

Rescue

The British Archaeological Trust

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21st August 2013

Dear Sir

RE: SAMDev Revised Preferred Option

Rescue - The British Archaeological Trust is a non-political organisation dedicated to supporting archaeology and archaeologists in Britain and abroad. We do not receive any state support and are entirely dependent on the contributions of our members to support our work.

We believe the development proposed for areas OSW002, 003 and 004 will have an unacceptably negative impact on the Old Oswestry hillfort, a statutorily protected Scheduled Ancient Monument. Old Oswestry is described by English Heritage as 'the most hugely impressive Iron Age hillfort on the Welsh Borders' and is one of the largest and best preserved of such monuments in the country. Hillforts are rare monuments and very few survive in the exceptional condition of Old Oswestry with such complete circuits of earthworks. Its outstanding condition is denoted by the fact of its relatively early scheduling in May 1934.

Under the provisions of the Ancient Monuments and Archaeological Areas Act 1979, scheduled monuments are protected from destruction or disturbance and the impact on the setting of a Scheduled Monument by development is also a material consideration in the planning system. The setting of hillforts is a fundamental part of their importance as they were originally designed with the surrounding open space as an integral and indeed indispensable part of the layout. Any development in the areas, OSW002, 003 and 004 will have a serious impact on the landscape setting of the hillfort. We believe that the current proposals conflict with the protection afforded to the monument by the 1979 Ancient Monuments and Archaeological Areas Monuments Act, and contravene the UK's commitments to the protection of the historic environment set out within the Valletta Convention (1992).

It is clear that all the proposed development areas, OSW002, 003 and 004 will be clearly visible from the eastern side of the hillfort and the loss of this open space would significantly compromise its historic and scenic value. The certain impact of allowing the development to proceed will be to damage the visual magnificence and special character of one of this country's most important prehistoric strongholds. Any incursion into this space would be catastrophic for the archaeological integrity of the monument. The outlook

across Oldport Farm is of particular significance affording views across miles of countryside to, on a clear day, the Wrekin. Such views would have been of significance to the hillfort builders and occupiers and would have certainly influenced its siting. It is critical to the understanding of the monument that these views are preserved without interruption and that visitors get the chance to experience them. Any loss of this would dilute the visitor experience and potential impact on visitor numbers.

Old Oswestry is an extremely important contributor to the tourism income of this area (and the country as a whole); Heritage-based tourism now contributes at least £5 billion GDB and 134,000 jobs and is one of the significant growth industries in the country¹, having increased significantly (more than 20%) between 2010 and 2013. It is therefore vital that the economic benefits to the local economy of Old Oswestry are taken into account and are not compromised by unsympathetic development.

We are also concerned that the Heritage Impact Assessment submitted is not NPPF-(National Planning Policy Framework) compliant, as there is no HER information included. Whilst it does adequately address the immediately visible above ground aesthetic matters that are important in setting, the below-ground potential and contextual data that is essential is absent. At the Danebury hillfort, for example, the excavator proved that it was surrounded by evidence of contemporary field systems and occupation, but this possibility is almost entirely unconsidered in the Oswestry assessment (with the exception of a one line mention about aerial photo evidence on page 15), and it doesn't appear to have been researched properly. This potential is massively important in considering the "setting" of the monument, and to brush it aside in section 8.1 as being "previously addressed in an evaluation in 2009" entirely misses the point. Did they evaluate everything around the site? The author has also stated that Oswestry is visible to 15 other Hillforts (paragraph 5.3.17, pg. 25) - yet hasn't considered the views from those sites to Oswestry should the allocation proceed at all. Again, previous research has clearly demonstrated that intervisibility between these sites is part of their strategic nature and therefore fundamental in considering their significance. The English Heritage guidance on setting² demonstrates quite conclusively through the definition on pages 4-5 that this ought to be assessed. If nothing else, the housing allocation might be damaging to the setting of the other 15 monuments as well. In Rescue's opinion, the author has actually only adequately considered the curtilage of this site, and as the English Heritage guidance makes clear, curtilage and setting are entirely different things altogether, with setting being a far wider, esoteric and flexible concept. The Heritage Impact Assessment is inadequate, and further consideration - by a properly qualified archaeological organisation or individual is required.

Yours sincerely

Diana Friendship-Taylor
Chair,
RESCUE: The British Archaeological Trust

¹ Kareen El Beyrouly, and Andrew Tessler, 2013. *The Economic Impact of the UK Heritage Tourism Economy*. Oxford Economics.

² *The Setting of Heritage Assets* (2011): English Heritage