

Representation Form

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

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

Part B: Representation

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

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

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

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

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

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

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

SHREWSBURY

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

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

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

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

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

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

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

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

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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: