

**SHROPSHIRE COUNCIL SITE ALLOCATIONS AND
MANAGEMENT OF DEVELOPMENT (SAMDev) PLAN
2006-2026**

**Statement of Common Ground
between**

Shropshire Council and English Heritage

October 2014

1. Introduction

- 1.1 This Statement of Common Ground has been prepared jointly between Shropshire Council (the Council) and English Heritage (EH).
- 1.2 This document has been prepared to
- set out the areas now under AGREEMENT between the Council and EH, following a representation made by EH on the SAMDev Pre-Submission Draft Plan (the Final Plan)
 - detail the AGREED amendments made to the Plan before submission and included in the Schedule of Proposed Minor Modifications (CD29)
 - detail the AGREED amendments post-submission

2. Background

Responses to earlier stages of the Plan

- 2.1 EH's representations to the Issues and Options, Preferred Options and Revised Preferred Options (both the Draft Development Management Policies and revised proposed Site Allocations documents) stages of SAMDev covered the following;
- i. the need for a robust evidence base to inform the site selection process
 - ii. encouragement to seek opportunities for the positive use of heritage assets,
 - iii. support for the preparation of an Historic Environment SPD
 - iv. encouragement to use the West Midlands Historic Farmsteads and Landscapes Project for policy development, particularly in the sustainable use and re-use of rural buildings
 - v. the need for a discrete policy covering the historic environment and heritage assets
 - vi. comments on the impact of proposed allocations on specific heritage assets with particular reference to sites OSW002, OSW003 and OSW004
 - vii. a need for clarity on how the minerals policy directions will address the demand for building and roofing stone
 - viii. support for the extensive engagement with Town and Parish Councils
 - ix. advice that settlement policies should highlight where development might need to be limited in order to conserve heritage assets
 - x. the need to have regard to World Heritage Site management plans

EH response to the Final Plan

- 2.2 EH's response to the Final Plan consultation (dated 28th April 2014) raised issues of legal compliance and soundness: the latter with respect to consistency with national policy and a justified, effective and positively prepared Plan. Their covering letter stated that they had concerns about the following:
- i. The evidence based used to inform the Plan
 - ii. Those site allocations which state that future assessments for heritage assets will be needed at the planning application stage
 - iii. Whether the Sustainability Appraisal has been produced in accordance with the SEA Directive.
- 2.3 The main part of the response included a table which can be summarised under the following headings:
- Areas where the Plan is not legally compliant
- Policy MD9
 - Settlement Policy S8.3 (Minerals allocation at Wood Lane Quarry)
- Areas where the Plan is not sound
- Policies: MD2, MD5a, MD8, MD9, MD12, MD13, MD15, MD16 and MD17

Statement of Common Ground: Shropshire Council and English Heritage
October 2014

- Settlement Policies for the Bishop's Castle (including Lydbury North) Broseley, Craven Arms, Ellesmere, Market Drayton and Shrewsbury Areas.
- Site allocations: ALB003, Minerals allocation at Wood Lane Quarry, , MIN002/MIN015, OSW004, SHREW095-115, ELR006/007 and SHREW105
- Delivery and monitoring box for Policy MD13
- Shropshire Policies Map: Key

Areas where the Plan is not in line with national policy

- Policies MD2, MD5a, MD8, MD9, MD13, MD15, MD16
- Settlement Policies for the Bishop's Castle, Broseley, Craven Arms, Ellesmere and Shrewsbury Areas
- Site allocations: ALB003, Minerals allocation at Wood Lane Quarry, MIN002/MIN015, OSW004, SHREW095-115, ELR006/007 and SHREW105

Areas where the Plan is not justified

- Policies MD5a, MD8, MD9, MD13, MD15, MD16,
- Settlement Policies for the Bishop's Castle, Broseley, Craven Arms, Ellesmere and Shrewsbury Areas
- Site allocations: ALB003, MIN002/MIN015, OSW004, SHREW095-115, ELR006/007 and SHREW105
- Delivery and monitoring box for Policy MD13

Areas where the Plan is not effective

- Policies MD8, MD9, MD12, MD13, MD15, MD16
- Settlement Policies for the Broseley, Craven Arms and Ellesmere Areas
- Site Allocation MIN002/MIN015 and OSW004
- Delivery and monitoring box for Policy MD13

Areas where the Plan is not positively prepared

- Policies MD8, MD9, MD12, MD13, MD15, MD16 and MD17
- Settlement Policies for the Broseley and Market Drayton Areas
- Site Allocation MIN002/MIN015 and OSW004

2.4 Amendments were suggested to:

- Policy MD7a, its explanation and MD11
- S16:Shrewsbury Area Clause 6 (iii)
- The settlement Policy for Ludlow

2.5 The following were felt to be sound or were supported;

- Policy MD2 Clause 2 (ii), Clause 5 (i)
- Paragraphs 4.11, 4.55, 4.130. 4.150 and 4.134,
- The removal of sites OSW002 and OSW003
- The delivery and monitoring box for Policy MD2

3. Main issues raised by English Heritage at Final Plan stage

- 3.1 SC met with EH on 16th June 2014 to clarify the issues raised in their representation and discuss a way forward. It became apparent at the meeting that EH had six main concerns. These are set out below along with the actions agreed at the meeting and any subsequent actions where relevant.

The evidence base for the site assessment process

- 3.2 EH had been unable to access the evidence base for the site assessment process and so were concerned that heritage assets had not been adequately taken into account in the site assessment and allocation process. As a result, they felt that many of the site allocations were unsound (see below for more detail on specific sites

Statement of Common Ground: Shropshire Council and English Heritage
October 2014

in Oswestry and Shrewsbury) and that those development guidelines which refer to the need for further heritage assessments are not in line with national policy.

Actions agreed

- 3.3 SC to send EH a web-link to the site assessment sheets and the Site Allocations and Development Management Background paper. The latter describes the overall approach to the site assessment process. EH would then confirm whether, having seen this information, their concerns still stood.

The sustainability appraisal

- 3.4 EH had been unable to access earlier versions of the Sustainability Appraisal Report. They thus were unable to gauge how the sustainability objective for the historic environment had influenced amendments to the Plan.

Actions agreed

- 3.5 SC was currently updating the SA Report to incorporate comments from the Final Plan consultation. They agreed to send EH a copy of the latest version, pending a finalised copy. EH would then confirm whether, having seen the draft Report, their concerns still stood.

Policy MD13

- 3.6 EH felt that Policy MD13 was not effective and should be re-worded to bring it in line with national policy.

Actions agreed

- 3.7 EH would send SC some suggested wording for Policy MD13. Officers from both organisations would then work together to develop a mutually acceptable form of words.
- 3.8 EH agreed that should they find that heritage assets had been properly considered in the site assessment and SA processes and they reached an agreement on the re-wording of MD13 with SC then this would be sufficient to remove their concerns on all issues except those detailed below. After further discussions EH requested a number of amendments to the development guidelines for a number of sites in the Plan, to supplement the amended wording for MD13. These were subsequently made.

Oswestry Hill Fort

- 3.9 The allocation of site OSW004 for housing development is contentious locally and EH had been involved in discussions from the earliest stage of the Plan process. EH did not object to the principle of some development on this site but wanted assurances that the design quality and landscaping were appropriate with regard to the significance and setting of the hill fort. EH would like a requirement for master-planning and good design principles to be included in SAMDev rather than being left to the planning application stage.

Actions agreed

- 3.10 EH would send SC some suggested text as to what a master plan and design guidelines for the site should cover. SC would send EH a copy of the site promoters' representations to the Final Plan. It should be noted that these representations only concern the removal of sites OSW002 and OSW003 from the Final Plan. As OSW004 is proposed for allocation, the site promoters had not made a representation on this. On receipt of text from EH, SC would amend the development guidelines for the site.

Shrewsbury Battlefield

- 3.11 EH objected to the inclusion of areas of the Registered Battlefield within the Battlefield Enterprise Park committed employment site under Policy MD9 and to the effective allocation of this land without due process and assessment. They would like the boundaries of the protected employment site to be re-drawn to exclude the Registered Battlefield. EH had raised some concerns regarding the status of the sites adjacent as an existing employment area. SC provided details of the history of this area which show that the principle of development has been established through planning applications and that any specific development design matters and mitigation measures can be dealt with through the Development Management process (see also CD28 pages 108-109).
- 3.12 EH also felt that the development of the housing and employment allocations SHREW095, SHREW105, SHREW115, ELR006 and ELR007 could affect the setting and significance of the Registered Battlefield. EH would like the development guidelines for these sites to refer to the design principles set out in the draft interim planning guidance note for the Battle of Shrewsbury. This note is not finalised (SC are awaiting comments from EH, requested in March 2013) but in any event, its substance will be incorporated in the forthcoming Historic Environment SPD. EH will be given the opportunity to engage in this process.

Actions agreed

- 3.13 SC agreed to amend the boundary of the committed employment site to exclude the Registered Battlefield and amend the explanatory text to include a reference to the interim planning guidance/ Historic Environment SPD. For the housing and employment allocations, SC agreed to amend the development guidelines to refer to the need to have regard to the setting of the Registered Battlefield and the Interim planning guidance, including design principles.

Shrewsbury, Longnor Hall

- 3.14 EH felt that there was no evidence to show that the Shrewsbury South Sustainable Urban Extension (SUE) would not affect the setting and significance of Longnor Hall Registered Park and Garden.

Actions agreed

- 3.15 EH agreed to review the situation in the light of the information SC supplied about the site assessment process and then to inform SC if they still had concerns. EH raised a further query about this assessment and the SC Historic Environment Manager confirmed that no impact would occur, evidenced by the assessment.

4. Actions taken following the meeting.

- 4.1 On 17th June SC sent EH the following via email:
- i. a web link to the site assessment information for the housing and mineral sites and a request to let SC know if information on employment sites was needed.
 - ii. a web link to the Site Allocations and Development Management Background Paper
 - iii. the draft Sustainability Appraisal Report
 - iv. some suggested re-wording of Policy MD13 based on discussions at the meeting the previous day (SC intended this to provide a starting point for EH's more substantial amendments to the Policy).

Statement of Common Ground: Shropshire Council and English Heritage
October 2014

- 4.2 On 18th June SC sent EH a copy of the site promoter's (J10 Planning) representation on sites OSW002 and OSW003. Although not included in the email, SC offered to provide copies of the updated Heritage Impact Assessment (HIA) and Archaeology Statement referred to in the representation.
- 4.3 On 23rd June SC sent EH an email re-iterating the actions agreed at the meeting of the 16th June, setting out the timescale for agreeing amendments and asking if EH were in a position to respond. EH confirmed that they would liaise with SC during that week (23rd – 27th June).
- 4.4 On 27th June EH confirmed their intention to respond to SC as soon as possible and asked SC if the Registered Battlefield would be excluded from the Battlefield Enterprise Park committed employment site. SC responded on 30th June confirming that the Battlefield would be excluded from the committed employment site.
- 4.5 On 1st July SC sent EH a more extensive set of amendments to Policy MD13, prepared with advice from SC's Historic Environment Manager. SC reminded EH that they would like to agree amendments with them by the 3rd July to allow time for SC to prepare the report for the forthcoming Council meeting considering the Plan for submission.
- 4.6 EH informed SC by phone on 3rd July that they would be unable to agree any amendments to the Plan before submission and requested that modifications be made through a Statement of Common Ground. SC agreed to this by email the same day. SC also offered to put together a table summarising the key points of EH's representation and the actions agreed at the meeting of 16th June as a means of providing clarity on the way forward.
- 4.8 In the absence of agreement with EH, SC proposed a number of modifications to the Plan at the Submission Stage (see CD29).
- 4.7 Discussions during August, September and October resulted in AGREEMENT being reached on a number of post-submission modifications to the Plan. Appendix 1 shows the areas of AGREEMENT. It sets out all the modifications proposed at both the submission and post-submission stages, except for those to MD13 and to the Development Guidelines for site OSW004. Appendix 2 shows the AGREED post-submission modifications to Policy MD13 and Appendix 4 shows those for site OSW004. English Heritage's Statement of Significance of Old Oswestry Hillfort and Design Principles for Site OSW004 forms Appendix 3.

5. Conclusion

- 5.1 All AGREED proposed modifications to the Plan are shown in Appendices 1, 2 and 4
- 5.2 The AGREED Statement of Significance of Old Oswestry Hillfort and Design Principles for site OSW004 comprises Appendix 3.
- 5.3 There are no outstanding matters between the two parties.
- 5.4 English Heritage and Shropshire Council consider the SAMDev Plan to be SOUND provided the agreed modifications are made.

Signed on behalf of Shropshire Council

.....
Andy Mortimer, Policy and Environment Manager.
Date: ... 21 / 10 / 2014

Signed on behalf of English Heritage

Kezia Taylerson
.....
Kezia Taylerson, Historic Environment Planning Advisor
Date: ... 20 . 10 . 2014

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
<p>MD2 Sustainable Design Clause 2) iii</p> <p>Unsound and not in line with national policy</p>	<p>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 Protecting, conserving and enhancing the historic context and character of heritage assets, their significance and setting, in accordance with MD13.</p>	<p>6. Amend MD2.2 (iii) to “Protecting, conserving and enhancing the historic context and character of heritage assets, their significance and setting, in accordance with MD13.”</p>		<p>AGREED</p> <p>EH confirm that they accept this proposed modification</p>
<p>Schedule MD5a: Wood Lane North Extension, point 6.</p> <p>Unsound, not in line with national policy and not justified</p>	<p>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 is not allocated or appropriate mitigation measures are established in a development plan policy to</p>	<p>No change was proposed at this stage.</p>	<p>SC supplied EH with a web-link to the housing and mineral site assessment sheets (now EV81 Minerals and S1-S18 documents) and the background paper which details the site assessment process (EV77) by email on 17.06.14. A working draft of the SA Report (final SA Report is CD2) was also attached to the email.</p>	<p>AGREED</p> <p>SC confirmed to EH that a detailed Heritage Assessment has been submitted with the planning application for this site, which covers a full archaeological assessment. Therefore, no further change is required.</p>

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
	ensure the protection of any nearby heritage assets, in line with the NPPF. English Heritage has raised this issue at a previous consultation stage.			
<p>MD7a Managing Housing Development in the Countryside Clause 1</p> <p>Amendment required</p>	<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: Add the following: ‘... sensitive re-use and retention...’</p> <p>This Policy should also be in accordance with Policy MD13 The Historic Environment.</p>	<p>29. <i>Proposed changes to second part of 1st paragraph:</i> In the case of market residential conversions requiring planning permission, schemes should provide an appropriate mechanism for the sensitive re-use and retention of buildings which are heritage assets.</p>		<p>AGREED</p> <p>EH confirm that they accept this proposed modification</p>
<p>MD7a Managing Housing Development in the Countryside Clause 5, C</p> <p>Amendment required</p>	<p>Support the retention and re-use of heritage assets within this policy. Add the following: ... sensitive re-use and retention ...’</p>	<p>No change was proposed at this stage.</p>	<p>It would be inappropriate to include these changes in the Policy or explanation.</p> <p>EH indicated in the meeting of 16.06.14 that it was not fully understood that this part of the policy relates to</p>	<p>AGREED</p> <p>EH accepts the explanation.</p>

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
			existing holiday let properties and the principle of the removal of condition to allow full time accommodation (rather than the actual conversion which has already taken place). Reference can however be made in explanatory text to where additional alterations are proposed to existing conversions which are heritage assets and additional revised wording is proposed in paragraph 4.62 as below (modification 30)	
<p>Para 4.62 Amendment required</p>	<p>Support the need for development and conversion to not compromise their significance as heritage assets. Amend to the following: '... do not compromise the significance of heritage assets or their settings or the local landscape character</p>	<p>30. <i>Insert in paragraph 4.62:</i>Open market residential use will only be accepted where the conversion has met the criteria set out in Policy CS5 and retains Identifiable heritage value. Where additional alterations are proposed these must respect the</p>	<p><i>Revise modification (30) to read:</i> Open market residential use will only be accepted where the conversion has met the criteria set out in Policy Policies CS5 and MD13 and retains identifiable heritage value. Where additional alterations are proposed these must respect the significance of the heritage asset, its</p>	<p>AGREED EH confirm that they accept this revised modification</p>

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
		significance of the heritage asset, its setting and the local landscape Character.	setting and the local landscape character.	
<p>MD8 Infrastructure Provision Clause 3) iv</p> <p>Unsound, not in line with national policy and not justified, effective or positively prepared,</p>	<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. Suggest including a separate clause for the natural environment and the historic environment as there are different needs and issues.</p>	<p><i>35. Amend to remove ‘recognised’ and insert cross reference to MD13 to provide reference to significance.</i></p>	<p><i>Insert text to paragraph 4.71 to read:</i> Further information about landscape character is provided in the Shropshire Landscape Character Assessment and Historic Landscape Characterisation. Additionally, Policy MD13 seeks to protect, conserve and sympathetically enhance heritage assets.</p>	<p>AGREED</p> <p>EH confirm that they accept this proposed modification</p>
<p>MD9 Protected Employment Areas</p> <p>Not legally compliant, unsound, not in line with national policy and not justified, effective or positively</p>	<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><i>37. A change is proposed to the boundaries of the employment area safeguarded under Policy MD9 at Battlefield Enterprise Park to exclude any land forming part of the Registered</i></p>	<p>Pages 108-109 of CD28 provide an explanation of the issue of protected employment land: Policy MD9 does not allocate land for employment, it safeguards existing sites and areas. The land at Battlefield</p>	<p>AGREED</p> <p>EH are content that the Registered Battlefield will be fully excluded from the allocation.</p>

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
prepared.	<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</p>	<p><i>Battlefield.</i></p> <p><i>109. 5.1 66 (S16) Insert reference to the Draft Interim Planning Guidance for the Registered Battlefield and its design principles (to be incorporated within the Historic Environment SPD).</i></p> <p><i>120. Shrewsbury Area S16 – Inset 1 Map Amend the boundaries of the employment area safeguarded under Policy MD9 at Battlefield Enterprise Park on the Policies Map to exclude any land forming part of the Registered Battlefield (see Policy MD9).</i></p> <p><i>121. Policy S16 Paragraph 5.166 Include a new sentence at the end of paragraph 5.166 of the Explanation</i></p>	<p>Enterprise Park already has consent for employment development and some development has taken place (including the Food Enterprise Centre), while development has also been implemented around the periphery of the site with the Waste Transfer Station and Energy from Waste Facility. The principle of development has therefore been established through planning applications, confirmed by the recent approval for the relocated Mercedes dealership from their existing site on Battlefield Road to the east. The land forms an important part of the employment land portfolio for Shrewsbury, being a high quality, serviced, accessible site forming part of an established sub-regional employment site. Any specific development design matters and mitigation measures can be dealt with</p>	

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
	<p>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</p>	<p><i>to Policy S16.1 to read: 'With regard to the Registered Battlefield, attention is drawn to the Draft Interim Planning Guidance for the Registered Battlefield and its design principles (to be incorporated within the Historic Environment SPD).'</i></p> <p><i>122. Policy S16 Development guidelines Amend development guidelines for sites SHREW095, SHREW115, SHREW105, ELR006 and ELR007 to refer to the need to have regard to the setting of the Registered Battlefield, by the addition of 'Development should have Rep Submission SAMDev Plan: CD29 Schedule of Proposed</i></p>	<p>through the Development Management process upon submission of further applications. Any development which is proposed will be considered in the context of the Draft Interim Planning Guidance for the Registered Battlefield and its design principles (to be incorporated within the Historic Environment SPD) and Battlefield 1403. The site has therefore been protected as a development opportunity within the existing Battlefield Enterprise Park. As the site is protected employment land, it is considered that a Sustainability Appraisal or HRA is not required. A change is proposed to the boundaries of the employment area safeguarded under Policy MD9 at Battlefield Enterprise Park to exclude any land forming part of the Registered Battlefield.</p>	

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
	<p>to the Interim Planning Battlefield Guidance note or how guidance within it will be applied to applications and 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</p>	<p>Minor Modifications 32 Page/Policy / Para. Proposed Change Source (Rep or edit) regard to the significance and setting of the Registered Battlefield'.</p> <p><i>123. Policy S16 Amend boundaries of the employment area safeguarded under Policy MD9 at Battlefield Enterprise Park to exclude any land forming part of the Registered Battlefield</i></p>		

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
	Heritage at Risk Assessment which now places the Registered Battlefield in the 'Vulnerable' category, see Appendix 2 as a result of the SAMDev.			
<p>MD12 The Natural Environment Unsound, not effective and not positively prepared.</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.	Change inadvertently omitted from schedule of proposed modifications	<i>Insert text to para 4.128 to read:</i> The Shropshire Landscape Character Assessment and Historic Landscape Characterisation provide information on the locally distinctive features which combine to produce the characteristic landscapes of Shropshire. Historic landscapes make an important and distinct contribution to landscape character and their significance and setting should be taken into account when assessing the impact of development proposals in accordance with Policy MD13. The Shropshire Hills AONB Management Plan provides information on the valued	AGREED EH supports the inclusion of a sentence on historic landscapes within the justification text of this policy.

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
			characteristics which comprise the landscape of the designated area.	
Para 4.130	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.	No change to Plan proposed.	SC welcomes EH involvement in a Historic Environment SPD. A scoping draft of the SPD was provided at the submission stage of the Plan (EV76).	AGREED EH is content to be involved in the scoping draft of the Historic Environment SPD and can confirm receipt of this. Our comments will be available during this process.
MD13 Historic Environment Unsound, not in line with national policy and not justified, effective or positively prepared.	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, para17), how will sustainable development will be defined	44. No change proposed at this stage.	EH and SC agreed a series of proposed modifications to MD13. These are shown in context in Appendix 2.	AGREED EH supports the proposed modifications set out in Appendix 2

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
	<p>locally (NPPF, para 15) or a clear indication of what will or will not be permitted (NPPF, para 154). Other 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. 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. 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</p>			

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
	<p>wording. 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>			
<p>Delivery and Monitoring Box for Policy MD13 Unsound and not justified or effective</p>	<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</p>	<p>i. <i>45. Changes proposed:</i> Change heritage features to heritage assets. Delete the phrase 'as and when' Include World Heritage Site Management Plans as both evidence base and the indicator documents</p>	<p>The State of the AONB Report monitors the effect of the AONB Management Plan. It is thus a different document to the Management Plan and is more relevant as an indicator.</p> <p><i>Revise proposed modification 45 to read</i> The following indicators will be used to monitor the effectiveness of the policy:</p> <ul style="list-style-type: none"> • Number of heritage features whose significance is adversely affected through development (as and when information is 	<p>AGREED</p> <p>EH supports the proposed amendments to the monitoring indicators. We have recommended targets which we understand will be included within the Monitoring Framework.</p>

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
	<p>Heritage has not been involved in any conversations about how we will be engaged in this indicator. 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. Insert World Heritage Sites Management Plans both as evidence base documents and delivery and monitoring tools. 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>		<p>available and working with English Heritage);</p> <ul style="list-style-type: none"> • The number of heritage assets at risk (compared with the 2012-13 baseline). • The number of reports (produced in response to development proposals) integrated to the Historic Environment Record on an annual basis. 	
MD15 Landfill and Landraising Sites	English Heritage requires consideration in this policy as	No change was proposed at this stage.	SC considers that MD13 (particularly with EH	AGREED

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
<p>Unsound, not in line with national policy and not justified, effective or positively prepared.</p>	<p>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. Insert a reference to Core Strategy policies and to a re-worded Policy MD13.</p>		<p>suggested amendments) together with the Historic Environment SPD address this issue.</p>	<p>EH accept that no amendments are needed and refers to the proposed modifications to MD13 shown in Appendix 2.</p>
<p>MD16 Minerals Safeguarding Unsound, not in line with national policy and not justified, effective or positively prepared.</p>	<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</p>	<p>No change was proposed at this stage.</p>	<p>SC considers that MD13 (particularly with EH suggested amendments) together with the Historic Environment SPD address this issue.</p>	<p>AGREED EH accept that no amendments are needed and refers to the proposed modifications to MD13 (Appendix 2). EH accept</p>

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
	<p>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. 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. Insert a reference to Core Strategy policies and to a re-worded Policy MD13. English Heritage has produced guidance on Minerals Planning which may assist with amendments to this</p>			<p>that no amendments are needed and refer to the proposed modifications to MD13 shown in Appendix 2.</p>

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
	policy.			
<p>General comment regarding Area Based Policies/ Development Strategies/Site Allocations Unsound, not in line with national policy and not justified, effective or positively prepared.</p>	<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</p>	<p>No change was proposed at this stage.</p>	<p>SC supplied EH with a web-link to the housing and mineral site assessment sheets (now EV81 Minerals and S1-S18 documents) and the background paper which details the site assessment process (EV77), by email on 17.06.14</p>	<p>AGREED</p> <p>EH supports the individual site amendments shown in this table when taken into account alongside the proposed amendments to Policy MD13 shown in Appendix 2.</p>

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
	<p>willing to work with the Local Authority to amend these strategies so that they accurately reflect and protect the historic environment. 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</p>			

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
	<p>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>			
<p>MD17 Managing the Development and Operation of Minerals Sites Unsound and not positively prepared.</p>	<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. Consider comments raised above in relation to other Minerals Policies.</p>	<p>No change was proposed at this stage. The Plan should be read as a whole and this issue is already addressed in CS6 / CS17 & MD13 (3);</p>	<p><i>Insert text to point 1 of Policy MD17 to read:</i> 1. Applications for minerals developments will be supported where applicants can demonstrate that potential adverse effects on the local community and Shropshire’s natural and historic environment can be satisfactorily controlled. Particular consideration will be given (where relevant) to: (ix) Protecting, conserving and enhancing the significance of heritage assets including archaeology.</p>	<p>AGREED EH confirms that they accept the modification proposed to the wording for MD17.</p>
<p>S1 Albrighton Area Land at White Acres (ALB003)</p>	<p>The development statement for this site states that development proposals will</p>	<p>No change was proposed at this stage.</p>	<p><i>Insert text to Albrighton Schedule S1.1a to read:</i> Development should respect</p>	<p>AGREED EH accepts the proposed</p>

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
<p>(ALBa in the Albrighton Plan) Unsound, not in line with national policy and not justified.</p>	<p>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.</p>		<p>and enhance the character and significance of the Conservation Area and its setting'</p>	<p>insertion of the term 'significance' in this sentence.</p>
<p>S2 Bishop's Castle Area and S2.2 Lydbury North Unsound, not in line with national policy and not justified.</p>	<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</p>	<p><i>60. Settlement policy S2.2 (iv) to be amended to Read: ...Development will protect and enhance respect the character of the village and its heritage assets and their settings particularly within the central Conservation Area...."</i></p>	<p><i>Revise proposed modification (60) to read: Development will respect protect, conserve and enhance the character of the village and its heritage assets, their significance and setting, particularly within the central Conservation Area...."</i></p>	<p>AGREED. EH confirm that they accept the revised proposed modification</p>

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
	<p>proposed allocation? Any proposed development should take into account the implications for the setting of the Conservation Area and the nearby Listed Building. We recommend that a clause is inserted into this policy to protect, conserve and enhance the heritage assets, their significance and setting.</p>			
<p>S4 Broseley Area Unsound, not in line with national policy and not justified, effective or positively prepared.</p>	<p>The policy is a little unclear. What does the Local Authority mean by 'restoration of heritage feature' in the context of this policy? Amend to refer to 'heritage asset' and provide clarification. Amend clause to reflect the NPPF points in respect of the historic environment. 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>	<p>69. <i>Amendment to S4, paragraph 5. to read:</i> "Tourist related development will be supported where it enhances an existing business on the same site, offers a conservation gain by restoring or improving the sustainable use of a heritage asset feature in accordance with MD13, or creates a new tourism related business on a suitable infill or brownfield site."</p>	<p>SC considers that MD13 (particularly with forthcoming EH suggested amendments) together with the Historic Environment SPD address this WHS issue.</p> <p>Additionally, Policy CS17 makes explicit reference to the importance of development reflecting the setting of World Heritage Sites.</p> <p><i>Insert text to Schedule S4.1b Employment sites to read:</i> Land south of Avenue Road (ELR017); The following site is allocated</p>	<p>AGREED</p> <p>EH confirm that they accept this proposed modification.</p>

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
			for employment-related development: for small scale office, workshop and light industrial uses (B1 use class) with access directly off Avenue Road. Development is subject to the completion of an archaeological assessment and appropriate mitigation measures, as required and the layout and design must respect the character and significance of the Conservation Area.	
<p>S7 Craven Arms Area Unsound, not in line with national policy and not justified or effective.</p>	<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</p>	<p>No changes proposed at this stage</p>	<p>SC supplied EH with a web-link to the housing and mineral site assessment sheets (now EV81 Minerals and S1-S18 documents) and the background paper which details the site assessment process (EV77) by email on 17.06.14 SC also considers that MD13 (particularly with EH suggested amendments) together with the Historic Environment SPD address the issue of archaeological assessment.</p>	<p>AGREED</p> <p>EH accept these modifications.</p>

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
	<p>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. 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>		<p><i>Insert text to Schedule S7.1a Housing sites to read:</i> CRAV002 The site requires strategic landscaping to enclose the development from views within the AONB to the west and should accommodate the route of the Shropshire Way. Development is also subject to the completion of an archaeological assessment and appropriate mitigation measures, as required.</p> <p>CRAV030 Redevelopment and conversion of the farmstead must respect the architectural value of the buildings and conserve the setting of the listed Lodge. Development is also subject to the completion of an archaeological assessment and appropriate mitigation measures, as required.</p>	

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
<p>S8 Ellesmere Area Unsound, not in line with national policy and not justified or effective</p>	<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. 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</p>	<p>No changes proposed at this stage</p>	<p><i>Insert text to Schedule S8.1a Housing sites to read:</i> ELL003a The design and layout of the site will need to satisfactorily address drainage and flood risk (in conjunction with ELL003b) and the character, setting and significance of the Conservation Area, whilst retaining and enhancing existing ecological features.</p>	<p>AGREED</p> <p>EH confirm that they accept this proposed modification.</p>

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
	applications and proposals.			
<p>S8.3 Minerals Allocation Wood Lane Quarry Extension Not legally compliant, unsound and not in line with national policy</p>	<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 to inform the site allocations. Without access to this information we cannot be confident that the Plan complies with the NPPF.</p>	<p>No changes proposed at this stage</p>		<p>AGREED</p> <p>SC has confirmed that a detailed Heritage Assessment has been submitted with the planning application for this site, which covers a full archaeological assessment. Therefore, EH accept that no further change is required.</p>

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
<p>S10 Ludlow Area Amendment required</p>	<p>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.</p>	<p>90. Clarification of S10.1 para 6 to read: " All development should protect, restore and enhance have regard to the setting and significance of the historic core of the town recognising the importance of Ludlow Castle as an historic asset of national and international significance."</p>	<p>Revise minor modification (90) to read: All development should protect, conserve and enhance have regard to the setting and significance of the historic core of the town recognising the importance of Ludlow Castle as a heritage asset of national and international significance</p>	<p>AGREED</p> <p>EH confirm that they accept this proposed modification.</p>
<p>S11 Market Drayton Area Unsound and not positively prepared.</p>	<p>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.</p>	<p>No changes proposed at this stage</p>	<p>SC considers that MD12 and MD13 (particularly with EH suggested amendments) together with the Historic and the Natural Environment SPDs, address the recognition of the Tern Valley and Shropshire Union Canal</p> <p><i>Insert text to Market Drayton S11.1 point 6 to read:</i> New development must recognise the importance of safeguarding and where possible enhancing the landscape and historic</p>	<p>AGREED</p> <p>EH confirm that they accept this proposed modification.</p>

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
			character and amenity value of the Tern Valley...	
<p>Schedule S12a Housing Sites and Mixed Use Allocations – Hall Farm, Minsterley Unsound, not in line with national policy and not justified, effective or positively prepared.</p>	<p>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</p>	<p>No change at this stage</p>	<p>SC considers that MD7 (b) (as amended) together with the Historic Environment SPD addresses the issue of re-use and conservation of historic farm buildings.</p> <p><i>Insert and delete text to Schedule S12a Housing sites to read:</i> MIN002/MIN015 Hall Farm Minsterley New build housing is allocated, as part of a mixed use development, subject to it forming part of a comprehensive development scheme for the whole site which secures the appropriate re-use and conservation of the historic farm buildings farmstead and layout at Hall Farm.</p> <p>See below for amendments to para 5.122</p>	<p>AGREED</p> <p>EH confirm that they accept this proposed modification</p>

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
	historic farmstead layout.			
<p>Para 5.122 Unsound, not in line with national policy and not justified, effective or positively prepared.</p>	<p>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.</p>	<p>Change inadvertently omitted from schedule of proposed modifications</p>	<p><i>Insertions and deletions to para 5.122 be amended to read:</i> “The housing site at Hall Farm, part of mixed use proposal, provides an important opportunity to realise enable the enhancement of a site with a range of largely disused farm buildings, some of which have significant historic interest. The site also adjoins and forms part of the setting of the Grade II* listed Minsterley Hall .A primary aim of development on Hall Farm, Minsterley and adjoining land is this site would be to secure the conservation of the local heritage assets, including the historic farmstead layout (see also the Shropshire Historic Farmsteads Characterisation Project) on this site. New housing development will help to</p>	<p>AGREED</p> <p>EH accepts that there was a misunderstanding relating to the use of the term enabling development.</p> <p>EH confirm that they accept this proposed modification.</p>

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
			<p>achieve this objective. with some land adjoining the existing buildings being allocated for housing to seek to enable this;</p>	
<p>Schedule S14.1a Housing Sites – Land off Whittington Road (OSW004) Unsound, not in line with national policy and not justified, effective or positively prepared.</p>	<p>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</p>	<p>95. Amend to include a specific requirement for a masterplan to be prepared to guide the proposed development in response to representations from English Heritage.</p>	<p>EH provided SC with a Statement of Significance for Old Oswestry Hillfort to form part of the evidence base for the Plan. SC and EH also agreed a set of design principles to be included in the development guidelines for site OSW004.</p> <p>The agreed proposed modifications to the development guidelines for site OSW004 are shown in context in Appendix 4.</p>	<p>AGREED</p> <p>EH and SC agree that the Statement of Significance of Old Oswestry Hillfort forms part of the evidence base for the SAMDev Plan. This is included as Appendix 3.</p> <p>EH confirm that they accept the proposed modifications to the development guidelines for site OSW004.</p>

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
	<p>given the sensitivity of the area we advise an overarching framework to guide its planning and design. Latterly we have advised we would require good design principles and master-planning 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. 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</p>			

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
	<p>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. We would require a set of clear design principles on how this site could be brought forward in respect of its relationship to</p>			

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
	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.			
S14.2 Knockin Land north of Lower House (KK001)	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	No changes proposed at this stage	<i>Insert and delete text to Knockin Schedule S14.2(ii) to read:</i> Development subject to, design measures to address potential impacts on the setting significance of the Conservation Area, drainage issues and the outcome of archaeological and biodiversity assessment and evaluation.	AGREED EH confirm that they accept this proposed modification

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
	justification of harm to a heritage asset, its setting or significance. We accept that the evidence base may exist however it is not clear at this stage whether that assessment has been undertaken.			
S14.2 Land South of Brookfield's and Aspen Grange Weston Rhyn (WRN010)	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.	No changes proposed at this stage	<i>Insert text to Weston Rhyn Schedule S14.2 (ix) read:</i> WRN010 Development subject to appropriate drainage, archaeological assessment including mitigation and biodiversity surveys.	AGREED EH confirm that they accept this proposed modification
S16 Shrewsbury Area Unsound, not in line with national policy and not	The Sustainable Urban Extension Shrewsbury South, whilst not adjacent to the Registered Park and Garden	No changes proposed at this stage	Following discussion of this issue at the meeting of 16.06.14, SC emailed EH on 23.06.14 and asked EH to	AGREED SC has undertaken further assessment with their

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
justified,	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. Please note substantive comments are made elsewhere in our response to development in the Shrewsbury area, particularly impacting upon the Registered Battlefield.		inform them if they still had concerns.	historic environment manager, including a site visit which takes into account, specifically the topography of the area and their conclusion that the development will have no impact. On this basis EH is content to accept that no modification is required.
S16: Shrewsbury Area Clause 6) iii	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. Insert a clause specifically relating to the Registered Battlefield and	<u>120. Shrewsbury Area S16 Inset 1 Map; Amend the boundaries of the employment area safeguarded under Policy MD9 at Battlefield Enterprise Park on the Policies Map to exclude any land forming part of the Registered Battlefield</u> (see Policy MD9). <u>121. Policy S16 Paragraph 5.166 Include a new sentence at the</u>		AGREED EH support the exclusion of any land forming part of the Registered Battlefield from the allocation. EH supports the additional reference to the Battlefield Guidance and its future status within the Historic Environment SPD.

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
	how applications and proposals will be decided in reference to the significance and setting of the Registered Battlefield.	<i>end of paragraph 5.166 of the Explanation to Policy S16.1 to read: 'With regard to the Registered Battlefield, attention is drawn to the Draft Interim Planning Guidance for the Registered Battlefield and its design principles (to be incorporated within the Historic Environment SPD).'</i>		
<p>SHREW095-115 Unsound, not in line with national policy and not justified.</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 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</p>	<p><i>122. Amend development guidelines for sites SHREW095, SHREW115, SHREW105, ELR006 and ELR007 to refer to the need to have regard to the setting of the Registered Battlefield, by the addition of 'Development should have regard to the significance and setting of the Registered Battlefield.</i></p>	<p>Revise amendment to read: <i>122. Amend development guidelines for sites SHREW095, SHREW115, SHREW105, ELR006 and ELR007 to refer to the need to have regard to the setting of the Registered Battlefield, by the addition of 'Development should have regard to the significance and setting of the Registered Battlefield including the Draft Interim Planning Guidance and its design principles</i></p>	<p>AGREED EH accepts this modification and request that the amendment is made for all of the sites affected by this amendment.</p>

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
	heritage asset.			
<p>ELR006/ ELR007 Unsound, not in line with national policy and not justified.</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>	<p>As 122 above</p>		<p>AGREED</p> <p>EH accepts this modification and requests that the amendment is made for all of the sites affected by this amendment.</p>
<p>SHREW105 Unsound, not in line with national policy and not justified.</p>	<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</p>	<p>As 122 above</p>		<p>AGREED</p> <p>EH accepts this modification and request that the amendment is made for all of the sites affected by this amendment.</p>

Appendix 1: Table showing areas of agreement and all proposed modifications (except to Policy MD13 and site OSW004)

Para/policy no and reasons	English Heritage Comment	Number (from schedule of proposed changes) and nature of proposed change at submission	Other action taken, including post-submission changes.	Agreed/Not agreed
	evidence base relating to a heritage impact assessment for proposed allocations or any justification of the potential harm to this heritage asset. 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 and not in line with national policy</p>	<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. Amend the following: Historic Battlefield Site to Registered Battlefield</p>	<p>124. Amend Shropshire Policies Map Key and text elsewhere in the Plan to read 'Registered Battlefield' rather than 'Historic Battlefield Site'.</p>		<p>AGREED</p> <p>EH confirm that they accept this proposed modification</p>

Appendix 2: Agreed modifications to Policy MD13 in context

MD13: The Historic Environment

In accordance with Policies CS6 and CS17 and through applying the guidance in the Historic Environment SPD, Shropshire's heritage assets will be **protected**, conserved, sympathetically enhanced and restored by:

1. **Ensuring that wherever possible, proposals avoid harm or loss of significance to designated or non-designated heritage assets, including their settings.**
2. Ensuring that proposals which are likely to ~~either directly or indirectly~~ affect the significance of a **designated or non-designated** heritage asset, including its setting, are accompanied by a Heritage Assessment.
3. Ensuring that ~~the social or economic benefits of a development can be demonstrated to clearly outweigh any~~ **proposals which are likely to have an adverse effects on the significance of a non-designated heritage asset, or including its setting, will only be permitted if it can be clearly demonstrated that the public benefits of the proposal outweigh the adverse effect. In making this assessment, taking into account the degree of harm **or loss of significance to the asset including its setting**, the importance of the asset and any potential beneficial use ~~of the asset~~ **will be taken into account**. Where such proposals are permitted, measures to ~~offset mitigate~~ and record the loss of significance to the ~~heritage asset including its setting~~ **and to advance understanding in a manner proportionate to the asset's importance and the level of impact, will be required.****
4. Encouraging development which delivers positive benefits to heritage assets, as identified within the Place Plans. Support will be given in particular, to proposals which appropriately conserve, manage or enhance the significance of a heritage asset including its setting, especially where these improve the condition of those assets which are recognised as being at risk or in poor condition.

Explanation

- 4.69 Whilst this policy is closely related to sustainable design (CS6 and MD2) and the conservation of Shropshire's natural environment (CS17 and MD12) it sets out specific guidance on the protection of Shropshire's historic environment, including the requirements that need to be met for those development proposals which are likely to have ~~an either a direct or indirect~~ impact on the significance, including the setting, of a heritage asset;
- 4.70 Heritage assets are buildings, monuments, sites, places, areas or landscapes ~~which have a degree of significance and heritage interest~~ that merit consideration as part of the planning process. The term includes all designated **and non-designated** assets. **Designated assets comprise** ~~namely~~ Listed Buildings, Conservation Areas, World Heritage Sites, Registered Parks and Gardens, Registered Battlefields **and** Scheduled

~~Ancient Monuments, and nationally protected landscapes such as Areas of Outstanding Natural Beauty; Shropshire has a wide range of.~~

- 4.71 ~~Non-designated heritage assets such as~~ **include** structures, features or deposits with archaeological interest, historic buildings, historic farmsteads, the historic character of the landscape as expressed in the patterns of fields, woods and heathlands and the **locally distinctive** character of settlements. The latter includes locally derived building materials and the distinctive forms, details and design of buildings. **Policy MD2 requires new development to respect, enhance or restore the historic context of buildings.** ~~The Local Authority will use the Shropshire Historic Environment Record and other information to identify~~ **sets out Shropshire's** non-designated heritage assets.
- 4.72 Through their contribution to the character of the county, heritage assets play an important role in promoting economic regeneration and growth;
- 4.73 This policy is based on the following hierarchal approach:
- i. wherever possible, avoid harm or loss to the significance of heritage assets, including their settings;
 - ii. where development proposals can be justified in terms of public benefits which outweigh the harm to the historic environment, provide ~~off-setting~~ **mitigation** measures for any loss of significance to the affected heritage asset, including the setting;
 - iii. where a development proposal results in the partial or total loss of significance to an asset, including the setting, record and advance the understanding of that significance.
- 4.74 In order that the degree of impact of a development proposal can be fully assessed it is essential that the significance of heritage assets **including their or the setting**, is fully understood. A Heritage Assessment is therefore required for any development proposal which ~~is~~ **are** likely to either ~~directly or indirectly~~ affect the ~~character or setting of~~ **significance of** a heritage asset, **including its setting**. This includes any proposals within or affecting; the historic core of a settlement; a Conservation Area; a Listed Building; a Scheduled Ancient Monument; a World Heritage Site; ~~or~~ a Registered Park and **Garden; Registered Battlefield and all non-designated heritage assets**. ~~Further guidance on when a Heritage Assessments is required is set out in the Historic Environment SPD;~~
- 4.75 The **Historic Environment** SPD also sets out the level of detail that should be provided in a Heritage Assessment. This will be in proportion to the significance of the heritage asset and the scale of any impacts upon it. For assets with archaeological interest this may include a desk-based assessment and where necessary, a field evaluation **carried out by an appropriate professional**. Such assessments should be carried out well in advance and must be submitted with the planning application;
- 4.76 Heritage assets are a finite, non-renewable resource and great care must therefore be taken when determining applications which result in a loss of significance, either partial or total. Proposals adversely affecting either the significance or setting of ~~designated or non-designated~~ heritage assets will

therefore be rejected unless the harm to the significance of the asset is outweighed by the public benefits of the proposal ~~and there are no satisfactory alternatives~~. In making this decision the significance of the asset, its level of importance, the degree of impact and opportunities for a viable beneficial use of the asset will be taken into account. Proposals which would result in harm, or a loss of significance, to a designated heritage asset, including the setting, will be determined in line with national policy;

- 4.77 Where the public benefits of a proposal are deemed to outweigh the loss of significance, measures to ~~offset~~ **mitigate** the loss will be required. These may include **but are not limited to**, design or landscaping measures (in accordance with MD2) and/or the use of appropriate building materials or construction methods. The submission of additional information relating to these for prior approval may sometimes be necessary. In addition, the preparation of a comprehensive record of the asset by a suitable qualified person, in a manner proportionate to the significance of the asset and the impact of the proposal, may be required. A copy of the final report should be deposited in the Shropshire Historic Environment Record within an agreed time period, where it will be made publically accessible. When required a report should also be published in an appropriate manner. Any resulting archive should be deposited with the Shropshire Museum Service, again within an agreed timescale. Further guidance on ~~offsetting~~ **mitigation** measures and the recording of heritage assets is provided within the Historic Environment SPD;
- 4.78 Shropshire has a rich diversity of heritage assets, which make an important contribution to the county’s character and local distinctiveness. Development proposals offer valuable opportunities to enhance the historic environment, including by achieving the aspirations set out within the Place Plans. This may involve improving the condition of heritage assets and their settings, and/or enhancing or better revealing their significance, particularly for those assets recognised as being at risk. Proposals should also seek to increase the connectivity between assets to provide benefits to both the natural and historic environment in accordance with Policy CS17.

Key Evidence:
<ol style="list-style-type: none"> 1. Shropshire Hills AONB Management Plan 2009 – 2014 and subsequent updates; 2. Shropshire Environmental Network Map and guidance; 3. Shropshire Historic Environment Record; 4. Shropshire Historic Landscape Characterisation; 5. Shropshire Historic Farmsteads Characterisation Project.

Delivery and Monitoring of Policy:
This policy will be delivered by:

Delivery and Monitoring of Policy:

- The development management process;
- Preparation of an Historic Environment Supplementary Planning Document;
- Production of guidance notes for developers;
- Promoting the preparation and use of Town and Village Design Statements and Parish Plans;
- The LDF Implementation Plan;
- Regularly updating the LDF evidence base;
- Regularly updating the Historic Environment Record;
- The Shropshire Hills AONB Management Plan;
- Utilising developer contributions to provide offsetting measures and the recording of loss of significance to heritage assets.

The following indicators will be used to monitor the effectiveness of the policy:

- ~~Number of heritage features whose significance is adversely affected through development (as and when information is available and working with English Heritage);~~
- **The number of heritage assets at risk, compared with the 2012-13 baseline.**
- **The number of reports produced in response to development proposals that are integrated to the Historic Environment Record on an annual basis.**
- The State of the AONB Report;
- Progress against programmes and projects identified in the Implementation Plan, including developer contributions.

**Appendix 3: Statement of Significance of Old Oswestry Hillfort and Design Principles
for site OSW004**

Significance of Old Oswestry Hillfort and design principles for site OSW004

This Statement supports the representation English Heritage made at the Pre-Submission stage on 28 April 2014.

We have stated in previous responses going back to August 2013 that it may be possible for some development to take place on Site OSW004, subject to appropriate masterplanning and design principles, that help to conserve the significance of Old Oswestry Hillfort, including its setting.

If the Council considers the site is justified by the evidence base it has and the Planning Inspector is minded to include Site OSW004 within the adopted SAMDev Local Plan, then we would seek the following modifications to ensure the impacts to the significance of the Hillfort are minimised and enhancement opportunities are secured.

The purpose of this additional information is to inform the strategic design principles set out overleaf, to conserve the significance of the Hillfort. The Statement of Significance is not intended to form part of the SAMDev Local Plan itself but to form part of the evidence base and inform the masterplanning of this site. The design principles would need to be included within the SAMDev Local Plan in order to ensure it can be considered Sound.

Statement of Significance

Old Oswestry Hillfort is one of the largest and most impressive Hillforts in England and is designated as a Scheduled Monument in recognition of its national importance. It was built in the Iron Age and occupied by farming communities for many centuries and was a major tribal centre in the central Welsh borders. The early medieval Wat's Dyke, a frontier bank and ditch, was constructed to include the Hillfort. The two adjacent sections of Wat's Dyke are also scheduled. The massive multiple earthworks are a prominent feature, as is the rural landscape setting of Old Oswestry Hillfort and both contribute to the sites significance.

The Hillfort utilises a prominent hill within a long standing border area, with the Welsh hills to the west and the English lowlands to the east. Within this strategic location the Hillfort is a political statement of territory ownership and was an important economic and social centre from where the surrounding agricultural potential, as well as long distance trade, could be established and controlled. This explains the wealth and success of the Iron Age communities that lived here.

The setting of the Hillfort is essentially rural with prominent views to the east, west and north which are not appreciably affected by modern development. Maintaining this rural setting is important in allowing the significance of the site to be better understood. The Hillfort is located close to the northern extent of the existing urban area of Oswestry and screened from it by a small steep hill directly to the south of the Hillfort. The urban area does not, apart from near Jasmine Gardens; extend northwards from the town onto higher ground in the view of the Hillfort, which enables a separateness to be maintained between them.

Site OSW004 would be seen from the Hillfort against the existing urban edge, in views to the south east. The site is lower lying than the land to the west of the B5069 and so would have a roofscape presence in views to the south east from the Hillfort, which would need careful design

Appendix 3: Statement of Significance of Old Oswestry Hillfort and Design Principles for site OSW004

consideration. The south west section of OSW004 is further away and partly obscured behind existing industrial development.

The Local Authority would need to satisfy itself that the appropriate information was available through a Heritage Statement accompanying the development proposals. Given the proximity of the site to Old Oswestry Hillfort we would expect a full archaeological assessment to be undertaken to assess archaeological potential, mitigation measures and to inform the layout of the site.

The proximity of OSW004 to the Hillfort requires additional consideration in order to minimise the impact upon the significance of the Hillfort resulting from development within its setting. Disruption of views to and from the Hillfort should be minimised as they contribute to its aesthetic value. The development also needs to create an open, layout ensuring visual permeability through the site so that views and glimpses of the Hillfort can be seen from a variety of viewpoints within the site.

The layout of the development needs to respect its situation within the wider setting of the Hillfort to minimise impacts. This can be achieved by ensuring the massing and form of the development carefully prevent block development which could create an over dominance of built form in that part of the landscape. The layout should ensure that new development does not protrude to the north of the existing built development, to the west of the allocation, and to include that area which is in closest proximity to the Hillfort in the landscaping proposals. The height of buildings should be contained so that the development blends into the existing built development in the vicinity of the site, respecting local character and the wider townscape setting.

A designed landscape zone, including public open space, would reduce the impact and establish a permanent buffer between the urban edge and rural setting, preventing encroachment towards the east which is rural in nature. As outlined above the views from the Hillfort to the east are not significantly affected by modern development so the landscape buffer should create a distinct settlement boundary between the built form of the new development and the wider open countryside. To the east of the existing residential townscape, which is to the south of site OSW004, there is an existing landscape buffer. The opportunity to retain a linear openness running in parallel with this should be sought, to ensure long distance views to and from the Hillfort are retained. There may be opportunities for enhancement measures to better reveal the significance of the Hillfort and its communal and aesthetic values, including interpretation and footpaths. Existing vegetation should be supplemented across the site, including street trees and hedgerows to ensure appropriate massing throughout the site.

Building, highways and lighting materials need to be sensitively incorporated so as not to detract from the significance of the Hillfort. Opportunities to minimise the impacts of street lighting and sky glow should be sought.

The development should seek to secure opportunities for enhancement measures to improve the access, interpretation and enjoyment of the Hillfort and its wider setting.

Appendix 4: Modifications to the development guidelines for site OSW004 in context

Allocated sites	Development Guidelines	Provision
<p>Land off Whittington Road (OSW004)</p>	<p>Development subject to the access, layout and landscaping and design of the site having securing high quality design and appropriate integration of development within the sensitive historic landscape. Development should demonstrate appropriate regard to the significance and setting of the Old Oswestry Hill Fort. A master plan is required for the development of the site which will apply the following design principles:</p> <ol style="list-style-type: none"> 1. To inform the layout of the site, full archaeological assessment will be required to enhance the understanding and interpretation of the significance of the Hillfort and its wider setting; 2. Ensuring long distance views to and from the Hillfort within its wider setting are conserved; 3. Development should be designed to allow views and glimpses of the Hillfort from within the site; 4. The layout of development, its form, massing, height and roofscape design will be designed to minimise the landscape impact; 5. A landscape plan will be required to design a landscape buffer along the northern and eastern boundaries of the site, to create a clear settlement boundary between the built form and open countryside. The landscape buffer will retain important views to and from the Hillfort, including from Whittington Road. The landscape plan should also include detail on appropriate vegetation and screening to ensure high quality design across the site; 6. Street lighting should be designed to minimise light pollution and sky glow; 7. The opportunity should be taken to consider measures to improve the access, interpretation and enjoyment of the Hillfort and the wider historic landscape. <p>In addition to these design principles, development to be subject to pedestrian and cyclepath links to the former railway and a new footpath link between Whittington Road and Gobowen Road to improve</p>	<p>117</p>

Appendix 4: Modifications to the development guidelines for site OSW004

Allocated sites	Development Guidelines	Provision
	access towards the Hill Fort. Development also to be subject to improvements to the Whittington and Gobowen Roads junction and the junction of Whittington Road with the A5/A483, and the incorporation of appropriate buffer areas/uses to existing businesses on Whittington Road.	