

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:	Click or tap here to enter text.	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 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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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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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

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- (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.

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Thank you for consulting Historic England on the Pre-Submission Draft Shropshire Local Plan that was published on 18th 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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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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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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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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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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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 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.

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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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 A Reference:

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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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: Elizabeth Boden

Date: 26/02/2021

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