
5. Designation as a Scheduled Monument confirms the status of the area of Uffington Roman Temporary Camp as a nationally important archaeological site and necessitates that Scheduled Monument Consent (SMC) is now required to carry out any works to the monument. There is a presumption that Scheduled Monuments will be handed on to future generations in much the same state that we have found them, with the NPPF advising that great weight should be given to an asset’s conservation (para.205) and that substantial harm or loss of assets of the highest significance, which includes Scheduled Monuments, should be wholly exceptional (para.206).
6. Scheduled Monument Consent is a separate process to obtaining planning permission and, as such, whilst there is an association to the NPPF, the determinative document in respect of SMC is the Department for Culture, Media and Sport (DCMS) Policy Statement for “*Scheduled Monuments & nationally important but non-scheduled monuments*” October 2013: <https://www.gov.uk/government/publications/scheduled-monuments-policy-statement>
7. Attention is drawn to Part 1, paragraph 6 of the DCMS 2013 Policy Statement, which states that the purpose of the schedule of ancient monuments of national importance is to “*help preserve them, so far as possible, in the state in which they have come down to us today*”. Only in the case of Nationally Significant



Consent Order

Monument Consent.

8. Historic England advises the Secretary of State on applications for Scheduled Monument Consent, and thus an employment development on the Scheduled Monument, as per the proposed allocation in the Shropshire Local Plan, would be highly unlikely to comply with the requirements of the DCMS 2013 Policy Statement. As such we would be minded to advise the Secretary of State that any such application should refuse Scheduled Monument Consent and this position would be mirrored in Historic England's advice on planning permission for such works, as it would clearly cause substantial harm, and possible total loss, of the Scheduled Monument, as well as substantial harm to its setting, contrary to the NPPF.
9. Furthermore, without Scheduled Monument Consent it is the case that site SHR166 would be undeliverable and thus the spatial strategy set out in the Shropshire Local Plan would not be achievable. The designation of site SHR166 as an employment allocation would therefore mean that the Shropshire Local Plan, as well as not being consistent with national policy, would not be justified or effective, and thus it would not comply with the tests of soundness as set out in the NPPF at para.35.
10. In addition to the above, we refer back our representation to the consultation on the Regulation 19 Plan dated 26/02/21 (attached as **Appendix A**), where we raised objection to the proposed allocation of site SHR166 on several grounds aside from the harm to the significance of the Roman marching camp and its setting, and we consider that our objection on grounds 2, 3 and 4 still remain.
11. Moreover, Historic England notes that '*The Proposed Spatial Strategy*', as revised by the Updated Housing & Employment Topic Paper at para.21.6 a. sets out that it will deliver a minimum of 320 hectares of employment land; of which 30 hectares will contribute towards the unmet needs forecast to arise within the Black Country and meaning that 290 hectares are to meet Shropshire's needs. However, previously the Topic Paper has calculated the residual employment land requirement as 270 hectares (para. 17.6), meaning that the Plan proposes an oversupply of employment land.
12. HE therefore concludes that our objection could be addressed through removal of site SHR166 from the Local Plan; which, if developed for employment, has the potential to substantially harm both designated and undesignated heritage assets.



Additional Sustainability Appraisal of the Draft Shropshire Local Plan, April 2024

13. Historic England understands that the purpose of this additional Sustainability Appraisal (SA) is to provide a summary of the updated additional SA assessment work undertaken by Shropshire Council in order to respond to the conclusions reached by the Planning Inspectors within ID28, ID36 and ID37; mainly focussing on how the Shropshire Plan will meet any unmet housing and employment needs arising within the Black Country.
14. However, we note that the scope of the SA document (para. 4.1) includes identifying an appropriate strategic distribution of development across Shropshire and a re-assessment of relevant draft policies within the draft Shropshire Local Plan, to support identification of main modifications in response to the consideration of the updated additional SA assessment work undertaken. Furthermore, we understand that Site SHR166 is proposed to be allocated to meet the employment needs of Shropshire, and not to meet any unmet housing and employment needs arising within the Black Country.
15. With specific reference to the assessment of Site SHR166 in relation to employment development attention is drawn to the following:
Table 12.2: Summary of the Conclusions of the Stage 2a Employment Site Assessments – the ‘Overall Settlement Sustainability Conclusion’ for ‘Shrewsbury’ assesses the site as ‘Poor’, whereas many others are assessed as ‘Good’ and as a ‘Potential Strategic Site’ the assessment conclusion is ‘Fair’, again with many other sites being assessed as ‘Good’.
16. The Additional SA also considers ‘*Likely Significant Effects and Mitigation*’, with Table 12.5 summarising these for the proposed employment allocations and again the ‘Overall Settlement Sustainability Conclusion’ for ‘Shrewsbury’ assesses the site SHR166 as ‘Poor’. HE notes that paragraph 12.94 comments in relation to Table 12.5 of the Additional SA states that:
“...only 2 of the proposed allocations within the assessment area perform ‘poorly’ and as such are considered to have likely significant adverse effects for which mitigation measures should be proposed”.
17. The SA document at para.12.95 goes on: *“The first site is SHR166 at Shrewsbury, which is intended to contribute towards achieving the proposed employment land guideline for Shrewsbury, the proposed employment land requirement for Shropshire and the wider spatial strategy for Shropshire. It is not proposed to accommodate any of the proposed contribution to the unmet employment land need forecast to arise within the Black Country. Much of the site contains a newly designated Scheduled Monument (designated in late 2022). This matter is currently being given due consideration, informed by ongoing engagement with the site promoter”.*

18. Additionally, at

the mitigation measures previously identified for these sites (with the exception of the matter of the newly designed Scheduled Monument on site SHR166 which is currently being given due consideration), it is considered that they are effective in the context of sustainably accommodating Shropshire needs.”

19. HE refers to our response to the ‘Updated Housing & Employment Topic Paper’ as set out above, particularly paragraphs 4, 5, 6, 7, 8 and 9 with regard to the Scheduling and the implications of this for the development of this proposed employment site.

20. We note that Table 12.6 of the Additional SA seeks to give reasons for the ‘Poor’ score in relation to Site SHR166, amongst others, and sets out mitigation measures. However, we note that both the reasons and the mitigation are deficient in that they do not include any reference to heritage or to the Scheduled Monument on the site and HE therefore considers that the likely significant effects on the historic environment have not been fully assessed.

21. Additionally, with reference the assessment of Site SHR166 as contained in Appendix 1 (p.25) and Appendix 2 (p.18) to the Additional SA Report, HE notes that again these assessments have failed to take into account the designation of a Scheduled Monument on the site and therefore require updating; potentially meaning that the assessment of effects would result in an even more negative scoring. This is similarly the case in Appendix 9 (p.157), where we consider that the ‘Heritage Comments Significant Constraints/Other Constraints’ should reference the Scheduled Monument and the implications of this.

22. Given the above, HE therefore considers that the likely significant effects on the historic environment have not been sufficiently addressed within the Additional SA document. In addition, we also consider that mitigating measures have not been adequately addressed and that a full assessment of reasonable alternatives has not been carried out. Thus, HE concludes that in relation to Site SHR166 the requirements for SEA have not been met.

(Please continue on a separate sheet if necessary)

Please succinctly provide all necessary evidence and information to support your response. After this stage, further submissions may only be made if invited by the Planning Inspectors, based on the matters and issues identified for examination.

Q5. Do you consider it necessary to participate in relevant examination hearing session(s)?

Please note: This response provides an initial indication of your wish to participate in relevant hearing session(s). You may be asked to confirm your request to participate.

No, I do not wish to/consider it necessary to participate in hearing session(s)

Yes, I consider it is necessary/wish to participate in hearing session(s)

*The Inspectors will determine
during this consultation.*



Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	MRS ELIZABETH BODEN, HISTORIC ENGLAND
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Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text" value="Click or tap here to enter text."/>	Policy:	<input type="text" value="S16"/>	Site:	<input type="text" value="SHR166"/>	Policies Map:	<input type="text" value="S16.b"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |

(Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

SHREWSBURY

S16. Shrewsbury Place Plan Area - Schedule S16.1(i). Residential and Mixed Use Allocations: Shrewsbury Strategic Centre

Proposed employment site: Land to the west of the A49, Shrewsbury (SHR166) - Historic England **objects** to this site being allocated for development on the following grounds:

- 1) a) Development of the proposed allocation would be likely to cause substantial harm (in NPPF terms) to a large early Roman Marching Camp sited in the loop of the river which is included in the Historic Environment Record (HER 00124) -

'Marching Camp c1km SW of Uffington'. This is thought to have been part of a network of temporary marching camps relating to Roman campaigns in the Midlands and Wales in the early Roman period, with the fortress, forts and camps in the vicinity of Wroxeter located about 6 km to the SW. The marching camp was discovered via cropmarks in 1976 and archaeological investigation works ahead of the construction of the A5/A49 Shrewsbury bypass in the 1990s revealed two ditches attributed to the camp, but no dateable artefacts (The Uffington Marching Camp report, 1991).

- b) The site clearly has further archaeological potential to add evidence and knowledge of Roman Marching Camps in Early Roman Britain. Thorough archaeological evaluation in order to assess its appropriate level of overall significance and to establish if the principle of development is appropriate at all, should be completed before any land allocation is considered.
- c) As the proposed allocation would almost entirely envelop the camp and its immediate setting, there would be a direct negative impact on the significance of this non-designated heritage asset. As there is insufficient evidence in relation to archaeology at the site, the development of this site could result in the loss of a non-designated heritage asset, and its setting, that is demonstrably of equivalent significance to a scheduled monument. In that circumstance the proposed development is likely to cause substantial harm in NPPF terms (footnote 63). In light of the current insufficient evidence base to inform this allocation it is considered that the Plan is not positively prepared, justified or consistent with national policy in respect of the historic environment, and is therefore not sound.

2) a) Development would affect the significance of Scheduled Monuments on Haughmond Hill due to development within their setting. These include an early Iron Age Camp, within which stands the ruins of the 18th century Haughmond Castle Folly and a World War II gun emplacement; a Norman or Anglo-Saxon ringwork (medieval fortification) known as Queen Eleanor's Bower and Haughmond Abbey, an Augustinian Abbey dating from around c.1130, which is also Grade I Listed.

b) Whilst the harm would be less-than-substantial (NPPF para. 196), the overall cumulative impact on all of the Scheduled Monuments within their landscape setting would be detrimental to understanding the relationship of these designated heritage assets with the town of Shrewsbury, which lies in the plain of the River Severn beneath Haughmond Hill. Development of the site would therefore impede the experience of understanding the story of using higher areas for overlooking the lower plains. This is particularly so, as the proposed allocation is for 45 hectares of B2 and B8 employment uses and will potentially result in the development of very large sheds, which would be 'foregrounded' in views from Haughmond Hill.

3) The proposed allocation of this site for employment development would mark a major change in the urban structure to the east of Shrewsbury. The town is currently contained to the west of the River Severn that forms a strong physical eastern edge to the town, beyond which the River Severn plain leads to Haughmond Hill. The villages and hamlets to the west of the river are read as individual nucleated settlements within a rural landscape and there is a strong demarcation between this landscape and the form of the town. This rural setting is not only important for the Scheduled Monuments on Haughmond Hill, but also for the town itself, as it provides an accessible context for its historical location within the tight loop of the river and the wider plain of the River Severn. This

Office Use Only	Part A Reference:
	Part B Reference:

relationship is of a finer grain and more accessible than elsewhere in the town's environs and forms an important part of the setting of this historic county town.

- 4) It is considered that this proposed development for 45 hectares of employment land, especially if linked to a train station in this location, may result in pressure for further development in the Severn Plain between the River Severn and Haughmond Hill. In this respect it is unclear how this allocation would be part of a longer term approach in terms of overall employment land provision that may be available as a result of the planned north-west relief road (that will include a new river crossing to the north of town), and development opportunities that may arise to the north and west of Shrewsbury in the long term.

Whilst Historic England notes the additional material supplied by the Council in the form of a 'Historic Environment Supplementary Site Assessment' in relation to SHR166, our view remains unchanged, as mitigation is not clear and convincing justification for the substantial harm that is likely to be caused to the Roman Marching Camp from the development of this proposed allocation.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Site SHR166 should be removed from the Local Plan as a proposed employment allocation.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

Office Use Only	Part A Reference:
	Part B Reference:

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Historic England would welcome the opportunity to address the above issues by way of a Statement of Common Ground with the Local Planning Authority, but if it is not possible to reach agreement on any or all of the issues, we would wish to participate in the hearing session to explain and clarify our concerns, and, if necessary, to take part in any discussions on the matter and to answer any questions the Inspector may have.

(Please continue on a separate sheet if necessary)

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature:

Elizabeth Boden

Date:

26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor unique Part A Ref *	A0348
Matter	1 – Legal / Procedural Requirements
Relevant questions nos	2, 3 & 4

*Your unique reference can be found in the Schedule of Respondents (Schedule 3 of document SD014.01) at:

<https://shropshire.gov.uk/planning-policy/local-planning/local-plan-review/draft-shropshire-local-plan-2016-2038-examination/examination-library/earlier-regulation-18-plan-making-stages-of-consultation/regulation-19-pre-submission-draft-of-the-shropshire-local-plan-consultation/>



SHROPSHIRE LOCAL PLAN EXAMINATION IN PUBLIC MAY 2022
Stage 1 - Matter 1

Historic England Statement

1.0 Overview

1.1 Historic England (HE) has been involved with the Plan process throughout, including responding to consultations on the following:

- Sustainability Appraisal (SA) Scoping Report in November 2016
- Issues and Strategic Options in March 2017
- Preferred Scale and Distribution of Development in December 2017
- Preferred Sites consultation document in January 2019
- Strategic Sites consultation in September 2019
- Regulation 18 Pre-Submission Draft consultation in September 2020
- Pre-Submission Draft / Regulation 19 consultation in February 2021.

HE also produced a Statement of Common Ground in conjunction with Shropshire Council in August 2021 and we can confirm that we have no concerns in respect of Duty to Co-operate matters.

1.2 At the Regulation 19 stage HE submitted two representations to the Pre-Submission Plan: one which considered the Regulation document to be unsound in relation to the proposed allocation of 'Land to the west of the A49, Shrewsbury (SHR166)' and another commenting on several policies and allocations within the Plan, which HE considered met the tests of soundness.

1.3 In addition to these representations, HE also submitted a representation raising concerns regarding the Sustainability Appraisal Report & its accompanying Appendix Q. Shrewsbury Place Plan Area Site Assessments (APPENDIX 1).

1.4 HE notes that its response to the SA document is not included within the Council's Examination document GC4a Appendix 1 (Sustainability Appraisal Responses to Reg 19 consultation), as the response of Representor Unique Part A Ref: A0348 is not listed.

1.5 Furthermore, the Statement of Common Ground between HE and Shropshire Council, August 2021, did not address the issues raised by HE in relation to the SA. HE therefore submits this Hearing Statement in relation to Matter 1 – Legal/Procedural Requirements, with specific reference to the SA.

2.0 HE Current position in relation to the Submission Plan

- 2.1 In response to paragraph 18 of Initial Questions from the Inspectors, HE has replied to a request from Shropshire Council to provide an update in relation to its objection to the proposed allocation of site SHR166 for employment development within the Shropshire Local Plan.
- 2.2 Our letter dated 16th February 2022 responding to this request, setting out our latest position on this matter, has been published on the Council's website in 'Examination stage documents', under 'Other Documents' OD001 Historic England Correspondence (SHR166) (APPENDIX 2).

3.0 HE Current position in relation to the Stage 1 Matters, Issues and Questions Paper

- 3.1 With regard to the Inspectors' Matters, Issues and Questions Paper, Matter 1 Legal/Procedural Requirements raises four questions in respect of the Sustainability Appraisal, to which Historic England responds consecutively below:

Q2. Are the likely environmental, social and economic effects of the Local Plan adequately and accurately assessed in the Sustainability Appraisal (SA)?

- 3.2 Planning Policy Guidance advises that a sustainability appraisal should consider the environmental, social and economic effects of a Local Plan and thus the SA should meet all of the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (PPG Paragraph: 007 Reference ID: 11-007-20140306 Revision date: 06 03 2014).
- 3.3 With regard to the environmental effects of the Shropshire Plan, the SA Report sets out that effects on the historic environment have been assessed under Sustainability Objective SO15: *'Conserve and enhance features and areas of heritage value and their setting'*. However, it is noted that the SA questions under this objective only allow for consideration of designated heritage assets and their setting (SA Report pages 41 and 45-46 refer). HE considers that this offers limited scope for consideration of the historic environment and that non-designated heritage assets and their setting should also be encompassed within the SA criteria for the assessment of sites, as they can make a positive contribution to the character of our settlements and enrich our sense of place. Furthermore, HE contends that the scope of Sustainability Objective SO15 clearly allows for the consideration of non-designated heritage assets by referring to *"features and areas of heritage value"* and does not specifically stipulate designated heritage assets.
- 3.4 Moreover, HE made comments in response to the SA Scoping Report consultation in November 2016 (APPENDIX 3), raising issues regarding the consideration of non-designated heritage assets within the SA, amongst others, and concluding that *"based on the information available in the consultation*

Scoping Report it is considered that the criteria for site assessment would not form a robust base for assessment to inform the SA or LPR.

- 3.5 In addition, HE also responded to the Local Plan Issues and Options consultation in March 2017 (**APPENDIX 4**), raising the same issues with regard to the parameters for the assessment of sites.
- 3.6 This is particularly pertinent in relation to proposed employment allocation site SHR166 as the proposed allocation lies over an un-designated early Roman marching camp. Although this site has been assessed within the SA in relation to designated heritage assets, HE considers that the environmental effects on the historic environment have not been adequately or accurately assessed in relation to the non-designated heritage asset, over which this site lies. In addition, given what is known about the site in the Historic Environment Record (HER 00124), HE contends that the SA assessment should have considered the opportunity of unknown archaeology of national importance that could be on the site in relation to SHR166, and that the SA is also inadequate in this regard.
- 3.7 Furthermore, with reference to Table 1.3 of the SA report, HE notes that Site SHR166 was assessed as scoring 'Poor' at both the Regulation 18 and Regulation 19 Stages of the Local Plan. Despite Table 1.3 being entitled "*How significant effects identified by the SA have influenced employment site allocations*", it is not clear as to how a site with a 'Poor' rating in the SA, which at para.2.6 of the SA Report is said to be equivalent to 'significant negative' effects, can then still be proposed to be allocated, if the significant effects identified by the SA have truly influenced the employment site allocations.
- 3.8 In addition, with regard to Table 1.3, it is noted that site SHR166 was assessed as 'Fair' at the 'Preferred Sites' consultation stage, whereas three other potential Shrewsbury employment sites were also assessed as 'Fair' at this stage but then not carried forward into the Regulation 18 Plan and one site even assessed as 'Good' but also not carried forward.
- 3.9 Furthermore, within the Summary of the SA results for sites included in Chapter 10 of the SA report HE notes that there are a very large number of employment sites which score either 'Good' or 'Fair', but with little or no explanation as to why these sites were not selected as employment allocations. The omission of the SA to assess this site SHR166 against 'reasonable alternatives', as required by the Regulations, is commented on under Q3 below, but the Summary of the SA results set out in Chapter 10 clearly demonstrates that there are other sites that would have a lesser effect on the environment that could have been assessed further, or carried forward to proposed allocations stage, rather than this site, which has the potential to cause harm to heritage assets.
- 3.10 Chapter 11 of the SA Report goes on to set out the 'Likely Significant Effects' of the Plan. However, HE considers that there are fundamental omissions and disconnects within the SA. For example, site SHR166 is not included within Table 11.3 (p.255) "*Allocated employment sites SA ratings*" but does appear

within Table 11.4 (p.259) "*Mitigation measures for site allocations*", wherein there is no consideration of mitigation of harm to heritage assets.

- 3.11 In response to concerns expressed by HE to Shropshire Council during the Regulation 19 consultation stage, and to provide explanation with regard to the process of employment site selection at Shrewsbury, Shropshire Council prepared a paper entitled "*Overview of Shrewsbury 'Strategic' Employment Development Options Assessment*" – received by HE via email on 25th February 2021 (Appendix 5). HE considers that whilst this paper explains the process of site selection and its integration with the SA, it does not offer sufficient justification for the selection of some sites and the rejection of others. It is intended that further comment will be provided on this paper by HE in relation to proposed allocation SHR166 at Stage 2 of the EIP.
- 3.12 Therefore, for the above reasons HE considers that the likely effects of the Local Plan on the historic environment are not adequately or accurately dealt with in the SA.

Q3. Does the SA test the Local Plan against the preferred options chosen and all reasonable alternatives?

- 3.13 The Environmental Assessment of Plans and Programmes Regulations 2004 set out the requirement for the SA report to identify, describe and evaluate the likely significant effects on the environment of reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme and Planning Policy Guidance is clear that the sustainability report should demonstrate why the proposals in the plan are the most appropriate (PPG para: 022 Ref ID: 11-022-20140306 Rev Date: 06 03 14).
- 3.14 HE notes that para.2.24 of the SA Report states that rather than carrying out the SA of all sites in Shropshire as a whole, sites were assessed against each other on a settlement-by-settlement basis.
- 3.15 Therefore, HE considers that proposed allocations have not been tested against all reasonable alternatives. With regard to a large employment site such as SHR166, the availability of such as sites in and around one given settlement is obviously going to be limited and HE considers that the SA should have undertaken a full SA assessment of all other available employment sites on a county-wide basis, to ensure that site SHR166 was tested against 'reasonable alternatives'. As referred to in para.3.8 above, Chapter 10 of the SA report demonstrates that other sites put forward for employment scored better than site SHR166 throughout the SA process, but with very little/no explanation as to their lack of selection.

Therefore, notwithstanding, the fact that this site is scored as 'Poor' within the SA, there appears to be no reason why potential large employment sites within

and around the other Principal Centres in the County have not been assessed for comparison against SHR166.

Q4. Have any concerns been raised about the SA methodology and what is the Council's response to these?

- 3.16 As referred to above in paragraph 3.5 HE made comments about the SA methodology in response to the SA Scoping Report consultation in November 2016 (**APPENDIX 3**), with only some of our comments then being addressed within the SA report.
- 3.17 For example the 300m survey distance for designated heritage assets (other than for listed buildings) appears to have been derived from the advice of Shropshire Council's Environment Team, despite our comments at the early SA Scoping and Local Plan Issues and Options stages that the setting of a heritage asset could include an area much further than 300m.
- 3.18 With regard to the stages of the 'Site Assessment Process' HE considers that, regarding the historic environment, the method applied is incomplete, as at Stages 1 and 2 consideration has only been given to designated heritage assets. Furthermore, the SA report states that at Stage 3, the 'Detailed Site Review' (p.61), the assessments would be informed by Heritage input, amongst others, but in fact no Heritage Impact Assessment was prepared in advance of the Regulation 19 stage for site SHR166. This was also the case for other allocations proposed at the Regulation 18 stage, and about which Historic England raised this issue at that time.
- 3.19 It is noted that the SA assessments of proposed allocation SHR166 are contained in Appendix Q of the SA – Shrewsbury Place Plan Area Site Assessments (SD 006.18). In the Stage 3 assessment (p.589) the Heritage comments have not been classed as 'significant' but rather as 'other' constraints, and refer to the fact that the site may effect settings of Scheduled Monuments of Haughmond Hill hillfort (NHLE ref. 1021282) and Queen Eleanor's Bower ringwork (NHLE ref. 1021281), and that the site contains majority of large Roman marching camp (HER PRN 00124) and so has significant archaeological potential. In addition, the assessment notes that the site is detached from the existing built edge of Shrewsbury and that the 'management of constraints' require a Heritage Assessment to be submitted with a planning application, to consider the impact on settings of Scheduled Monuments, along with an Archaeological DBA and field evaluation.
- 3.20 However, HE contends that in order for the Local Plan to be found sound, the justification for the principle of development of each proposed allocation should be clearly specified, either within the plan itself, or within the SA, or other accompanying documents, such as topic papers; and this cannot be left until the planning application stage. HE considers that as the SA clearly sets out that there are likely significant negative effects with regard to SHR166, and that reasonable alternatives have not been effectively considered, and then goes

on to state that assessments will be undertaken at planning application stage, the principle of development on the site has clearly not been proven as acceptable and justified.

3.21 Therefore, at the Regulation 19 consultation stage HE advised that a Heritage Assessment should be undertaken prior to the allocation of the site and maintains the view that without such work having informed the SA process, the SA's methodology is therefore fundamentally flawed.

3.22 Following concerns expressed by HE during the Regulation 19 consultation process Shropshire Council produced a "Supplementary Site Assessments" paper (**Appendix 6**), to assess in detail the potential impact these allocations would have upon the historic environment. It is intended that further comment will be provided on this paper by Historic England in relation to proposed allocation SHR166 at Stage 2 of the EiP.

Q5. *Have the requirements for Strategic Environmental Assessment (SEA) been met?*

3.23 With regard to the requirements for Strategic Environmental Assessment (SEA) HE considers that with regard to proposed employment allocation SHR166 the likely significant effects on the historic environment have not been fully assessed, mitigating measures have not been adequately addressed and a full assessment of reasonable alternatives has not been carried out. Thus, HE concludes that the requirements for SEA have not been met.

4.0 Summary

4.1 Based on the current content of the Sustainability Appraisal which accompanies the Submission Plan HE maintains its concerns as to whether the Council has complied with the relevant legal and procedural requirements.

4.2 Overall, HE considers that further clarity is required of the SA process, particularly with regard to harm to the historic environment and how the site assessments within the SA Report have influenced the selection of site allocations. Current HE concerns could be addressed through removal of site SHR166 from the Local Plan; which is a poorly scoring site, and which, if developed for employment, has the potential to harm both designated and undesignated heritage assets.

Elizabeth Boden MA MRTPI
Historic Environment Planning Adviser (Midlands)

25th May 2022

Shropshire Council: Shropshire Local Plan Representation Form



Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:

MRS ELIZABETH BODEN, HISTORIC ENGLAND

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:	SA Report & SA Appendix Q. Shrewsbury Place Plan Area Site Assessments	Policy:	Click or tap here to enter text.	Site:	SHR166	Policies Map:	
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | |
|--|-------------------------------|---|
| A. Legally compliant | Yes: <input type="checkbox"/> | No: <input type="checkbox"/> |
| B. Sound | Yes: <input type="checkbox"/> | No: <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: <input type="checkbox"/> | No: <input type="checkbox"/> |

(Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

With regard to the Sustainability Appraisal (SA) which accompanies the Regulation 19 Plan, it would appear that further work has been undertaken to refine the site selection procedure and to make the process more transparent. Thus, two further stages have been added to the SA documents – Stage 2b and Stage 3 and it is evident that heritage matters have been considered within the SA, which is welcomed. However, in some cases it is not clear why some sites, which score worse than others in overall terms within the SA, or when assessed against other sites for a particular settlement, are put forward as an allocation, when the harm to the historic environment is not clear from the SA.

In particular, SHR166 scores as 'Poor' but is put forward as an employment site allocation. With regard to SHR166, there are also disconnects within the SA since the site is not included within Table 11.3 of the SA Report which sets out 'Allocated employment sites SA ratings' but is included within Table 11.4. Table 11.4 (p.260) sets out 'Mitigation measures for site allocations' but fails to include any consideration of mitigation of harm to heritage assets for site SHR166 so, again, it is not clear how the historic environment has been assessed.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Further clarity is required with regard to the assessment of the effects of proposed allocations on the historic environment, either within the SA, or within another evidence base document, together with a full explanation of the site selection process. Particularly regard should be given to sites scoring as 'POOR' within the SA, such as Site SHR166. Please refer to Historic England's representation on the Regulation 19 document regarding this site, which we consider should be removed from the Local Plan as a proposed employment allocation.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

Office Use Only

Part A Reference:

Part B Reference:

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Historic England would welcome the opportunity to address the above issues by way of a Statement of Common Ground with the Local Planning Authority, but if it is not possible to reach agreement on any or all of the issues, we would wish to participate in the hearing session to explain and clarify our concerns, and, if necessary, to take part in any discussions on the matter and to answer any questions the Inspector may have.

(Please continue on a separate sheet if necessary)

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature:

Elizabeth Boden

Date:

26/02/2021

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Part A Reference:

Part B Reference:



Historic England

Our ref: PL00709782

Your ref:

Telephone:

Email:

16 February 2022

FAO: Edward West, Planning Policy Manager

Dear Sir,

Re: Shropshire Council Examination In Public (EIP) of the Shropshire Local Plan 2016 to 2038 – Uffington Roman Marching Camp

Following an initial question set out by the appointed EIP Inspectors, Historic England is now responding to a request from Shropshire Council to provide an update in relation to its objection to the proposed allocation of site SHR 166 for employment development within the Shropshire Local Plan.

Historic England notes that **Paragraph 18 of the Inspectors' Initial Questions** states:

In relation to Policy S16.6 Shrewsbury, site SHR 166, paragraphs 4.1.6 and 4.1.7 of the Statement of Common Ground between Historic England and Shropshire Council, dated August 2021 state, "Historic England is undertaking further work in liaison with landowner in the Summer of 2021 in order to understand the significance of the site and will keep Shropshire Council fully informed. Once further information is known about the buried archaeology of the site and its significance, then the principle of development may, or may not be established. If the principle of development is established, then Historic England would agree to development being carried out in an appropriate way, together with mitigation, in association with the Council's Natural and Historic Environment Manager. However, it is Historic England's view that there is insufficient evidence available at the present time to make such a judgement on the principle of development at this site." Can the Council please advise what the latest position is on this matter. Also, are there any other unresolved matters in relation to the historic heritage of this site?



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Latest position:

Site SHR 166 encompasses the majority of a large non-designated Roman marching camp. At the time of the Council's consultation on the Regulation 19 pre-Submission Local Plan Historic England objected to the proposed allocation of the site on several grounds, and including the following in relation to the Roman marching camp:

- a) *Development of the proposed allocation would be likely to cause substantial harm (in NPPF terms) to a large early Roman Marching Camp sited in the loop of the river which is included in the Historic Environment Record (HER 00124) - 'Marching Camp c1km SW of Uffington'. This is thought to have been part of a network of temporary marching camps relating to Roman campaigns in the Midlands and Wales in the early Roman period, with the fortress, forts and camps in the vicinity of Wroxeter located about 6 km to the SW. The marching camp was discovered via cropmarks in 1976 and archaeological investigation works ahead of the construction of the A5/A49 Shrewsbury bypass in the 1990s revealed two ditches attributed to the camp, but no dateable artefacts (The Uffington Marching Camp report, 1991).*
- b) *The site clearly has further archaeological potential to add evidence and knowledge of Roman Marching Camps in Early Roman Britain. Thorough archaeological evaluation in order to assess its appropriate level of overall significance and to establish if the principle of development is appropriate at all, should be completed before any land allocation is considered.*
- c) *As the proposed allocation would almost entirely envelop the camp and its immediate setting, there would be a direct negative impact on the significance of this non-designated heritage asset. As there is insufficient evidence in relation to archaeology at the site, the development of this site could result in the loss of a non-designated heritage asset, and its setting, that is demonstrably of equivalent significance to a scheduled monument. In that circumstance the proposed development is likely to cause substantial harm in NPPF terms (footnote 63). In light of the current insufficient evidence base to inform this allocation it is considered that the Plan is not positively prepared, justified or consistent with national policy in respect of the historic environment and is therefore not sound.*

In order to advance our understanding of this historic asset Historic England commissioned further investigative work in the Summer of 2021, comprising:

- Geophysical survey
- Aerial investigation and mapping report and
- Archaeological field evaluation.

These reports have already been forwarded to Shropshire Council.



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Taken collectively the findings of the reports highlight varied heritage values and areas of interest. Areas of interest include:

Historic Interest

- The Roman camp at Uffington conforms to the classic straight-sided rectangular shape with rounded corners ('playing-card' form), constructed and used by Roman soldiers for a temporary period, as part of military campaigns, or for training.
- The camp's perimeter ditches are clearly discernible from aerial photographic evidence and indicates that this is one of the most complete examples of a temporary camp in Shropshire.
- Uffington is a very good English example of a camp which has been modified and reused across multiple campaigns, as demonstrated through aerial, geophysical and excavation evidence.
- Uffington forms part of a cluster of seven camps that have been identified around the legionary fortress at Wroxeter; indicating that this area formed a 'gathering ground' from which military operations would have been initiated. Some of these other camps have been tentatively associated with the campaigns of Agricola in 78 AD, when Wroxeter was used as a base to attack North Wales and Anglesey. Uffington may have temporarily accommodated some of these troops in the 78 AD campaign.
- The Uffington camp appears to have a sequential relationship with the camps at Whittington, Pen Plaenau and Penrhos; potentially representing a single pre-Flavian (latter half of the 1st century AD) campaign into Wales, with Uffington as the starting point. Such sequences are unusual in England, and this is the only cited example in Wales and The Marches.
- The marching camp at Uffington is historically and archaeologically significant in developing understanding of Roman invasion routes into Wales. The location of Uffington was of clear strategic importance, enabling and controlling access into Wales along the River Severn and at a key river crossing point.

Archaeological Interest

- Recent archaeological investigations have confirmed the physical survival of the V-shaped fort ditches, including the northern perimeter defensive ditch, the southern perimeter defensive ditch, and the northern entrance and ditch terminal.
- The southern ditch was revealed to be the best preserved and was sectioned to reveal an ankle-breaker slot at its base; a clear diagnostic feature of Roman defences.



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- Diagnostic Roman finds were not recovered from the trial trenching which focussed upon feature identification. It should be noted that due to the temporary nature of marching camps they tend to be quite clean in terms of material culture, however larger scale interventions would recover datable finds.
- The site of the camp is monumental in that it exists as a defined set of architectural spaces set in articulation with the physical topography and strategic landscape. The monumental significance of the site can be seen both in its re-fortification through successive campaigns and its setting relationship to contemporary and later monuments. These attributes of the site would be largely lost, were development as proposed in the allocation to take place.

Historic England has indicated that it would engage constructively with master-planning, were an allocation to be made contra our objection. It should be clearly understood that this does not dilute our position of objection. In this instance even best efforts to mitigate impacts upon heritage assets through design (either directly, or as setting) could not, in the context of the scale and type of the proposed allocation, reduce that harm to a sustainable level.

The Roman marching camp at Uffington belongs to a historically significant group of monuments in the Wroxeter area that adds, and has further potential to add, to our understanding of early Roman military campaigns into Wales. Despite pro-longed intense agricultural activity, the camp endures as a clearly delineated enclosure with diagnostic features, such as the 'Punic' ditch form, with ankle-breaker slot at the base. Of particular importance is the strong strategic landscape setting in relation to the River Severn and the topography, which includes Haughmond Hill to the east. The strategic location has clear similarities with other Roman marching camps in England (such as the group at Newton on Trent), suggesting a common suite of military strategies taught and adopted by Roman commanders and an organisational ability to remember locations used in previous campaigns and re-fortify them. Historic England therefore considers Uffington Roman marching camp to be demonstrably of equivalent significance to a scheduled monument.

In NPPF terms Historic England considers that the allocation and consequent development of the proposed site for employment uses will lead to substantial harm to the significance of this heritage asset, and its setting, as most of the camp would likely be destroyed through damage to the completeness of the camp's defensive ditches and crucially its monumental place in the landscape subverted. This non-designated heritage asset of archaeological interest, being of national importance, is therefore demonstrably of equivalent significance to a scheduled monument, and consequently footnote 68 of the Framework is engaged. Thus, the principle of development is not established and substantial harm, or loss, should be wholly exceptional.



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Historic England

Historic England's Development Advice Team (Midlands) has asked Historic England's separate Listing Team to assess the monument for designation as a scheduled monument under S1 of the 1979 Ancient Monuments and Archaeological Areas Act. If the case is taken forwards to assessment any decision as to adding the monument to the schedule would rest with the Secretary of State (DCMS) who would consider the report and recommendation provided by Historic England's Listing Team.

Historic England maintains its objection to the proposed allocation of Site SHR166 for employment land in the Shropshire Local Plan and on this basis considers that the Plan is not positively prepared, justified or consistent with national policy and is therefore unsound.

With regard to the Inspectors' question regarding any other unresolved matters in relation to the historic heritage of this site, Historic England confirms that it also maintains its objection to the proposed employment allocation on grounds 2, 3 and 4, as set out in our representation to the consultation on the Regulation 19 Shropshire Local Plan (2016-2038).

Yours faithfully,

Elizabeth Boden

Elizabeth Boden (Mrs)
Historic Environment Planning Adviser
E-mail:

cc.

cc.



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RE: SHROPSHIRE COUNCIL LOCAL PLAN REVIEW 2016-2036 – SUSTAINABILITY APPRAISAL SCOPING REPORT CONSULTATION NOVEMBER 2016

Thank you for consulting Historic England on the Scoping Report for the Local Plan Review's Sustainability Assessment. We have some overall concerns about the scope of the report and how this could potentially impact on the outcomes of the SA and LPR. Our comments on various stages and aspects of the Scoping Report are set out below.

Chapter 2 – Plans and Programmes et al

Page 15 and 16 – The plans and programmes information for the historic environment is rather limited and does not offer scope to provide a fully informed assessment of this aspect in relation to a plan review. There are more international and national sources which could inform the process and it is recommended that these be included. For example, Planning Practice Guidance is not referenced, and Historic England (HE) documents which could be of use to the findings and approach to the SA framework and site selection do not appear to have been considered: e.g. HE Good Practice Advice Note 1 The Historic Environment in Local Plans; e.g. HE Heritage Counts report 2016; e.g. HE advice note on SEA and Sustainability Appraisal.

There is also concern that there is no regional or local information included within the scope of the SA to assist with the plan review: e.g. Historic Landscape Characterisation work; e.g. Conservation Area Appraisals and Management Plans; e.g. the Historic Environment Record.

With regard to the Summary of Key Issues section, this again is very limited as a result of the limited scope of plans and programmes considered and it is suggested that the key issues could, and should, be expanded. In terms of the issue highlighted at present, it does not provide a sound basis for consideration of the historic environment as setting is not addressed. It is recommended that the existing issue be revised to read '*Conserve and enhance designated and non-designated heritage assets and their setting*'.

Further information and advice can be found in the Historic England advice note on Strategic Environmental Assessment and Sustainability Appraisal which may be of use to you at this stage of the process:

<https://historicengland.org.uk/images-books/publications/strategic-environ-assessment-sustainability-appraisal-historic-environment/>

Chapter 3 – Baseline Information

Table 3.9 (k) Cultural Heritage

All references to 'undesigned' heritage assets should be amended to 'non-designated' heritage assets in line with NPPF terminology.

The baseline information at present is very limited and does not identify trends for cultural heritage in Shropshire in any meaningful way to inform the LPR or SA in a robust manner. For example, what baseline information is available for Conservation Areas?; and, How has data included in Heritage Counts been used to inform the process?

At present non-designated heritage assets are quantified, but this does not provide for any unknown archaeological elements which may become evident through site allocation work. This would need to be taken into account in line with the requirements of NPPF Para.139. In addition, are there any commitments to a Local List in relation to non-designated heritage

assets or existing Local List information which could be used as part of the baseline information?

As a result of the baseline information being insufficient in relation to the historic environment at this stage, the resulting identified issues, and Summary of Issues, for Cultural Heritage set out in Chapter 4 are also insufficient. Historic England recommends that tasks are reviewed and the scope widened to ensure that the historic environment has been provided for fully in subsequent assessments.

Again, we would direct you to the Historic England advice note on Strategic Environmental Assessment and Sustainability Appraisal, and also the Good Practice Advice Note 1: The Historic Environment in Local Plans.

Chapter 5 – SA Framework

Following on from the limitations of the Plans and Programmes and Baseline information, the framework information is lacking in detail for the historic environment. Notwithstanding this fundamental issue, Sustainability Appraisal Objective 15 Cultural Heritage is welcomed although it is recommended that setting be included within the objective to ensure matters are considered fully and in line with national requirements. For example, the objective set out in [Table 5.1](#) could be amended to read as follows: *'To conserve and enhance features and places of heritage value and merit, including heritage assets, along with their setting'*.

Page 36 – Table 5.2 – SA Objective supplementary questions

Due to insufficient information at earlier stages of the Scoping exercise, the supplementary questions form a very limited scope for consideration of the historic environment under SO15. Historic England is concerned that this does not form a sufficient basis to inform the SA and LPR and would refer you again to the HE advice note on SEA and SA.

Page 37 – Table 5.3 Compatibility of SA Objectives

Table 5.3 indicates that there is potential incompatibility with SA Objectives 2 (Economy) and 3 (Housing) which is possible in terms of site allocations. However, the SA will need to consider potential positives between SA Objectives 2, 3 and 15 e.g. any benefits of the historic environment as a catalyst for the local economy; e.g. any benefits of high quality design in the built environment. The current very limited scope of the report at present does not provide for the full consideration of issues within the SA and LPR.

Page 38 – Table 5.4 – Assessment Criteria

The assessment criteria text relates to the significance of effects of policy against the SA objectives. However, this is not reflected in Table 5.4 which refers to the effect on people and places. It is recommended that the criteria be revised to clearly set out whether the policy or option supports the achievement of the objective and all decision making criteria or not taking into account the individual significance of effect levels set out in the table. For example, + Positive could read *'Policy or option supports the achievement of this objective although it may have only a minor beneficial effect'*.

Table 5.5 – SA Criteria for site assessment

Historic England has concerns with the criteria for assessment in relation to SO15 (Cultural Heritage). The overall limited scope set out in the document results in a flawed approach to the historic environment.

Criteria No.13 does not take into account setting so a site not falling within any of the cited heritage assets would score 'O' based on the proposed approach, when in fact the site could be adjacent or nearby to one of these heritage assets and have a negative effect due to impact on setting.

Criteria No.14 sets out 300m as a survey distance but it is not clear how this distance has been reached as an appropriate survey base. The setting of a heritage asset could include an area much further than 300m e.g. views to and from a heritage asset.

Of further concern is that Listed Buildings and non-designated heritage assets do not feature at all in either criteria.

Based on the information available in the consultation Scoping Report it is considered that the criteria for site assessment would not form a robust base for assessment to inform the SA or LPR.

I am sorry not to be more positive at this time, but hope that this information is of use to you at this time. We look forward to working further with you on the SA and LPR.

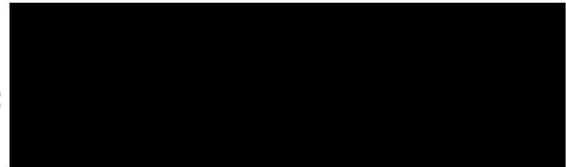


Historic E

WEST MIDLANDS

Shropshire Council
planning.policy@shropshire.gov.uk

Our ref:
 Telephone:
 Email:



20 March 2017

Dear Sir, Madam,

Re: Shropshire Local Plan Review

Many thanks for consulting Historic England on the above consultation document.

We note the content of the Local Plan Review on page 5; does this confirm that there are no proposed amendments to the historic environment policies contained within the Core Strategy (2011) and SAMDev (2015) Local Plans?

Paragraph 1.12 on page 9 identifies a new set of strategic objectives for the Shropshire Local Plan Review. Whilst we recognise that the Local Plan Review is covering only limited issues, as there will be new proposed site allocations we consider it essential that there is a strategic objective that focusses on the environment. The Local Plan must have a positive strategy for the conservation of the historic environment (Paragraph 126 of the NPPF) and ensure that any proposed site allocations are effective, justified, consistent with national policy and legally compliant. We consider that a strategic objective for the environment/ historic environment will be an opportunity to demonstrate that the historic environment is being positively considered and assist in the assessment of proposed site allocations.

We understand that there are a number of potential sites suggested within the opportunities section on page 11 and would recommend that these be assessed in line with our advice note (link included below), or other appropriate methodology, to assess their suitability in respect of the historic environment.



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We note that the Local Plan Review is seeking to plan for a higher level of growth for housing and employment land, than the previous Plan and we are keen to ensure that this is prepared in line with Section 12 of the NPPF with appropriate consideration for the historic environment. Where new sites are proposed for allocation we would expect that they be justified by appropriate evidence relating to the historic environment and fully consider the harm to the significance of heritage assets, where relevant.

Historic England prepared an advice note to assist Local Authorities when preparing their Local Plans with site allocations and I include a link to this advice note below:

<https://content.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans.pdf/>

We consider that there could be additional detail contained within the section on community hubs/clusters and draft criteria, at the next stage of the plan preparation. Where community hubs/clusters are within conservation areas or affect heritage assets, including their setting where relevant, additional detail could be included to ensure their conservation but also look at ways in which there could be enhancement through design principles or heritage at risk for example. Where infill development is suggested and/ or conversions of existing buildings we request that this be sympathetic to the historic environment and recognise ways to enhance the historic environment. We welcome the inclusion of a specific clause on heritage and look forward to engaging on this section of the plan, as it develops.

Paragraph 4.17 includes some text on enabling development and the historic environment. Historic England is currently preparing some up to date advice in relation to enabling development and the historic environment. I will forward this information onto you as soon as it is available.

I attach a link to our current advice in the meantime:

<https://content.historicengland.org.uk/images-books/publications/enabling-development-and-the-conservation-of-significant-places/enablingwebv220080915124334.pdf/>

Appendix 1 includes a list of allocated sites that have not yet commenced, are these sites going to be taken forward into the Local Plan Review? Are you anticipating any modifications to these proposed allocations? We note a typographical error on page 36, 'commended' we believe should read 'commenced'.



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Strategic Environmental Assessment – SA Consultation Report

Table 2.9 could also usefully refer to the Good Practice Advice Notes 1, 2 and 3 which considers the historic environment in local plan making, what is significance and decision taking and understanding the role of setting.

We welcome the inclusion of a specific indicator on cultural heritage; SO15 on page 33.

We would recommend some amendments to the text in Table 5.2 on page 37, including inserting the term heritage assets into the Objective so that it is in line with the NPPF terminology. The SA could look at ways to minimise harm as well as avoid harm and we would recommend that these mitigation measures are included within the plan itself. The indicator for heritage at risk is a positive inclusion, would the Council consider including a target to reduce heritage at risk over the plan period?

Table 5.6 sets out parameters for site assessment, we consider that in its current form this is a very limiting site assessment. In line with the national planning policy framework sites should be assessed to identify the harm to the significance of heritage assets, designated and non-designated, including their setting, where relevant. The current parameters only record designated heritage assets but we consider the assessment should also look at non-designated heritage assets and particularly the Historic Environment Record and consider such issues as unknown buried archaeology. Additionally, we do not encourage a buffer zone approach only as there may be heritage assets outside of 300m where harm could arise to the significance of heritage assets, as a result of proposed development.

We look forward to commenting on future iterations of the SEA and hope you have found our current advice useful. I include a link below to our recently adopted advice note on Strategic Environmental Assessment and the Historic Environment:

<https://content.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/heag036-sustainability-appraisal-strategic-environmental-assessment.pdf/>

We would welcome a meeting with Shropshire Council to discuss the Local Plan Review at an early stage in the process, especially in relation to proposed site allocations.

Kind regards

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Overview of Shrewsbury 'Strategic' Employment Development Options Assessment

1. Introduction - Shrewsbury

- 1.1. To achieve a sustainable and appropriate pattern of development which also maximises investment opportunities, the 'Strategic Approach' proposed within the Local Plan Review includes an 'Urban Focus', by which the majority of new development will be focused in urban areas.
- 1.2. Shrewsbury is the largest settlement in Shropshire¹, both in terms of population and households. It is also the settlement with the most extensive range of services and facilities. As such, in accordance with the principle of 'Urban Focus', it is proposed that Shrewsbury will be identified as the Strategic Centre of Shropshire and the primary focus for new development in the County within the Local Plan Review. Recognising this role, and building upon the priority established in the Big Town Plan to achieve balanced growth, between 2016 and 2038, it is proposed that around 8,625 dwellings will be delivered and around 100 hectares of employment land will be made available for development.
- 1.3. Due to the role of Shrewsbury as a 'Strategic Centre' in the Local Plan Review and its opportunities to facilitate achievement of the economic needs and aspirations for Shropshire identified within the Local Plan Review and Economic Growth Strategy (2017-2021), it is critical that any proposed employment allocation(s) are deliverable and of the right type, scale and in the right location to be attractive to the market and facilitate the delivery of high-quality and well-designed employment development.
- 1.4. It is also considered critically important that proposed allocation(s) identified in Shrewsbury to accommodate employment development include a high-quality 'strategic' employment site, to act as a focus for new employment development in the town/county; complement existing employment sites focused in the north of the town and emerging employment site opportunities on the two existing Sustainable Urban Extensions (SUE's); and contribute to the economic growth aspirations of the wider region.
- 1.5. In this context, it is important to note that within the Local Plan Review, additional allocations specifically incorporating employment land (dedicated employment allocations or mixed use allocations specifically containing employment land), have been proposed in only four existing settlements, as well as two new strategic settlements, these are:
 - Shrewsbury as the Strategic Centre – new employment land is proposed as part of a mixed-use SUE (5ha) and as a new high-quality 'strategic' employment site (45ha) (this document provides further details of the process by which this site was identified);
 - Bridgnorth as a Principal Centre – new employment land is proposed as part of a mixed-use SUE (16ha) alongside two extensions to the successful Stanmore Industrial Estate (11.4ha total);
 - Ludlow as a Principal Centre – new employment land (5ha) is proposed specifically as an extension to an existing employment allocation in order to create a critical mass for development in terms of the provision of infrastructure and the suitability of the site for larger building footprints.
 - Shifnal as a Key Centre on the M54/A5 'strategic corridor' – new employment land is proposed to form a new 'strategic' employment campus (39ha).
 - Clive Barracks. Tern Hill – new employment provision of around 6 ha is proposed as part of the extensive mixed use redevelopment of the site, expected to happen after 2025;
 - Former Ironbridge Power Station – new employment provision of around 6ha is proposed as part of the extensive mixed use redevelopment of the site.

¹ All references to Shropshire refer to the Shropshire Council Local Authority area.

1.6. The other Principal and Key Centres with employment development guidelines will deliver employment development on any existing mixed use or employment allocations and through appropriate windfall opportunities.

2. Introduction - Site Assessment Process

- 2.1. In order to identify appropriate sites to accommodate development in Shrewsbury, including a potential high-quality 'strategic' employment site, a comprehensive site assessment process has been undertaken (as has occurred and consistent with that undertaken in other settlements where site development guidelines have been proposed).
- 2.2. The site assessment process undertaken is transparent and evidence-based and considers all relevant legislation, policy and guidance, and consultation responses where they raised material issues. It also includes consideration of the following factors: Green Belt (where appropriate); Highways; Heritage; Ecology; Landscape and Visual Sensitivity; Agricultural Land Quality; Flood Risk; Water Quality; Public Protection and any other Strategic Considerations.
- 2.3. This site assessment process incorporates the assessment of sites undertaken within the Sustainability Appraisal of the Local Plan, recognising that the Sustainability Appraisal is an integral part of plan making, informing the development of vision, objectives and policies and site allocations.
- 2.4. The site assessment process also considers any relevant supporting information received as part of relevant site promotions.
- 2.5. The key stages of the site assessment are summarised below:
- 2.6. **Stage 1** of the Site Assessment process was undertaken within the Strategic Land Availability Assessment (SLAA). This involved a technical and very strategic assessment of the suitability; availability; and achievability (including viability) of land for housing and employment development.
- 2.7. **Stage 2a** of the Site Assessment process consisted of the analysis of the performance of sites against the Sustainability Objectives identified within the Sustainability Appraisal Scoping Report. The Sustainability Appraisal and Site Assessment Environmental Report illustrates how these Sustainability Objectives relate to the SEA Directive and the Environmental Assessment of Plans and Programmes Regulations 2004.
- 2.8. **Stage 2b** of the Site Assessment process involved screening of identified sites. This screen was informed by consideration of a site's availability, size and whether there were obvious physical, heritage or environmental constraints present, based on the strategic assessment undertaken within the SLAA.
- 2.9. **Stage 3** of the Site Assessment process considered those sites which were not 'screened out' of the assessment at Stage 2b. It involved a detailed review of sites and selection of proposed site allocations. This stage was informed by:
- The results of Stage 1 of the Site Assessment process (Informs the assessment of sites).
 - The results of Stage 2a of the Site Assessment process (Informs the assessment of sites).
 - The results of Stage 2b of the Site Assessment process (Informs the site assessed).
 - Assessments undertaken by Highways; Heritage; Ecology; Tree; and Public Protection Officers. In undertaking detailed reviews of sites within stage 3 of the Sustainability Appraisal: Site Assessment process, officers considered best available evidence, where necessary undertook site visits and applied professional judgement in order to provide commentary on each site.
 - Commissioned evidence base studies, including a Landscape and Visual Sensitivity Study; Level 1 Strategic Flood Risk Assessment; and Green Belt Review.

- A Habitats Regulations Assessment.
- Consideration of infrastructure requirements and opportunities.
- Other strategic considerations and professional judgement.

2.10. For further information on these stages, please refer to the Site Assessment Appendices of the Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan. The summary of the site assessment process undertaken for the Shrewsbury Place Plan Area, which includes Shrewsbury town, is Appendix Q of the Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan.

3. Shrewsbury Site Assessment Process – Identification of a Strategic Employment Site

3.1. The site assessment process undertaken for Shrewsbury in order to identify a potential high-quality 'strategic' employment site formed part of the wider site assessment process undertaken to identify all potential allocations in the town. This section of the document provides a targeted summary of this process.

3.2. Reflecting the scale and importance of Shrewsbury, it is perhaps unsurprising that a significant number of potential site allocations were identified for consideration within the site assessment process. Specifically: 192 sites were identified and considered in and around the town².

3.3. In Stage 2b of the site assessment process, 105 sites were 'screened out' as:

- There was uncertainty about whether the site is available for relevant forms of development (in Shrewsbury, relevant forms of development for the purpose of this site assessment is residential, employment or mixed-used development incorporating residential and/or employment development); or
- They were of less than 0.5ha (and there was no potential for allocation as part of a wider site); or
- The strategic assessment of the site has identified a significant physical, heritage and/or environmental constraint identified within the strategic assessment of sites undertaken within the SLAA.

3.4. As a result, Stage 3 of the site assessment process involved consideration of 87 sites.

3.5. Whilst all of these 87 sites were considered as part of the general site assessment process undertaken for Shrewsbury, not all were of sufficient size to realistically accommodate a high-quality 'strategic' employment site. Specifically, individual sites of less than 25ha are unlikely to have sufficient capacity to accommodate a high-quality 'strategic' employment site, particularly given the general assumption that only 40% of the site will actually represent employment floorspace.

3.6. As such, of these 87 sites, only around 15 were realistically of sufficient scale in and of themselves to accommodate a high-quality 'strategic' employment site.

3.7. Of these 15 sites, the majority were specifically promoted for residential development or a mixed used development which either did not include employment development or the employment development represented only a small element of the site.

3.8. Furthermore, there was also an element of 'overlapping' amongst the sites, illustrating the different formats within which they have been promoted and assessed. This is summarised within the following table:

² Please Note: Following the completion of the SLAA, further sites were promoted for consideration through the consultation and engagement process. Where possible these sites have been included within Stages 2a, 2b and 3 of the Sustainability Appraisal: Site Assessment process.

Site	Site Area	Promoted for Significant Employment Development?	Overlapping Sites Considered Potential High-Quality 'Strategic' Employment Sites	Considered Further – Specifically as a Potential High-Quality 'Strategic' Employment Site?
SHR057	51.46ha	Promoted for residential-led mixed use development (Including 7ha of employment land)	N/A	No – Scale of employment land promotion is insufficient to accommodate a Potential High-Quality 'Strategic' Employment Site. Part of the site is proposed for allocation for residential development.
SHR109	50.74ha	Yes	N/A	Yes
SHR157	42.74ha	Yes	SHR157VAR and SHR225	Yes – Jointly with SHR157VAR and SHR225
SHR157VAR	63.49ha	Yes	SHR157 and SHR225	Yes – Jointly with SHR157 and SHR225
SHR158	75.47ha	Promoted for residential led mixed use development, with 5ha of employment land included..	N/A	No – Scale of employment land promotion is insufficient to accommodate a Potential High-Quality 'Strategic' Employment Site. Site proposed for allocation as part of a mixed use SUE.
SHR166	43.28ha	Yes	N/A	Yes
SHR174	93.21ha	Promoted for residential/residential-led mixed use development. Propose mix of uses does not specifically include employment development.	SHR181	No
SHR176	29.42ha	No	N/A	No
SHR181	42.45ha	Promoted for residential/residential-led mixed use development. Propose mix of uses does not specifically include employment development.	SHR174	No
SHR190	36.98ha	No	SHR219 and SHR225	No
SHR192	34.76ha	No	SHR219 and SHR225	No
SHR197	32.83ha	Promoted for residential development. A variation SHR197VAR was subsequently promoted which represented a sub-component of the site (9ha), specifically promoted for employment development.	N/A	No – Full site not promoted for employment. Scale of subsequent employment land promotion is insufficient to accommodate a Potential High-Quality 'Strategic' Employment Site. The variation SHR197VAR was identified as a proposed allocation (as a less 'strategic' employment site) as part of the Regulation 18 stage of consultation, however it was ultimately concluded that the site would constitute a major new direction for growth given its location to the east of the A49 and this was not considered necessary at this time.

Site	Site Area	Promoted for Significant Employment Development?	Overlapping Sites Considered Potential High-Quality 'Strategic' Employment Sites	Considered Further – Specifically as a Potential High-Quality 'Strategic' Employment Site?
SHR198	48.89ha	Possible employment location	N/A	Yes
SHR219	82.60ha	No	SHR190, SHR192 and SHR225	No
SHR225	140.74ha	Mixed use development. Employment element aligns with site SHR157.	SHR157, SHR157VAR, SHR190 and SHR219	Yes – Jointly with SHR157 and SHR225

3.9. As illustrated in the above table, of the 15 sites that were realistically of sufficient scale in and of themselves to accommodate a high-quality 'strategic' employment site, 9 were promoted for either residential development or a mixed use development which it was considered did not include sufficient employment land to achieve a high-quality 'strategic' employment site (of these 9 sites, all or part of 2 was ultimately identified as a proposed allocation for other purposes – a residential development and a mixed use development respectively).

3.10. Further, 3 of the remaining 6 sites were promotions of a similar location in different formats (two different extents of an employment site and one comprehensive employment and residential development incorporating employment land in the same general location as the other two site promotions).

3.11. As such, there were 4 general site options (one of which is promoted in three different formats), promoted for sufficient employment land to achieve a high-quality 'strategic' employment site, a general description of these sites is provided below:

Site	Summary
SHR109:	<ul style="list-style-type: none"> Greenfield site separated from development boundary by other land. South of Hencott Pool SSSI/Ramsar/LWS. No obvious access or road frontage. Boundary defined to west by the railway line; south by the track to Hencote Farm; and east and north by hedgerow and trees field boundaries.
SHR157 / SHR157VAR / SHR225 (employment element):	<ul style="list-style-type: none"> Large greenfield site beyond Shrewsbury A5 bypass. Specific extent of site (and number of agricultural fields included) varies between SHR157, SHR157VAR and SHR225, however all three options include the central fields in the area between the A5 to the north; railway line/old railway line to the south and east; and A488 to the west. Site has road frontage and potential access onto A488. No existing network or footways. Site isolated from any development by road and rail line.
SHR166:	<ul style="list-style-type: none"> Large greenfield site outside development boundary east of the River Severn which separates the site from the urban area. Bounded by the River Severn and associated flood zone to the east and north, A49 bypass to the west; and Shrewsbury-Wolverhampton railway line to the south. Site has boundary but no current access onto the A49 bypass. Element of site is within zones 2 and 3.
SHR198:	<ul style="list-style-type: none"> Greenfield site located to the north-east of the Livestock Market and north of the A53.

3.12. Key considerations resulting from the site assessment are set out below. To provide context to these considerations, extracts from the National Planning Policy Framework (The Framework) are provided, however this is not intended to be exhaustive or suggest that other relevant legislation, policy and guidance has not been considered.

Highways

3.13. By way of context, The Framework includes:

“102. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) the potential impacts of development on transport networks can be addressed;*
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;*
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.*

103. The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

104. Planning policies should:

- a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;*
- b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;*
- c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;*
- d) provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans);*
- e) provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements; and*
- f) recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government’s General Aviation Strategy.*

108. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users; and*
- c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*

109. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

110. Within this context, applications for development should:

a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;

c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;

d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and

e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations”.

- 3.14. Both SHR109 and SHR198 are dependent on the delivery of the North West Relief Road (NWRR) to provide sufficient highway capacity to facilitate their development. SHR109 is also dependent on the NWRR to provide an appropriate site access. As such, from a highway perspective, whilst in time these sites may have development potential, subject to delivery of the NWRR, ahead of this it is not considered that they can be supported by the highway network.**
- 3.15. SHR157 / SHR157VAR / SHR225 (employment element) has the potential to gain access off the A488, although the A5 bypass is a barrier to pedestrian/cycle links.**
- 3.16. SHR166 has the potential to gain access off the A49 bypass, although the River Severn is a barrier to pedestrian/cycle links.**

Flood Risk

- 3.17. Paragraphs 155, 157 and 158 The Framework state:**

“155. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.”

“157. All plans should apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of climate change– so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:

a) applying the sequential test and then, if necessary, the exception test as set out below;

b) safeguarding land from development that is required, or likely to be required, for current or future flood management;

c) using opportunities provided by new development to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques); and

d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.

158. The aim of the sequential test is to steer new development to areas with the lowest risk of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding”.

3.18. The following table summarised river and surface water flood risk identified for each site:

Site	Summary of Issue
SHR109:	Entirety of site in Flood Zone 1 (lowest risk). Small part of the site in 1 in 30, 1 in 100 and 1 in 1,000 surface flood risk zones.
SHR157 / SHR157VAR / SHR225 (employment element):	Entirety of site in Flood Zone 1 (lowest risk). Small part of the site in 1 in 30, 1 in 100 and 1 in 1,000 surface flood risk zones.
SHR166:	Majority of site in Flood Zone 1 (lowest risk), small part in Flood Zones 2 and 3. Small part of the site in 1 in 30, 1 in 100 and 1 in 1,000 surface flood risk zones.
SHR198:	Entirety of site in Flood Zone 1 (lowest risk). Small part of the site in 1 in 30, 1 in 100 and 1 in 1,000 surface flood risk zones.

3.19. It is considered that all of these sites are of a sufficient size that following the use of SUDs and attenuation ponds, development can avoid any areas with residual surface water flood risk. With regard to SHR166, it is considered that the site is of sufficient size that the development can avoid the elements of the site in flood zones 2 and/or 3.

Landscape and Visual Sensitivity

3.20. Paragraph's 127 and 170 of The Framework state:

"127. Planning policies and decisions should ensure that developments:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;..."

"170. Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;..."

3.21. According to Shropshire Council's Landscape and Visual Sensitivity Assessment the potential landscape and visual impact for each site are:

Site	Summary of Issue
SHR109:	Employment Landscape Impact: Medium-High Employment Visual Impact: Medium
SHR157 / SHR157VAR / SHR225 (employment element):	Employment Landscape Impact: Medium-High Employment Visual Impact: Medium-High
SHR166:	Employment Landscape Impact: High Employment Visual Impact: High
SHR198:	Employment Landscape Impact: Medium-Low (Majority) Employment Visual Impact: Medium-Low (Majority)

3.22. Based on available information regarding landscape and visual sensitivity, it is considered that SHR198 is the least sensitive and SHR166 is the most sensitive in relation to landscape and visual impact of

employment development – although it is noted that site SHR166 is much more self-contained than much of the land (which lies to the east of the A49) within the wider landscape parcel assessed.

- 3.23. The sensitivity of SHR109 and SHR157/SHR157VAR/SHR225 (employment element) lies between the other two sites.

Ecology

- 3.24. Paragraphs 170, 171, 174, 175 and 176 of The Framework state:

“170. Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.*

171. Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.”

“174. To protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
- b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.*

175. When determining planning applications, local planning authorities should apply the following principles:

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*
- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and*

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.

176. The following should be given the same protection as habitats sites: a) potential Special Protection Areas and possible Special Areas of Conservation; b) listed or proposed Ramsar sites; and c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites."

- 3.25. A Habitats Regulations Assessment (HRA) would be required for site SHR109, particularly due to its adjacency/proximity to Hencott Pool SSSI/Ramsar Site/LWS. It is considered that this may significantly reduce development capacity. There are tree preservation orders (TPO's) on trees within and on the site boundary. The site may also contain priority habitats and protected species. Northern element of the site could create a habitat that complements Hencott Pool.
- 3.26. A HRA would be required for site SHR157 / SHR157VAR / SHR225 (employment element). There are TPO's on trees along site boundaries. The site contains 3 ponds and may also contain priority habitats and protected species.
- 3.27. A HRA would be required for site SHR166. North-west and south-west corners of the site area are within the Environmental Network due to the proximity to the flood plain. The site may also contain priority habitats and protected species. Could create a habitat corridor along the sites western boundary and under power lines.
- 3.28. A HRA would be required for site SHR198. The site contains a number of ponds (at least 9). There are TPO's on trees along site boundaries. May also contain priority habitats and protected species. A site of this scale would have significant opportunities and could make the most of the existing features.
- 3.29. Based on available information it is apparent that proposals to develop any one of these four sites would need to be informed by a HRA assessment. It is considered that this would very likely limit the capacity of site SHR109, particularly the northern element of the site, given its adjacency/proximity to Hencott Pool SSSI/Ramsar Site/LWS.
- 3.30. With regard to the other ecological factors, it is generally considered that each of the sites are of sufficient size that the design and layout of development could reflect them.

Heritage

3.31. The Framework Includes:

"190. Local planning authorities should identify and 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) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal."

"192. In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) the desirability of new development making a positive contribution to local character and distinctiveness.*

193. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

194. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;**
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.**

195. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or 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 in the medium term through appropriate marketing that will enable its conservation; and**
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and**
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.**

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

197. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."

"199. Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

200. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably".

- 3.32. SHR109 is detached from built edge of town. It also includes a possible prehistoric cropmark enclosure (HER PRN 04415) and as it is very large, may also have wider archaeological potential. As such a Heritage Assessment would be required with any Planning Application.**
- 3.33. SHR157 / SHR157VAR / SHR225 (employment element) is detached from built edge of town. It also includes a possible cropmark enclosure (HER PRN 00005) and dependent on which extent of the site is considered is also crossed by the projected line of a Roman road (HER PRN 00098). As it is very large it may also have wider archaeological potential. As such a Heritage Assessment would be required with any Planning Application.**
- 3.34. SHR166 may affect settings of Scheduled Monuments of Haughmond Hill hillfort (NHLE ref. 1021282) and Queen Eleanor's Bower ringwork (NHLE ref. 1021281). The site contains the majority of a large Roman marching camp (HER PRN 00124) (Part of Roman marching camp was excavated in advance of construction of A49 bypass), so has significant archaeological potential. Site detached from existing built edge of Shrewsbury. As such a Heritage Assessment would be required with any Planning Application.**
- 3.35. With regard to Scheduled Monuments of Haughmond Hill hillfort (NHLE ref. 1021282) and Queen Eleanor's Bower ringwork (NHLE ref. 1021281), Heritage Assessment undertaken as part of the site assessment process indicates that less than substantial harm would arise to the significance of these**

designated heritage assets as a result of the changes that would occur to their settings. This is also the conclusion of a Heritage Impact Assessment undertaken by the site promoters. Because the tests set out in Paragraphs 193, 194 and 196 of The Framework are therefore engaged, the Council is required to place great weight upon to their conservation.

- 3.36. With regard to the large Roman marching camp (HER PRN 00124), whilst it is considered that an employment use on SHR166 would have a direct effect on the non-designated Roman marching camp, resulting in its partial or total loss, mitigation could be provided by excavating the site prior to development.
- 3.37. SHR198 may have a possible effect on the setting of Shrewsbury Registered Battlefield (NHLE ref. 1000033). It may also have archaeological interest relating to the battle and other archaeological potential. As such a Heritage Assessment would be required with any Planning Application.
- 3.38. With regard to the Shrewsbury Registered Battlefield (NHLE ref. 1000033), the Shrewsbury Battlefield Heritage Assessment, which has been undertaken to inform the Local Plan Review considers the sensitivity of the various elements that contribute to the significance of the Registered Battlefield (including aspects of the Site's setting and views), to future, as yet unspecified development³. This assessment concludes that much of site SHR198 is within the low sensitivity area to future development. No Heritage Impact Assessment has been undertaken by the site promoters.

Agricultural Land Quality

- 3.39. The Framework defines the best and most versatile agricultural land as *"Land in grades 1, 2 and 3a of the Agricultural Land Classification"*. Paragraph 170 of The Framework states:
- "170. Planning policies and decisions should contribute to and enhance the natural and local environment by:... b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland..."*
- 3.40. According to the Natural England Agricultural Land Classification Map⁴, the agricultural land quality of all four sites is as follows:
- SHR109: Primarily Grade 2 with Grade 4 along northern element of the site.
 - SHR157 / SHR157VAR / SHR225 (employment element): Grade 3
 - SHR166: Primarily Grade 2 with a small area of Grade 3 in the northern extent of the site.
 - SHR198: Grade 3.
- 3.41. As such, applying a precautionary approach, it is considered that all these sites have the potential to be amongst the best and most versatile agricultural land.

³ Please Note: The Assessment recognises that an 'impact assessment' of future development proposals is not possible at this stage given that the precise nature, form and scale etc. of potential developments are not known at this time. As such, it is not possible to definitively determine whether, or to what extent, any potential development would result in loss of significance.

⁴ Technical information Note 049 prepared by Natural England explains that: *"These maps are not sufficiently accurate for use in assessment of individual fields or development sites, and should not be used other than as general guidance. They show only five grades: their preparation preceded the subdivision of Grade 3 and the refinement of criteria, which occurred after 1976... These are more appropriate for the strategic use originally intended"*. This is recognised and these maps are used only as general guidance within the site assessment process. This increases the importance of a precautionary approach.

Water Quality

- 3.42. None of the four sites SHR109; SHR157 / SHR157VAR / SHR225 (employment element); SHR166 or SHR198 are within an identified source protection zone.

Public Protection

- 3.43. Paragraph's 170 and 180 of The Framework state:

"170. Planning policies and decisions should contribute to and enhance the natural and local environment by:... e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans..."

"180. Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should: a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life..."

- 3.44. SHR109 is close to sources of noise (railway line to the west). SHR157 / SHR157VAR / SHR225 is close to sources of noise (A5 to the north). SHR166 is close to sources of noise (A49 to the east and railway line to the south). SHR198 is close to sources of noise (commercial to south-west and east and A53 to the south). However, for all of these sites it is considered that this can be managed through design and layout of the development, appropriate use of materials and use of green infrastructure buffering.

Other Strategic Considerations

- 3.45. SHR109 would represent a significant new direction of development for the town. The Council's site assessment would indicate this is more suited to the development of a sustainable urban extension given its separation from existing services.
- 3.46. SHR157 / SHR157VAR / SHR225 (employment element) would represent a significant new direction of development for the town, south of the A5. It is also poorly related to the built form of the settlement, given that it lies south of the A5 which is itself a significant physical barrier to development and that there are significant areas of agricultural land north of the A5, between the site and the existing built form of the settlement (much of which has been promoted for development, but is not at this stage proposed to be allocated for development).
- 3.47. SHR166 is separated from the built form of the settlement by the River Severn, which is a significant physical barrier. However, its eastern extent is clearly defined by the A49, which alongside the A5, defines the eastern extent of the built form of Shrewsbury. The site is identified within the adopted Local Plan as a possible location for a Parkway Station.
- 3.48. SHR198 would represent a significant new direction of development for the town. In isolation it is poorly related to the built form of the settlement, given that it is separated from this built form by other land (much of which has been promoted for development, but is not at this stage proposed to be allocated for development) and in isolation projects into the countryside. It also lies east of the A49, which alongside the A5, defines the eastern extent of the built form of Shrewsbury and north of the A5124, which defines the north-eastern extent of the built form of Shrewsbury. As such its development in isolation would be incongruous with the built form of the town. It is also noted that the availability of this site was based on officer knowledge at the start of the site assessment process, however it is understood there has been no further proactive promotion of this site since this time.

Local Plan Review - Reg 19

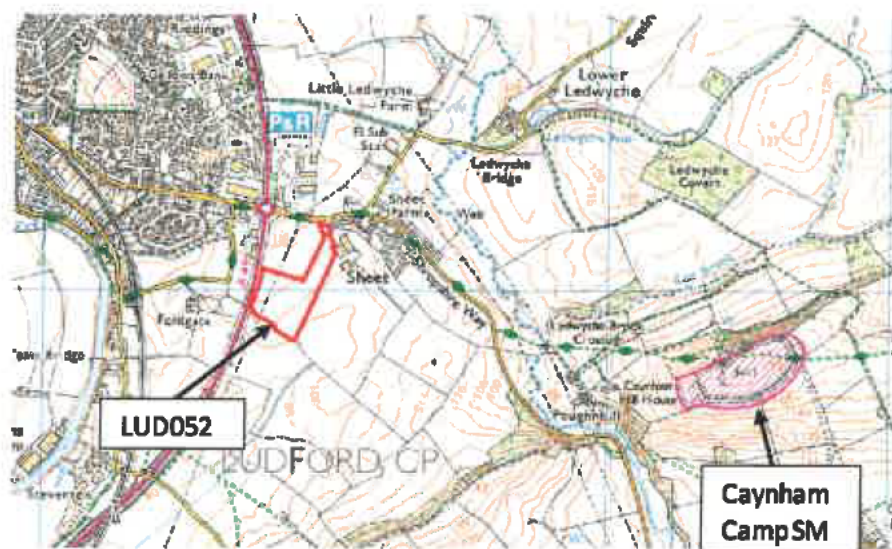
Historic Environment Manager: Supplementary Site Assessments to address Historic England's concerns

Introduction

This document is provided in response to concerns raised by Historic England in relation to a limited number of specific site allocations in the Regulation 19 Local Plan Review document. It has been prepared by Shropshire Council's Natural and Historic Environment Manager to give an additional, more detailed assessment of the potential impacts the allocation and subsequent development of these sites would have upon the historic environment. As such, it is intended to supplement, rather than replace, the historic environment team's comments, which informed the Council's site assessment and sustainability appraisal process prior to the Local Plan Preferred Sites consultation and the team's subsequent advice on Historic England's response to that consultation.

It should be borne in mind that at the plan making stage the level of detail available relating to the development that might come forward for these sites is largely limited to general uses (i.e. residential and/ or employment) and proposed site boundary, and does not include details of size, scale, design or massing of units. For each of the sites assessed below a more detailed Heritage Impact Assessment will therefore be required at the development management stage which assesses the specific details and impacts of the scheme being proposed.

LUD052 - Ludlow



It is understood that Historic England's outstanding concern regarding this proposed allocation is in relation to the potential impact on the significance of the Scheduled Monument of Caynham Camp, a large univallate hillfort 700m north west of Caynham (NHLE ref. 1010313) located c.1.3km to the east-south-east, as a result of development within its setting.

The significance of Caynham Camp derives primarily from its archaeological interest as a large and well-preserved example of a class monument known as hillforts that evolved over the course of the

later Bronze Age and Iron Age in Britain, particularly in the Welsh Marches. Generally constructed, modified and reworked between 800 – 100BC, these monuments played a significant role in the social, economic and political relations of the communities that constructed and maintained them. Hillforts, as their name implies were constructed in elevated positions, and whilst this may in part have been for defensive purposes, it would also have advertised the fluctuating social status of these communities, enabling them to see and be seen within the landscape. Parts of the communities would also have dwelt within the monuments, sometime permanently and sometimes on a temporary or episodic basis.

Because of these factors, hillforts usually have extensive settings. In the case of Caynam Camp, this extends westwards to, and includes the, proposed site allocation, as well as a significant distance to the north, east and south of the monument. The setting remains predominantly rural, comprising rolling farmland with small and generally linear belts of woodland, with dispersed farmsteads. This enables the significance of the hillfort, as an elevated monument located in a commanding position above the valley of the Ledwyche Brook, to be readily appreciated and understood. However, to the west, the character of the setting changes as one approaches the historic market town of Ludlow, with the small outlying settlement of Sheet lying partially between the proposed site allocation and the hillfort. As a result of this, and the distances involved, the land that comprises the proposed site allocation can be recognised to make a limited contribution to the significance of the hillfort.

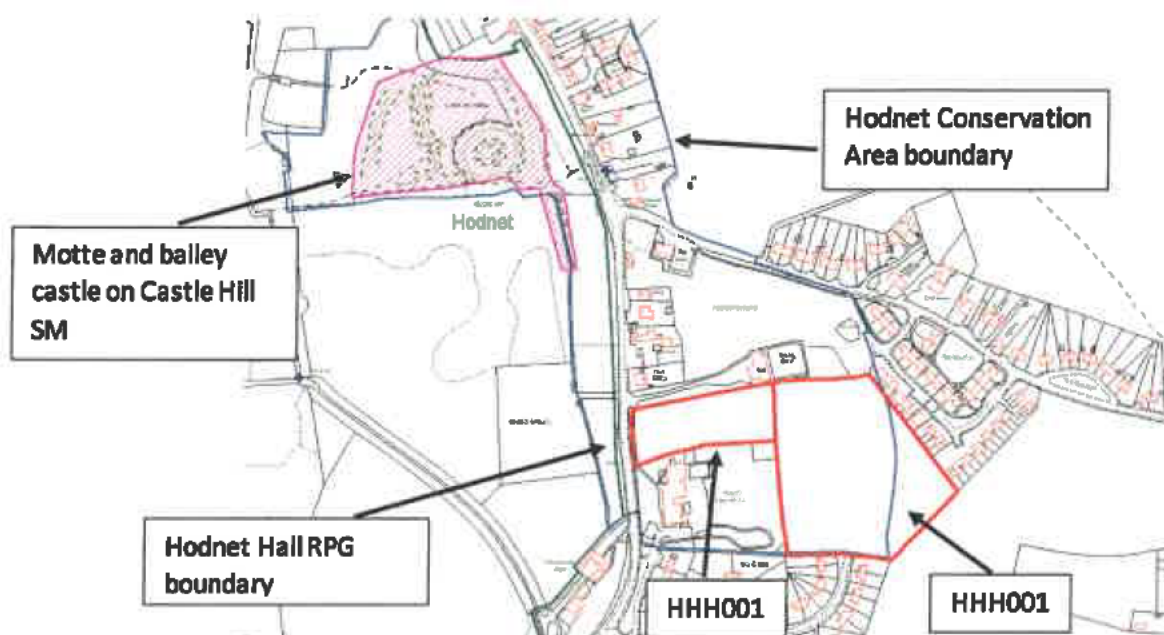
The proposed site allocation is located partially adjacent to the A49 corridor, with existing employment land uses immediately beyond it to the east of the trunk road and north of the proposed site allocation. It is also located adjacent to, and will serve as an extension, for an existing employment site allocation (ELR058). There is also existing intervening residential and agricultural development at Sheet, immediately to the east of the proposed site allocation. With regard to views towards and out from the hillfort, it is therefore concluded that in visual terms the proposed site allocation would be read in relation to the existing built edge of the town and to previous allocations and will read as such in the landscape.

Excessively large and/ or tall and brightly coloured buildings have some potential to cause harm to the significance of the hillfort as a result of becoming overly conspicuous elements within the setting, making them strikingly modern and visually distracting elements in views to and from the monument, thus in turn disrupting the ability to appreciate the landscape context of the monument. However, it is considered that such harm can be mitigated, and most likely avoided all together, by ensuring that building heights are kept to a maximum of 7m in height to eaves and are of good contemporary design in relation to materials, visually recessive colours (including their roofs), layout and landscaping.

The presence of non-designated archaeology on the proposed site allocation was identified during the Local Plan site assessment process. This comprises a probable Bronze Age ring ditch and Iron Age settlement (HER PRN 30994) and a possible Roman fort (HER PRN 04532), which has been partially destroyed by the construction of the A49. These features are only known from cropmark evidence and their identification/ classification therefore remains untested and based solely on the interpretation of aerial photographs. Their heritage significance derives primarily from their archaeological interest through their potential ability to inform understandings of funerary practices in the earlier Bronze Age (in the case of the ring ditch); Iron Age settlement and farming practices outside hillforts; and the construction of smaller scale Roman military sites. Each of these sites will only survive as below ground remains. The development of the proposed site allocation would potentially entirely destroy those parts of the historic sites that fall within it. However, it is considered that an appropriate level of mitigation could be achieved at the development

management stage through an appropriate level of archaeological recording secured by a planning condition, the specific requirements of which would be informed by an initial desk based assessment and field evaluation that are undertaken prior to submission of a planning application.

HHH01 & HHH014 - Hodnet



It is understood that Historic England's principle concern regarding these proposed allocations is their potential impacts on the significance of the Hodnet Conservation Area. However, for the sake of completeness, the potential impacts on the settings and significance of the Scheduled Monument of the Motte and bailey castle on Castle Hill, and the associated remains of a park pale, a fishpond and a formal garden (NHLE ref. 1019653), and the Grade II Hodnet Hall Registered Park and Garden (NHLE ref 1001125) are also considered.

The two proposed site allocation fall either wholly or largely within the Hodnet Conservation Area. Shropshire Council's Summary Character Appraisal for the Hodnet Conservation Area assigns that part of the Conservation Area within which both sites are located to Character Area 6: Football and recreation ground. This is characterised as falling "Outside the village core with striking views of the abrupt boundary between settlement and open countryside. Adjacent C20 housing developments give this area a suburban character." Somewhat in contrast to this, the land that comprises the proposed site allocations is currently in arable agricultural use and forms part of a larger field that was created through hedgerow removals in the second half of the 20th century. To the north, the site is bounded by the Hodnet Bowls Club, to the south-west by Hodnet Primary School, and beyond the Conservation Area boundary to the south and north-west, by 20th century housing. Whilst the land comprising the sites is open and undeveloped, there is no public access to it.

Given the above, it can be argued that the contribution the proposed site allocations make to the overall significance of the Conservation Area is limited. Likewise, it is considered that, in principle, residential development on these sites will not result in a significant change to the character and appearance of the character area or the wider Conservation Area as a whole. Consequently, the level of harm to its significance would be limited. However, this would be subject to the residential development being of a high design standard, with good quality timber joinery detailing and a palate

of materials that is informed by, and in keeping with, the local vernacular. In terms of density and layout, this should ideally be low and should incorporate well designed landscaping and amenity space. There is potential for one or two plots to be incorporated onto the Shrewsbury Street frontage of HHH001, but these would need to be of a design that is sympathetic to the 19th century dwellings to the north, beyond the access to the bowling club. Otherwise, site access should ideally be gained via the bowling club access if feasible, or off the turning head on The Grove. Consideration should also be given to creating views and vistas out into the countryside beyond the Conservation Area. These measures would mitigate any residual harm to the significance of the Conservation Area.

With regard to the Scheduled Monument, this comprises the earthwork remains of a motte and bailey castle which is understood to have been established by Earl Roger de Montgomery in the late 11th century. Following his son's forfeiture in 1102, the manor passed to Henry I, who granted it to a branch of the Fitz Warin family who subsequently assumed the name of de Hodnet. In 1250 Odo de Hodnet, was granted a charter by Henry III to hold a weekly fair and annual market at Hodnet, and it has been suggested this provided the stimulus for a planned extension of the settlement to the north and east of the castle. Edward I stayed at Hodnet Castle in December 1295, during his journey from Shrewsbury to Chester, and Edward III garrisoned the castle 1321 or early 1322 during a period of unrest in the area. The castle's significance therefore derives from both its historic and archaeological interest.

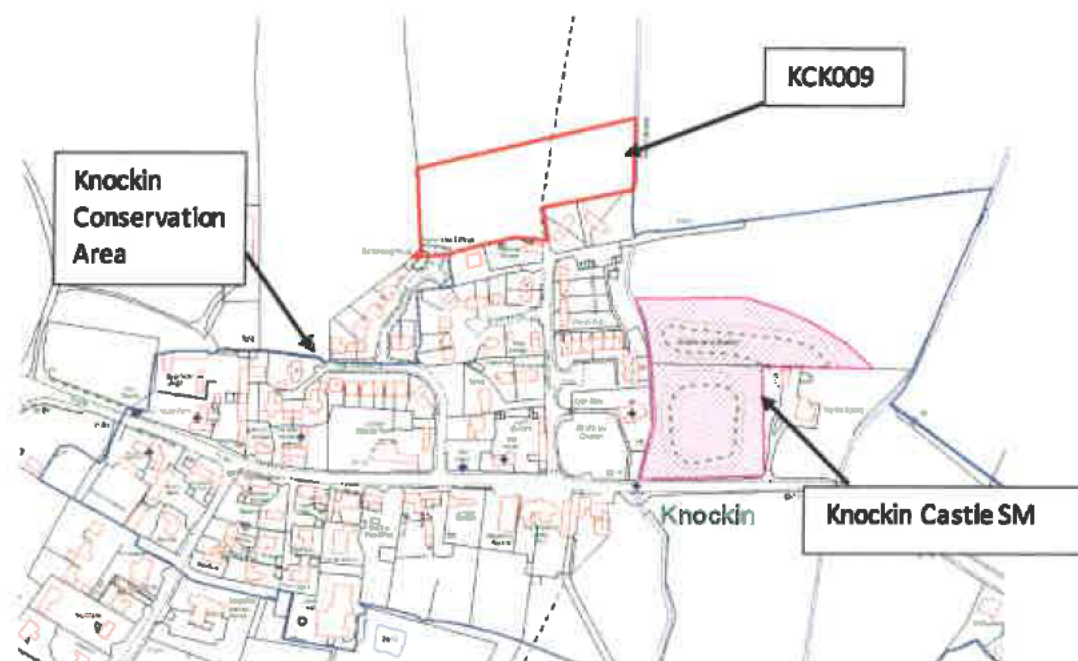
As previously indicated, the proposed site allocations lie outside the historic core of the village, including a planned medieval element, which is located c.200m to the north. Inter and intra visibility between the monument and the proposed sites is also very limited as a result of intervening built development and tree cover, particularly along the boundary of Hodnet Hall Park. It is therefore considered that the land comprising the site allocations makes little contribution to the setting and significance of the Scheduled Monument, and that their development would not cause harm to it as a result.

The Hodnet Hall Registered Park and Garden comprises the gardens, pleasure grounds and park that surround Hodnet Hall. Originally established as a deer park associated with the medieval castle, it persisted into the 16th and 17th centuries. The estate was inherited by the Heber family in 1752 and remains with them to the present day. A new Hall was built by the family on an elevated site within the park in 1870, whilst the present extensive gardens began to be developed in the 1920s by Brigadier A G W Heber-Percy (d 1962). The park's significance therefore derives from its historic, architectural and archaeological interest as an exemplar of the Shropshire parkland that has developed from a medieval antecedent, and with notable gardens developed in the 20th century.

The proposed site allocation is located just to the east of the low sandstone boundary of park and is separated from it by Shrewsbury Street. However, views into and out of the park at this location are screened by a mixed species planting belt on the park side of the boundary wall. The agricultural land which comprises the two proposed site allocations formed part of the surrounding historic estate land and can therefore be considered to form part of the park's setting. However, any residential development on the sites would be seen in relation to existing built development, and as a component of a settlement that has served as an estate village for a number of centuries. Subject to implementation of the design considerations set out above in relation to the Conservation Area, it is therefore concluded that development on the proposed site allocations would not result in harm to the significance of the Registered Park and Garden.

There is no known archaeological interest on the proposed site allocations. However, given their extent and the current agricultural land use, an archaeological desk based assessment, and if appropriate a field evaluation, should be submitted with any planning application so that a suitable level of archaeological mitigation can be secured by condition if necessary.

KCK009 - Knockin



It is understood that Historic England's principle concern regarding the proposed allocation is the potential impact on the significance of the Knockin Conservation Area as a consequence of impacts upon its setting. However, for the sake of completeness potential impacts on the settings and significance of the Scheduled Monument of Knockin Castle: a motte and bailey castle immediately east of St Mary's Church (NHLE ref. 1019304) have also been considered.

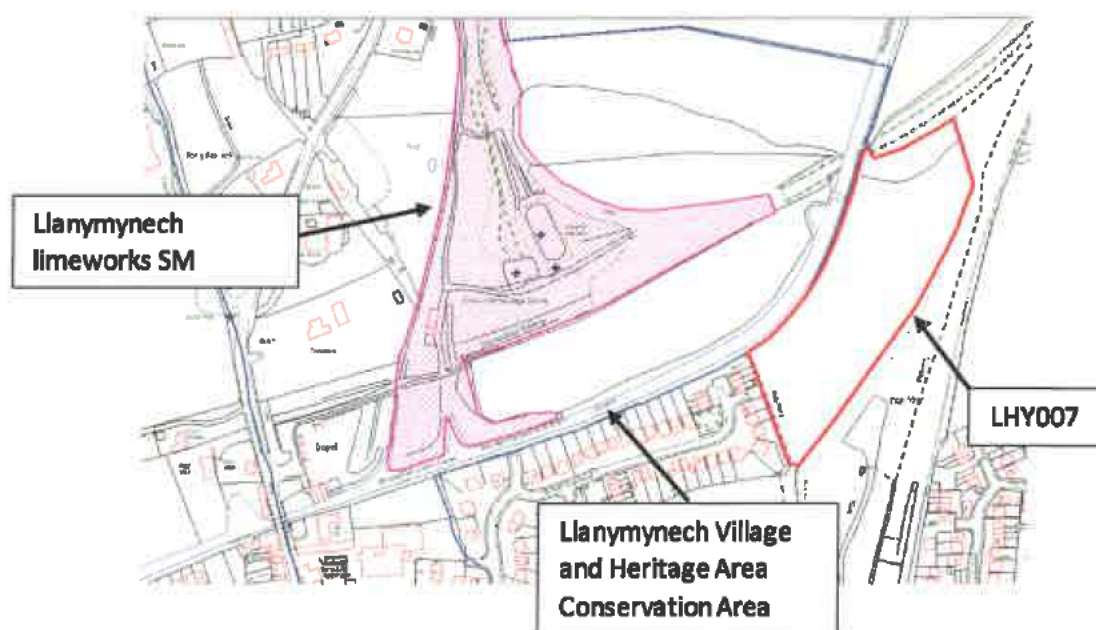
The allocation is located immediately north of the Knockin Conservation Area boundary and therefore within its setting. However, the land immediately to south and south-east, both within and immediately outside the Conservation Area boundary, comprises 20th century residential development, the most recent of which was built out within the last 5 years on a previous site allocation. It is therefore considered that residential development on the proposed site would be seen and experienced in the context of this recent built development, and as an addition to it. As such it is concluded that in principle development in this location would not cause harm to the significance of the Conservation Area as a result of inappropriate impacts on its setting, subject to it being of a comparable design, scale and layout to that which has been built most recently to the south.

The proposed site allocation is located c.95m to the north of the Scheduled Monument of Knockin Castle. The castle was founded by Guy Le Strange between 1154 and 1160, and it was to remain the principle holding or 'caput' of the Le Stranges, one of the principle land owning families in northern Shropshire throughout the Middle Ages. It is not known when the castle was abandoned, but it was described as being ruinous in c.1540.

The castle was constructed in a low-lying position on the east bank of the Weir Brook, and the agricultural land immediately to the north and south remains open and undeveloped. These parts of the castle's setting make an important contribution to its significance, since they enable the topographic and strategic location of the monument to be readily experienced and appreciated. In contrast, the proposed site allocation is separated from the castle by intervening modern development, and there is therefore limited inter- and intra- visibility between them. As a consequence, the land that comprises the proposed site allocation is considered to make a much more limited contribution to the monument's significance. Consequently, it is concluded that development in this location would be seen in the context the existing built form of the village and would be unlikely to cause any harm to the significance of the castle.

The presence of non-designated archaeology on the proposed site allocation was identified during the Local Plan site assessment process. This comprises two linear earthwork features (HER PRN 03723), which have been interpreted as a continue of features that extended southwards towards the centre of the village. Archaeological investigations between 2015-19 on the recent development site south of the proposed site allocation have established that at this location these feature represent the remains of two substantial, infilled medieval ditches. These have been interpreted either as a settlement boundary, or alternatively as possibly being associated in some way with the castle to the east. The development of the proposed site allocation would again partially destroy those parts of these features. However, it is considered that an appropriate level of mitigation could be achieved at the development management stage through an appropriate level of archaeological recording secured by a planning condition, the requirements of which should be informed by an initial desk based assessment and field evaluation that are undertaken prior to submission of a planning application.

LHY007 - Llanymynech



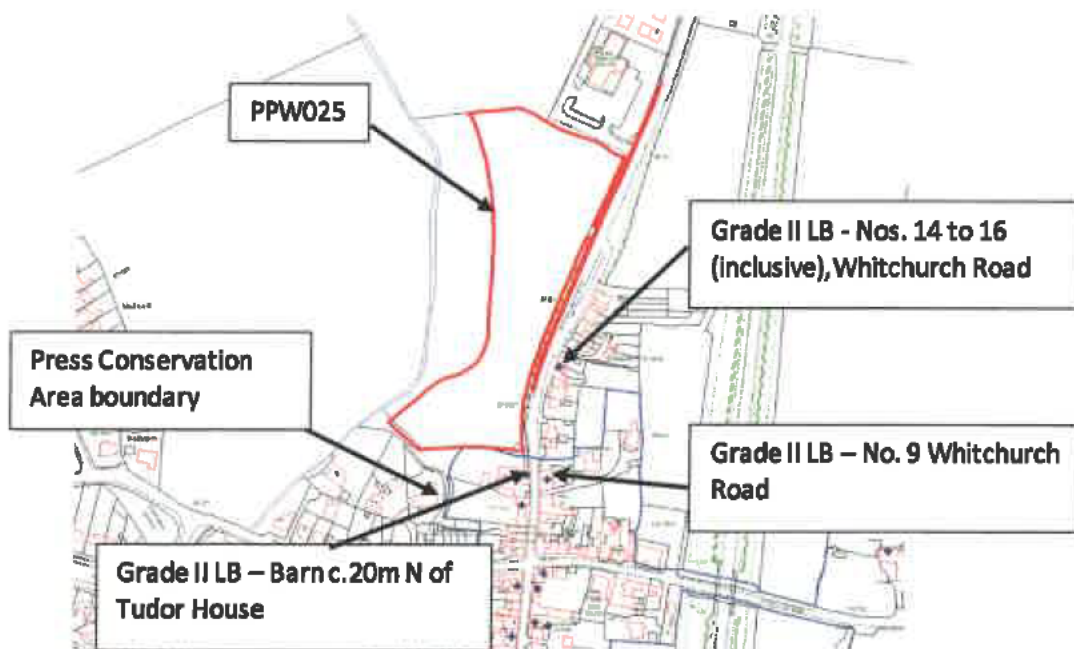
It is understood that Historic England's principle concern regarding the proposed allocation is the potential impact on the significance of the Llanymynech Village and Heritage Area Conservation Area as a consequence of impacts upon its setting. However, for the sake of completeness the potential

impact on the settings and significance of the Scheduled Monument of Lime kilns, associated tramways, structures and other buildings at Llanymynech (Llanymynech Lime Works) (NHLE ref. 1021412) has been considered.

The allocation is located immediately south-east of the Llanymynech Village and Heritage Area Conservation Area boundary and therefore is within its setting. However, it is located adjacent to two existing site allocations: LLAN009 to the west, which was developed for residential use in 2017-18; and LLAN001 for residential use on the former railway coal yards to the south-east, which has yet to come forward. It is therefore considered that residential development on the proposed site would be seen and experienced in the context of this recent built development and the associated allocated land, and as an addition to it. As such, it is concluded that in principle development in this location would not cause harm to the significance of the Conservation Area as a result of inappropriate impacts on its setting, subject to its being of a comparable design, scale and layout to the recent development on LLAN009

The Llanymynech Lime Works Scheduled Monument comprises a complex of 19th century lime kilns, tramways, incline planes, quarries and other associated buildings. The lime works developed in association with, and were initially serviced by the, Montgomery Canal (HER PRN 00927), and subsequently by the Cambrian Railway (HER PRN 08408). Its significance derives from its historic, architectural and industrial archaeological interest in terms of the evidence these features provide for the development of the limestone quarrying and processing industry across much of the course of the 19th century. The proposed site allocation is sandwiched between the canal and a former railway line (not the line that serviced the lime works) but, whilst forming part of the monument setting, is not considered to make any substantive contribution to its significance. Additionally, views into and out of the limeworks are largely precluded by the tree cover within the Scheduled area, and to a lesser degree along the canal corridor. Subject to the design considerations set out above in relation to the Conservation Area, and a well-designed and appropriate landscape buffer along the canal to further screen the site, it is considered that residential development on the proposed site would not harm the significance of the Scheduled Monument.

PPW025 - Prees



It is understood that Historic England's principle concern regarding the proposed allocation is the potential impact on the significance of the Prees Conservation Area as a consequence of impacts upon its setting. However, for the sake of completeness potential impacts on the settings and significance of the three closest listed buildings (all Grade II): Nos. 14 to 16 (inclusive), Whitchurch Road (NHLE ref. 1236426); No. 9 Whitchurch Road (NHLE ref. 1222022); and the barn c.20m N of Tudor House (NHLE ref. 1264627) have also been considered.

The allocation is located immediately north-east of the Prees Conservation Area boundary and is therefore within its setting. The proposed site allocation is currently in agricultural use and comprises a field between Whitchurch Road and an un-named and partially canalised watercourse to the west. The historic core of Prees extends to the southern boundary of the site, whilst ribbon development comprising dwellings in mixed architectural styles dating from the late 17th to 20th century lie to the east along Whitchurch Road. The recently built Press Medical centre is located immediately to the north. Whilst the land in question forms part of the general rural setting of Prees, this particular land parcel is not considered to make any particular contribution to the significance of the Conservation Area's setting as it is already bounded by built form to the north and east. Consequently, it is concluded that in principle development in this location would not cause harm to the significance of the Conservation Area as a result of inappropriate impacts on its setting, subject to it being of a comparable scale to adjacent form and of good design standard, with a palette of materials that is informed by and is in keeping with the local vernacular.

Of the adjacent listed buildings, Nos. 14 to 16 Whitchurch Road comprise a row of three late 17th century timber framed roadside cottages below plain tile roofs, which were remodelled and cased in brick in the 19th century. No. 9 Whitchurch Road comprises a three story early 19th century house of red brick beneath a slate roof with later additions and alterations. The Barn c.20m N of Tudor House is early 17th century timber framed barn with weather board cladding and a 19th century brick gable, beneath a plain tile roof. These buildings derive their significance from their architectural interest as exemplars of the changing vernacular architecture between the 17th– 19th centuries, and in relation to the development of the settlement of Prees.

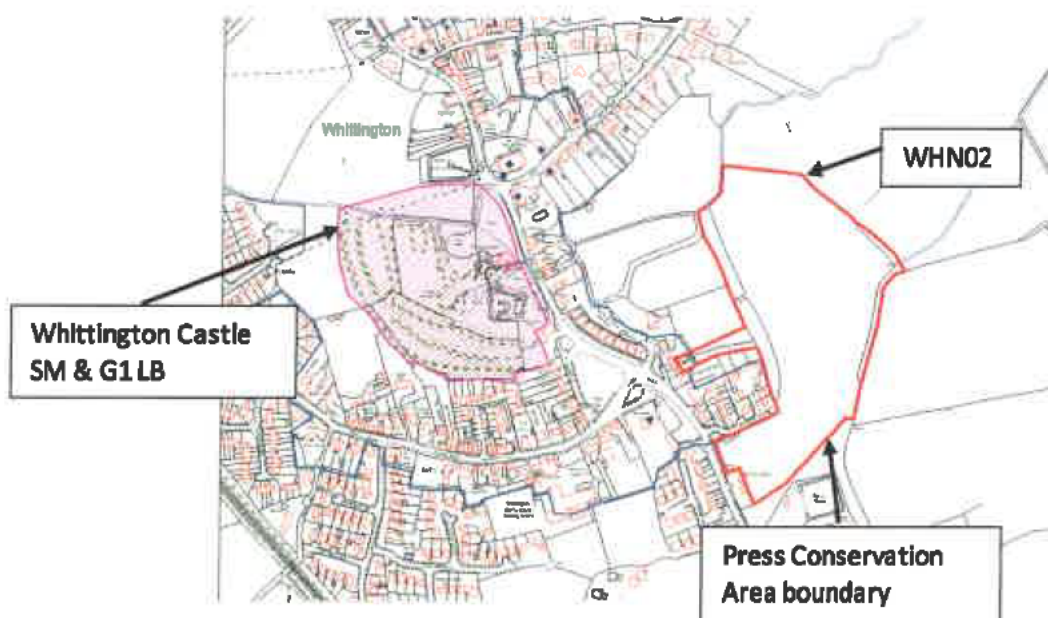
In the case of Nos. 14 to 16 Whitchurch Road, and as a row of roadside cottage, the road itself arguably forms the most significant component of the building's setting, as does the historic core of the village immediately to the south. Its primary elevation faces directly towards the proposed site allocation and it currently enjoys open views out across it. Careful consideration would need to be given to the scale, massing and layout of development on the part of proposed development site opposite this building, in order to mitigate any harm that might arise through inappropriate development within its setting.

No. 9 Whitchurch Road lies on the edge of the historic core of the village and its principle elevation fronts directly onto Whitchurch Road. The principle component of its setting is therefore considered to be the settlement to the south, and it has only oblique views towards the proposed site allocation. It is therefore considered that the proposed site allocation does not form part of the setting of this building and that it would not harm its significance as a result.

Finally, the setting of the Barn c.20m N of Tudor House mainly comprises the surrounding historic farmstead of which it forms a part. The open agricultural character of the proposed development site does make a minor contribution in terms of enabling its significance as a historic agricultural building to be appreciated. Harm to this significance could, however, be avoided by providing a suitable and well-designed landscape buffer at the southern end of the site, to provide an area of amenity space and a stand off from it.

There is no known archaeological interest on the proposed site allocation. However, given its size, position adjacent to the historic core of the settlement, and agricultural land use, an archaeological desk based assessment, and if appropriate a field evaluation, should be submitted with any planning application so that a suitable level of archaeological mitigation can be secured by condition is necessary.

WHN024 - Whittington



It is understood that Historic England's principle concern regarding the proposed allocation is the potential impact on the significance of the Whittington Conservation Area as a consequence of impacts upon its setting. However, for the sake of completeness potential impacts on the setting and significance of the Scheduled Monument and Grade I Listed Building of Whittington Castle (NHLE refs. 1019450 & 1178307) have also been considered.

The allocation is located predominantly outside of and to the east of the Whittington Conservation Area boundary and is therefore within its setting. The exception to this comprises a small area on the western site of the proposed site allocation which lies just inside the boundary. At its south-western end much of the built form inside the adjoining Conservation Area is of 20th century date. At its north-western end the site is separated from the Conservation Area by a number of paddocks, which would remain in agricultural use. Open views into and out of the Conservation Area from the proposed site allocation are therefore significantly constrained by intervening built form and tree cover, particularly by a belt of established trees on the western boundary of the site, as well as the flat, lowland topography. As such it is concluded that in principle development in this location would not cause harm to the significance of the Conservation Area as a result of inappropriate impacts on its setting.

The proposed site allocation is situated c.230m east of Whittington Castle. This was originally established as a motte and bailey which was replaced by a fortified masonry keep in the early 13th century. The castle defences incorporated a series of banks and ditches to the west and south, a moat to the east and an area of marshland to the north. Based on the character and extent, it has

been suggested that these banks and ditches originated as part of an Iron Age defended settlement, and as such that the castle was deliberately sited to utilise an earlier prehistoric monument. Within these banks a complex of earthworks has been identified which indicate that the east of the masonry build was laid out as a pleasance at some point after the 13th century. The castle's 13th century gatehouse, with later alterations and additions survives as a standing, roofed building. The castle's significance therefore derives from its historic, architectural and archaeological interest as a major Marcher masonry castle that evolved from an earlier earthwork precursor that in turn utilised a prehistoric, defended, enclosure site.

Situated in a low lying, marshy location the open land immediately to the west and north of the scheduled area make an important contribution to the significance of the monument by enabling its landscape context to be readily experienced and appreciated. To the south, east and north it is surrounded by built development associated with the attendant historic settlement that grew up beyond the castle's gates. Views to and from the castle to the proposed site allocation are therefore blocked by the intervening built form and tree cover, whilst the paddocks immediately east of the Conservation Area would also act as a buffer, enabling its wider setting of agricultural land to be retained. It is therefore considered that residential development on the proposed site allocation would not cause harm to the significance of the castle as a result of inappropriate development within its setting.

There is no known archaeological interest on the proposed site allocation. However, given its size, and relative proximity to the castle and its potential prehistoric precursor, an archaeological desk based assessment, and if appropriate a field evaluation, should be submitted with a planning application so that a suitable level of archaeological mitigation can be secured by condition is necessary.

Dr Andy Wigley, BSc, MA, PCHE, PhD, FSA, MCIFA

Natural and Historic Environment Manager
Shropshire



Historic England

Our ref: PL00709782

Your ref:

Telephone:

Email:

05 October 2022

FAO: Planning Inspectors Louise Crosby, Carole Dillon and Nick Palmer

Dear Sir/Madam,

Re: Shropshire Council Examination in Public (EiP) of the Shropshire Local Plan 2016 to 2038 – Uffington Roman Temporary Marching Camp, Shrewsbury / Proposed employment allocation SHR 166

Following Historic England's assessment of the above site for inclusion on the National Heritage List for England, the Secretary of State for Digital, Culture, Media and Sport (DCMS) has considered all the representations made and completed their assessment of the monument.

I am writing to inform you that having considered our recommendation, the Secretary of State for DCMS has decided to add Uffington Roman Temporary Camp, Shrewsbury to the Schedule of Monuments.

The notification report from DCMS can be accessed via the following link:
<https://services.historicengland.org.uk/webfiles/GetFiles.aspx?av=9BFDE1C6-F0FA-4BBA-970A-0AF160C76F7B&cn=43ADDBFB-4D15-4540-B01D-78AF58C34287>

A copy of the Schedule entry for this monument, together with a map, has now been published on the National Heritage List for England as List Entry Number: 1480432, and is available for public access through Historic England's website, via the link below:

<https://historicengland.org.uk/listing/the-list/list-entry/1480432?section=official-list-entry>

I trust that the above information is of assistance, but please contact me should you require any further details.



Historic England, Midlands Regions Group, The Foundry, 82 Granville Street, Birmingham, B1 2LH

Telephone 0121 6256888 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.





Historic England

Yours faithfully,

Elizabeth Boden

Elizabeth Boden (Mrs)
Historic Environment Planning Adviser



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