



Historic England

Our ref: PL00709782

Your ref:

Telephone:

Email:

16 February 2022

FAO: Edward West, Planning Policy Manager

Dear Sir,

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

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

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

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



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

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**Latest position:**

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

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

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

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

These reports have already been forwarded to Shropshire Council.





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

### Historic Interest

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

### Archaeological Interest

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





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

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

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

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





Historic England

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

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

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

Yours faithfully,

*Elizabeth Boden*

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