



Historic England

Mr Philip Mullineux
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Direct Dial: 0121 625 6820

Our ref: P01186608

16 April 2020

Dear Mr Mullineux

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND TO THE NORTH OF WHITTINGTON ROAD, OSWESTRY, SY11 1HZ
Application No. 20/01033/EIA**

Thank you for your letter of 12 March 2020 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England Advice

The site is allocated (ref: OSW004) within the Site Allocations and Management of Development Plan Document (SAMDev) adopted by Shropshire Council in December 2015, and includes development guidelines for delivering 117 houses.

As part of the SAMDev process Historic England successfully sought the rejection of two further proposed allocations within the setting of the hillfort - Jasmine Gardens (OSW002) and site at Old Port Farm (OSW003), and also negotiated a significant reduction in the proposed area for allocation on site OSW004. A Statement of Common Ground (SOCG) that required any development to minimise impact upon the significance of Old Oswestry Hillfort was also agreed and signed by both parties, in October 2014.

The shortest distance between the scheduled (protected) area at Old Oswestry Hillfort and OSW004 is approximately 300 metres. When viewed from the hillfort plateau the nearest houses would be about 450 metres away, and seen against the urban edge of Oswestry, beyond Oldport Farm, the B5069 road and a currently disused railway line.

We responded to a consultation regarding application 19/02686/EIA for residential development on 10th July 2019. In our response we expressed serious concerns about the application. Some of our concerns were addressed in amended plans which were



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subsequently submitted. In our further consultation response of 5th November 2019, however, we explained that we still had some concerns. These included the overall assessment of impact upon Old Oswestry Hillfort, including a lack of detail in terms of photomontages, the landscaping scheme, the detailed design and materials scheme, lighting, boundary treatments (including the proposed pumping station), and the need to keep all elements of the scheme within the site boundary.

We subsequently met with the applicant on site on 29th November 2019 and again on 15th January 2020 to discuss those areas of concern. The applicant subsequently withdrew applications 19/02685/EIA and 19/02686/EIA and has submitted a new application ref: 20/01033/EIA.

We are now commenting on this new planning application. The Local Plan is up to date and adopted so any planning application should be decided in accordance with these policies, including S14.1/S14.1A. Local Plan policy was informed by the SOCG that includes a Statement of Significance for Old Oswestry Hillfort. The SOCG design consideration text is included in policy and is part of the development plan.

The current application is an improvement on the two earlier schemes and so is more compliant with the Statement of Common Ground agreed for the site compared to the earlier applications 19/02685/EIA and 19/02686/EIA.

The application includes numerous documents listed in the 'Schedule of Submitted Documents'. These include a Planning Statement and Environmental Statement (ES) that includes a Heritage Impact Statement (Warwickshire Archaeology 2019 - ES Appendix 6), and Landscape and Visual Impact Assessment (LVIA) (ES Chapter 8). Photomontages showing various viewpoints are also included.

We did not support the earlier proposal for two separate applications and so agree that the site is now best considered as a single detailed application.

The revised Planning Statement confirms that the development proposal is now for 91 houses. This is a reduction from the Local Plan projected figure of 117, and from the 100 subsequently proposed following discussion with Shropshire Council and Historic England. This will allow a further reduction in density, and a consequent increase in open spaces, (including public open spaces), and wider gaps between the houses that collectively will allow the development to be more visually permeable.

We agree with the Heritage Impact Assessment by Warwickshire Archaeology that views from the hillfort towards the east, west and north contribute more greatly to its significance than those to the south which are into the nearby urban edge of Oswestry. We also agree with the Landscape and Visual Impact Assessment by Pegasus Group that the view from Whittington Road towards the hillfort would be substantially changed by development that will introduce new built form, albeit set back from the



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road, and that the proportion of the view affected would be relatively extensive.

We accept that further progress has been made towards the master-planning of the site informed by the SOCG, as set out in the application details including the Planning Statement (February 2020) and Design and Access Statement (March 2020). The improved landscape strategy includes a detailed planting scheme within green buffers at the development boundaries, an increase in public open space, and an improved internal landscape infrastructure as shown on the Landscape Master Plan and Soft Landscape Details Plan dated 5/03/2020. In overall terms the landscape proposals are an improvement from the previous application that we commented upon on 5th November 2019 and would soften the overall impact of the development.

We support the broadening of the buffer areas in the new planning application, as we had recommended in our advice of 5th November. The northern boundary is now considerably deeper than in the earlier designs and includes footpaths and a feature observation point, with hillfort interpretation boards, that connects to a pedestrian avenue linking to Whittington Road. This will reduce the impact (compared to the earlier applications) and establish a distinct settlement boundary as shown in the photomontage looking towards the hillfort. The proposed built boundary is now south of the adjacent industrial land's northern boundary, although it remains north of the factory building itself. A broad landscaped buffer is also included alongside Whittington Road, including the easement for the Lake Vyrnwy water pipeline.

We had expressed concern over the location of the proposed attenuation pond and sub-station as these had been outside of the allocated site boundary. These are both now inside the boundary and includes a wetland planting scheme. This is an improvement on the previous design layout.

The reduction to 91 houses (around 22% less than the SAMDev development guideline of 117) and the redesigned road layout does help diffuse the massing of the development and allow glimpses throughout the site to the hillfort, as required by the SOCG and is an improvement from the earlier applications. The orientation of houses towards public open space will also encourage shared ownership of those spaces. We had also expressed concerns over the palette of materials, especially for the roof-scape, and so support the use of recessive colours for the roofs now set out in the Design and Access Statement, and as shown in the submitted photomontage of the post-development view looking from the hillfort.

We are concerned that the impact of lighting should be minimised, and so agree with the applicant that it would be appropriate, should planning permission be granted, for a condition to be applied requiring a detailed lighting design that minimises sky glow to be agreed.

Archaeological evaluation of the development site has included a geophysical survey



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by GSB in 2007, trial trenching by Oxford Archaeology North in 2009 and by Warwickshire Archaeology in 2018. Some evidence of World War I practice trenches was discovered. If planning permission is granted the Council should consider an appropriate archaeological mitigation strategy.

We do not agree that the impact in every aspect would be 'relatively minor' (Planning Statement 5.22). In particular, views towards the hillfort from those parts of Whittington Road adjacent to the new development would be impacted to a greater than 'relatively minor' degree, and we do not support the inclusion of an agricultural access into the adjoining field in the north east corner of the design. In our view the road layout should exclude, as far as practicably possible, the potential to extend the road network in the future to adjacent areas.

In overall terms the current application is an improvement on the earlier applications in terms of compliance with the SOCG. A level of impact inevitably remains, however, especially in terms of the views towards the hillfort from Whittington Road.

Recommendation

We agree that the impact of the development would, in NPPF terms, be less-than-substantial. We still have some concerns about the 'agricultural access' and recommend that it is redesigned so as to ensure that a buffer between the urban edge and rural setting is not interrupted. In coming to its decision overall the Council should fully consider the potential impacts as set out in NPPF paragraphs 193 and 194, and apply the tests of NPPF paragraph 196.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely



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Principal Inspector of Ancient Monuments

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cc:



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