Mr Philip Mullineux

Shropshire County Council

Shirehall

By email: planning.northern@shropshire.gov.uk; Philip.Mullineux@shropshire.gov.uk

February 15th 2023

Dear Sir

*Re Planning Application:* No. 23/00225/FUL

The Prehistoric Society is dedicated to furthering the understanding of our prehistoric past and conserving prehistoric remains for the future. Our members are passionately interested in many prehistoric sites, collections and excavations both in Britain and abroad.

I am writing to raise concerns regarding the current planning application noted above. The Prehistoric Society has written previously, regarding development within the setting of Old Oswestry Hillfort and I wish to confirm my own opposition.

The proposed development will impact adversely upon the setting of the scheduled monument of Old Oswestry Hillfort (NHLE 1014899). The setting is extremely important for the continued enjoyment and appreciation of the scheduled monument itself; it provides context and understanding of why the monument was constructed there, and how it dominated the landscape. Modern scale development will harm the relationship of the hillfort and its setting by introducing new elements into what remained partly open landscape under modern planning decisions.

The site was clearly selected for its topography, and the hillfort was constructed to dominate the landscape; it became the most significant element, asserting the authority of the society which constructed and used it. Any proposed development within the setting of the scheduled monument must take account of this to ensure that the visual predominance is not affected; otherwise, the understanding and appreciation of the monument within its landscape will be compromised. Furthermore, the views from the monument will be compromised by infilling currently open land and increasing the mass of development to the southeast of the monument.

The current proposals clearly impact upon the setting of the monument and will diminish the impact it makes within its landscape by restricting the ability to view it clearly. The insertion of more modern buildings will adversely affect the site by hemming it in, and the incremental development will lead to its becoming an isolated island, surrounded by modern buildings, rather than being the clear and solitary focus of authority within a wide and open landscape. The landscape and Visual Assessment document, submitted with the planning application makes it clear that the impact upon the views from the hillfort will be significant and adverse. This would degrade the significance of the asset, contrary to all guidance on the protection and enhancement of heritage assets.

We ask you again to take into consideration a number of paragraphs within the NPPF (2021 revision), when making your judgment. Firstly, section 16, underscores that ‘*Heritage assets are an irreplaceable resource and 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 existing and future generations*.’ Paragraph 194 stresses the contribution made by the setting of heritage assets, paragraph 195 stresses that local authorities should identify and assess the significance of the heritage asset affected by a development affecting its setting. In particular, paragraph 200 states that ‘*any harm to, or loss of, the significance of a designated asset (from its alteration or destruction or from development within its setting), should require clear and convincing justification*.’

Paragraph 202 notes that where the harm is less than substantial, the harm should be weighed against the public benefit of the proposal. As the current proposals affect the setting rather than the monument itself, this can be taken to impact monument significance, as such it requires clear and convincing justification. After ten years of public opposition, this do not yet seem to be forthcoming. Therefore, I urge you to weigh very carefully the significance of the monument, glorious within its landscape, against the very limited public benefits of the proposals.

I ask you also to consider the content of the Historic England guidance on *The Setting of Heritage Assets* (December 2017), which outlines clearly how to assess the contribution of views to the setting and therefore significance of heritage assets. Paragraph 36 in particular refers to cumulative assessment of existing and proposed development and is of specific relevance here, particularly with reference to phase 2.

Furthermore, Historic England’s Conservation Principles (April 2008) place great weight on communal value in additional to evidential value, which the hillfort contains in high degree. Communal value underlines the importance of an asset to many communities, not simply the local community, but all interested parties. Old Oswestry Hillfort is more than simply a local asset, it is nationally significant and of importance and value to all those interested in Prehistory globally.

I ask you also to consider all local policies regarding the treatment and protection of heritage. Shropshire’s Cultural Strategy 2021-31 underscores the importance of your heritage assets and indeed the significant financial accrual from visitors. Development within the setting of the hillfort may ultimately make it less attractive to visitors. Development like this rarely enhances heritage.

Policy MD13 of the SAMDev states that ‘*wherever possible, proposals avoid harm or loss of significance to designated or non-designated heritage assets, including their settings*.’ I appreciate the need to provide housing for the local community, but there are other suitable allocated sites in your area, development of which will create significantly less harm to national heritage assets.

Scheduled monuments are of exceptional significance and rarity, and one quite so complete and uncompromised as Old Oswestry, ever more so. I urge you, therefore, to consider all these points, and refuse planning permission and preserve the significance of Old Oswestry hillfort for current and future generations.

Yours faithfully,

Professor Linda Hurcombe

President of The Prehistoric Society