

Diana Friendship-Taylor

Chair,

RESCUE, The British Archaeological Trust

Dear Diana Friendship-Taylor,

Old Oswestry Hillfort

Thank you for your letter of 21st January regarding the land allocation proposals near Old Oswestry Hillfort within Shropshire Council's Site Allocation and Management of Development process (SAMDev). I apologise for the delay in responding but I thought it useful if I described our current position and engagement to date, which is not quite as you indicate in your letter.

We certainly agree with RESCUE that the hillfort is a hugely important site of national significance and we have consistently expressed concern over the scale of the proposed land allocations. English Heritage has been asked to comment on numerous proposals put forward since 2007. In 2007 a Masterplan was presented that filled the whole area between the Hillfort and A5 with mixed development. We opposed that plan, and also subsequent plans by the scheme promoters, J10 Planning working with the landowner, showing progressively reduced areas of allocation e.g. Masterplan studies of 2009 and 2011. As a consequence the proposals within the Preferred Options SAMDev of March 2012 for sites OSW002, OSW003, and OSW004 were much reduced from their original scale, and other sites were deleted altogether. Our view, however, was that the proposals were still inappropriate and so, in our response of July 2012, we objected to all three sites being taken forward. The scheme promoters responded by further reducing the overall scale and this was reflected in the Revised Preferred Options SAMDev of July 2013 to which we responded in August 2013. We continue to have a number of concerns about the impact upon the hillfort that would result from development within its setting, as laid out in the revised SAMDev, and our current advice to the Council is as follows.

Site OSW002. We object to the inclusion of site OSW002 (Land of Gobowen Road at Jasmine Gardens). Despite this area being close to existing houses against which any development would be seen in views from the hillfort, the area is also on rising ground close to the hillfort. On balance, development here would have a significantly negative impact.

Site OSW003 (Oldport Farm). We object to the inclusion of site OSW003. We do accept that should Oldport Farm cease to be a working farm then some redevelopment could be considered. We have advised that this should be based upon the historic footprint of the farm, excluding the more modern expansion of sheds and outbuildings. In terms of design that process should be informed by an historic buildings' analysis of the farm. Overall that approach has the potential to result in a sympathetic and locally distinctive development that would be an improvement to the setting of the hillfort when compared with the existing farm complex. The current proposals in the revised SAMDev are not consistent with this approach as a large car park and the 23 units proposed for the site is over intensive and we therefore object to OSW003. Site OSW004, we have negotiated a significant reduction in its spatial extent compared to the July 2012 proposals, so that in views from the hillfort the area is seen against the existing town and not within more open and significant views over open country to the east and west. The proposed site is lower lying and further away from the hillfort than Jasmine Gardens and Oldport Farm and partially obscured by modern industrial development which is nearer to the hillfort. The reduction in spatial area is acceptable to English Heritage although we still have significant concerns about overall masterplanning, design, and numbers of houses proposed for that land allocation. Within site OSW004, development is better considered in the south west portion of the site, subject to appropriate archaeological assessment, within the triangle of land between Whittington Road and the existing industrial units. The northern and eastern parts of the allocation should include a designed urban edge including public open space as a buffer between housing and the adjacent agricultural land, and to ensure minimal disruption of views of the hillfort from Whittington Road. We remain concerned that the overall reduction (between Preferred Options of 2012 and Revised Preferred Options of 2013) in housing numbers (125 to 117) does not reflect the reduction in spatial area (approximately 50%?). Because of our concerns it should not be assumed that English Heritage will not object to any development proposals within OSW004.

Throughout the process the scheme promoters have, in our view, not taken on board fully the significance we, and many others, attach to the hillfort and its setting. Only recently has the promoter talked to our Historic Properties Team who manage the hillfort about the claimed benefits – gifting of land, car park, interpretation boards, footpaths and access. There is no detail about the gifting of land for a new car park,

and the existing car park facilities on the west side work reasonably well. The latest scheme proposal of November 2013 (termed 'Engagement Material') includes a one-sided analysis of benefits that would result from development. We do not agree with the central themes of this document which are: 1, that the development of all three sites represents a 'sympathetic development/ enhancement', and 2, that unless all three sites are agreed there will be 'missed opportunity for public access, linkages, tourism, and heritage....'. In our view inappropriate development will be damaging to future potential for access and tourism initiatives in that area. We also do not agree with some aspects of detail within the November 2013 'Engagement Material', including the claim that the existing tenancies and grazing rights are not compatible with public access. Grazing the ramparts under licence with a local farmer has worked well and the public has still been able to walk around the site and appreciate the significance of the hillfort. Grazing with sheep helps to keep the regrowth of scrub under control.

You refer to the Heritage Impact Statement. We have seen the HIS of January 2013 produced on behalf of the scheme promoters. We fundamentally disagree with some of the arguments e.g. section 5.3 'contribution of setting to significance', but accept that it has been produced professionally in good faith. We have also seen the archaeological evaluation produced by Oxford Archaeology August 2009, and the Heritage Statement produced by the Old Oswestry Hillfort Campaign Group December 2013. We understand further assessments are being produced by interested groups, and we will be pleased to see all such work. It is likely that English Heritage would also request further detailed assessments in response to any planning applications that may come forward.

You also refer to the NPPF ('The Framework'). We have raised this directly and in detail with the Council including in terms of the protection and enhancement of the historic environment as a key dimension of sustainable development (paragraphs 6 and 7); the simultaneous seeking of economic, social and environmental gains (paragraph 8); seeking improvements in the quality of the historic environment (paragraph 9); and the overarching principle that heritage assets should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations (paragraph 17). We believe that the Council's position in seeking to take forward all three sites is not consistent with the NPPF.

We have met with local stakeholder groups including the Civic Society and the Old Oswestry campaign group/s directly to explain our position, both on site and at informal meetings. We have also attended a full Town Council meeting on 5th

December and explained our position and answered questions. We remain, of course, available to liaise with interested parties as needed.

I hope that this email sets out the background to our engagement and clearly explains our current position. Please do get in touch directly if I can be of further assistance,

Yours Sincerely,

Bill Klemperer | Principal Inspector of Ancient Monuments

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