



ENGLISH HERITAGE

WEST MIDLANDS

Shropshire Council
Email response -
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28 April 2014

Dear Sir/Madam,

Re: Shropshire Site Allocations and Development Management Policies DPD (SAMDev) Pre-Submission stage

English Heritage was not aware of the consultation on the Pre-Submission version SAMDev document until a meeting with the Council on 3 April 2014, having not received a notification of the representation period which started on 17 March 2014. As a result we have had a limited time to prepare our comments or undertake assessment of the evidence base at this stage.

Site Allocations and Development Management Policies pre-submissions version

In an effort to provide clarity in our response and to ensure that it has been produced in relation to a format appropriate for the Council, we have compiled our comments in full in a table form, appended to this letter (Appendix I/Table I). Please see Table I for all of our comments.

We have raised some comments in relation to both development management policies and site allocations. From our assessment it is unclear as to what evidence base relating to the historic environment has been used to inform the preparation of development management policies and specifically the allocation of sites. We have raised comments on individual site allocations, however, there is some inconsistency in how site allocations are detailed and to how the development strategies have been prepared. There are references to the historic environment in some strategies and allocations and a reference to the need to have regard to the historic environment. Yet there are also references to site allocations which state that future heritage assessments, archaeological assessments, impacts to conservation areas will be required at the time of receiving a planning application. English Heritage does not support this approach as proportionate evidence base should be available to establish whether the principle of development is acceptable in the first instance, which must be demonstrated at this stage. As a result we have found a number of site allocations to be unsound as they are not compliant with national policy or justified based on the information we have found available, within the timeframe. It may be that the Council has undergone a full heritage assessment on all site allocations, however, this is not obvious to us and we need to ensure that the Plan is Sound and fully compliant with the NPPF.



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We also include in our response a Heritage at Risk assessment for Shrewsbury Battlefield, taking into account proposals within the pre-submission SAMdev, attached as Appendix 2.

Table I includes a range of general and specific comments and all should be taken together as our complete response.

Sustainability Appraisal Comments

English Heritage does have some concerns regarding the production of the Sustainability Appraisal and the availability of information relating to this assessment.

At previous stages of the SAMDev process English Heritage have been unable to access earlier iterations of the Sustainability Appraisal report as they have not been available for consultation. As such it has been difficult to accurately gauge how the Plan has been amended as a result of the Sustainability Appraisal, especially in relation to the Historic Environment and the sustainability objective for this indicator. Additionally, English Heritage has been unable to adequately assess whether the principles of sustainable development have been applied to the site allocations identified within the Pre-Submission version SAMdev or the 'alternative' sites that may have been considered and discounted.

In a recent meeting with the Council, on 3 April 2014 English Heritage did raise their concerns and were told that we would be sent some additional information in the form of site proformas relating to the key sites we had raised previous concerns with. We requested this information as an opportunity to assess whether heritage assessments had been undertaken of all site allocations. However, this information has still yet to be provided to English Heritage.

We do have some concerns about whether the Sustainability Appraisal has been produced in accordance with the SEA Directive.

Conclusion

English Heritage would like to attend the hearings at the Examination in Public and requests permission from the Planning Inspectorate to do so, at the appropriate time.

We are hopeful that we can work with the Council to produce an outcome that is beneficial for both parties. We would be open to producing a Statement of Common Ground ahead of the hearing sessions if there are areas in which we can all agree on. We would welcome receiving information relating to the issues we have raised above, including the lack of an evidence base and information relating to the Sustainability Appraisal in the hope that additional information may alleviate our concerns.

Attachments

- 1) Table I English Heritage comments in relation to the pre-submission SAMDev Plan
- 2) Heritage at Risk Assessment for the Registered Battlefield at Shrewsbury.

Yours faithfully,

Kezia Taylerson

Kezia Taylerson Historic Environment Planning Adviser (West Midlands)



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Appendix I Table I English Heritage comments in relation to the pre-submission SAMDev Plan

Para/ Policy No.	Legally Compli- ant Yes/No	Sound/ Unsound	In line with national policy Yes/No	Justified Yes/No	Effective Yes/No	Positively prepared Yes/No	Amendments required
MD2 Sustainable Design Clause 2) ii	Yes	Sound					We welcome reference to the use of locally characteristic design and building materials.
MD2 Sustainable Design Clause 2) iii		Unsound	No				2) iii) Respecting, enhancing or restoring the historic context, such as the significance and character of any heritage assets, in accordance with MD13 Amend to 2) iii <u>Protecting, conserving and enhancing the historic context and character of heritage assets, their significance and setting, in accordance with MD13.</u>
MD2 Sustainable Design Clause 5) i	Yes	Sound					Support reference to heritage assets within this clause as the historic environment can be overlooked within the natural environment.
4.11	Yes	Sound					Support this statement.
Delivery and Monitoring Box relating to Policy MD2	Yes	Sound					We support the preparation of a Historic Environment SPD and would query when this is likely to be produced. English Heritage would welcome active involvement in the preparation of this document. We would welcome involvement in the preparation of a revised Sustainable Design SPD and additional detail in respect of design and the historic environment.
Schedule MD5a: Wood Lane		Unsound	No	No			Given the proximity to heritage assets in this area English Heritage would expect a full assessment of the historic environment and any harm to heritage assets, in conformity with the NPPF to be assessed prior to allocation. The potential impacts should be known to the authority prior to allocation so that either the site

North Extension, point 6.							is not allocated or appropriate mitigation measures are established in a development plan policy to ensure the protection of any nearby heritage assets, in line with the NPPF. English Heritage has raised this issue at a previous consultation stage.
MD7a Managing Housing Development in the Countryside Clause I		Amend					<p>English Heritage supports the sensitive restoration of heritage assets. We support the ethos of this clause in line with English Heritage Guidance Constructive Conservation and would request the following amendment:</p> <p>Add the following:</p> <p>‘... <u>sensitive</u> re-use and retention...’</p> <p>This Policy should also be in accordance with Policy MD13 The Historic Environment.</p>
MD7a Managing Housing Development in the Countryside Clause 5, C		Amend					<p>Support the retention and re-use of heritage assets within this policy.</p> <p>Add the following:</p> <p>... <u>sensitive</u> re-use and retention ...’</p>
4.55		Sound					Support the justification text relating to Policy MD7.
4.62		Amend					<p>Support the need for development and conversion to not compromise their significance as heritage assets.</p> <p>Amend to the following:</p> <p>‘... do not compromise the significance of heritage assets or their settings or the local landscape character’</p>

MD8 Infrastructure Provision Clause 3) iv		Unsound	No	No	No	No	<p>Request amendment to the wording as confusion over the reference to 'recognised heritage assets'.</p> <p>The Policy should reflect all heritage assets, designated and undesignated, in line with the NPPF. Also request policy wording relate to heritage assets, their setting and their significance.</p> <p>Suggest including a separate clause for the natural environment and the historic environment as there are different needs and issues.</p>
MD9 Protected Employment Areas	No	Unsound	No	No	No	No	<p>This comment relates to the designation of land adjacent to the Registered Battlefield at Shrewsbury. There is no reference number for this site as it is being cited as an existing employment area and not a new allocation.</p> <p>English Heritage notes that the land adjacent to the Registered Battlefield in the SAMdev Plan appears now to be allocated as Protected Employment Land. After further assessment we note that the allocation in the earlier Local Plan for the land adjacent, though not including the Registered Battlefield, was 'Countryside'. As such it appears that this site has now been 'allocated' as a protected employment area without having undertaken the formal process. This site has not, to our knowledge, been subject to Sustainability Appraisal or Habitat Regulations Assessment. Additionally and most importantly for English Heritage there has been no assessment as to the potential impact on the historic environment and specifically the Registered Battlefield by allocating this land as a protected employment area. This approach is unsound.</p> <p>At the previous consultation stage we stated that the small sections of the Registered Battlefield should be excluded from development due to the harm on the assets' significance and setting. Registered Battlefields are designated heritage assets and are afforded protection under the NPPF. English Heritage requests that the areas of the Registered Battlefield that have been included as part of the protected employment area be removed and remain as a heritage asset designation only. We also raised the need for the Council to be in accord with its' Draft Interim Planning Battlefield Guidance note (March 2013) which it is not currently. There is no reference within the SAMdev to the Interim Planning Battlefield Guidance note or how guidance within it will be applied to applications and</p>

							<p>proposals. How will the need for height, massing and design of new development to respect the setting of the Registered Battlefield, in line with the Interim Planning Battlefield Guidance note, be incorporated into the SAMdev? We advise this is either through Policy MD13 or a separate policy on the Registered Battlefield. The SAMdev must be in accordance with the Council's policies and guidance documents.</p> <p>We find both the designation as a proposed employment allocation without due regard to process and allocating parts of the Registered Battlefield as employment use, to be unsound.</p> <p>English Heritage attaches a Heritage at Risk Assessment which now places the Registered Battlefield in the 'Vulnerable' category, see Appendix 2 as a result of the SAMdev.</p>
MD11 Tourism facilities and visitor accommodation							<p>Support the recognition of the canal as a heritage asset.</p> <p>We recommend the inclusion of a clause reflecting appropriate wider heritage tourism and the benefits this can have for the historic environment and its enhancement, in line with the NPPF.</p>
MD12 The Natural Environment		Unsound			No	No	<p>We recommend inserting a clause on the historic environment and in particular the role of historic landscapes and how applications and proposals will be decided in these landscapes, their significance and setting. This is currently an omission in the Plan.</p>
4.130							<p>English Heritage supports the link between the natural and historic environment. The policy states that this will be developed within the Natural Environment SPD. We would seek involvement in the preparation of this SPD, a timetable for its production and recognition of the role that the historic environment has on the natural environment.</p>
MD13 Historic Environment		Unsound	No	No	No	No	<p>We support the inclusion of a Historic Environment Policy within the SAMdev, however, we are concerned that the current policy does not contain enough development management detail, adequate clarity or certainty. For example, how will applications or proposals affecting heritage assets be determined (NPPF, para 17), how will sustainable development will be defined locally (NPPF, para 15) or a clear indication of what will or will not be permitted (NPPF, para 154). Other</p>

						<p>omissions include such issues as proposals affecting non designated archaeology and how these will be considered? Details regarding what a Heritage Assessment will include and who it should be carried out by and when are necessary.</p> <p>There are two World Heritage Sites within Shropshire; how will applications and proposals be decided that may impact upon the World Heritage Sites? The relationship to the World Heritage Sites Management Plans for example.</p> <p>Whilst we support the preparation of a Historic Environment SPD, clarity and detail should not be left until this stage as an SPD does not carry the same weight as a Development Plan Policy and should only offer guidance and not policy wording.</p> <p>We would be willing to work with the Local Authority to produce appropriate wording that constitutes a sound policy and is consistent with the NPPF. This could be in the form of a Statement of Common Ground.</p>
4.134	Yes	Sound				<p>Amendment encouraged. We would encourage the production of a Local List of Heritage Assets, either as a separate document or combined within the Historic Environment SPD.</p>
Delivery and Monitoring Box for Policy MD13		Unsound		No	No	<p>We have some reservations about the indicators selected to monitor Policy MD13. We would recommend that 'heritage features' are referred to as 'heritage assets' in accordance with the NPPF. We would also consider that the SAMdev should protect, conserve and enhance the significance of heritage assets and produce a positive strategy for the enjoyment of the historic environment, in accordance with the NPPF, rather than measuring adverse effects through development. Additionally, 'as and when' is not an appropriate form of monitoring and English Heritage has not been involved in any conversations about how we will be engaged in this indicator.</p> <p>We support a reference to the AONB report; though consider this would be clearer if entitled 'Management Plan' and the recognition of the role of the historic environment in the natural landscape. However, amend the name of the indicator rather than its 'state' so that it is an up to date and relevant evidence base.</p> <p>Insert World Heritage Sites Management Plans both as evidence base documents</p>

							<p>and delivery and monitoring tools.</p> <p>We do not consider that there are appropriate measures in place to effectively monitor this policy but would be willing to work with the Local Authority to devise appropriate monitoring indicators.</p>
MD15 Landfill and Landraising Sites		Unsound	No	No	No	No	<p>English Heritage requires consideration in this policy as to how the historic environment will be considered when deciding applications for this use of development. A key concern is how the presence of archaeology on these sites will be addressed and how this will be conserved, protected and enhanced. English Heritage would require assessments into the presence of archaeology on site, by acknowledged professionals and how archaeology will be recorded and removed or left in situ. Amended wording is required within this policy for English Heritage to consider it sound.</p> <p>Insert a reference to Core Strategy policies and to a re-worded Policy MD13.</p>
MD16 Minerals Safeguardin g		Unsound	No	No	No	No	<p>English Heritage requires consideration in this policy as to how the historic environment will be considered when deciding applications for this use of development. A key concern is the presence of archaeology on these sites and how this will be conserved, protected and enhanced. English Heritage would require assessments into the presence of archaeology on site, by acknowledged professionals and how archaeology will be recorded and removed or left in situ. Amended wording is required within this policy for English Heritage to consider it sound.</p> <p>A further consideration is the need to safeguard mining areas for locally distinctive building materials that will support restoration and sensitive new design. Use the English Heritage Stone Survey evidence base.</p> <p>Insert a reference to Core Strategy policies and to a re-worded Policy MD13. .</p> <p>English Heritage has produced guidance on Minerals Planning which may assist with amendments to this policy.</p>
4.150							<p>Support the reference to English Heritage's Stone Survey evidence base.</p>

General comment regarding Area Based Policies/ Development Strategies/ Site Allocations		Unsound	No	No	No	No	<p>Where there are heritage assets sited within or adjacent/ in close proximity to a proposed allocation the area policy/development strategy should have due regard to how development will affect the significance and the setting of any heritage asset. There is current inconsistency between development strategies whereby some briefly refer to heritage assets and others are silent. We advise that this issue be addressed to offer consistency to the process and not unduly raise the profile of heritage assets in some areas to the detriment of others. Where there are specific issues the development strategies should take account of this and we would recommend a link to a re-worded Policy MD13 which provides clarity and detail. We would be willing to work with the Local Authority to amend these strategies so that they accurately reflect and protect the historic environment.</p> <p>It is also unclear as to whether heritage assessments or historic environment evidence base have been used to inform and assess the allocation of sites. It may be that this is the case, however English Heritage must have confidence that the SAMdev and allocation of particular sites has had due regard to the historic environment in conformity with the NPPF before the principle of development has been established. We have raised additional comments in relation to this on our cover letter attached, please see. We have raised specific comments on development strategies and allocations below; however, it is our intention that our concern relates to the overall approach and justification taken to the information provided and the approach taken. We would welcome being made available of the evidence base used to assess the impact to heritage assets and the historic environment, if it is available.</p>
MD17 Managing the Development and Operation of Minerals Sites		Unsound				No	<p>In accordance with the NPPF, development should create a positive strategy for the historic environment. The current wording of the policy is negative. Development should protect, conserve and enhance the setting and significance of heritage assets. Amend wording to reflect this consideration.</p> <p>Consider comments raised above in relation to other Minerals Policies.</p>

S1 Albrighton Area Land at White Acres (ALB003) (ALBa in the Albrighton Plan)		Unsound	No	No			The development statement for this site states that development proposals will need to take account of the Conservation Area. English Heritage raised in previous consultation stages the need for the impact on the setting and significance of heritage assets, including conservation areas to be considered before allocating sites for development. What evidence base has been used to assess the impact on the conservation area from this proposed allocation? We recommend that a clause is inserted into this policy to protect, conserve and enhance the heritage assets, their significance and setting.
S2 Bishop's Castle Area and S2.2 Lydbury North		Unsound	No	No			<p>The reference in the text to protecting heritage assets within a conservation area is unclear; will the Authority be producing Conservation Area Management Plans? We would be supportive of this approach. What evidence base has been used to assess the impact on the conservation area from this proposed allocation? Any proposed development should take into account the implications for the setting of the Conservation Area and the nearby Listed Building.</p> <p>We recommend that a clause is inserted into this policy to protect, conserve and enhance the heritage assets, their significance and setting.</p>
S4 Broseley Area		Unsound	No	No	No	No	<p>The policy is a little unclear. What does the Local Authority mean by 'restoration of heritage feature' in the context of this policy?</p> <p>Amend to refer to 'heritage asset' and provide clarification.</p> <p>Amend clause to reflect the NPPF points in respect of the historic environment.</p> <p>Any development that may affect the World Heritage Site at Ironbridge should have regard to the World Heritage Site Management Plan. Insert a clause to reflect this and/ or link to a re-worded Policy MD13.</p>

S7 Craven Arms Area		Unsound	No	No	No		<p>At an earlier consultation stage we recommended that the development on site CRAV030 take account of the historic farmstead mapping project and assess how this evidence base could inform proposals for the re-use of this site and influence the design, massing and materials of new development. We also raised the importance of undesignated archaeology at sites in this area in a previous response and the need to be mindful to appropriate assessments and surveys before allocations can be implemented. There is little recognition of this within the pre-submission SAMdev and no reference to how archaeology will be assessed. Policy MD13 is also silent on this issue. Clarity is needed. See comments relating to MD13. Suggest re-worded Policy MD13 and a link to this policy to the Development Strategies to ensure consistency.</p> <p>There is also reference to the AONB within certain site descriptions however the Development Strategy (S7) has no regard to the historic environment, heritage assets or landscapes or archaeology.</p>
S8 Ellesmere Area		Unsound	No	No	No		<p>English Heritage previously raised concerns over the proposed allocation of Land South of Ellesmere (ELL003B) due to the harm to the significance and setting of the Ellesmere Conservation Area and a number of Listed Buildings. The pre-submission version includes development at this site yet it is not clear whether the area extending in proximity to the Conservation Area and Listed Buildings has been taken out as we previously requested. We would recommend that the Council does amend the allocation boundary to reflect our previous comments.</p> <p>We are supportive that any development does have regard to the setting of the Conservation Area and Listed Buildings and Canals and consider that a re-worded Policy MD13 may offer some clarity on how this will be assessed against applications and proposals.</p>
S8.3 Minerals Allocation Wood Lane Quarry Extension	No	Unsound	No				<p>The policy is a little confusing as it states that the site is being proposed for allocation in the SAMdev yet that this is subject to further Heritage Assessment. It is a requirement for the Local Authority to provide the appropriate evidence base and be content that the Plan is Sound at this stage. English Heritage cannot support an allocation where the impact to heritage assets remains unknown. We would require a heritage assessment at this stage to consider any likely impacts before proceeding. We have raised this issue elsewhere in our comments to the Pre-Submission version and seek clarity on the evidence base and assessments used</p>

							to inform the site allocations. Without access to this information we cannot be confident that the Plan complies with the NPPF.
S10 Ludlow Area		Amend					We welcome the inclusion of wording reflecting the historic nature of this town and would request the inclusion of the term ' <u>significance</u> ' as well as setting. Development should ' <u>protect, conserve and enhance</u> ' the historic environment rather than only 'regard'. Advise amend wording.
S11 Market Drayton Area		Unsound				No	We support the recognition of the Tern Valley and Shropshire Union Canal as a consideration in this development strategy and request recognition of its historic nature and importance for the historic environment as well as an environment resource and natural asset.
Schedule S12a Housing Sites and Mixed Use Allocations – Hall Farm, Minsterley		Unsound	No	No	No	No	Site MIN002/MIN015 recognises the valuable contribution of the historic farmstead setting and we support the need for new development to secure the appropriate re-use and conservation of historic farm buildings. We would recommend the development strategy to refer to the need for the appropriate re-use and conservation of the historic farm buildings and a link to the Council's Historic Farmsteads Mapping Project to ensure that new development reflects this principle. The current wording is a little vague, even though the site explanation does include this reference. As stated in a previous response English Heritage would not support development on this site that was not in keeping with the historic farmstead layout.
5.122		Unsound	No	No	No	No	English Heritage has not been involved in any discussions relating to enabling development and the need to allocate land for housing within the setting of Grade II* listed Minsterley Hall. We have not received any evidence to support the justification of harm to this heritage asset. We would welcome conversation on this topic.
Schedule S14.1a Housing Sites – Land off Whittingto n Road (OSW004)		Unsound	No	No	No	No	English Heritage has been in discussions with the Council regarding this site and in our previous statement, at the revised preferred options consultation, we set out the significance of the Old Oswestry Hillfort and the implications for development in its setting. We reiterate these statements within this latest representation period and request that the Local Authority refer to our previous statements in support of our comments submitted now. We stated previously that it may be possible for some development to be allocated in this area subject to 'design quality and its landscaping' taking into account 'local topography and the existing built form'. We stated that given the sensitivity of the

S14.2 Knockin Land north of Lower House (KK001)							<p>area we advise an overarching framework to guide its planning and design. Latterly we have advised we would require good design principles and masterplanning to be included within the Plan. It would not be a Sound Plan to defer these important details to the planning applications stage. These issues have not been addressed to our satisfaction.</p> <p>No evidence base has been provided by the Council nor have any mitigation, design principles or the requirement for a Masterplan been included within the Plan as requested. The Council have not produced a Heritage Impact Assessment to assess the harm to this heritage asset through proposed new development nor has there been any justification as to why harm is appropriate or could be mitigated. The site information within the SAMdev states that full assessment will take place at the planning application stage, however the principle of development is being established within the SAMdev and full assessment needs to take place prior to allocation in order to assess the harm and whether allocation is appropriate. English Heritage have not received any evidence to suggest that harm to this asset is justified, in accordance with the NPPF or any certainty that the hillfort will be protected, conserved and/ or enhanced through new development. The significance of this asset and its setting need to be protected, conserved and enhanced in accordance with the NPPF.</p> <p>We would require a set of clear design principles on how this site could be brought forward in respect of its relationship to the hillfort and we would request a Masterplan to be developed in accordance with the design principles set out in the Plan and a Heritage Impact Assessment produced by the Local Authority to assess the impact, harm and mitigation solutions. We have raised concerns regarding this site in previous consultations.</p> <p>We cannot find evidence of an assessment to the potential impacts of development on the setting of the conservation area and whether development will be harmful. Design measures and archaeological assessment will be required on any development in order to ensure that it has regard to the historic environment and is compliant with the NPPF. However, sites should not be allocated where an assessment of harm has not been undertaken and where there is no evidence of justification of harm to a heritage asset, its setting or significance. We accept that</p>
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<p>S14.2 Land South of Brookfield's and Aspen Grange Weston Rhyn (WRN010)</p> <p>Removal of allocation Land off Gobowen Road, Site OSW002</p> <p>Removal of allocation Oldport Farm, Gobowen Road, Site OSW003</p>		<p>Sound</p> <p>Sound</p>					<p>the evidence base may exist however it is not clear as this stage whether that assessment has been undertaken.</p> <p>This site also refers to the need for archaeological assessment. Has the Local Authority assessed this site in terms of the significance of any un-designated archaeology and how this will be addressed? We accept that this information may be available but the information is vague and measures need to be in place to ensure that heritage assets, both designated and undesignated are protected, conserved and enhanced and a positive strategy is in place or that harm has been justified.</p> <p>English Heritage supports the removal of Site OSW002 from the SAMdev.</p> <p>At previous stages we had set out how we considered development on this site to be harmful due to the proximity of development to the Old Oswestry Hillfort and the impact it would have on the significance of the asset, by virtue of its location within the setting of the designated heritage asset. These concerns remain, particularly regarding the erosion of the Hillforts open and rural setting and we are encouraged to see that this site has now been removed.</p> <p>English Heritage would consider the Plan unsound if this allocation were to be reinstated for the reasons stated in above and in our earlier responses.</p> <p>English Heritage supports the removal of Site OSW003 from the SAMdev.</p> <p>At previous stages we set out how we had concerns regarding development on this site and its impact on the significance and setting of Old Oswestry Hillfort. Whilst we acknowledge that if the current farming operations cease there will be a case for achieving a new purpose for this site, the proposals put forward within the SAMdev would potentially have an impact on the significance and setting of the heritage asset. We stated how we considered that this could be an opportunity to reduce the visual impact of development on the setting and how this could be</p>
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							<p>achieved by using the historic courtyard plan form of the farmstead to inform a future development rather than the current footprint which over time has extended towards the hillfort. We remain of this view and are encouraged to see the removal of this site from the SAMdev.</p> <p>English Heritage would consider the Plan unsound if this allocation were to be reinstated for the reasons stated in above and in our earlier responses.</p>
<p>S16 Shrewsbury Area</p> <p>S16: Shrewsbury Area Clause 6) iii</p> <p>S16: Shrewsbury Area, Section B</p> <p>SHREW09 5-115</p>		<p>Unsound</p> <p>Unsound</p>	<p>No</p> <p>No</p>	<p>No</p> <p>No</p>			<p>The Sustainable Urban Extension Shrewsbury South, whilst not adjacent to the Registered Park and Garden at Longner Hall should have regard to its proximity and assess whether any harm could be caused as a result of significant development. There is currently no available evidence as to whether an assessment for this allocation has taken place.</p> <p>Please note substantive comments are made elsewhere in our response to development in the Shrewsbury area, particularly impacting upon the Registered Battlefield.</p> <p>We recommend re-wording this clause. Whilst we support the reference to heritage we consider it would be more appropriate to word 'protect, conserve and enhance heritage assets, their significance and settings in accordance with Policy MD13'. As we have requested elsewhere in this response.</p> <p>Insert a clause specifically relating to the Registered Battlefield and how applications and proposals will be decided in reference to the significance and setting of the Registered Battlefield.</p> <p>We note the reference to Ditherington Flax Mill and proposals having regard to its restoration and redevelopment.</p> <p>Housing allocation adjacent to the boundary of the Registered Battlefield. English Heritage has concerns about the potential impact of this housing development to the significance and setting of the Registered Battlefield. English Heritage has not</p>

ELR006/ ELR007		Unsound	No	No			<p>been able to find any evidence base relating to a heritage impact assessment for proposed allocations or any justification of the potential harm to this heritage asset.</p> <p>Employment allocation in proximity to the Registered Battlefield. English Heritage has concerns about the potential impact of this housing development to the significance and setting of the Registered Battlefield. English Heritage has not been able to find any evidence base relating to a heritage impact assessment for proposed allocations or any justification of the potential harm to this heritage asset. There is no reference within this allocation to the draft interim planning guidance relating to the Battlefield and its design principles.</p>
SHREW10 5		Unsound	No	No			<p>English Heritage has concerns about the potential impact of this housing development to the significance and setting of the Registered Battlefield. English Heritage has not been able to find any evidence base relating to a heritage impact assessment for proposed allocations or any justification of the potential harm to this heritage asset.</p> <p>Please note there is no reference within this allocation to the draft interim planning guidance relating to the Battlefield and its design principles. Please see comments raised elsewhere in our response.</p>
Shropshire Policies Map - Key		Unsound	No				<p>Amend the key to read Registered Battlefield rather than Historic Battle Site as it is a registered battlefield and should be afforded the full weight of its designation, in accordance with the NPPF.</p> <p>Amend the following:</p> <p>Historic Battlefield Site to <u>Registered Battlefield</u></p>

Shrewsbury Battlefield (LEN: 1000033) Risk Assessment

Date designated: 6th June 1995

Risk assessment undertaken: 3rd April 2014

Risk to registered battlefields is assessed in terms of the condition, vulnerability and trend of the four key criteria used in their designation:

- Landscape readability – is it possible to understand the setting and course of the battle by reading the landscape in which it was fought?
- Landscape features – are features which we know influenced the battle visible and able to be appreciated in the landscape today?
- Archaeological integrity – is archaeology that would help us understand the battle threatened?
- Ambience – is our appreciation of the factors that influenced the site of the battle affected by negative elements such as noise, development or infrastructure destroying the ambience to the extent that its setting can no longer be understood?

Condition

Landscape readability is in **fair** condition as the ground upon which it was fought and the topographical influences on the battle are still clearly legible. The context in which the forces amassed, particularly those of the King coming south from Shrewsbury is less clear due to the expansion of the urban area up to the southern edge of the battlefield.

Landscape features are in **good** condition as the respective locations of the opposing forces at the start of the battle, the location of the main focus of the battle and the topography which influenced this are still clearly legible.

Archaeological integrity is in **fair** condition, the site was the subject of uncontrolled metal detecting and finds have undoubtedly been lost, but this is now under control.

Ambience – is in **fair** condition as the designated area is relatively unaffected by development. Transport infrastructure in terms of the railway and the A5124, A49 and the junction on the outer ring road affect the margins of the site while development in the form of the hotel and cattle market and of the industrial estate affect its setting.

Vulnerability

Land use is a major factor influencing vulnerability. In this instance the majority of the site is in agricultural use, in single ownership and ownership which is sympathetic to the value of the heritage asset. There are questions regarding the currently public ownership of the battlefield viewing area and the small area of battlefield south of the A5124.

The vulnerability of landscape readability is **medium** – this is generally protected by the benign ownership of the site. However, the history of development on the southern edge of the designated area and the apparent inclusion of those parts of the registered area south of the A5124 as ‘protected employment land’ by Shropshire Council suggest further development will take place here. Draft policy guidance for the battlefield exists but can be

accorded only limited weight in the planning process until adopted. Recent planning history suggests an inconsistent approach to the significance of the battlefield by the Council.

The vulnerability of landscape features is **low** as there is every indication that the principal owners will continue to manage the site in such a way as to protect its significance.

The vulnerability of archaeological integrity is **low** as unauthorised metal detecting is under control and land use minimises threat to the archaeological record.

The vulnerability of ambience is **high** as there appears to be considerable development pressure on the southern edge of the battlefield and the conservation of its setting cannot currently be guaranteed.

Trend

Landscape readability - declining

Landscape features – stable

Archaeological integrity – stable

Ambience – declining

Risk assessment

Shrewsbury battlefield is considered to be **vulnerable**. Its current condition is fair to good, in large part due to the positive management of the site by the majority owner, it would therefore be inappropriate to consider it as at risk. It is however, vulnerable to development on its margins which has the potential to impact negatively upon its setting and development which has already taken place means that both ambience and landscape readability are declining.