Church Stretton Town Council's representation concerning section S5 Church Stretton Area (S5.1 Church Stretton Town) of the Shropshire Site Allocation and Management Development Plan, Pre-Submission Draft (Final Plan) 17<sup>th</sup> March 2014.

#### **Executive summary**

This paper presents the views of Church Stretton Town Council on the soundness of the preparation by Shropshire Council of the SAMDev Plan. Although the Town Council had concerns about earlier stages of the consultation on the Church Stretton Area Plan, it now believes that the Plan is sound with one exception, namely the inclusion of the potential release of greenfield land for housing East of the A49 (S5 Church Stretton Area, page 110 of DPD). S5.1 (3) is not compliant with the National Planning Policy Framework (NPPF) (2012) and therefore is not sound or sustainable and should be removed from the plan, as there are more viable alternatives within or adjacent to the built environment to address future development needs.

#### **Church Stretton in its context**

Church Stretton is the only market town in the Shropshire Hills AONB and lies between the Long Mynd (SSSI) and Caer Caradoc (National Heritage Asset). The area has exceptional tree cover [Appendix A]. The majority of the town is within a conservation area [Appendix B]

Tourism is a major feature of the town's economy. An estimated 150,000 visitors from far and wide enjoy relaxing, walking, cycling, riding, gliding, all within spectacular scenery. Overflow car parking is often required at peak holiday weekends to cope with the volume of visitors to the National Trust run Carding Mill Valley within the Long Mynd. Schools and colleges regularly use the area for field study activities and Duke of Edinburgh Award exercises. Apart from tourism, there is a scientific technology business and a water extraction business in the town.

The Town Council has been monitoring the demographics of the town carefully for a number of years. Twice the national average of residents is over 65 years [Appendix C] There is an increasing demand for care services and facilities which also puts pressure on the Medical Practice. Surveys of employment such as the Nursing Home Survey 2012 by the Health & Social Care Partnership and surveys of employers, [Appendix D] highlight low wages and high house prices meaning that key workers cannot afford to live within the town A stubbornly large pool of unsold houses and an increasing number of second homes prevail, as parents struggle to accommodate growing families within easy reach of our schools. The Town Council is therefore clear about the need for social housing (when government funding again becomes available) as the only affordable option for the 41 local families currently on the housing waiting list, [Appendix E] since even affordable housing is beyond their means, given the inflated prices in this area. In the interim, the requirement of 20% affordable housing in the proposed developments will be of benefit to those local families seeking second phase housing. A much better safeguard of appropriate housing development would involve conferring on Areas of Outstanding Natural Beauty the same planning powers as are now afforded to National Parks.

#### Church Stretton and the national need for housing and employment land

Representing as it does a market town serving a scattered community in a rural environment, the Town Council has actively engaged with Shropshire Council's drive to establish a Site Allocation & Management Development Plan for the County. To do this it has been keen to work with officers and Members of Shropshire Council and has formed a Community Consultation Group to include residents, community groups and organizations. For example, over 1,000 residents responded in January 2014 to the Town Council's consultation on employment land site options, where 95% preferred additional employment land to be sited on the southern edge of the town (Laundry Bank) adjacent to the A49 rather than east of the A49.

Given the number of unsold houses in the area, the community, as a whole, is unconvinced of the need for additional market-priced houses in Church Stretton, especially as such houses will not meet local housing needs and are likely further to unbalance the town's demographic. However, understanding the nationally imposed constraints imposed on Shropshire Council and in the spirit of cooperation with the Council, it was agreed to increase the number of houses allocated to 370 and to offer alternative sites closer to the built environment to those proposed east of the A49. Indeed, the collective goal of the Town Council with the Community Consultation Group has been to achieve what is best for the long-term sustainable development of Church Stretton. This has required robust representations to Shropshire Council's Cabinet in February 2014, reminding Members that 96% of a large number of consultee responses from the community rejected development east of the A49.

Further, the Town Council considers that the potential release of greenfield land for housing east of the A49 [S5 Church Stretton Area (page 110 of DPD) is not compliant with the National Planning Policy Framework (NPPF) (2012) and therefore is not sound or sustainable and should be removed from the plan. This area has particular landscape sensitivity which is why the Town Council put forward more viable alternatives within or adjacent to the built environment to address future development needs. [Appendix F].

In summary, any proposed development east of the A49 would be isolated from the built environment and existing services. There would also be significant highway safety issues involved [Appendix G] as the A49 is a major trunk road providing for long distance through traffic. Page 60 of a Sustainability Report on these sites says: "The Highways Agency had concerns over the A49 access and could not agree to the development. Therefore it wasn't carried forward as a potential site." Restrictions would also apply relating to the AONB and building so close to the Caer Caradoc Hill Fort - a National Heritage Asset. [Appendix H] Not least, the need for more 'market housing' in Church Stretton is not proven, especially after sites had been identified for more than 100 additional houses adjacent to the built environment.

The Town Council believes it has acted responsibly balancing the national need for more houses with the protection of a sensitive landscape by offering alternative sites for housing and employment land which are sustainable and do not impact adversely on the AONB.

#### The plan for Church Stretton

The provision of 52 houses adjacent to the Church Stretton Technology Academy (CSTR 18) offers the potential for second-phase family homes to be built next to the schools and improved sporting facilities for both the school and the community. The possibility of developing light industrial employment land (ELR 78) between Spring Bank Farm and the railway line behind the school also provides exciting scope for joint working between the Technical Academy, local employers and the community. A further 52 houses are proposed adjacent to the built environment at Leasowes (CSTR 19) which together with CSTR 18 will achieve the housing target in full for the town.

It is proposed that there should be additional employment land provided on the southern edge of the town at Laundry Bank and that this could provide for complementary heavier industrial capability to that proposed at Spring Bank Farm with direct access on to the A49.

#### The soundness of the plan for Church Stretton

The Town Council has tested the plan for Church Stretton, as laid out in S5.1 of the SAMDev Pre-Submission Draft (Final Plan), against the NPPF, Shropshire Council's Core Strategy and the Town Design Statement and believes that it is a better match with these national and county policies than Shropshire Council's original alternative sites. However, the potential release of greenfield land for housing east of the A49 [S5 Church Stretton Area (page 110 of DPD] is not compliant with the National Planning Policy Framework (NPPF) (2012) and therefore is not sound or sustainable and should be removed from the plan as there are more viable alternatives within or adjacent to the built environment.

Nine key tests of soundness have been applied using the Planning Advisory Service, Soundness Self-Assessment Checklist (January 2013):

Has the plan been positively prepared and based on objectively assessed requirements? We believe the plan for Church Stretton is the best fit against some challenging development and infrastructure requirements within current policy requirements. The plan offers the best potential for providing the much-needed affordable and second phase homes in the town identified by the Town Council.

#### *Is the plan justified?*

Yes. The plan is the most appropriate option against the original alternatives proposed by Shropshire Council east of the A49 for the reasons outlined in this paper and is therefore justified.

#### Is it based on robust and credible evidence?

Yes. The Town Council has worked hard to understand the housing and employment land needs of the area and apply them sensibly within a sensitive landscape.

#### *Is it the most appropriate strategy when considered against alternatives?*

Yes. The research/fact finding undertaken by the Town Council has informed the choices made in the plan, and given the limitations of the Victorian infrastructure, addresses the importance of any new development being close to the built environment. As the formal consultations evidence, residents, community groups and organizations have been actively involved in considering and commenting on these issues.

#### *Is the document effective?*

Partially. Shropshire Council has listened to the robust representations from the community concerning alternative sites east of the A49 but should remove potential greenfield land east of the A49 for future development from the DPD for it to be fully effective.

#### Is it deliverable?

Developers are confident about the deliverability of these sites and at the time of writing, work to progress the land swap between Shropshire Council, the landowner and the school is progressing which will complete the deliverability of the planned development at the school (CSTR018). Building close to the built environment is the most effective way of connecting with the existing infrastructure and adding value to the community. A planning application has been submitted for development of the land at Leasowes (CTSR019)

#### *Is it flexible?*

It is the Town Council's view, that the plan is compatible with the Bruntland definition of sustainable development because it is development that "meets the needs of the present without compromising the ability of future generations to meet their own needs." (World Commission on Environment and Development (WCED). Our common future. Oxford University Press, 1987)

#### Can it be monitored?

The Town Council has not only developed effective and inclusive links with community groups and organizations, but has also engaged constructively with developers who are already expressing a willingness to work with the community on design and this will strengthen ownership and sense of 'place.'

#### *Is it consistent with national policy?*

Yes. With the caveats above, the Town Council can support the plan for Church Stretton because it now balances the national need for more houses with the need to protect a sensitive landscape.

## In summary

The Town Council has taken an informed and strategic view of the town's development. It has sought to be an effective partner with Shropshire Council and to be inclusive with community groups and organizations. It has taken a responsible and balanced approach to the tension between the national need for more houses and the protection of a sensitive landscape. Overall, it considers the plan for Church Stretton to be sound. However, the potential release of greenfield land for housing east of the A49 [S5 Church Stretton Area (page 110 of DPD] is not compliant with the National Planning Policy Framework (NPPF) (2012) and therefore is not sound or sustainable and should be removed from the plan as there are more viable alternatives within or adjacent to the built environment.

# Sections of Appendix 1 of the Church Stretton Town Design Statement

Background to trees in Church Stretton

"Semi-natural woodland in Church Stretton has not changed since the medieval period. "

"A particular feature of Church Stretton is the presence of many fine specimen conifers on the valley sides. Many of these evergreens were planted in the mid 19<sup>th</sup> century when there was a desire to create a landscape of trees interspersed with large houses"

"A large group TPO was served on Church Stretton in 1959. This gave protection to groups of trees around the town."

"The proposal to extend the Conservation Area to the east of the A49 would extend some protection to trees in that part of the town." (The Conservation Area has since been extended)

# **APPENDIX B**

# Extract from the Appraisal Document for the Conservation Areas in Church Stretton (Shropshire County Council)

Church Stretton lies in a narrow valley, half a mile wide, between the Stretton Hills to the east and the Long Mynd to the west. The scale of the surrounding hills gives the town a strategic and picturesque position at the low pass between the North Shropshire Plain and Apedale and the Teme Valley. Sandford Avenue which runs east-west across the town represents approximately the watershed between headwaters of Quinney Brook (Teme catchment) to the south and Cound Brook (Severn catchment) to the north.

Natural England's Landscape Character Assessment<sup>1</sup> places Church Stretton in the Shropshire Hills Joint Character Area. The characteristics of this area are:<sup>2</sup>

- Dominant pattern of south-west to north-east ridges, scarps and intervening valleys.
- Steep, rounded 'whaleback' hills.
- Hill tops often crowned with open moorland, with woodland on steeper slopes.
- Hill slopes with patchworks of small pasture fields, giving way to arable lands in the dales.
- Distinctive and prominent landmarks, such as Long Mynd, Wenlock Edge, the Wrekin and Clee peaks.
- Scattered farms in dales and sheltering in valleys.
- Larger settlements confined to the Stretton Valley and the A49 corridor.
- Small fields and cottages of squatter settlements in some areas.

Shropshire County Council's *Shropshire Landscape Typology*<sup>3</sup> considers the landscape in more detail. Church Stretton lies on the boundaries of no fewer than four landscape types. These are the open moor of the Long Mynd, the summits and narrow valleys of the Stretton Hills, the wooded slopes of the valley and the farmland of the valley floor. These have the following characteristics:

#### High Open Moorland (The Long Mynd)

- Upland plateau and slopes with extensive tracts of heathland
- Largely unenclosed landscape with few signs of habitation
- Large scale landscape, offering open views
- Scattered prehistoric barrows and other earthworks
- Narrow, steep sided valleys

#### High Volcanic Hills and Slopes (Stretton Hills)

- Precambrian volcanic geology
- Prominent hills with notable steep slopes
- Unsettled, unenclosed landscape with few signs of habitation
- Rough grazing

#### Wooded Hills and Farmlands (Stretton Hills lower slopes)

- Prominent, sloping topography
- Hedged fields with predominantly ancient origins

Natural England, Landscape Character Assessment, 2002

Ibid, Joint Character Area 62, Shropshire Hills, 2002

<sup>&</sup>lt;sup>3</sup> Shropshire County Council, *Shropshire Landscape Typology*, 2006

- Large discrete woodlands with ancient character
- · Mixed farming land use
- Dispersed settlement pattern
- Medium scale landscapes with framed views

Settled Pastoral Farmlands (the valley floor)

- Heavy, poorly drained soils
- Pastoral land use
- Scattered hedgerow trees
- Irregular field pattern
- Small to medium scale landscapes

The whole town, with the surrounding hills and lower landscapes lies within the Shropshire Hills Area of Outstanding Beauty which was designated in 1959<sup>4</sup>.

The narrow valley of Strettondale is more open to the plain to the north than to landscapes to the south. From the north the lines of the hills to the east and west seem to funnel the the traveller into the valley. From the south the approach is winding and indistinct in the landscape. Even so, Church Stretton is not prominent in the wider landscape. Once in the valley, however, one is in no doubt in the importance of the town to its landscape setting.

#### 4.1.4 South Shropshire Landscape Sensitivity and Capacity Study

This was undertaken in 2008 in relation to the production of the Shropshire Local Development Framework<sup>5</sup>. Its purpose was to assess, in landscape terms, the sensitivity of potential development sites. Nine sites were assessed in the Church Stretton area. Of these only sites SSSC1 (land to the west of Trevor Hill) and SSCS5 (land to the north of Sandford Avenue) lie within the proposed Conservation Area boundary. These were assessed as having medium to high sensitivity and low capacity for development (medium in the case of site SSCS5 immediately in the vicinity of The Leasowes).

#### 6. Suggested boundary changes

English Heritage guidance<sup>6</sup> suggests that, in the past, conservation area boundaries have tended to be drawn too tightly. This may have been borne of a desire to ensure uniformity of architectural quality and character. But the approach has meant less emphasis on aspects of more general historic interest. Sometimes this had led to less coherent conservation areas than would otherwise be the case.

In the case of Church Stretton the picture is mixed. The boundary of the Conservation Area set in 1986 was drawn tightly around the historic core of the village. Later consideration of boundary extensions did not provide a consistent approach as so many of the areas for possible inclusion contained significant amounts of modern development.

There seems little point in including aspects of the town's setting in the Conservation Area. This is for 3 reasons:

- The setting is protected against new development by planning policy.
- The whole area lies within the Shropshire Hills AONB. This status requires sensitivity to be adopted in the design of any development that does take place.

White Consultants, South Shropshire Landscape Sensitivity and Capacity Study, 2008

<sup>4</sup> AONB Management Plan

English Heritage, Guidance on Conservation Areas Appraisals

• The burden on landowners of having to notify the LPA of all works to trees would be disproportionately onerous.

English Heritage guidance also suggests that the values ascribed to an area by the local community should be recognised<sup>7</sup>.

Taking these aspects together, there is a strong case for 5 extensions to the Conservation Area:

- The Edwardian suburbs to the east of the A49. This has a similar character to that of the Madiera Walk and Trevor Hill area which is already included.
- The area around Crossways and the station. This has little architectural merit but is historically interesting because of its development by the Stretton Land and Development Companies.
- An area at the south-west end of Cunnery Road. This includes the grounds of the Long Mynd Hotel and surrounding land.
- Carding Mill Valley. This has played a significant part in the history of the town. In view of the protection given to the landscape by AONB designation and ownership by the National Trust, it is proposed to draw the boundary fairly tightly around the C19 mill development and associated engineering remains.
- Minor amendments to the boundaries in several places.

This appraisal has been carried out on the basis that the Conservation Area will be extended as suggested. Detailed reasoning is apparent from the appraisal.

#### **APPENDIX C**

#### **Church Stretton Demographics**

The Town Council contends that clearly identified need is more important than arbitrary numbers. In assessing housing requirements for the population of Church Stretton, it is important to look at the local demographics. The Core Strategy states that 31.5% of people are aged 65 or over, compared with 19.7% for Shropshire (based on 2001 census). This figure is set to rise as Church Stretton attracts retirees from out of the area because of its tranquil setting.

Out of a population of 4,671 (2011 Census) Church Stretton has:

- 0-15 years old 593 12.7%
- 16-44 1068 22.9%
- 45-retirement 1361 29.1%
- Retirement+ 1649 35.3%
- Shropshire has 20.7% over the age of 65

It can be seen from the above that there is an imbalance in the age profile of the town which has worsened since the 2001 census.

Those of working age tend to be employed in the following categories:

- Professional/Managerial these people in the main work out of Church Stretton
- Leisure/tourism
- Caring professions
- Retail and services
- Homeworkers
- Administrative/casual

Similar numbers of people commute in and out of town each day.

Wages in and around Church Stretton are low – some 10% lower than the median for Shropshire.

The Town Council believes that priority should be given to providing housing for local families and key workers who at present cannot afford to live in the area. As the only town in the AONB, Church Stretton house prices are higher than elsewhere in South Shropshire, where the average house price is already £100k above the county average. As a consequence the prices are more than 14 times the average local salary. This house price inflation is being fuelled by an increasing number of second homes (despite the 100% Council Tax). Many towns in National Parks face the same pressures - there is an increasingly urgent need to slow the second home expansion, to build housing specifically for the elderly and to encourage downsizing to release more existing accommodation for families. In the current housing market, strategic planning has to recognise that "affordable housing", calculated against the local market rate in this area, will be beyond the means of the people on the "Homepoint" waiting list (currently approximately 260). As in many other communities, this issue will only be addressed when once again there is investment in social housing on exception sites. This adds to the imperative to allow for this inevitability.

It is not felt appropriate to build large numbers of 4/5/6 bedroom market value houses to further attract retirees and professionals who work out of the area, even if 20% of the build, yields affordable housing.

#### **APPENDIX D**

# **Church Stretton Survey of Travel and Housing – an Analysis**

#### Introduction

**Sample**: The survey was sent to 209 employees of the major employers in Church Stretton. 127 returns were received, a sample of 42% which is statistically significant and so can be regarded as moderately representative. Employers included were Church Stretton Academy, St Lawrence's Primary, Agilent, The Co-op and Princes Water.

Percentage returns from each employer were:

Co-op 55%

Princes 50%

St Lawrences 48%

Agilent 46%

Academy 27%

A copy of the survey is attached and the detailed response data are shown on the attached spreadsheet.

Pulling out some relevant relationships:

# Where people live and how they commute

39% live within Church Stretton and 43% live more than 10 miles away.

Of those living more than five miles away from their work, three people travel by train (4%), and two by bus (2.7%). The rest travel by car (93%).

Of those who live more than 10 miles away from their work (55), only 15 (27%) might be interested in moving to Church Stretton.

24% of the respondents walk to work, representing 60% of those who live in Church Stretton

# The respondents

# The age profile of those responding was:

16-21 9%

22-45 35%

46-60	45%
>60	11%

# **Demand for accommodation**

Regardless of whether people would consider a move to Church Stretton, all were asked to consider their next home. For the whole sample:

Property sought	Whole sample	Those who might be interested in moving to Church Stretton	
Detached	57%	44%	
Semi-detached	25%	29%	
Terraced	8%	15%	
Flat	10%	12%	

Looking at the number of bedrooms sought:

Bedroom number	Whole sample	Those who might be interested in moving to Church Stretton 11%	
1	6%	11%	
2	20%	18%	
3	47%	50%	
4	21%	5%	
5+	6%	6%	

Of those who might consider a move to Church Stretton, 39% would seek an affordable home. The percentage for the whole sample is 33%

Looking at property type sought in the next move (which can only be an aspiration):

	Whole Sample	Those who might consider moving to Church Stretton
Period	24%	22%
Post-war	23%	23%
Modern	25%	27%
New	28%	28%

# Rent or Buy?

We asked whether the next move would be to a rental property or and owned one:

	Whole Sample	Those who might consider moving to Church Stretton
Rental	24%	37%
Owned	76%	63%

#### **Principal data findings**

- a) A relatively long commute is no reason to think people are wanting to move closer to Church Stretton
- b) Public Transport plays very little part in work commuting
- c) Those who might consider a move to Church Stretton have an above the average demand for an affordable home, and a very significantly higher demand for rental properties
- d) 40% of the workforce live in Church Stretton
- e) Of the people living outside Church Stretton (> 10 miles) only a quarter would consider moving to be nearer their work
- f) The majority (73%) of accommodation requirements are 1,2 or 3 bedroomed.
- g) 38% of those surveyed are looking for an "affordable" house in a move to Church Stretton.
- h) 56% of those who might move to Church Stretton are looking for a flat, terraced or semidetached house. The comparable figure for the whole sample is 42%.
- i) 37% of those who may move to Church Stretton would be looking for a rental property

APPENDIX E HOMEPOINT

DAND	D !		T-4-1	/Of which
BAND	Requireme	<u>nt</u>	Total	(Of which Local)
PRIORITY				Local)
i itiOitii i	1 hedroom	(Applicants aged under 60 years)	0	0
		(Applicants aged over 60 years)	0	0
		(Applicants aged under 60 years)	1	1
		(Applicants aged over 60 years)	0	0
	3 bedroom	(Applicants aged over 60 years)	0	0
	4 bedroom		0	0
GOLD	4 Dealoom			0
GOLD	1 hedroom	(Applicants aged under 60 years)	5	0
	1 bedroom	(Applicants aged over 60 years)	9	4
		(Applicants aged under 60 years)	5	0
	2 bedroom	(Applicants aged over 60 years)	1	0
	3 bedroom	(ppca.ne agea over 60 years)	1	0
	4 bedroom		0	0
	1 500100111			
SILVER				
<u> </u>	1 bedroom	(Applicants aged under 60 years)	19	7
		(Applicants aged over 60 years)	10	2
	2 hedroom	(Applicants aged under 60 years)	8	3
		(Applicants aged over 60 years)	0	0
	3 bedroom	(Applicants aged over 60 years)	6	0
	4 bedroom		2	1
	4 Dedicoiii		2	1
BRONZE				†
DIVONZL	1 hodroom	(Applicants aged under 60 years)	13	6
		(Applicants aged under 60 years)	13	6
		(Applicants aged under 60 years)	13	8
			2	
		(Applicants aged over 60 years)		0
	3 bedroom		5 1	2
	4 bedroom		1	1
	TOTAL 0		44.4	44
	TOTALS		114	41
SUMMARY	,			
SUIVIIVIARI		(Applicants and under 60 years)	27	10
		(Applicants aged under 60 years)	37	13
		(Applicants aged over 60 years)	32	12
		(Applicants aged under 60 years)	27	12
		(Applicants aged over 60 years)	3	0
	3 bedroom		12	2
	4 bedroom		3	2
			44.5	
	TOTALS		114	41
	1			d

# APPENDIX F Extracts from NPPF

- 14. For decision-taking this means:
- approving development proposals that accord with the development plan without delay; and
- where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this
  Framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted.[9]
- [9]For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets;.....
- 115. Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.
- 116. Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.
- 118. When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:
- if significant harm 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;.....
- planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss; ......
- 126. Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing

so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- the desirability of new development making a positive contribution to local character and distinctiveness; and
- opportunities to draw on the contribution made by the historic environment to the character of a place.
- 129. 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 assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.
- 131. In determining planning applications, local planning authorities should take account of:
- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to

sustainable communities including their economic vitality; and ● the desirability of new development making a positive contribution to local

character and distinctiveness.

132. 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. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification......

157. Crucially, Local Plans should:

- identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.

**Comment** - The land to the East of the A49 is considered by the community to be of great landscape importance as it lies at the foot of two important assets within South Shropshire, Helmeth Hill and Wood and the Hillfort of Caer Caradoc which is a National Monument. Surrounding Caer Caradoc, (a multivallate hillfort), is a registered iron- age field system.

In National Character Area profile 65 Shropshire Hills it says "Key landmarks include the dramatic Wenlock Edge, The Lawley, Caer Caradoc and the Long Mynd."

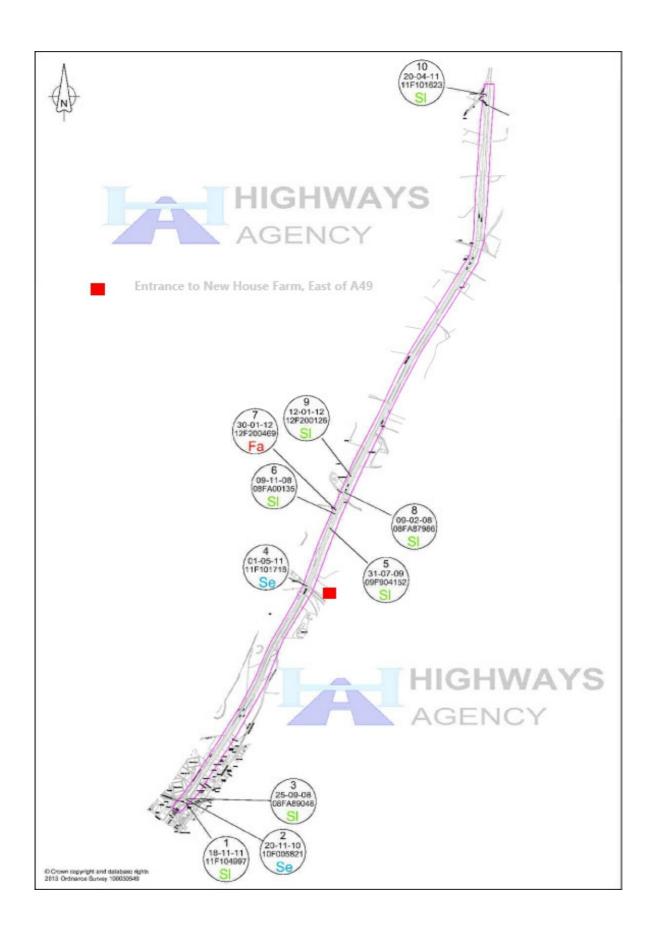
The setting of any National Monument is part of the overall experience of that asset. The setting is the surroundings in which the asset is experienced. The sides of Caer Caradoc as well as the land below, form the panorama, which creats the setting for this important hillfort.

Helmeth Wood on Helmeth Hill is an ancient woodland (over 600 years old) which contains ancient sessile oaks as well as small-leaved lime and toothwort, yellow archangel and wood sorrel.

Building on or near these nationally important assets would have great impact locally.

#### **APPENDIX G**

Map showing accident numbers and locations – Highways Agency Data



#### **APPENDIX H**

Name: Caer Caradoc large multivallate hillfort, associated causeway and Caractacus' Cave on the summit of Caer Caradoc Hill

Date first scheduled: 17-Oct-1930

Date of most recent amendment: 14-Dec-1994

# **List entry Description**

# **Reasons for Designation**

Large multivallate hillforts are defined as fortified enclosures of between 5ha and 85ha in area, located on hills and defined by two or more lines of concentric earthworks set at intervals of up to 15m. They date to the Iron Age period, most having been constructed and used between the sixth century BC and the mid-first century AD. They are generally regarded as centres of permanent occupation, defended in response to increasing warfare, a reflection of the power struggle between competing elites. Earthworks usually consist of a rampart and ditch, although some only have ramparts. Access to the interior is generally provided by two entrances although examples with one and more than two have been noted. These may comprise a single gap in the rampart, inturned or offset ramparts, oblique approaches, guardrooms or outworks. Internal features generally include evidence for intensive occupation, often in the form of oval or circular houses. These display variations in size and are often clustered, for example, along streets. Four- and six-post structures, interpreted as raised granaries, also occur widely while a few sites appear to contain evidence for temples. Other features associated with settlement include platforms, paved areas, pits, gullies, fencelines, hearths and ovens. Additional evidence, in the form of artefacts, suggests that industrial activity such as bronze- and iron-working as well as pottery manufacture occurred on many sites. Large multivallate hillforts are rare with around 50 examples recorded nationally. These occur mostly in two concentrations, in Wessex and the Welsh Marches, although scattered examples occur elsewhere. In view of the rarity of large multivallate hillforts and their importance in understanding the nature of social organisation within the Iron Age period, all examples with surviving archaeological potential are believed to be of national importance.

Caer Caradoc large multivallate hillfort survives well and is a fine example of its class. The earthworks are unusual in the area in their incorporation of natural rock outcrops into the defences. The apparent 'gangwork' nature of the ditch construction, which offers an insight into how labour was organised, is also an unusual feature of the monument. The eastern entrance, with its well engineered causeway surviving in good condition is another unusual feature of this site. All the earthwork elements of the site will contain archaeological

information concerning their design and method of construction. They will also contain cultural material relating to the occupation of the site. The interior of the hillfort, which is undisturbed, will also contain valuable archaeological information relating to the occupation of the site. Environmental material relating to the landscape in which the monument was constructed and the economy of its inhabitants will survive in the various ditch fills and sealed on the old land surfaces beneath the ramparts. From its position and strength, the hillfort must be considered as of pre-eminence in the area and, when considered in relation to other lesser structures of the same period which occur in the vicinity, the site contributes important information relating to the settlement pattern, economy and social organisation of the area during the Iron Age period.

## **Details**

The monument includes Caer Caradoc camp, a large multivallate hillfort with associated causeway and Caractacus' Cave. Both the hillfort and cave are named by tradition after the legendary first century AD Welsh chieftain Caractacus. The hillfort is situated on the strategically strong summit of Caer Caradoc Hill, a distinctive, steep-sided hill of volcanic origin rising to a height of 460m on the east side of Church Stretton valley. The hillfort lies orientated along the spine of the hill and has overall dimensions of 450m south west to north east by 160m transversely with a total enclosed area of 3ha. The defences of the hillfort are designed to enhance the natural strength of the hilltop position. They include inner and outer ramparts, separated by on average 28m of falling ground and are well defined around most of the hilltop, in places incorporating natural rock outcrops into the defensive circuit to encircle the hill summit. The inner rampart represents the earliest phase of the defences and is well defined around the north east, north and western flanks of the hill. It has been constructed by cutting back into the natural hillslope, so creating a steep outer face up to 8m high and a lower inner face some 1.5m high. A shallow linear ditch averaging 7m wide and 0.8m deep runs alongside the inner face of the bank, it is stepped along the line of the ditch as a series of hollows. It appears to be the remains of the quarry ditch for the inner bank, material being thrown downslope to form the bank. The stepping may indicate how work was organised during the construction of the rampart, each hollow being the work of a separate team. At its southern extent the bank turns to the south east to cut across the neck of the hill and join with a large basalt tor. From the north edge of this tor a short length of bank curves to the north to form the south side of a simple inturned entrance 2.5m wide. A shallow oval platform set into the inner side of the bank, south of the entrance, is believed to be the site of a guard chamber. The entrance is approached by a well engineered causeway, 300m long and averaging 4m wide, which climbs the hill from the north east. To the north of the entrance the defences continue for 120m as a series of well defined banks. These link the natural rock outcrops along the edge of the precipitous east face of the hill to form a strong defensive wall. The natural outcrops become less pronounced towards the north of the hill and a more continuous inner rampart is established. The outer rampart also commences here, running roughly parallel to the inner rampart around the north east, north, west and south of the hillfort. Where it exists the outer

rampart is similar in form and construction to the inner; the natural hillslope has been cut back to create an outer slope averaging 5m high with an inner slope 1.5m high. A ditch averaging 6m wide and 0.8m deep runs along the inner face of the bank, once again this is stepped in a series of pronounced linear hollows. This would have served as a quarry ditch for the bank, the spoil being thrown outwards. The scooping, here more pronounced than in the inner rampart, is strongly indicative of a construction technique using a number of different work gangs. There is no outer defence around the south east quarter of the site where the natural topography makes it unecessary. The southern end of the hillfort, where approach is possible along the more gentle southern end of the ridge, is strengthened by a third outer bank. It curves for 80m across the neck of the hill, joining the outcropping rock at the south east corner of the site with the precipitous hillslope to the west. The bank stands up to 1.7m high on its outer face and 1.5m high on its inner. The interior of the hillfort, which comprises the narrow rocky summit of the hill, offers limited scope for permanent occupation. However, a series of levelled platforms in the south east quarter of the hillfort, north of the entrance, may represent the site of buildings. There is a clear emphasis on military considerations in the selection of the site. The hilltop has difficult access and limited space for occupation but does very effectively command the surrounding landscape. The construction of the substantial earthworks on the hill would have required a considerable effort of well organised labour. In the north west quarter of the hillfort, adjacent to the inner face of the inner rampart (annotated on OS maps as a well), is a small spring-fed pond. This water supply, within the defences of the hillfort, may have encouraged the occupation of the site. In the north western quarter of the monument, immediately adjacent to the outer rampart, is the entrance to Caractacus' Cave, named by tradition after the legendary Celtic warrior Caractacus or Caradoc. It has a keyhole-shaped entrance 1.6m high and 1m wide and is 4.3m deep.

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HER Number (PRN): 00241

Site Name : Caer Caradoc Field System

- Monument Type:
- Field System (Iron Age)
- Lynchet (Early Iron Age to Medieval)
- Civil Parish:
- o Church Stretton, South Shropshire, Shropshire
- Grid Reference: SO 482 959
- Related Monuments:
- o Caer Caradoc hillfort, 00226
- **Brief Description:** Fragments of a banked field system of uncertain date.
- Description: Lynchets <1a>

Evaluated for MPP in 1990-1, as one of less than 10 Regular Aggregate Field Systems (Prehistoric)

The site was surveyed during the 1960s or 1970s by staff of RCHME, for further information see archive report.->

-> Fragments of a banked field system of uncertain date, were mapped from good quality aerial photographs at SO 4819 585, during the Marches Upland NMP.<5>