



SHROPSHIRE LOCAL PLAN EXAMINATION IN PUBLIC SEPTEMBER 2024

Stage 2 - Matter 26 – All Employment Allocations

SHR166 – Land to the west of the A49, Shrewsbury

Historic England Statement

1.0 HE current position in relation to the Shropshire Local Plan

1.1 In relation to proposed employment allocation SHR166 – Land to the west of the A49, Shrewsbury, Historic England has raised objection to the inclusion of this site at various stages throughout the Plan process and we particularly draw attention to the following:

- Response of Historic England to Shropshire Local Plan Additional Consultation – May 2024 (**APPENDIX 1**)
- Historic England Statement – Shropshire Local Plan Examination in Public May 2022 Stage 1 – Matter 1 (**APPENDIX 2**)
- Statement of Common Ground between Historic England and Shropshire Council August – 2021 (**APPENDIX 3**)

1.2 Since the Stage 1 Hearing Sessions held in July 2022, and as referenced in our response to the Additional Consultation held on the Shropshire Local Plan in May 2024 (**APPENDIX 1**), part of the site SHR166 once occupied by a temporary Roman Marching Camp, and known as ‘*Uffington 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). A copy of Historic England’s letter dated 5th October 2022 informing the EiP Inspectors of the scheduling is attached at **APPENDIX 4** and 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 following link: <https://historicengland.org.uk/listing/the-list/list-entry/1480432?section=official-list-entry>

1.3 Whilst Historic England maintains objection to the allocation of site SHR166 for employment development on four grounds, as set out in our representation to the Regulation 19 stage consultation on the Plan (**APPENDIX 5**), the designation as a Scheduled Monument, effectively means that the site would be undeliverable, as we would be minded to advise the Secretary of State that Scheduled Monument Consent should be refused, due to the substantial harm to, and possible total loss, of the Scheduled Monument, as well as substantial

harm to its setting, contrary to the NPPF. Therefore, Historic England continues to maintain that the Plan is unsound with the inclusion of the proposed allocation of site SHR166 for employment and urges the Council not to proceed with this allocation.

1.4 In response to the Inspectors' questions on Matter 26, relating to site SHR166, Historic England considers that:

Q3: The NPPF is clear that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to asset's conservation, irrespective of the level of harm to the asset's significance (paragraph 199, NPPF 2021). In the case of this site, there is a very strong probability of substantial harm to, or possibly total loss of, the significance of the Scheduled Monument and its setting, and no substantial public benefits would ensue, to outweigh this harm or loss (NPPF para 201). Furthermore, we refer you to our representation to the Regulation 19 Plan (**APPENDIX 5**), which sets out our additional grounds of objection and consider that there is no reasonable basis for the allocation of the site that would be outweighed by the public benefits of the proposal. Therefore, the principle of development on proposed site SHR166 has clearly not been proven as acceptable and justified.

- **Q6:** Given that the development of this site for employment would have significant potential adverse impacts on the historic environment, including the possible total loss of the Scheduled temporary Roman Marching Camp, Historic England do not consider that such impacts could be mitigated sufficiently that harm could be reduced to an acceptable level.
- **Q9:** The site is not deliverable as Scheduled Monument Consent (SMC), required to carry out any works to the monument, is unlikely to be forthcoming, as the proposed allocation would be highly unlikely to comply with the requirements of the DCMS 2013 Policy Statement for "*Scheduled Monument and nationally important but non-scheduled monuments*", October 2013:
<https://www.gov.uk/government/publications/scheduled-monuments-policy-statement>
Please see the 'Response of Historic England to Shropshire Local Plan Additional Consultation – May 2024' (**APPENDIX 1**) for further details.
- **Q12:** In light of the fact that the principle of development on proposed site SHR166 has not been proven as acceptable and justified, the policy requirements in respect of the historic environment are considered to be no longer relevant.

1.5 Given the Scheduling of the site, and thus the changed circumstances since the submission of the Plan in September 2021, Historic England suggests that the Council may wish to consider recommending the removal of proposed employment allocation site SHR166 from the Plan. In the event that this

becomes the Council's preferred course of action, Historic England would be prepared to revisit the Statement of common Ground (**APPENDIX 3**), with a view to potentially removing our four original grounds of objection.

- 1.6 In addition, Historic England's comments on the legal compliance of the Sustainability Appraisal and of the Updated Sustainability Appraisal Report, as set out in our Stage 1 Hearing Statement to the Shropshire Local Plan Examination in Public May 2022 (**APPENDIX 2**) and in our Response of Historic England to Shropshire Local Plan Additional Consultation, May 2024 (**APPENDIX 1**) respectively, would no longer be of relevance.

Elizabeth Boden MA MRTPI
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19th September 2024