

**Shropshire Council Local Plan  
2016 -2038**

**Statement of Common Ground between**

**Historic England and  
Shropshire Council**

**August 2021**

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## **1. Introduction**

- 1.1. This Statement of Common Ground has been prepared jointly between Shropshire Council (SC) and Historic England (HE). It sets out the response from SC to the representations made by HE to the Regulation 19 Pre-Submission Draft Shropshire Local Plan consultation and clarifies where issues have been resolved and where they remain unresolved.

## **2. Background**

- 2.1. The current Local Plan for Shropshire comprises the Core Strategy (2011) and the Site Allocations and Management of Development document (2015), together with any adopted formal Neighbourhood Plans. These documents allocate land for employment and housing and set out development management policies for the period 2006-2026.
- 2.2. Local Planning Authorities are required to keep under review, any matters that might affect the development of their area. Changes to numbers of houses needed in Shropshire and to national planning policy mean that the Council is now updating the Local Plan.
- 2.3. The Draft Shropshire Local Plan covers the period 2016-2038 and has been prepared in several iterative stages:
  - Issues and Options;
  - Preferred Scale and Distribution of Development;
  - Preferred Sites;
  - Preferred Strategic Sites:
  - Regulation 18 Pre-Submission Draft
  - Regulation 19 Pre-Submission Draft.
- 2.4. Each of these stages was subject to public consultation and comments were received from HE as a statutory consultee. HE's Regulation 19 responses (Appendix A) form the basis for this Statement of Common Ground and are discussed in greater detail in section 3 onwards.

## **3. HE Regulation 19 representations**

- 3.1. HE made two representations to the Regulation 19 Pre-Submission Draft Shropshire Local Plan: one objection and one set of comments. Both are covered in this SoCG. HE also met SC on 18<sup>th</sup> March 2021 to clarify areas of agreement/disagreement and the minutes of that meeting form Appendix B
- 3.2. Appendix C sets out a summary analysis of HE's representation and SC's response for all issues where the Council is not proposing a modification to the Pre-Submission Draft of the Shropshire Local Plan. The final column of Appendix C shows where agreement has been reached for these issues.
- 3.3. Section 4 sets out HE's objection and SC's response whilst section 5 sets out the minor modifications that SC are proposing in response to HE's comments on the following policies and/or their explanations:
  - Policy DP23
  - Policy DP24
  - S3.1 Bridgnorth site BRD030

- S9.1 Highley site HNN016
- S10.1 Ludlow
- S11.2 Hodnet
- S14.2 Knockin
- S14.2 Llanymynech
- S14.2 Whittington
- S18.2 Prees

3.4. HE did not agree to SC's response to their comment about the role of site promotional material in the Local Plan process (see Appendix C) when the first draft of this document was sent to them. SC sought further clarification from HE and this, along with SC's subsequent response are set out in section 6.

## **4. HE objection to Policy S16.1 Shrewsbury, site SHR166**

### **4.1. Early Roman Marching Camp**

#### HE comments

4.1.1. 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).

1 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.

1 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.

4.1.2. 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.

4.1.3. Historic England suggest a modification to remove site SHR166 from the Local Plan as an employment allocation.

#### SC response

- 4.1.4. On the basis of existing evidence, SC consider the early Roman Marching Camp to be a non-designated heritage asset whose significance relies on its archaeological interest. SC accepts that the development of site SHR166 is likely to result in this asset's partial or total loss. In such situations, NPPF paragraph 197 requires the Local Authority to apply a balanced judgement. SC considers that the significance of the asset is likely to have been very heavily and negatively affected by prolonged and intensive cultivation. As such, its significance is outweighed by the need for a high quality strategic employment site to support Shrewsbury's role as the Strategic Centre. A robust and proportionate site assessment process, carried out in consultation with the Council's Natural and Historic Environment Manager, concluded that site SHR166 was the most suitable site for such a strategic employment allocation. An overview of the site assessment process in relation to the strategic employment land options for Shrewsbury was prepared by SC for HE in February 2021 and is included here as Appendix D. It should be noted that this presents information, which was previously available in the published evidence base in a different way for clarity. SC thus considers it is appropriate to proceed with the allocation of site SHR166 and in line with NPPF paragraph 199, proposes a minor modification to the 7th paragraph of the site guidelines to require developers to put in place measures to record and advance understanding of the significance of the Roman Marching Camp as follows:

A heritage assessment will be required to inform the site's layout and massing, and the site must be read within the context of its setting of Haughmond Hill and Queen Eleanor's Bower ringwork, both Scheduled Monuments. The heritage assessment will also address any impact on non-designated archaeology potentially on site. **Any loss of, or harm to non-designated archaeological features will be mitigated by a comprehensive excavation of the site prior to the commencement of development, the results of which should be made publicly accessible.**

#### HE Further Comments

- 4.1.5. Historic England has considered the Council's "Overview of Shrewsbury 'Strategic' Employment Development Options Assessment" (Appendix D) and notes that this document does not draw any conclusions on which sites are favoured over others as 'strategic' employment allocations for Shrewsbury. Rather, it is the case that the document sets out statements of fact in relation to the various constraints and issues relating to each site. Particular attention is drawn to p.11 para.3.34 where it is noted that site SHR166 may affect the settings of Scheduled Monuments and has significant archaeological potential, due to the site containing the majority of a large Roman marching camp. Attention is also drawn to p.8 para.3.21 where under the issue of 'Landscape and Visual Sensitivity' these are noted as 'High' for site SHR166, whereas all other sites are noted as 'Medium-High' or 'Medium-Low'.
- 4.1.6. With regard to the view of Shropshire Council that "*the significance of the asset is likely to have been very heavily and negatively affected by prolonged and intensive cultivation*", Historic England considers that this is not proven. Since the consequences of the development of the site for buried archaeology is very great, Historic England therefore consider it sensible to establish the significance of the archaeology on the site to a higher degree of confidence than is currently available, prior to the allocation of the site within the Local Plan. 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.
- 4.1.7. 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.

**Agreement not reached**

#### **4.2. Effect on the significance of Scheduled Monuments**

##### HE comment

4.2.1. Historic England objects to this site being allocated for development on the following grounds:

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.

2 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 land-scape 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 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.

4.2.2. Historic England suggest a modification to remove site SHR166 from the Local Plan as an employment allocation.

### SC Response

- 4.2.3. Agreement was reached at the HE-SC liaison meeting on 18th March 2021 (Appendix B) that Haughmond Abbey Scheduled Monument would be unlikely to be affected by the development of site SHR166. HE also agreed that a masterplan for site SHR166 would be an appropriate mechanism for mitigating the level of harm which was likely to arise from its development to the significance of the settings of all the other designated heritage assets on Haughmond Hill. SC thus propose a minor modification to the 7<sup>th</sup> paragraph of the site guidelines for SHR166 as follows:

A heritage assessment will be required to inform the site's layout and massing, and the site must be read ~~within~~ the context of its **location within the** settings of **a number of designated heritage assets on** Haughmond Hill, **including** ~~and~~ Queen Eleanor's Bower ringwork, ~~both~~ Scheduled Monuments. **A masterplan should be prepared to guide the design of development, including building height and materials, based on the outcome of this heritage assessment.** The heritage assessment will also address any impact on non-designated archaeology potentially on site.

### HE Further Comments

- 4.2.4. If the principle of development is found to be acceptable then Historic England would agree that a masterplan approach to guide the design of the development would be appropriate.

**Agreement reached**

## **5. HE comments where SC's response involves minor modifications.**

HE comments have been summarised in places and for the sake of clarity, some references to specific Local Plan policies have been added.

Deleted text is shown as ~~struck through~~, additional text shown as **bold and underlined**.

### **5.1. Policy DP23: Conserving and Enhancing the Historic Environment**

#### HE comment.

- 5.1.1. The inclusion the inclusion of this policy is welcomed, and Historic England considers that the policy sets out a positive strategy for the conservation and enjoyment of the historic environment. It is noted that the explanation to the policy (at para. 4.203) includes a list of what constitutes designated and non-designated heritage assets, which is also welcomed, but all references to 'Scheduled Ancient Monuments' should be revised to 'Scheduled Monuments' in line with NPPF terminology.

#### SC response

- 5.1.2. Agreed. The reference to Scheduled Ancient Monuments occurs elsewhere in the Plan as well, so the Council proposes to make minor modifications to paragraphs 2.9 and 4.203 as follows:

2.9 The richness of Shropshire's historic environment is reflected in the number of designated heritage assets. There are 6,913 listed buildings, 441 Scheduled ~~Ancient~~ Monuments, 34 Registered Historic Parks and Gardens (including 3 which are cross-border) and a Registered Historic Battlefield. The wider value of historic landscapes and townscapes is recognised through the designation of 127 Conservation Areas in Shropshire, together with the wealth of non-statutory undesignated heritage assets (c 35,000) recorded on the Historic Environment Record.

4.203 Heritage assets are buildings, monuments, sites, places, areas or landscapes that merit consideration as part of the planning process. The term

includes all designated and non-designated assets. Designated assets comprise Listed Buildings, Conservation Areas, World Heritage Sites, Registered Parks and Gardens, Registered Battlefields and Scheduled Ancient Monuments. Non-designated heritage assets include structures, features or deposits with archaeological interest, historic buildings (including those associated with our industrial past such as canals, warehouses and other similar structures) historic farmsteads, the historic character of the landscape as expressed in the patterns of fields and woods and includes locally derived building materials and the distinctive forms, details and design of buildings. The Shropshire Historic Environment Record sets out Shropshire's non-designated heritage assets.

**Agreement reached**

**5.2. Policy DP24: Shropshire Hills Area of Outstanding Natural Beauty**  
HE comment.

- 5.2.1. Reference to the policy of this plan which covers historic assets is welcomed as part of the considerations to be encompassed within an assessment required to be provided for all major development within the AONB. However, it is considered that policy DP23 should be added to the list of policies specifically referred to.

SC response

- 5.2.2. The Council proposes to make minor modifications to Policy DP24, paragraph 3 to include a cross reference to Policy DP23 as follows:

3. Where major development is permitted in the Shropshire Hills AONB, mitigation and compensation measures to offset any residual environmental, landscape or recreational impacts will be required in line with policies DP12, DP14, DP15, DP16, DP17, DP18, DP19, ~~and DP22~~ **and DP23**. These measures should be compatible with the conservation of the designated area and the priorities set out in Shropshire Hills AONB Management Plan and must be demonstrably capable of being implemented to ensure that harm is minimised.

**Agreement reached**

**5.3. Schedule 3.1(i) Bridgnorth site BRD030**  
HE comment.

- 5.3.1. With regard to the development guidelines for proposed allocation BRD030 (Tasley Garden Village): we welcome the proposed approach to develop the site in accordance with a vision, design code and masterplan, to be adopted as a Supplementary Planning Document by Shropshire Council. Given the heritage assets within the site and the wider area, Historic England would welcome involvement in the master planning of the development as the process evolves.
- 5.3.2. The requirement for the site's design and layout to reflect and respect the site's heritage and heritage assets within the wider area is welcomed, as is the requirement for the retention of listed and non-designated historic farm buildings. Whilst the prerequisite that green infrastructure will create appropriate settings for identified heritage assets and for the retention of historic field patterns and hedgerows is welcomed, it is considered that the word 'safeguard' instead of 'create' would ensure that the settings of heritage assets are conserved in an appropriate manner.
- 5.3.3. We are satisfied that the impact on the heritage assets can be adequately mitigated but recommend Development Guidelines incorporate a requirement that any Planning Application should be accompanied by a heritage statement and an archaeological assessment. Note this is included within the Stage 3 assessment for this site in the



Appendix of the Sustainability Appraisal accompanying the Plan, but this has not been carried through into the Development Guidelines within the draft Shropshire Local Plan.

SC response

- 5.3.4. Noted. For clarity, minor modifications are proposed to the 15<sup>th</sup> paragraph of the draft Site Guidelines for site BRD030 (Tasley Garden Village) in Schedule 3.1(i) as follows:

**Any planning application will be accompanied by a heritage assessment, including an archaeological assessment where necessary. This will inform the site design and layout which will reflect and respect the site's heritage and heritage assets within the wider area. Listed and non-designated historic farm buildings heritage assets will be retained. Green infrastructure will create safeguard appropriate settings for identified heritage assets.**

**Agreement reached**

**5.4. Schedule 9.1(i) Highley site HNN016**

HE comment.

- 5.4.1. Historic England welcomes the requirements of the Site Allocation Development Guidelines that the design and layout of this 100 unit housing site will reflect and respect the site's heritage and heritage assets within the wider area, including Grade II listed Hazelwell's Farm House, and that landscape buffers will be required to create appropriate settings for nearby heritage assets and built form. However, we consider that to inform the above the Development Guidelines should also include the requirement for a heritage assessment.

SC response

- 5.4.2. A minor modification is proposed to the 3<sup>rd</sup> paragraph of the draft Site Guidelines for site HNN016 in Schedule 9.1(i) as follows:

**Any planning application will be accompanied by a heritage assessment. This will inform the site design and layout which will reflect and respect the site's heritage and heritage assets within the wider area, including Grade II listed Hazelwell's Farm House.**

**Agreement reached**

**5.5. Schedule 10.1(i) Ludlow site LUD052**

HE comment.

- 5.5.1. Whilst we welcome the requirement of the Development Guidelines for a Heritage Impact Assessment to consider cumulative impacts on the significance of heritage assets located within Ludlow to the west and also the significance of the scheduled monument at Caynham Camp to the east, including its setting, we reiterate some of our previous concerns. Therefore, we recommend that a specific requirement be added for a low-rise form of development to take into account any impact, particularly the longer-term effects of cumulative development, on the setting of Caynham Camp and the Council may wish to consider that longer term a Local Development Order for the site may assist in terms of setting out what may be appropriate in relation to permitted development..

SC response

- 5.5.2. A minor modification is proposed to the 5<sup>th</sup> paragraph of the draft site guidelines for site LUD052 in Schedule 10.1(i) as follows:

A proportionate Heritage Impact Assessment (HIA) will be needed to consider cumulative impacts on the significance of the heritage assets in the historic town

(west) including their settings, and the significance of the scheduled monument Caynham Camp (east), including its setting. The findings of the HIA should be taken into account in the design of the development **and should pay particular attention to building height, layout and materials**

### Agreement reached

#### 5.6. Schedule 11.2(i) Hodnet sites HHH001 and HHH014

##### HE comment.

- 5.6.1. Whilst further to our concerns raised at the Preferred Sites Consultation stage of the Plan, it is noted that the Council has undertaken 'Supplementary Site Assessments' with regard to these proposed allocations. Whilst Historic England welcomes these assessments, we note that the 1st edition OS map shows a gap in the boundary planting along the east side of the park, opposite the proposed housing allocation sites. This would appear to have provided a view to the rural landscape to the east, across the allocation site, and possibly into the distance; perhaps intended to be seen while travelling along the south drive of Hodnet Hall. If this was estate land it may have emphasised a connection to it, or just taken in an attractive view. Although this view is no longer available, it could be recoverable.
- 5.6.2. However, housing development on the proposed allocation site would remove the possibility of recovering what appears to be a designed view across these fields, and also lead to the further, incremental loss of the rural setting of the park along its east boundary, as the new clusters of settlement would be joined together and become contiguous with the original village and conservation area. This would have a degree of harmful impact on the significance, derived from its setting, of the registered park and garden and potentially the other heritage assets within it.
- 5.6.3. Whilst a Supplementary Site Assessment has been provided for these allocations, from the information provided it is unclear that the significance of these sites to the Hodnet Conservation Area & to the Registered Park and Garden of Hodnet Hall has been fully considered, and also consideration of how this significance would be impacted by proposed housing development in this location. Further analysis, in line with the methodology set out in HEAN 3, is therefore suggested prior to allocation.
- 5.6.4. It is noted that the Development Guidelines for these sites include the requirement for a Heritage Impact Assessment and a high-quality site design and layout. However, Historic England notes that the Supplementary Site Assessment sets out several more detailed measures to ensure that any residual harm to the Hodnet Conservation Area and other heritage assets will be mitigated, such as: low density development; incorporating well designed landscape and amenity space; good quality timber joinery detailing; and a palate of materials that is informed by, and in keeping with, the local vernacular. Historic England therefore suggests that the Development Guidelines be strengthened by the inclusion of these additional measures in order to conserve and enhance the historic environment of Hodnet.

##### SC response

- 5.6.5. It is considered that sufficient analysis of the impact of development on the significance of Hodnet Hall Registered Park and Garden and its setting has been undertaken both through the site assessment process and the Supplementary Site Assessment carried out by the Historic Environment Manager
- 5.6.6. However, a minor modification is proposed to the 3rd paragraph of the draft site guidelines for site HHH001 and HHH014 in Schedule 11.2 as follows:

Site design and layout will be of a high quality, incorporate well designed landscape and amenity space, and positively respond to its location. A proportionate Heritage Impact Assessment should be carried out and its recommendations taken into account with respect to the impact of development on the significance of the Hodnet Conservation Area and its setting and the significance, including the setting, of any other heritage assets within proximity of the site. **Such recommendations may include good quality timber joinery detailing and a palate of materials informed by, and in keeping with, the local vernacular.**

Agreement reached

#### 5.7. Schedule 14.2(i) Knockin site KCK009

##### HE comment.

- 5.7.1. Whilst further to our concerns raised at the Preferred Sites Consultation stage of the Plan, the Council has undertaken a 'Supplementary Site Assessment' with regard to this proposed allocation, which concludes 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'. This is welcomed by Historic England and we note that the Development Guidelines for the allocation include stipulations for a Heritage Impact Assessment to be carried out and its recommendations taken into account with respect to the impact of the development on the significance of the Knockin Conservation Area. However, it is considered that the Development Guidelines should be strengthened by the inclusion of more specific guidance relating to the design, scale and layout of the proposed allocation (as per the Supplementary Site Assessment), and thereby mitigating any harm that may be caused to the significance of the Conservation Area.
- 5.7.2. Additionally, Historic England also welcomes the assessment of the site in relation to the significance of the Scheduled Monument of Knockin Castle and its setting. With regard to non-designated archaeology, it is noted that two linear earthwork features (HER PRN 03723), (the remains of two substantial, infilled medieval ditches), would be partially destroyed by the development of this site allocation. Although, it is suggested that mitigation could be achieved at the development management stage through archaeological recording, secured by a planning condition, and that 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, this is not mentioned in the Development Guidelines at present and it is therefore recommended that these specific requirements be included

##### SC response

- 5.7.3. A minor modification is proposed to the 2nd paragraph of the site guidelines for KCK009 in Schedule S14.2(i) as follows:

A proportionate Heritage Impact Assessment **including an archaeological assessment (desk based with field work as necessary)** should be carried out **prior to a planning application** and its recommendations taken into account **particularly** with respect to the impact of development on the significance of the Knockin Conservation Area and its setting-**and non-designated archaeological features. The design of development, including scale, layout and materials should reflect the findings of this Heritage Impact Assessment.**

Agreement reached

## **5.8. Schedule 14.2(i) Llanymynech site LYH007**

### HE comment.

- 5.8.1. Further to our concerns raised at the Preferred Sites Consultation stage of the Plan, the Council has undertaken a 'Supplementary Site Assessment' with regard to this proposed allocation, regarding the potential impact on the significance of the Llanymynech Village and Heritage Conservation Area and 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).
- 5.8.2. The assessment is welcomed by Historic England and we note that the Development Guidelines for the allocation include stipulations for a Heritage Impact Assessment to be carried out and its recommendations taken into account with respect to the impact of the development on the significance of the Llanymynech Conservation Area and its setting.
- 5.8.3. However, we recommend that the Development Guidelines be strengthened through the inclusion of more specific guidance relating to the design, scale and layout of the proposed allocation, to ensure that the development is comparable to the recent development of site LLAN009.
- 5.8.4. Additionally, Historic England also welcomes the assessment of the site in relation to the significance of the Llanymynech Lime Works Scheduled Monument and notes that a well-designed landscape buffer along the canal is also recommended, in addition to the design considerations set out in relation to the Conservation Area. However, we note that this is not mentioned in the Development Guidelines at present and it is therefore recommended that these specific requirements also be included.

### SC response

- 5.8.5. A minor modification is proposed to the 2nd paragraph of the draft Site Guidelines for site LYH007 in Schedule 14.2(i) as follows:

A proportionate Heritage Impact Assessment should be carried out and its recommendations taken into account with respect to the impact of development on the significance of the Llanymynech Conservation Area and its setting. **The design of development, including scale, layout and materials should reflect the findings of this Heritage Impact Assessment and include a well-designed buffer along the canal frontage.**

**Agreement reached**

## **5.9. Schedule 14.2 (i) Whittington site WHN024**

### HE comment.

- 5.9.1. Further to our concerns raised at the Preferred Sites Consultation stage of the Plan, it is noted that the Council has undertaken a 'Supplementary Site Assessment' with regard to this proposed allocation, regarding the potential impact on the significance of the Whittington Conservation Area as a consequence of impacts upon its setting and the potential impacts on the setting and significance of the Scheduled Monument and Grade I Listed Building of Whittington Castle (NHLE refs. 1019450 & 1178307).
- 5.9.2. Historic England welcomes this assessment. We note that the Development Guidelines for the allocation include the requirement for a proportionate Heritage Impact Assessment to be carried out, and its recommendations taken into account, with respect to the impact of the development on the significance of the Whittington Conservation

Area and its setting, and the significance, including the setting, of any other heritage assets close to the site.

- 5.9.3. It is also noted that the Assessment recommends that 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. However, it is noted that this is not mentioned in the Development Guidelines at present and Historic England therefore recommends that these specific requirements also be included.

SC response

- 5.9.4. A minor modification is proposed to the 2nd paragraph of the draft Site Guidelines for site WHN024 in Schedule 14.2(i) as follows:

A proportionate Heritage Impact Assessment **including an archaeological assessment (desk based with field work as necessary)** should be carried out and its recommendations taken into account **particularly** with respect to the impact of development on the significance of the Whittington Conservation Area and its setting and the significance, including the setting, of any other heritage assets within proximity of the site.

**Agreement reached**

**5.10. Schedule 18.2 (i) Prees site PPW025**

HE comment.

- 5.10.1. Further to our concerns raised at the Preferred Sites Consultation stage of the Plan, it is noted that the Council has undertaken a 'Supplementary Site Assessment' with regard to this proposed allocation, regarding the potential impact on the significance of the Prees Conservation Area as a consequence of impacts upon its setting and the 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).
- 5.10.2. This concludes 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, due to the Conservation Area being bounded by existing development to the north and west and thus this land parcel not being considered to make any particular contribution to the significance of the Conservation Area's setting. However, it is noted that the Assessment states that this would be subject to it being of a comparable scale to adjacent form and of good design standard, with a palate of materials that is informed by and is in keeping the local vernacular. The Development Guidelines for the allocation, whilst requiring a proportionate Heritage Impact Assessment and its recommendations taken into account, accordingly, does not include the above requirements, and it is therefore suggested that the Development Guidelines be amended to encompass these.
- 5.10.3. With regard to the adjacent listed buildings, the Assessment identifies the potential for harm to nos. 14 to 16 Whitchurch Road and also to the setting of the Barn c.20m north of Tudor House, which mainly comprises the surrounding historic farmstead of which it forms a part. Suggested mitigation, set out in the Assessment, could include careful consideration of the scale, massing and layout of development on part of the site fronting Whitchurch Road and by the provision of 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 the Barn. However, again such requirements are omitted from

the Development Guidelines, and it is therefore strongly suggested that these be added, together with the requirement for an archaeological desk-based assessment, and if appropriate a field evaluation, to be submitted with any planning application, as referenced in the Assessment.

SC response

- 5.10.4. A minor modification is proposed to the 4th paragraph of the draft Site Guidelines for site PPW025 in Schedule 18.2(i) as follows:

A proportionate Heritage Impact Assessment should be carried out and its recommendations taken into account with respect to the impact of development on the significance of the Prees Conservation Area and its setting and the significance, including the setting, of any other heritage assets within proximity of the site. including Tudor House and associated barn. **The design of the new development should be comparable in scale and form to adjacent buildings within the Conservation Area, particularly with respect to layout, scale, form and materials and should include a landscape buffer to the heritage assets to the south of the site.**

**Agreement reached**

## **6. HE concern: status of site promotional material in the Local Plan**

- 6.1.1. HE has indicated in Appendix C that they do not agree with the Council's response to their comment A0438 B002.

Original HE comment

- 6.1.2. We have considered Heritage Impact Assessments and masterplans provided by the site promoters for BRD030, SHR166 and IRN001 ahead of this response, as requested by the Council. However, as the Council does not view these as part of the evidence base for the Plan, we are unclear what weight is being given to them.

Original SC response

- 6.1.3. Noted, no actions proposed

- 6.1.4. Further discussion with HE led to them providing the following additional comment:

HE further comment

HE answered "No" to this being agreed as we are still unclear as to what weight the Council is giving to Heritage Impact Assessments and Masterplans provided by the site promoters for BRD030, SHR166 and IRN001. An explanation of how the Council has taken these documents into consideration in the Plan process, and the weight being given to them, would be very much appreciated.

SC further response


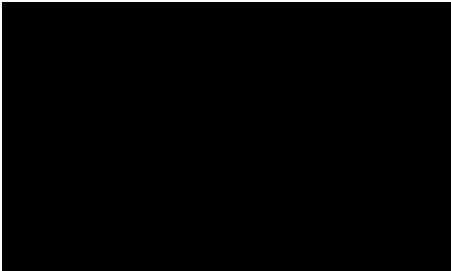
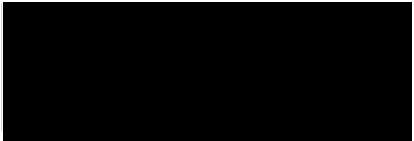
- 6.1.5. The Council has taken account of the information provided by the promoters for sites BRD030, SHR166 and IRN001 during its site assessment process (supported by advice from specialist officers, including those within the Historic Environment Team). Such site promotional material includes technical evaluations, such as Heritage Impact Assessments and design concepts such as initial masterplans. However, these documents do not form part of the evidence base for the Local Plan. SC considers this approach to be appropriate, given that the information submitted by site promoters may not always be consistent with the Council's views. Also, whilst initial masterplans are useful examples of how a site could be developed, it is the Local Plan's guidelines for allocated sites and a site's compliance with other Local Plan policies which set the framework for a site's future development. On a more general point, site promotional material is often extensive and guidance from the Planning Inspectorate indicates that Local Authorities should avoid including large

amounts of material in their evidence base where this has not directly informed the content of the Local Plan.

- 6.1.6. All promotional material supplied by site promoters as part of their representation to the Regulation 19 Consultation on the Draft Local Plan is publicly available on the Council's website and will be submitted to the Planning Inspector for their consideration.

**Agreement reached**

## 7. Formal approval

	
Name:	Edward West
Position:	Planning Policy and Strategy Manager
Signature:	
Date:	24 <sup>th</sup> August 2021
<b>Historic England</b>	
Name:	Elizabeth Boden
Position:	Historic Environment Planning Adviser
Signature:	
Date:	25 <sup>th</sup> August 2021



**Appendix A: Copy of HE Representations to Regulation 19  
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:	<a href="#">Click or tap here to enter text.</a>	Policy:	S16	Site:	SHR166	Policies Map:	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 18<sup>th</sup> 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

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	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.*

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	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:

## 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:	2.9 2.31	Policy:	SP1/SP5/SP6/ SP8/SP9/SP10/ SP12/SP13/SP14/ SP15/SP16 DP9/DP10/DP16/ DP17/DP23/DP24/ DP26/DP31/DP32  S2.2/S3/S9/ S10/ S11/S13/S14/ S16.2/S18/S20	Site:	CLU005 BRD030 HNN016 LUD056 LUD052 BUR002 CHK002 MDR012 MDR034 HHH001 HHH014 CES006 KCK009 LYH007 WHN024 FRD011 PPW025 IRN001	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:  No:
  - B. Sound Yes:  No:
  - C. Compliant with the Duty to Co-operate Yes:  No:
- (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.

Thank you for consulting Historic England on the Pre-Submission Draft Shropshire Local Plan that was published on 18<sup>th</sup> December 2020. In relation to this consultation document we have the following comments:

### General comments

Historic England responded to the Preferred Sites Consultation in January 2019 and commented that although the document set out that heritage assessments had been undertaken to inform the site selection process, it was not clear how the historic environment had been considered through the evidence base information or the Sustainability Appraisal (SA). Due to these concerns, issues over the soundness of the document were raised and Historic England suggested that if heritage assessment work had been undertaken it would be worth considering setting this out in more detail in a heritage topic paper as part of the evidence base for the Plan, or incorporating the information into the next iteration of the SA.

As previously advised, to ensure that plans are positively prepared we advise undertaking the process of the 'Site Selection Methodology' as set out in Historic England's Advice Note 3 The Historic Environment and Site Allocations in Local Plans, 2015 (HEAN3):

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

We would also recommend that detailed Heritage Impact Assessments (HIAs) are prepared, either by or on behalf of the Local Authority, with reference to Historic England's Advice Note 3 The Historic Environment & Site Allocations in Local Plans, 2015 (HEAN3) and Good Practice Advice Note 3 (Second Edition): The Setting of Heritage Assets (2017) (GPAN3).

With specific reference to non-designated heritage assets, these can make a positive contribution to the character of our settlements and enrich our sense of place. It is noted that the Plan and the SA identifies where non-designated heritage assets may be affected by the proposed allocations. We recommend that the views of your chosen specialist archaeological adviser are sought on these allocations to confirm that the evidence base is sufficiently robust to ensure that any proposed allocation is deliverable in accordance with local and national planning policies. Your adviser will inform you on whether further assessment work is required through field assessment prior to allocation to ensure the extent, character and significance has been adequately understood to inform the allocation of a site. This is particularly relevant with regard to the proposed allocation of site SHR166, as set out on a separate representation form.

Furthermore, in order to address concerns raised by Historic England to a number of proposed allocations, it is noted that the Council have now produced a 'Supplementary Site Assessments' paper, which forms part of the Council's evidence base. In overall terms we consider that these assessments demonstrate that sufficient analysis has now been undertaken to enable an understanding of what contribution these sites (in their current form) make to the significance of the relevant heritage asset(s); to identify what impact the allocation might have on that significance; and whether any harm will result to designated and non-designated heritage assets and their settings, and at what level. We are therefore satisfied that the approach is consistent with that advocated in HEAN3 and in NPPF

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	Part B Reference:



paragraph 190 in respect of proposed allocations LUD052, KCK007, LYH007, PPW025 and WHN024.

Historic England has also been asked by the Council to consider Heritage Impact Assessments, and further information in the form of masterplans, which have been produced by private consultants on behalf of site promoters for a number of the proposed allocations, namely: BRD030, SHR166 and IRN001. We have considered these as requested ahead of this response. The Council has confirmed that although this information does not form part of the evidence base for the Regulation 19 Local Plan, it has been given due consideration as part of the site assessment process, along with views on them and wider advice from the Council's Historic Environment team, at the Regulation 18 stage. Notwithstanding this clarification, it remains unclear as to what weight this information is being given in the Plan process when it does not form part of the current evidence base for the Plan.

### **Specific comments**

## **INTRODUCTION**

### **Shropshire's Character**

Historic England welcomes the inclusion of paragraph 2.9, which focuses on the number of designated heritage assets and the wealth of non-statutory undesignated assets within Shropshire; creating a county with a rich historic environment.

### **Spatial Vision**

Historic England welcomes the inclusion of the aspiration that the County's historic and natural environmental assets will be protected and enhanced (paragraph 2.31).

## **STRATEGIC POLICIES**

**Policy SP1. The Shropshire Test** – Historic England welcomes the inclusion of this strategic policy seeking to ensure that development enhances the area's character and historic environment.

**Policy SP5. High Quality Design** – Historic England welcomes the references to local character and historic interests, as well as building materials and detailing, included in this strategic policy which offers the opportunity to conserve and enhance the historic environment.

**Policy SP6. Health and Wellbeing** – the acknowledgment of the critical role the historic environment plays in the health and welfare of individuals and communities in Shropshire is supported in this strategic policy which requires that development proposals ensure a high-quality of living and working environment through good design and environmental quality, including a good relationship with the historic environment.

**Policy SP8. Managing Development in Community Hubs** - Historic England welcomes the inclusion of respecting heritage assets as a consideration for assessing development sites in Community Hubs.

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	Part B Reference:



**Policy SP9. Managing Development in Community Clusters** - Historic England welcomes the inclusion of respecting heritage assets as a consideration for assessing development sites in Community Clusters.

**Policy SP10. Managing Development in the Countryside** – Historic England welcomes the inclusion of the requirement for proposals for the replacement of buildings which contribute to the local distinctiveness, landscape character and historic environment to be resisted, unless other sustainability considerations can be demonstrated and that and the requirements of Historic Environment Policy DP23 can be met, which will assist in safeguarding heritage assets.

**Policy SP12. Shropshire Economic Growth Strategy** – Historic England welcomes reference to the historic environment in this policy, particularly in terms of reference. The context of the policy offers potential opportunities for heritage led regeneration which could conserve and enhance the historic environment.

**Policy SP13. Delivering Sustainable Economic Growth and Enterprise** – Historic England welcomes this strategic policy requiring that development of employment generating uses need to demonstrate that they satisfy the requirements of national and local policies, especially to conserve historic environments, except where justified.

**Policy SP14. Strategic Corridors** – Historic England welcomes the inclusion in the requirements of this policy, that proposals for development in the ‘strategic corridors’, must satisfy the requirements of Policy SP13 and consider the scale of the proposal in relation to the significance of the historic environment.

**Policy SP15. Whole Estate Plans** – Historic England welcomes the requirement in this policy that ‘Whole Estate Plans’ must be prepared by Estates in collaboration with relevant external organisations, including statutory bodies and is keen to work with landowners to ensure sustainable estate management with regard to the historic environment.

**Policy SP16. Strategic Planning for Minerals** – the reference to locally distinctive materials is noted and welcomed.

#### **DEVELOPMENT MANAGEMENT POLICIES**

**Policy DP9. Managing and Supporting Town Centres (Retail and Leisure)** – the content of this policy is noted and would offer opportunities to conserve and enhance the historic environment, including projects such as Oswestry High Street Heritage Action Zone.

**DP10. Tourism, Culture and Leisure:** - Historic England supports the aim of this policy and welcomes the recognition of the role that the historic environment plays in the tourist industry. Particularly placing emphasis on promoting and preserving the distinctive historic, heritage brand and values of Shrewsbury, the Market Towns and rural areas is welcomed, as is the support given in the policy for canal side development that enhances the role of canal as a multifunctional resource and heritage asset and the requirement for proposals for new and extended touring caravan and camping sites to have strong regard to the cumulative impact of visitor accommodation on the historic assets of the area.

**DP16. Landscaping of New Development** – the reference to heritage assets and setting in Criterion 3d is welcomed.

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Part B Reference:

**DP17. Landscape and Visual Amenity** – the reference to the Shropshire Landscape Typology within this policy is welcomed as Historic England is aware that this typology includes historic landscape character information.

**DP23. Conserving and Enhancing the Historic Environment** – the inclusion of this policy is welcomed, and Historic England considers that the policy sets out a positive strategy for the conservation and enjoyment of the historic environment. It is noted that the explanation to the policy (at para. 4.203) includes a list of what constitutes designated and non-designated heritage assets, which is also welcomed, but all references to ‘Scheduled Ancient Monuments’ should be revised to ‘Scheduled Monuments’ in line with NPPF terminology.

**DP24. Shropshire Hills Area of Outstanding Natural Beauty** – reference to the policy of this plan which covers historic assets is welcomed as part of the considerations to be encompassed within an assessment required to be provided for all major development within the AONB. However, it is considered that policy DP23 should be added to the list of policies specifically referred to.

**DP26. Strategic, Renewable and Low Carbon Infrastructure** – Historic England welcomes the reference in the policy to the need for assessments accompanying planning applications for non-wind renewable and low carbon development to comprise the consideration of historic assets (including the considerations within Policy DP23).

**DP31. Managing Development and Operation of Mineral Sites** – Historic England notes the minerals safeguarded areas and site allocations carried forward in policy DP29 and also the sites for sand and gravel working carried forward under policy DP30 and welcomes the reference to the historic environment in Policy DP31 in respect of development proposals requiring particular consideration to protecting, conserving and enhancing the significance of heritage assets including archaeology.

**DP32. Waste Management Facilities** – the reference in the policy to the requirement for applicants to demonstrate that potential adverse impacts on Shropshire’s historic environment can be satisfactorily controlled is welcomed by Historic England.

## **SETTLEMENT POLICIES**

### **S2. Bishop’s Castle Place Plan Area**

#### **S2.2. Community Hubs: Bishop’s Castle Place Plan Area**

#### **CLUN**

Historic England welcomes the recognition of Clun as historically significant in para.5.42 of the Plan and the various heritage assets mentioned.

**Proposed housing site CLU005** – we welcome the inclusion of the requirement in the development guidelines for this site for a heritage assessment to satisfy national and local heritage policies.

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Part A Reference:

Part B Reference:

## **BRIDGNORTH**

### **S3. Bridgnorth Place Plan Area**

#### **Schedule S3.1(i). Mixed Use Allocations: Bridgnorth Principal Centre**

**Proposed mixed allocation BRD030** – with regard to the proposed Tasley Garden Village, Historic England welcomes the approach to develop the site in accordance with a vision, design code and masterplan, to be adopted as a Supplementary Planning Document by Shropshire Council. Given the heritage assets within the site and the wider area, Historic England would welcome involvement in the master planning of the development as the process evolves.

The requirement within the Development Guidelines that the site's design and layout will reflect and respect the site's heritage and heritage assets within the wider area is welcomed, as is the requirement for the retention of listed and non-designated historic farm buildings to be retained. Whilst the prerequisite that green infrastructure will create appropriate settings for identified heritage assets and for the retention of historic field patterns and hedgerows is welcomed, it is considered that the word 'safeguard' instead of 'create' would ensure that the settings of heritage assets are conserved in an appropriate manner.

Whilst Historic England is satisfied that the impact on the heritage assets can be adequately mitigated, we recommend that the Development Guidelines should incorporate a requirement that any application should be accompanied by a heritage statement and an archaeological assessment. We note that this is included within the Stage 3 of the assessment for this site in the Sustainability Appraisal accompanying the Plan, but this has not been carried through into the Development Guidelines within the Regulation 19 Local Plan.

## **HIGHLEY**

### **S9. Highley Place Plan Area**

#### **Schedule S9.1(i). Residential Allocations: Highley Key Centre**

**Proposed Housing Site HNN016** – Historic England welcomes the requirements of the Site Allocation Development Guidelines that the design and layout of this 100 unit housing site will reflect and respect the site's heritage and heritage assets within the wider area, including Grade II listed Hazelwell's Farm House, and that landscape buffers will be required to create appropriate settings for nearby heritage assets and built form. However, we consider that to inform the above the Development Guidelines should also include the requirement for a heritage assessment.

## **LUDLOW**

### **S10. Ludlow Place Plan Area**

#### **S10.1 Development Strategy: Ludlow Town**

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Part B Reference:

Historic England welcomes point 2 of this strategy, which seeks to protect, conserve and enhance the significance of Ludlow’s heritage assets and protect the setting of this historic town.

**Schedule S10.1(i). Residential Allocations: Ludlow Principal Centre**

**Proposed housing site LUD056** – we note that the development guidelines for this site require a Heritage Impact Assessment to respect archaeological interest as this is the former site of the Fishmore Brick and Pipe Works.

**Proposed employment site LUD052** – Whilst we welcome the requirement of the Development Guidelines for a Heritage Impact Assessment to consider cumulative impacts on the significance of heritage assets located within Ludlow to the west and also the significance of the scheduled monument at Caynham Camp to the east, including its setting, we reiterate some of our previous concerns. Therefore, we recommend that a specific requirement be added for a low-rise form of development to take into account any impact, particularly the longer-term effects of cumulative development, on the setting of Caynham Camp and the Council may wish to consider that longer term a Local Development Order for the site may assist in terms of setting out what may be appropriate in relation to permitted development.

**Schedule S10.2(i). Residential Site Allocations: Community Hubs in the Ludlow Place Plan Area**

**BURFORD**

**Proposed housing site BUR002** - Historic England welcomes the requirements of the Site Allocation Development Guidelines that the design, layout and landscaping of the development should recognise the significance and setting of the heritage assets situated close to the site and supports the requirement for an assessment of the archaeological potential of the site situated close to Turnpike Cottage and the former Turnpike route along the A456, and also located near to Castle Trump Scheduled Monument.

**CLEE HILL**

**Proposed housing site CHK002** – we note the requirement for a heritage impact assessment regarding archaeological interest, as the site was formerly a coal and ironstone workings.

**MARKET DRAYTON**

**S11. Market Drayton Place Plan Area**

**Schedule S11.1(i). Residential Allocations: Market Drayton Principal Centre**

**Proposed housing sites MDR012 and MDR034** - it is noted that the development of a marina is key objective for Market Drayton (para. 5.155); seeking to utilise the town’s proximity to the Shropshire Union Canal. Historic England suggests that if the two housing sites, as well as the existing and protected employment sites, could be considered overall in relation to the potential marina development at Victoria Farm, within a masterplanned approach, then this would assist with wider connections for people and enhancement and enjoyment of heritage assets.

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## **S11.2. Community Hubs: Market Drayton Place Plan Area**

### **HODNET**

**Proposed housing sites HHH001 and HHH014** – further to our concerns raised at the Preferred Sites Consultation stage of the Plan, it is noted that the Council has undertaken ‘Supplementary Site Assessments’ with regard to these proposed allocations. Whilst Historic England welcomes these assessments, we note that the 1<sup>st</sup> edition OS map shows a gap in the boundary planting along the east side of the park, opposite the proposed housing allocation sites. This would appear to have provided a view to the rural landscape to the east, across the allocation site, and possibly into the distance; perhaps intended to be seen while travelling along the south drive of Hodnet Hall. If this was estate land it may have emphasised a connection to it, or just taken in an attractive view. Although this view is no longer available, it could be recoverable.

However, housing development on the proposed allocation site would remove the possibility of recovering what appears to be a designed view across these fields, and also lead to the further, incremental loss of the rural setting of the park along its east boundary, as the new clusters of settlement would be joined together and become contiguous with the original village and conservation area. This would have a degree of harmful impact on the significance, derived from its setting, of the registered park and garden and potentially the other heritage assets within it.

Whilst a Supplementary Site Assessment has been provided for these allocations, from the information provided it is unclear that the significance of these sites to the Hodnet Conservation Area & to the Registered Park and Garden of Hodnet Hall has been fully considered, and also consideration of how this significance would be impacted by proposed housing development in this location. Further analysis, in line with the methodology set out in HEAN 3, is therefore suggested prior to allocation.

It is noted that the Development Guidelines for these sites include the requirement for a Heritage Impact Assessment and a high-quality site design and layout. However, Historic England notes that the Supplementary Site Assessment sets out several more detailed measures to ensure that any residual harm to the Hodnet Conservation Area and other heritage assets will be mitigated, such as: low density development; incorporating well designed landscape and amenity space; good quality timber joinery detailing; and a palate of materials that is informed by, and in keeping with, the local vernacular. Historic England therefore suggests that the Development Guidelines be strengthened by the inclusion of these additional measures in order to conserve and enhance the historic environment of Hodnet.

## **S13. Much Wenlock Place Plan Area –S13.2. Community Hubs: Much Wenlock Place Plan Area**

### **CRESSAGE**

**Proposed housing site CES006** – Historic England welcomes the provisions of the Development Guidelines for this proposed allocation which require supporting studies, including heritage and archaeology, and that the recommendations of these should be clearly reflected in the proposed development scheme for the sympathetic conversion of the former Eagles Inn pub building (Grade II Listed) to dwellings and the development of the former pub car park for further residential units.

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Part A Reference:

Part B Reference:

## **S14. Oswestry Place Plan Area**

### **S14.2. Community Hubs: Oswestry Place Plan Area**

#### **Schedule S14.2(i). Site Allocations: Community Hubs in the Oswestry Place Plan Area**

##### **KNOCKIN**

**Proposed housing site KCK009** – further to our concerns raised at the Preferred Sites Consultation stage of the Plan, the Council has undertaken a ‘Supplementary Site Assessment’ with regard to this proposed allocation, which concludes 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’. This is welcomed by Historic England and we note that the Development Guidelines for the allocation include stipulations for a Heritage Impact Assessment to be carried out and its recommendations taken into account with respect to the impact of the development on the significance of the Knockin Conservation Area. However, it is considered that the Development Guidelines should be strengthened by the inclusion of more specific guidance relating to the design, scale and layout of the proposed allocation (as per the Supplementary Site Assessment), and thereby mitigating any harm that may be caused to the significance of the Conservation Area.

Additionally, Historic England also welcomes the assessment of the site in relation to the significance of the Scheduled Monument of Knockin Castle and its setting. With regard to non-designated archaeology, it is noted that two linear earthwork features (HER PRN 03723), (the remains of two substantial, infilled medieval ditches), would be partially destroyed by the development of this site allocation. Although, it is suggested that mitigation could be achieved at the development management stage through archaeological recording, secured by a planning condition, and that 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, this is not mentioned in the Development Guidelines at present and it is therefore recommended that these specific requirements be included.

##### **LLANYMYNECH**

**Proposed housing site LYH007** – further to our concerns raised at the Preferred Sites Consultation stage of the Plan, the Council has undertaken a ‘Supplementary Site Assessment’ with regard to this proposed allocation, regarding the potential impact on the significance of the Llanymynech Village and Heritage Conservation Area and 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).

The assessment is welcomed by Historic England and we note that the Development Guidelines for the allocation include stipulations for a Heritage Impact Assessment to be carried out and its recommendations taken into account with respect to the impact of the development on the significance of the Llanymynech Conservation Area and its setting.

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However, we recommend that the Development Guidelines be strengthened through the inclusion of more specific guidance relating to the design, scale and layout of the proposed allocation, to ensure that the development is comparable to the recent development of site LLAN009.

Additionally, Historic England also welcomes the assessment of the site in relation to the significance of the Llanymynech Lime Works Scheduled Monument and notes that a well-designed landscape buffer along the canal is also recommended, in addition to the design considerations set out in relation to the Conservation Area. However, we note that this is not mentioned in the Development Guidelines at present and it is therefore recommended that these specific requirements also be included.

## **WHITTINGTON**

**Proposed housing site WHN024** – further to our concerns raised at the Preferred Sites Consultation stage of the Plan, it is noted that the Council has undertaken a ‘Supplementary Site Assessment’ with regard to this proposed allocation, regarding the potential impact on the significance of the Whittington Conservation Area as a consequence of impacts upon its setting and the potential impacts on the setting and significance of the Scheduled Monument and Grade I Listed Building of Whittington Castle (NHLE refs. 1019450 & 1178307).

Historic England welcomes this assessment. We note that the Development Guidelines for the allocation include the requirement for a proportionate Heritage Impact Assessment to be carried out, and its recommendations taken into account, with respect to the impact of the development on the significance of the Whittington Conservation Area and its setting, and the significance, including the setting, of any other heritage assets close to the site.

It is also noted that the Assessment recommends that 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. However, it is noted that this is not mentioned in the Development Guidelines at present and Historic England therefore recommends that these specific requirements also be included.

## **SHREWSBURY**

**S16.2. Community Hubs: Shrewsbury Place Plan Area -  
Schedule S16.2(i). Site Allocations: Community Hubs in the Shrewsbury Place Plan Area**

## **FORD**

**Proposed housing site FRD011** - Historic England welcomes the provisions of the Development Guidelines for this proposed allocation which require supporting studies, including a heritage assessment with particular focus on potential archaeology and that their recommendations should be clearly reflected in the development scheme for the site.

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	Part B Reference:

## WHITCHURCH

### S18. Whitchurch Place Plan Area

#### S18.2. Community Hubs: Whitchurch Place Plan Area –

##### Schedule S18.2(i). Site Allocations: Community Hubs in the Whitchurch Place Plan Area

### PREES

**Proposed housing site PPW025** – further to our concerns raised at the Preferred Sites Consultation stage of the Plan, it is noted that the Council has undertaken a ‘Supplementary Site Assessment’ with regard to this proposed allocation, regarding the potential impact on the significance of the Prees Conservation Area as a consequence of impacts upon its setting and the 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).

This concludes 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, due to the Conservation Area being bounded by existing development to the north and west and thus this land parcel not being considered to make any particular contribution to the significance of the Conservation Area’s setting. However, it is noted that the Assessment states that this would be subject to it being of a comparable scale to adjacent form and of good design standard, with a palate of materials that is informed by and is in keeping the local vernacular. The Development Guidelines for the allocation, whilst requiring a proportionate Heritage Impact Assessment and its recommendations taken into account accordingly, does not include the above requirements, and it is therefore suggested that the Development Guidelines be amended to encompass these.

With regard to the adjacent listed buildings, the Assessment identifies the potential for harm to nos. 14 to 16 Whitchurch Road and also to the setting of the Barn c.20m north of Tudor House, which mainly comprises the surrounding historic farmstead of which it forms a part. Suggested mitigation, set out in the Assessment, could include careful consideration of the scale, massing and layout of development on part of the site fronting Whitchurch Road and by the provision of 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 the Barn. However, again such requirements are omitted from the Development Guidelines, and it is therefore strongly suggested that these be added, together with the requirement for an archaeological desk-based assessment, and if appropriate a field evaluation, to be submitted with any planning application, as referenced in the Assessment.

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Part B Reference:



## **STRATEGIC SETTLEMENT POLICIES**

### **S20. Strategic Settlement: Former Ironbridge Power Station**

**Proposed new strategic settlement Ironbridge IRN001** – Historic England welcomes the masterplan approach to inform the redevelopment of the power station site. It is noted that the Plan requires the redevelopment to conform to a number of site guidelines and with regard to site guideline 3a. it is considered that Buildwas Abbey, as a visitor destination should be recognised as both a constraint, to which nearby development must respond and especially in terms of how the abbey’s setting contributes to its significance, and an opportunity to enhance visitor experience within the master-plan. It is important that the Council and the developers engage with English Heritage in discussions on this issue.

Historic England notes the inclusion of a heritage centre, as mentioned in guideline 3e. and the aim that the community facilities and buildings will tap-into the heritage of the site.

With regard to guideline 3j. it is recommended that the design and layout of the site should be informed by clearer design guidance both of individual buildings and the overall structure of the development. As a consultee on the planning application Historic England notes that the approach taken to date highlights the influences both of nearby medieval market towns as well as C18th industrial villages in the World Heritage Site (WHS). We consider this to be potentially confusing and would place emphasis on the latter over the former, as the development will border the WHS and be within the head of the Ironbridge Gorge. This should be evidenced and informed by local character and also by an assessment of how setting contributes to the significance of the WHS, which should focus wider than just views, and recommendations included in the Policy Guidelines with respect to the design of urban realm, buildings, including roofing materials, heights, massing and lighting etc.

Historic England also supports guideline 3k. which will ensure that the Grade II listed Albert Edward railway bridge on the site’s boundary and buildings and structures associated with the Ironbridge A interwar power station will be sympathetically retained, enhanced/maintained and adaptively reused.

We hope that the above comments will assist but if you have any queries about any of the matters raised or consider that a meeting would be helpful, please do not hesitate to contact me.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its Regulation 19 consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

*(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*

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*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.*

Please see comments in relation to Q4.

*(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.*

- 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 be happy to participate in the hearing sessions should the Inspector require our attendance or would find our attendance helpful.**

*(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:

Date:

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	Part B Reference:

## **Appendix B: Minutes of HE-SC meeting on 18<sup>th</sup> March 2021**

### Present

Shropshire Council (SC) Planning Policy: Edward West (EW), Joy Tetsill (JT) and Daniel Corden (DC)

SC Historic Environment Team: Andy Wigley (AW)

Historic England (HE): Bill Klemperer (BK), Elizabeth Boden (EB) and Alison MacDonald (AM)

### 1. Introduction

JT confirmed that the main purpose of the meeting was to focus on the objection received from HE to the Shropshire Local Plan Reg 19 consultation in relation to site SHR166.

### 2. Local Plan Update

EW advised SC are now in the pre-election period before local elections in May 2021.

He then provided an update on the timescales for the Local Plan Review

- a) An updated Local Development Scheme (timetable for the Local Plan) was approved by SC Cabinet last week. This indicates an intention to seek full Council approval in July 2021 for submission of the Draft Shropshire Local Plan for Examination to the Planning Inspectorate. Council is currently scheduled to meet on the 15th July and submission would occur soon after.
- b) Due to this, there is a bit more time to allow for the completion of discussion/preparation/completion of Statements of Common Ground (SoCG) with organisations, such as HE, who have objected to the Plan.

### 3. HE Representation – other matters:

EB highlighted that the HE representations on other matters did still involve potential minor modifications. JT and DC confirmed that these representations have been reviewed and a number of minor modifications were being recommended in response.

### 4. HE Representation SHR166: significance of (currently non-designated) heritage asset.

JT summarised the main points of the HE representation as being:

There is insufficient evidence about the significance of archaeological remains on the site (which currently comprise a non-designated heritage asset) to inform the allocation. If allocation proceeds, there is a risk that a non-designated heritage asset that is demonstrably of equivalence to a Scheduled Monument would be lost. A thorough archaeological evaluation is needed to determine the appropriate level of significance of this asset. This should be carried out before the site is considered for allocation.

JT asked for clarification that the key point is the level of significance of the heritage asset present on site. EB confirmed this was correct.

BK then provided HE's context on the heritage asset which comprises the archaeological remains of a Roman marching camp. The camp is potentially linked to four such other sites in the area which formed part of the Romans' early military campaign: this could increase its significance. It was likely in use prior to the establishment of the more permanent Roman settlement at Wroxeter (which dates back to 55AD) meaning it is an early example.

EB and BK explained that they are seeking funding/approval within HE to commission archaeological investigations, comprising geophysics and trial trenching, of the camp. HE

considers the archaeological remains could demonstrably be of equivalent significance to a Scheduled Monument. The investigations will need permission from the landowner and will need to wait for an appropriate time to begin work with respect to the current agricultural use of the site. EW asked whether HE was commissioning investigative work with a view to designating the camp as a Scheduled Monument. BK confirmed that it was to provide a better understanding of its significance.

DC queried why the issue of the level of significance of the Roman marching camp was not raised in HE's responses to earlier Reg 18 Plan Consultations (including the Preferred Sites consultation when SHR166 was first proposed for allocation) and why archaeological site investigations had not been undertaken at these earlier Plan stages.

EB explained that the HE had consistently objected to the allocation of SHR166 at all stages of consultation. JT responded that whilst HE has raised the issue of harm to a non-designated heritage asset throughout previous consultations, the potential for the significance of the asset to be demonstrably equivalent to a Scheduled Monument was new at the Reg 19 stage.

AW highlighted the prolonged and intensive agricultural activities that have occurred on SHR166. The site historically formed part of a very large (the largest in Shropshire) field which has been in continued agricultural use. This use has been maintained since subdivision of the field by the construction of the A49 bypass and currently comprises potato crop rotation. This involves very deep ploughing - up to  $\frac{1}{2}$  metre depth. As such AW considered it highly probable that any archaeological remains will have been badly impacted. This is supported by the archaeological investigations undertaken during the construction of the A49 bypass (contained in a 1991 Report). On this basis, he felt it to be unlikely that the remains of the Roman marching camp would be demonstrably equivalent to a Scheduled Monument. He agreed that further archaeological investigation will be required but felt that this would be appropriate at the planning application stage rather than the Local Plan site allocation stage.

BK agreed that agricultural activities could have impacted the asset, but he considered that this is what the investigation would establish. He queried whether there was sufficient understanding at the Local Plan stage to defer archaeological investigations to the planning application stage. EB also raised concerns about the planning application stage being too late, as she felt allocation would naturally lead to development. EW disagreed with this latter point, explaining that the Local Plan process establishes a strategic framework for development, but allocations can only be developed if they are subject to an appropriate planning permission. The determination of any planning application would need to consider policies within the adopted Local Plan and the NPPF.

EB and BK remained of the view that at present, HE don't know whether the asset is nationally significant or not. Well preserved archaeology, should it survive, would be very significant in national terms. HE therefore recommends archaeological evaluation prior to allocation. HE's anticipation is that this approach would allow a more fully evidenced decision to be agreed as to how to manage the relative significance.

EW then asked about the timescale for the assessment work. EB and BK explained that this was dependent on the site owner and may need to wait until late summer 2021 after the crop has been harvested. AW highlighted that the site owner may not support a HE assessment, preferring to undertake their own instead.

EW advised that timescales are key and queried whether there was an expectation that the Local Plan would be delayed to allow time for this work to be completed. EB explained that whilst this would be ideal, HE appreciate that SC need to progress their Local Plan and have already identified their proposed timescales for this process. As such, the level of significance of the asset may be a topic for the Plan Examination.

EW then advised that the site promoter has proposed a minor modification to the Local Plan to require the preparation of a masterplan for SHR166. This approach has been used for some other proposed allocations where additional information is considered important. He asked whether this approach would be appropriate for resolving this issue. EB advised that whilst a Masterplan approach could work regarding impact on the setting of the Scheduled Monuments (see below) she did not consider it would be appropriate for this heritage asset which would be lost as a result of development.

EW then summarised SC's view that:

- a) the level of significance of the Roman marching camp is a new issue of objection, only raised at the Reg 19 stage
- b) the Council has sufficient and proportionate evidence (provided by AW, the Historic Environment Team Manager) to support the current non-designated status of the asset

He recognised that a balanced judgement is needed to address the impact on the non-designated heritage asset and committed to setting this out in a Statement of Common Ground (SoCG) between HE and SC.

In closing discussion on this issue, EB and BK agreed to liaise with AW regarding the scope of further assessment of the Roman marching camp, with AW feeding back to planning policy team colleagues as necessary.

#### 5. HE representation SHR166: Scheduled Monuments

AW advised that SC are generally in agreement with HE's assessment of the level of harm (less than substantial) to Haughmond Hill hillfort and Queen Eleanor's Bower SMs. He then queried whether the inclusion of Haughmond Abbey SM in HE's Reg 19 objection was relevant, given this asset's greater distance and lack of visual relationship to SHR166. His view was that the development of SHR166 would result in no harm to Haughmond Abbey SM.

BK and EB acknowledged that Haughmond Abbey did not have the same relationship to SHR166 as the other two SMs and as such was of less concern. JT advised that this change of emphasis could be addressed through the SoCG.

BK explained that the significance of the Haughmond Hill hillfort and Queen Eleanor's Bower SMs comes from their position on elevated ground overlooking the plain of the River Severn.

JT asked whether the aforementioned masterplan for SHR166 would be an appropriate mechanism for mitigating the level of harm to the significance of Haughmond Hill hillfort and Queen Eleanor's Bower SMs and their settings. BK and EB agreed that this was an acceptable approach and one which would allow detailed design to take account of the potential for large buildings on this very large allocation.

EW agreed to prepare a minor modification to the site guidelines for SH166, which would require a masterplan to be prepared, addressing the impact of development on the two SMs. This would form part of the preparation of a HE-SC SoCG.

## 6 Other matters not included in the HE Reg 19 representation.

EB raised the Economic Development Needs Assessment (EDNA) prepared to inform the Local Plan Review (although this topic does not form part of the HE representation to the Reg 19 consultation). She understood that it considers Covid 19 and the economic impact of the first lockdown but asked whether it would be updated to reflect subsequent lockdowns. She also queried the extent of employment land need identified as the Plan proposes an employment land requirement of 300ha and the appendix relating to supply shows 405ha. She made the point that this is a significant overprovision which calls into question the need for the allocation of SHR166.

EW confirmed that the EDNA considers the economic impact of Covid 19 and the first lockdown but that there is no intention to update it further – although an Economic Update may be required by the Inspector at Examination. He indicated that the expectation nationally is a short sharp economic shock and then recovery and ultimately it is very difficult to forecast long-term implications of these matters. He went on to say that the Local Plan employment land requirement exceeds the need in order to reflect the Council's economic growth agenda amongst other factors. He also explained that as with housing, the ability exists to exceed the identified employment land need. Moreover, the proposed employment land requirement is intended to be delivered over the Plan period and the supply exceeds need in order to provide choice and competition and to ensure delivery. Furthermore, advice from the SC Economic Growth team is that Shropshire can be a difficult place to attract investment which underpins the reasoning for strategically located sites such as SHR166 which are more attractive and viable to the market.

## 7. Statement of Common Ground

JT advised that SC would draft a Statement of Common Ground for HE to consider. This would set out the points of agreement and disagreement between SC and HE with respect to the proposed allocation of site SHR166.

**Appendix C: Summary of issues raised by HE where SC proposes no change.**

Part A Reference	Part B Reference	Relevant Document	Part of the Document Referenced by HE	Legally Compliant	Sound	Compliant with the Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation	Shropshire Council Relevant Local Plan Policy	Summary of Proposed Modification(s)	Shropshire Council Proposed Action(s) or Response(s)	Agreed
A0348	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Not Specified	Yes	Not Specified	<p>1. We raised concerns at previous consultation stages that the Plan was not sound because it was unclear how the historic environment had been considered in the Plan making process. Advice was given on how this might be rectified, with particular reference to the proposed allocation of SHR166. We note that the Council then produced a Supplementary Site Assessments paper and we now consider that sufficient analysis has been undertaken. We are satisfied that the Council's approach is consistent with Historic England Advice Note 3 and NPPF para 190 for sites LUD052, KCK007, LYH007, PPW025 and WHN024.</p> <p>2. We have considered Heritage Impact Assessments and masterplans provided by the site promoters for BRD030, SHR166 and IRN001 ahead of this response, as requested by the Council. However, as the Council does not view these as part of the evidence base for the Plan, we are unclear what weight is being given to them.</p>	General Comments	n/a	Noted; no actions proposed	See section 6 in main body of document.
A0348	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Shropshire's Character, para 2.9	Not Specified	Yes	Not Specified	Historic England welcomes the inclusion of paragraph 2.9, which focuses on the number of designated heritage assets and the wealth of non-statutory undesignated assets within Shropshire; creating a county with a rich historic environment.	Shropshire's Character	n/a	Noted; no actions proposed	Yes
A0348	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Spatial Vision, para 2.31	Not Specified	Yes	Not Specified	Historic England welcomes the inclusion of the aspiration that the County's historic and natural environmental assets will be protected and enhanced (paragraph 2.31).	Spatial Vision	n/a	Noted; no actions proposed	Yes
A0348	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1	Not Specified	Yes	Not Specified	Historic England welcomes the inclusion of this strategic policy seeking to ensure that development enhances the area's character and historic environment.	SP1 The Shropshire Test	n/a	Noted; no actions proposed	Yes
A0348	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP5	Not Specified	Yes	Not Specified	Historic England welcomes the references to local character and historic interests, as well as building materials and detailing, included in this strategic policy which offers the opportunity to conserve and enhance the historic environment.	SP5 High Quality Design	n/a	Noted; no actions proposed	Yes
A0348	B007	Regulation 19: Pre-Submission Draft of the	SP6	Not Specified	Yes	Not Specified	The acknowledgment of the critical role the historic environment plays in the health and welfare of individuals and communities in Shropshire is supported in this strategic policy	SP6 Health and Wellbeing	n/a	Noted; no actions proposed	Yes



Part A Reference	Part B Reference	Relevant Document	Part of the Document Referenced by HE		Legally Compliant	Sound	Compliant with the Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation	Shropshire Council Relevant Local Plan Policy	Summary of Proposed Modification(s)	Shropshire Council Proposed Action(s) or Response(s)	Agreed
		Shropshire Local Plan										
A0348	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8		Not Specified	Yes	Not Specified	Historic England welcomes the inclusion of respecting heritage assets as a consideration for assessing development sites in Community Hubs.	SP8 Managing Development in Community Hubs	n/a	Noted; no actions proposed	Yes
A0348	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP9		Not Specified	Yes	Not Specified	Historic England welcomes the inclusion of respecting heritage assets as a consideration for assessing development sites in Community Clusters.	SP9 Managing Development in Community Clusters	n/a	Noted; no actions proposed	Yes
A0348	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10		Not Specified	Yes	Not Specified	Historic England welcomes the inclusion of the requirement for proposals for the replacement of buildings which contribute to the local distinctiveness, landscape character and historic environment to be resisted, unless other sustainability considerations can be demonstrated and that and the requirements of Historic Environment Policy DP23 can be met, which will assist in safeguarding heritage assets.	SP10 Managing Development in the Countryside	n/a	Noted; no actions proposed	Yes
A0348	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12		Not Specified	Yes	Not Specified	Historic England welcomes reference to the historic environment in this policy, particularly in terms of reference. The context of the policy offers potential opportunities for heritage led regeneration which could conserve and enhance the historic environment.	SP12. Shropshire Economic Growth Strategy	n/a	Noted; no actions proposed	Yes
A0348	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13		Not Specified	Yes	Not Specified	Historic England welcomes this strategic policy requiring that development of employment generating uses need to demonstrate that they satisfy the requirements of national and local policies, especially to conserve historic environments, except where justified.	SP13 Delivering Sustainable Economic Growth and Enterprise	n/a	Noted; no actions proposed	Yes
A0348	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14		Not Specified	Yes	Not Specified	Historic England welcomes the inclusion in the requirements of this policy, that proposals for development in the 'strategic corridors', must satisfy the requirements of Policy SP13 and consider the scale of the proposal in relation to the significance of the historic environment.	SP14 Strategic Corridors	n/a	Noted; no actions proposed	Yes
A0348	B014	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP15		Not Specified	Yes	Not Specified	Historic England welcomes the requirement in this policy that 'Whole Estate Plans' must be prepared by Estates in collaboration with relevant external organisations, including statutory bodies and is keen to work with landowners to ensure sustainable estate management with regard to the historic environment.	SP15 Whole Estate Plans	n/a	Noted; no actions proposed	Yes



Part A Reference	Part B Reference	Relevant Document	Part of the Document Referenced by HE		Legally Compliant	Sound	Compliant with the Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation	Shropshire Council Relevant Local Plan Policy	Summary of Proposed Modification(s)	Shropshire Council Proposed Action(s) or Response(s)	Agreed
A0348	B015	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP16		Not Specified	Yes	Not Specified	The reference to locally distinctive materials is noted and welcomed	SP16 Strategic Planning for Minerals	n/a	Noted; no actions proposed	Yes
A0348	B016	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP9		Not Specified	Yes	Not Specified	The content of draft Policy DP9 is noted and would offer opportunities to conserve and enhance the historic environment, including projects such as Oswestry High Street Heritage Action Zone.	DP9. Managing and Supporting Town Centres	N/A	Noted.	Yes
A0348	B017	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP10		Not Specified	Yes	Not Specified	Supports the aim of draft Policy DP10 and welcome recognition of the role that the historic environment plays in the tourist industry. In particular: Emphasis on promoting and preserving the distinctive historic, heritage brand and values of Shrewsbury, the Market Towns and rural areas is welcomed. Support for canal side development that enhances the role of canals as a multifunctional resource and heritage asset is welcomed. Requirement for proposals for new and extended touring caravan and camping sites to have strong regard to the cumulative impact of visitor accommodation on the historic assets of the area is also welcomed.	DP10. Tourism, Culture and Leisure	N/A	Noted.	Yes
A0348	B018	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP16		Not Specified	Yes	Not Specified	Reference to heritage assets and setting in Criterion 3d of draft Policy DP16 is welcomed.	DP16. Landscaping of New Development	N/A	Noted.	Yes
A0348	B019	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17		Not Specified	Yes	Not Specified	Reference to the Shropshire Landscape Typology within draft Policy DP17 is welcomed as aware this typology includes historic landscape character information.	DP17. Landscape and Visual Amenity	N/A	Noted.	Yes
A0348	B022	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP26		Not Specified	Yes	Not Specified	Welcome reference in draft Policy DP26 to the need for assessments accompanying Planning Applications for non-wind renewable and low carbon development to comprise the consideration of historic assets (including the considerations within Policy DP23).	DP26. Strategic, Renewable and Low Carbon Infrastructure	N/A	Noted.	Yes
A0348	B023	Regulation 19: Pre-Submission Draft of the	DP31		Not Specified	Yes	Not Specified	Note minerals safeguarded areas and site allocations carried forward in draft Policy DP29 and also the sites for sand and gravel working carried forward under draft Policy DP30.	DP31. Managing Development and	N/A	Noted.	Yes

Part A Reference	Part B Reference	Relevant Document	Part of the Document Referenced by HE		Legally Compliant	Sound	Compliant with the Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation	Shropshire Council Relevant Local Plan Policy	Summary of Proposed Modification(s)	Shropshire Council Proposed Action(s) or Response(s)	Agreed
		Shropshire Local Plan						Welcome reference to the historic environment in draft Policy DP31 in respect of development proposals requiring particular consideration to protecting, conserving and enhancing the significance of heritage assets including archaeology.	Operation of Mineral Sites			
A0348	B024	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP32		Not Specified	Yes	Not Specified	Reference in draft Policy DP32 to the requirement for applicants to demonstrate that potential adverse impacts on Shropshire's historic environment can be satisfactorily controlled is welcomed by Historic England.	DP32. Waste Management Facilities	N/A	Noted.	Yes
A0348	B025	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S2.2 CLU005		Not Specified	Yes	Not Specified	Welcome recognition of Clun as historically significant in para 5.42 of the draft Shropshire Local Plan and the various heritage assets mentioned. With regard to proposed allocation CLU005, welcome development guideline for this site to undertake a heritage assessment to satisfy national and local heritage policies.	S2.2 Clun	N/A	Noted.	Yes
A0348	B029	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S10.2(i) BUR002		Not Specified	Yes	Not Specified	Welcome requirement within the proposed development guidelines for site BUR002 that the design, layout and landscaping of the development should recognise the significance and setting of the heritage assets situated close to the site and supports the requirement for an assessment of the archaeological potential of the site situated close to Turnpike Cottage and the former Turnpike route along the A456, and also located near to Castle Trump Scheduled Monument.	S01.2 Burford	N/A	Noted.	Yes
A0348	B030	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S10.2(i) CHK002		Not Specified	Yes	Not Specified	Note the requirement within the proposed development guidelines for site CHK002, for a heritage impact assessment regarding archaeological interest, as the site was formerly a coal and ironstone workings.	S01.2 Clee Hill	N/A	Noted.	Yes
A0348	B031	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.1(i) MDR012 & MDR034		Not Specified	Yes	Not Specified	Note that development of a marina is key objective for Market Drayton (para. 5.155), seeking to utilise the town's proximity to the Shropshire Union Canal. Suggest that if proposed allocations MDR012 and MDR034, as well as the existing and protected employment sites in this general area could be considered overall in relation to the potential marina development at Victoria Farm, within a masterplanned approach, then this would assist with wider connections for people and enhancement and enjoyment of heritage assets.	S11.1 Market Drayton	Consider MDR012 and MDR034, as well as the existing and protected employment sites in this general area, within a masterplanned approach to the potential marina development at Victoria Farm.	Noted. Shropshire Council considers that an effective approach to the development of existing and proposed allocations at Market Drayton is established within the draft Shropshire Local Plan and elements of the adopted SAMDev Plan proposed to be saved.	Yes

Part A Reference	Part B Reference	Relevant Document	Part of the Document Referenced by HE		Legally Compliant	Sound	Compliant with the Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation	Shropshire Council Relevant Local Plan Policy	Summary of Proposed Modification(s)	Shropshire Council Proposed Action(s) or Response(s)	Agreed
											It is also considered that draft Policy S11.1 provides an appropriate context for the opportunities to deliver a marina and related uses on land at Victoria Farm. If any such development is proposed, it would be subject to detailed consideration through the Planning Application process.	
A0348	B033	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 CES006		Not Specified	Yes	Not Specified	Welcome provisions of the draft Development Guidelines for CES006 which require supporting studies, including heritage and archaeology, and that the recommendations of these should be clearly reflected in the proposed development scheme for the sympathetic conversion of the former Eagles Inn pub building (Grade II Listed) to dwellings and the development of the former pub car park for further residential units.	S13.2 Cressage	N/A	Noted.	Yes
A0348	B037	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2(i) FRD011		Not Specified	Yes	Not Specified	Welcomes proposed Development Guideline for FRD011 which requires supporting studies, including a heritage assessment with particular focus on potential archaeology and that their recommendations should be clearly reflected in the development scheme for the site.	S16.2 Ford	N/A	Noted.	Yes
A0348	B039	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S20 IRN001		Not Specified	Yes	Not Specified	Welcomes the masterplan approach to inform the redevelopment of the Former Ironbridge Power Station site. Note the draft Shropshire Local Plan requires redevelopment of the Former Ironbridge Power Station site to conform to a number of site guidelines, comments are as follows: 3a. Consider that Buildwas Abbey, as a visitor destination should be recognised as both a constraint, to which nearby development must respond and especially in terms of how the Abbey's setting contributes to its significance, and an opportunity to enhance visitor experience within the Masterplan. It is important that the Council and the developers engage with English Heritage in discussions on this issue. 3e. Note reference to a heritage centre and the aim that the community facilities and buildings will tap-into the heritage of the site.	S20. Strategic Settlement: Former Ironbridge Power Station	Proposed Development Guidelines for the Former Ironbridge Power Station should: -Recognise Buildwas Abbey, as both a constraint and an opportunity to within the Masterplan. Engagement with English Heritage in discussions on this issue is important.	Noted. Proposed site guidelines proposed for the Former Ironbridge Power Station Site include the requirement to prepare a masterplan to inform the sites redevelopment. It is considered that this process is the appropriate mechanism to consider any necessary design	Yes

Part A Reference	Part B Reference	Relevant Document	Part of the Document Referenced by HE		Legally Compliant	Sound	Compliant with the Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation	Shropshire Council Relevant Local Plan Policy	Summary of Proposed Modification(s)	Shropshire Council Proposed Action(s) or Response(s)	Agreed
								<p>3j. Recommend that the design and layout of the site should be informed by clearer design guidance both of individual buildings and the overall structure of the development. As a consultee on the planning application Historic England notes that the approach taken to date highlights the influences both of nearby medieval market towns as well as C18th industrial villages in the World Heritage Site (WHS). Consider this to be potentially confusing and would place emphasis on the latter over the former, as the development will border the WHS and be within the head of the Ironbridge Gorge. This should be evidenced and informed by local character and also by an assessment of how setting contributes to the significance of the WHS, which should focus wider than just views, and recommendations included in the Policy Guidelines with respect to the design of urban realm, buildings, including roofing materials, heights, massing and lighting etc.</p> <p>3k. This guideline is supported as it will ensure that the Grade II listed Albert Edward railway bridge on the site's boundary and buildings and structures associated with the Ironbridge A interwar power station will be sympathetically retained, enhanced/maintained and adaptively reused.</p>		<p>-Require design and layout of the site should be informed by clear design guidance both of individual buildings and the overall structure of the development. This should be evidenced and informed by local character and also by an assessment of how setting contributes to the significance of the WHS, which should focus wider than just views, and recommendations included in the Policy Guidelines with respect to the design of urban realm, buildings, including roofing materials, heights, massing and lighting etc.</p>	<p>guidance for the site.</p> <p>With regard to Buildwas Abbey, proposed site guidelines include that high-quality design and layout of the site will also reflect and respect the sites heritage, heritage assets on the site and its relationship with heritage assets within the wider area, which includes Buildwas Abbey (which is specifically referenced). As such it is considered that the need to consider the constraints and opportunities associated with Buildwas Abbey are already recognised within the draft site guidelines.</p>	

**Appendix D: Overview of Shrewsbury 'Strategic' Employment Development Options Assessment**

## 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 Shropshire<sup>1</sup>, 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.

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<sup>1</sup> 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 town<sup>2</sup>.
- 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:

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<sup>2</sup> 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"> <li>Greenfield site separated from development boundary by other land.</li> <li>South of Hencott Pool SSSI/Ramsar/LWS.</li> <li>No obvious access or road frontage.</li> <li>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.</li> </ul>
SHR157 / SHR157VAR / SHR225 (employment element):	<ul style="list-style-type: none"> <li>Large greenfield site beyond Shrewsbury A5 bypass.</li> <li>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.</li> <li>Site has road frontage and potential access onto A488. No existing network or footways.</li> <li>Site isolated from any development by road and rail line.</li> </ul>
SHR166:	<ul style="list-style-type: none"> <li>Large greenfield site outside development boundary east of the River Severn which separates the site from the urban area.</li> <li>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.</li> <li>Site has boundary but no current access onto the A49 bypass.</li> <li>Element of site is within zones 2 and 3.</li> </ul>
SHR198:	<ul style="list-style-type: none"> <li>Greenfield site located to the north-east of the Livestock Market and north of the A53.</li> </ul>

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. Paragraph’s 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 effect 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 development<sup>3</sup>. 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 Map<sup>4</sup>, 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.

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<sup>3</sup> 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.

<sup>4</sup> 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.