

Local Plan Review - Reg 19

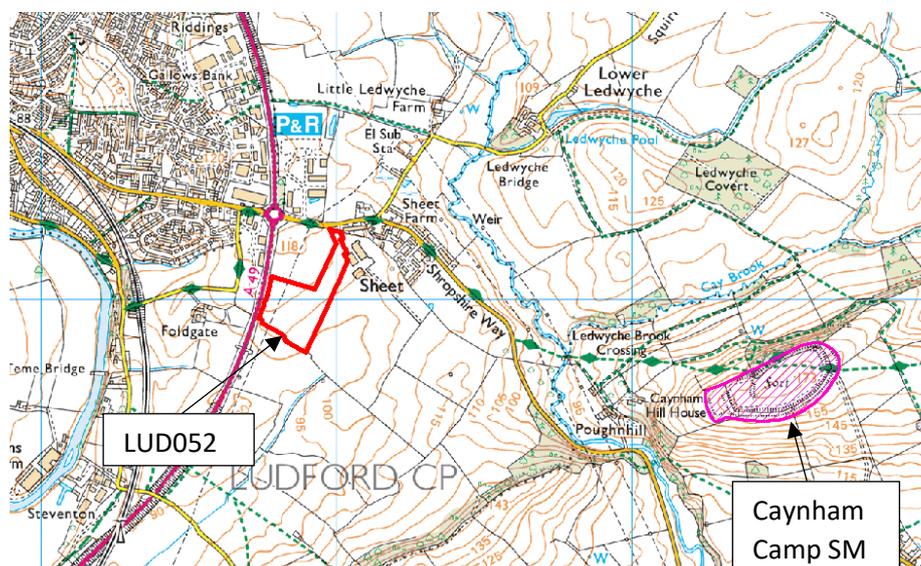
Historic Environment Manager: Supplementary Site Assessments to address Historic England's concerns

Introduction

This document is provided in response to concerns raised by Historic England in relation to a limited number of specific site allocations in the Regulation 19 Local Plan Review document. It has been prepared by Shropshire Council's Natural and Historic Environment Manager to give an additional, more detailed assessment of the potential impacts the allocation and subsequent development of these sites would have upon the historic environment. As such, it is intended to supplement, rather than replace, the historic environment team's comments, which informed the Council's site assessment and sustainability appraisal process prior to the Local Plan Preferred Sites consultation and the team's subsequent advice on Historic England's response to that consultation.

It should be borne in mind that at the plan making stage the level of detail available relating to the development that might come forward for these sites is largely limited to general uses (i.e. residential and/ or employment) and proposed site boundary, and does not include details of size, scale, design or massing of units. For each of the sites assessed below a more detailed Heritage Impact Assessment will therefore be required at the development management stage which assesses the specific details and impacts of the scheme being proposed.

LUD052 - Ludlow



It is understood that Historic England's outstanding concern regarding this proposed allocation is in relation to the potential impact on the significance of the Scheduled Monument of Caynam Camp, a large univallate hillfort 700m north west of Caynam (NHLE ref. 1010313) located c.1.3km to the east-south-east, as a result of development within its setting.

The significance of Caynam Camp derives primarily from its archaeological interest as a large and well-preserved example of a class monument known as hillforts that evolved over the course of the

later Bronze Age and Iron Age in Britain, particularly in the Welsh Marches. Generally constructed, modified and reworked between 800 – 100BC, these monuments played a significant role in the social, economic and political relations of the communities that constructed and maintained them. Hillforts, as their name implies were constructed in elevated positions, and whilst this may in part have been for defensive purposes, it would also have advertised the fluctuating social status of these communities, enabling them to see and be seen within the landscape. Parts of the communities would also have dwelt within the monuments, sometime permanently and sometimes on a temporary or episodic basis.

Because of these factors, hillforts usually have extensive settings. In the case of Cayhnam Camp, this extends westwards to, and includes the, proposed site allocation, as well as a significant distance to the north, east and south of the monument. The setting remains predominantly rural, comprising rolling farmland with small and generally linear belts of woodland, with dispersed farmsteads. This enables the significance of the hillfort, as an elevated monument located in a commanding position above the valley of the Ledwyche Brook, to be readily appreciated and understood. However, to the west, the character of the setting changes as one approaches the historic market town of Ludlow, with the small outlying settlement of Sheet lying partially between the proposed site allocation and the hillfort. As a result of this, and the distances involved, the land that comprises the proposed site allocation can be recognised to make a limited contribution to the significance of the hillfort.

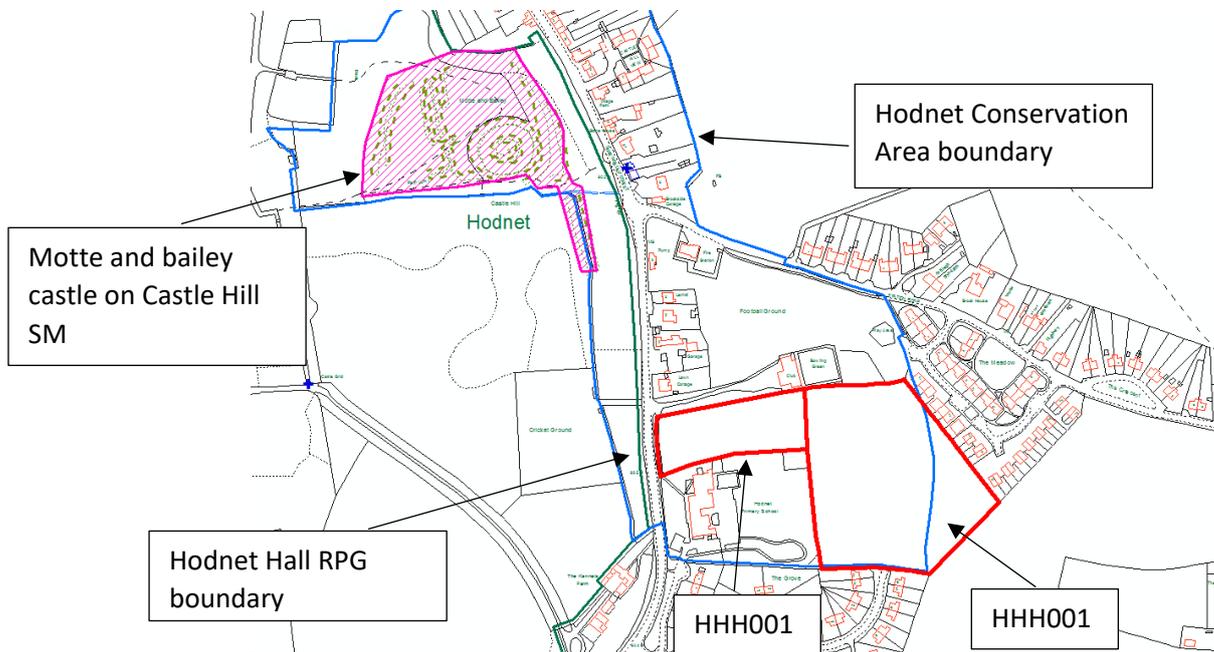
The proposed site allocation is located partially adjacent to the A49 corridor, with existing employment land uses immediately beyond it to the east of the trunk road and north of the proposed site allocation. It is also located adjacent to, and will serve as an extension, for an existing employment site allocation (ELR058). There is also existing intervening residential and agricultural development at Sheet, immediately to the east of the proposed site allocation. With regard to views towards and out from the hillfort, it is therefore concluded that in visual terms the proposed site allocation would be read in relation to the existing built edge of the town and to previous allocations and will read as such in the landscape.

Excessively large and/ or tall and brightly coloured buildings have some potential to cause harm to the significance of the hillfort as a result of becoming overly conspicuous elements within the setting, making them strikingly modern and visually distracting elements in views to and from the monument, thus in turn disrupting the ability to appreciate the landscape context of the monument. However, it is considered that such harm can be mitigated, and most likely avoided all together, by ensuring that building heights are kept to a maximum of 7m in height to eaves and are of good contemporary design in relation to materials, visually recessive colours (including their roofs), layout and landscaping.

The presence of non-designated archaeology on the proposed site allocation was identified during the Local Plan site assessment process. This comprises a probable Bronze Age ring ditch and Iron Age settlement (HER PRN 30994) and a possible Roman fort (HER PRN 04532), which has been partially destroyed by the construction of the A49. These features are only known from cropmark evidence and their identification/ classification therefore remains untested and based solely on the interpretation of aerial photographs. Their heritage significance derives primarily from their archaeological interest through their potential ability to inform understandings of funerary practices in the earlier Bronze Age (in the case of the ring ditch); Iron Age settlement and farming practices outside hillforts; and the construction of smaller scale Roman military sites. Each of these sites will only survive as below ground remains. The development of the proposed site allocation would potentially entirely destroy those parts of the historic sites that fall within it. However, it is considered that an appropriate level of mitigation could be achieved at the development

management stage through an appropriate level of archaeological recording secured by a planning condition, the specific requirements of which would be informed by an initial desk based assessment and field evaluation that are undertaken prior to submission of a planning application.

HHH01 & HHH014 - Hodnet



It is understood that Historic England’s principle concern regarding these proposed allocations is their potential impacts on the significance of the Hodnet Conservation Area. However, for the sake of completeness, the potential impacts on the settings and significance of the Scheduled Monument of the Motte and bailey castle on Castle Hill, and the associated remains of a park pale, a fishpond and a formal garden (NHLE ref. 1019653), and the Grade II Hodnet Hall Registered Park and Garden (NHLE ref 1001125) are also considered.

The two proposed site allocation fall either wholly or largely within the Hodnet Conservation Area. Shropshire Council’s Summary Character Appraisal for the Hodnet Conservation Area assigns that part of the Conservation Area within which both sites are located to Character Area 6: Football and recreation ground. This is characterised as falling “Outside the village core with striking views of the abrupt boundary between settlement and open countryside. Adjacent C20 housing developments give this area a suburban character.” Somewhat in contrast to this, the land that comprises the proposed site allocations is currently in arable agricultural use and forms part of a larger field that was created through hedgerow removals in the second half of the 20th century. To the north, the site is bounded by the Hodnet Bowls Club, to the south-west by Hodnet Primary School, and beyond the Conservation Area boundary to the south and north-west, by 20th century housing. Whilst the land comprising the sites is open and undeveloped, there is no public access to it.

Given the above, it can be argued that the contribution the proposed site allocations make to the overall significance of the Conservation Area is limited. Likewise, it is considered that, in principle, residential development on these sites will not result in a significant change to the character and appearance of the character area or the wider Conservation Area as a whole. Consequently, the level of harm to its significance would be limited. However, this would be subject to the residential development being of a high design standard, with good quality timber joinery detailing and a palate

of materials that is informed by, and in keeping with, the local vernacular. In terms of density and layout, this should ideally be low and should incorporate well designed landscaping and amenity space. There is potential for one or two plots to be incorporated onto the Shrewsbury Street frontage of HHH001, but these would need to be of a design that is sympathetic to the 19th century dwellings to the north, beyond the access to the bowling club. Otherwise, site access should ideally be gained via the bowling club access if feasible, or off the turning head on The Grove. Consideration should also be given to creating views and vistas out into the countryside beyond the Conservation Area. These measures would mitigate any residual harm to the significance of the Conservation Area.

With regard to the Scheduled Monument, this comprises the earthwork remains of a motte and bailey castle which is understood to have been established by Earl Roger de Montgomery in the late 11th century. Following his son's forfeiture in 1102, the manor passed to Henry I, who granted it to a branch of the Fitz Warin family who subsequently assumed the name of de Hodnet. In 1250 Odo de Hodnet, was granted a charter by Henry III to hold a weekly fair and annual market at Hodnet, and it has been suggested this provided the stimulus for a planned extension of the settlement to the north and east of the castle. Edward I stayed at Hodnet Castle in December 1295, during his journey from Shrewsbury to Chester, and Edward III garrisoned the castle 1321 or early 1322 during a period of unrest in the area. The castle's significance therefore derives from both its historic and archaeological interest.

As previously indicated, the proposed site allocations lie outside the historic core of the village, including a planned medieval element, which is located c.200m to the north. Inter and intra visibility between the monument and the proposed sites is also very limited as a result of intervening built development and tree cover, particularly along the boundary of Hodnet Hall Park. It is therefore considered that the land comprising the site allocations makes little contribution to the setting and significance of the Scheduled Monument, and that their development would not cause harm to it as a result.

The Hodnet Hall Registered Park and Garden comprises the gardens, pleasure grounds and park that surround Hodnet Hall. Originally established as a deer park associated with the medieval castle, it persisted into the 16th and 17th centuries. The estate was inherited by the Heber family in 1752 and remains with them to the present day. A new Hall was built by the family on an elevated site within the park in 1870, whilst the present extensive gardens began to be developed in the 1920s by Brigadier A G W Heber-Percy (d 1962). The park's significance therefore derives from its historic, architectural and archaeological interest as an exemplar of the Shropshire parkland that has developed from a medieval antecedent, and with notable gardens developed in the 20th century.

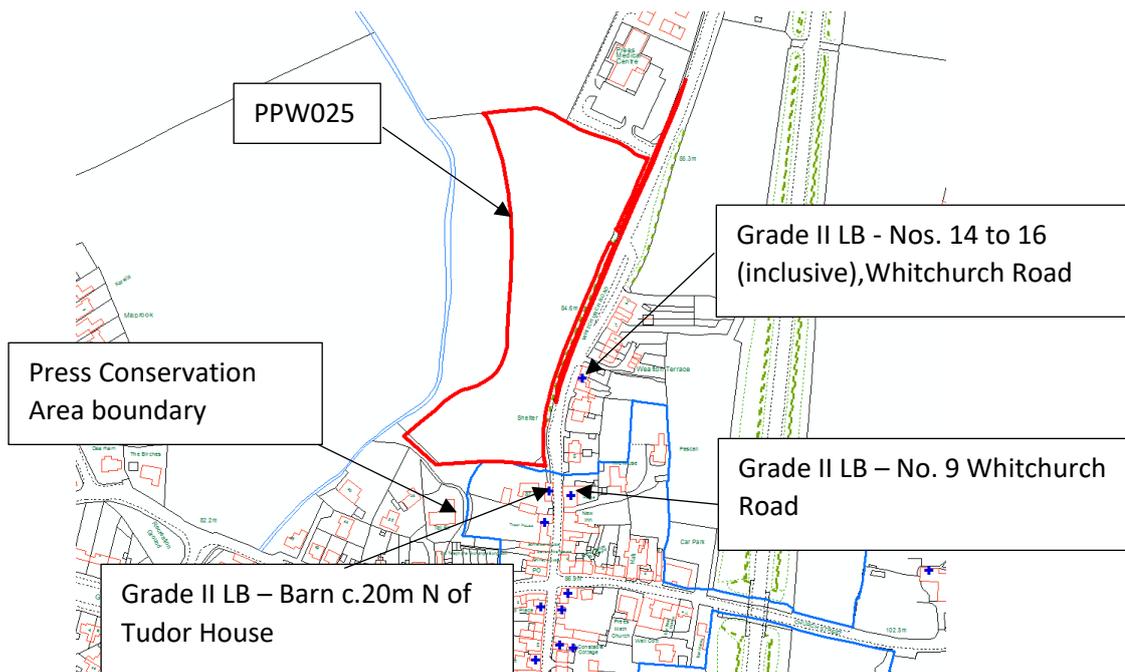
The proposed site allocation is located just to the east of the low sandstone boundary of park and is separated from it by Shrewsbury Street. However, views into and out of the park at this location are screened by a mixed species planting belt on the park side of the boundary wall. The agricultural land which comprises the two proposed site allocations formed part of the surrounding historic estate land and can therefore be considered to form part of the parks setting. However, any residential development on the sites would be seen in relation to existing built development, and as a component of a settlement that has served as an estate village for a number of centuries. Subject to implementation of the design considerations set out above in relation to the Conservation Area, it is therefore concluded that development on the proposed site allocations would not result in harm to the significance of the Registered Park and Garden.

impact on the settings and significance of the Scheduled Monument of Lime kilns, associated tramways, structures and other buildings at Llanymynech (Llanymynech Lime Works) (NHLE ref. 1021412) has been considered.

The allocation is located immediately south-east of the Llanymynech Village and Heritage Area Conservation Area boundary and therefore is within its setting. However, it is located adjacent to two existing site allocations: LLAN009 to the west, which was developed for residential use in 2017-18; and LLAN001 for residential use on the former railway coal yards to the south-east, which has yet to come forward. It is therefore considered that residential development on the proposed site would be seen and experienced in the context of this recent built development and the associated allocated land, and as an addition to it. As such, it is concluded that in principle development in this location would not cause harm to the significance of the Conservation Area as a result of inappropriate impacts on its setting, subject to its being of a comparable design, scale and layout to the recent development on LLAN009

The Llanymynech Lime Works Scheduled Monument comprises a complex of 19th century lime kilns, tramways, incline planes, quarries and other associated buildings. The lime works developed in association with, and were initially serviced by the, Montgomery Canal (HER PRN 00927), and subsequently by the Cambrian Railway (HER PRN 08408). Its significance derives from its historic, architectural and industrial archaeological interest in terms of the evidence these features provide for the development of the limestone quarrying and processing industry across much of the course of the 19th century. The proposed site allocation is sandwiched between the canal and a former railway line (not the line that serviced the lime works) but, whilst forming part of the monument setting, is not considered to make any substantive contribution to its significance. Additionally, views into and out of the limeworks are largely precluded by the tree cover within the Scheduled area, and to a lesser degree along the canal corridor. Subject to the design considerations set out above in relation to the Conservation Area, and a well-designed and appropriate landscape buffer along the canal to further screen the site, it is considered that residential development on the proposed site would not harm the significance of the Scheduled Monument.

PPW025 - Prees



It is understood that Historic England's principle concern regarding the proposed allocation is the potential impact on the significance of the Prees Conservation Area as a consequence of impacts upon its setting. However, for the sake of completeness potential impacts on the settings and significance of the three closest listed buildings (all Grade II): Nos. 14 to 16 (inclusive), Whitchurch Road (NHLE ref. 1236426); No. 9 Whitchurch Road (NHLE ref. 1222022); and the barn c.20m N of Tudor House (NHLE ref. 1264627) have also been considered.

The allocation is located immediately north-east of the Prees Conservation Area boundary and is therefore within its setting. The proposed site allocation is currently in agricultural use and comprises a field between Whitchurch Road and an un-named and partially canalised watercourse to the west. The historic core of Prees extends to the southern boundary of the site, whilst ribbon development comprising dwellings in mixed architectural styles dating from the late 17th to 20th century lie to the east along Whitchurch Road. The recently built Press Medical centre is located immediately to the north. Whilst the land in question forms part of the general rural setting of Prees, this particular land parcel is not considered to make any particular contribution to the significance of the Conservation Area's setting as it is already bounded by built form to the north and east. Consequently, it is concluded that in principle development in this location would not cause harm to the significance of the Conservation Area as a result of inappropriate impacts on its setting, subject to it being of a comparable scale to adjacent form and of good design standard, with a palette of materials that is informed by and is in keeping with the local vernacular.

Of the adjacent listed buildings, Nos. 14 to 16 Whitchurch Road comprise a row of three late 17th century timber framed roadside cottages below plain tile roofs, which were remodelled and cased in brick in the 19th century. No. 9 Whitchurch Road comprises a three story early 19th century house of red brick beneath a slate roof with later additions and alterations. The Barn c.20m N of Tudor House is an early 17th century timber framed barn with weather board cladding and a 19th century brick gable, beneath a plain tile roof. These buildings derive their significance from their architectural interest as exemplars of the changing vernacular architecture between the 17th – 19th centuries, and in relation to the development of the settlement of Prees.

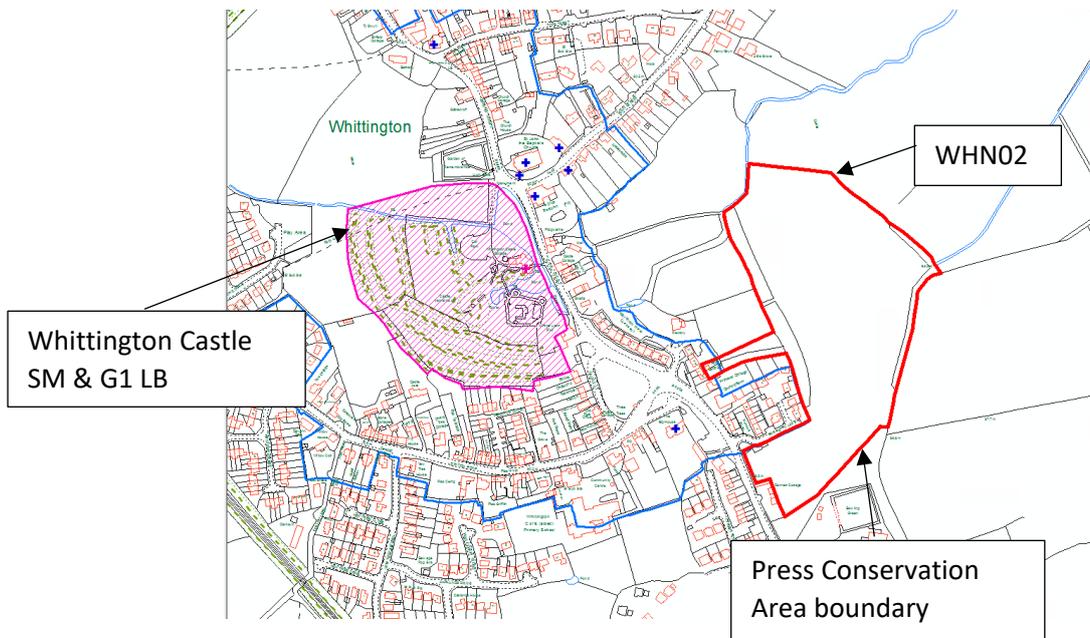
In the case of Nos. 14 to 16 Whitchurch Road, and as a row of roadside cottages, the road itself arguably forms the most significant component of the building's setting, as does the historic core of the village immediately to the south. Its primary elevation faces directly towards the proposed site allocation and it currently enjoys open views out across it. Careful consideration would need to be given to the scale, massing and layout of development on the part of the proposed development site opposite this building, in order to mitigate any harm that might arise through inappropriate development within its setting.

No. 9 Whitchurch Road lies on the edge of the historic core of the village and its principle elevation fronts directly onto Whitchurch Road. The principle component of its setting is therefore considered to be the settlement to the south, and it has only oblique views towards the proposed site allocation. It is therefore considered that the proposed site allocation does not form part of the setting of this building and that it would not harm its significance as a result.

Finally, the setting of the Barn c.20m N of Tudor House mainly comprises the surrounding historic farmstead of which it forms a part. The open agricultural character of the proposed development site does make a minor contribution in terms of enabling its significance as a historic agricultural building to be appreciated. Harm to this significance could, however, be avoided by providing a suitable and well-designed landscape buffer at the southern end of the site, to provide an area of amenity space and a stand off from it.

There is no known archaeological interest on the proposed site allocation. However, given its size, position adjacent to the historic core of the settlement, and agricultural land use, an archaeological desk based assessment, and if appropriate a field evaluation, should be submitted with any planning application so that a suitable level of archaeological mitigation can be secured by condition is necessary.

WHN024 - Whittington



It is understood that Historic England's principle concern regarding the proposed allocation is the potential impact on the significance of the Whittington Conservation Area as a consequence of impacts upon its setting. However, for the sake of completeness potential impacts on the setting and significance of the Scheduled Monument and Grade I Listed Building of Whittington Castle (NHLE refs. 1019450 & 1178307) have also been considered.

The allocation is located predominantly outside of and to the east of the Whittington Conservation Area boundary and is therefore within its setting. The exception to this comprises a small area on the western site of the proposed site allocation which lies just inside the boundary. At its south-western end much of the built form inside the adjoining Conservation Area is of 20th century date. At its north-western end the site is separated from the Conservation Area by a number of paddocks, which would remain in agricultural use. Open views into and out of the Conservation Area from the proposed site allocation are therefore significantly constrained by intervening built form and tree cover, particularly by a belt of established trees on the western boundary of the site, as well as the flat, lowland topography. As such it is concluded that in principle development in this location would not cause harm to the significance of the Conservation Area as a result of inappropriate impacts on its setting.

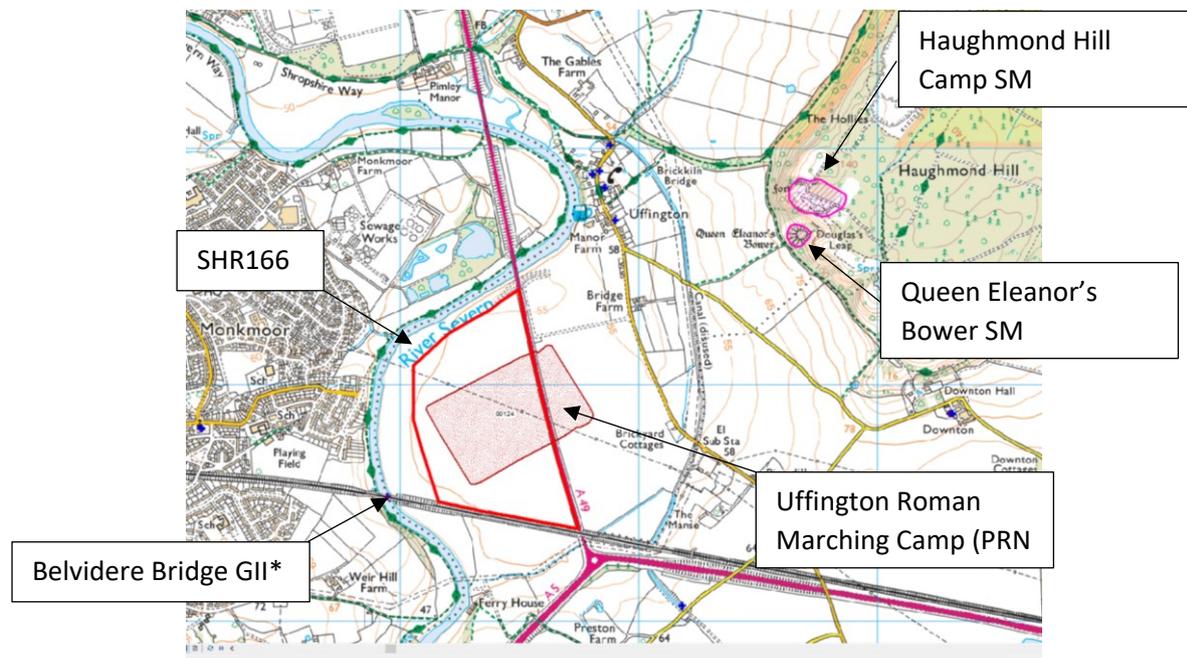
The proposed site allocation is situated c.230m east of Whittington Castle. This was originally established as a motte and bailey which was replaced by a fortified masonry keep in the early 13th century. The castle defences incorporated a series of banks and ditches to the west and south, a moat to the east and an area of marshland to the north. Based on the character and extent, it has

been suggested that these banks and ditches originated as part of an Iron Age defended settlement, and as such that the castle was deliberately sited to utilise an earlier prehistoric monument. Within these banks a complex of earthworks has been identified which indicate that the east of the masonry build was laid out as a pleasance at some point after the 13th century. The castle's 13th century gatehouse, with later alterations and additions survives as a standing, roofed building. The castle's significance therefore derives from its historic, architectural and archaeological interest as a major Marcher masonry castle that evolved from an earlier earthwork precursor that in turn utilised a prehistoric, defended, enclosure site.

Situated in a low lying, marshy location the open land immediately to the west and north of the scheduled area make an important contribution to the significance of the monument by enabling its landscape context to be readily experienced and appreciated. To the south, east and north it is surrounded by built development associated with the attendant historic settlement that grew up beyond the castle's gates. Views to and from the castle to the proposed site allocation are therefore blocked by the intervening built form and tree cover, whilst the paddocks immediately east of the Conservation Area would also act as a buffer, enabling its wider setting of agricultural land to be retained. It is therefore considered that residential development on the proposed site allocation would not cause harm to the significance of the castle as a result of inappropriate development within its setting.

There is no known archaeological interest on the proposed site allocation. However, given its size, and relative proximity to the castle and its potential prehistoric precursor, an archaeological desk based assessment, and if appropriate a field evaluation, should be submitted with any planning application so that a suitable level of archaeological mitigation can be secured by condition is necessary.

SHR166 – Shrewsbury



It is understood that Historic England's principle concern regarding the proposed allocation is the potential impact on the significance of the Scheduled Monuments of Haughmond Hill Camp (NHLE ref. 1021282) and Queen Eleanor's Bower (NHLE ref. 1021281) as a consequence of impacts upon their settings, as well as the direct impact on the non-designated Uffington Roman Marching Camp (HER PRN 00124). However, for the sake of completeness potential impacts on the setting and significance of the Grade II* Listed Belvidere railway bridge (NHLE ref. 1177239) have also been considered. It is not considered that the proposed allocation would affect the setting, and therefore the significance, of the Scheduled and Grade I listed Haughmond Abbey.

The proposed site allocation is located 1.2km west of Haughmond Hill Camp. The Scheduled Monument comprises the remains of a slight univallate hillfort, together with the remains of an 18th century folly formerly known as Haughmond Castle and a WWII spigot mortar emplacement. Slight univallate hillforts are thought to have been constructed between the Late Bronze Age and Early Iron Age periods (c.800 – 400 BC) and are therefore considered to have been amongst the earliest hillforts to have been constructed in Britain. These monuments are thought to have played a significant role in the social, economic and political relations of the communities that constructed and maintained them. Hillforts, as their name implies were constructed in elevated positions, and whilst this may in part have been for defensive purposes, they would also have advertised the fluctuating status of these communities, enabling them to see and be seen within the landscape. Unlike the more developed bivallate and multivallate hillforts, the slight univallate hillforts are thought to have been abandoned by the middle Iron Age.

Because of these factors, hillforts usually have extensive settings. In the case of Haughmond Hill Camp, there are extensive views from the interior of the monument southwards towards the South Shropshire Hills and westwards across the Severn valley and the town of Shrewsbury to the Welsh hills beyond. In these views at present, the town is seen to be located west of the River Severn. Beyond the site boundary the urban form is partially screened by mature tree cover on the western bank of the river. Within the immediate foreground, the flatter ground below the hill is in agricultural use, although a line of electricity pylons and the line of the A49 bypass are also readily visible. Nonetheless, the significance of the hillfort as an elevated monument located in a commanding position above the Severn valley can be readily appreciated and understood by those visiting Haughmond Hill. Supporting this point, the hillfort is located on publicly owned land, which is popular with recreational users, is crossed by a number of well used paths, and has a purpose built toposcope within it.

The proposed site allocation would be readily visible in views from the hillfort, albeit located on the westward side of the A49 road corridor. The development of SHR166 for employment uses has the potential to introduce modern, large scale buildings which would distract from and disrupt the ability to appreciate how the monument relates to the surrounding landscape. As such it is considered that this would cause harm to the significance of the monument – albeit less than substantial harm - as a result of the change to the character of its setting. This could be mitigated to some extent by either avoiding or significantly restricting the number of very large buildings (e.g. B8 uses) and locating these at the southern end of the site near the railway line. Other measures could include a low density site layout with good quality soft landscaping and high quality building design which makes use of natural cladding materials, green roofs and a visually recessive colour palette. A requirement for a master-planning approach to the site would assist in securing these measures.

The Haughmond Castle folly is understood to have been constructed by the Sundorne Castle Estate in the later 18th century. Early 20th century photographs, taken prior to its collapse in 1931, indicate that it comprised three semi-circular two storey crenelated towers set in a triangle separated by an

arched gateway. It would have been readily visible in views from the main house (which was located c. 1.6km to the north and demolished in the 1950s) and its grounds, and as such would have acted as an eye-catcher on the summit of the hill.

It is still possible to gain uninterrupted views from the remains of the folly to the surviving ancillary buildings associated with Sundorne Castle and these will not be affected by development on the proposed site allocation. As such, it is considered that this aspect of the significance of the Scheduled Monument would not be harmed.

Likewise, the WWII spigot mortar emplacement comprises a single concrete drum, or thimble, located to the north of the folly, and is largely surrounded by trees. The setting of this feature comprises the immediate hilltop around it, and as such it is considered that its significance would not be affected by the proposed site allocation.

Queen Eleanor's Bower is located 1.1km east of the proposed site allocation and is scheduled as a medieval ringwork: a class of defensive monuments which are thought to have been constructed between the 11th and 12th centuries. This particular example is situated on a knoll near the base of the south western side of Haughmond Hill. Whilst the monument is largely covered with trees, which filter views from it, the scheduling description notes that "...there are extensive views of the Severn valley, including the medieval urban centre of Shrewsbury to the south west."

As with Haughmond Hill Camp, these views and the agricultural character of the flatter land below the hill mean that the landscape context of this monument can be readily experienced and appreciated. The development of SHR166 has the potential to introduce modern, large scale buildings into the foreground of the views from the monument towards the medieval core of Shrewsbury. Whilst it is acknowledged that these views are filtered by the tree cover on the monument, there is still therefore potential to cause harm to the significance of the monument, at the bottom end of less than substantial harm, as a consequence of the change to the character of this aspect of the monuments setting. Again, as with the hillfort, this harm could be mitigated to a degree by the design measures set out above.

The Grade II* Belvidere railway bridge (otherwise known as Bridge No. 438) was built in 1848 to a design by the railway engineer. The listing citation describes it as comprising "Chamfered rusticated grey sandstone ashlar piers, engineering brick retaining walls and end piers with ashlar dressings, and painted cast iron arches and decking. 2 segmental skew arches, each consisting of 6 cast ribs with lattice spandrels; central pier with rounded rock-faced cutwater; coped curved retaining walls and square end piers with rock-faced ashlar quoins and stone caps; late C20 balustrade replacing 1848 one."

The bridge's setting is considered to comprise the railway line to its east and west, together with the immediate corridor of the River Severn to the north and south, where it can be readily appreciated from the Severn Way footpath on the west bank of the river. The land within the proposed site allocation is not, therefore, considered to contribute to the bridge's significance or to form part of its setting.

The Uffington marching camp is considered to be one of a number of early Roman military camps known from cropmarks in the wider area around the Roman city of Wroxeter. These camps are thought to have been established during the immediate conquest period in the mid-1st century AD and prior to the establishment of a more permanent legionary fortress at Wroxeter itself. Analysis of the cropmark evidence for the Uffington example indicates that it comprises a rectangular main enclosure of 19ha, together with an additional 2.6ha annex on its north-eastern end. The only

previous archaeological investigations of the site comprised a watching brief during the construction of the A49 bypass across it in 1988-1990. No features were observed during the stripping of the road corridor, so an evaluation trench was subsequently excavated at the northern end to try and locate the junction between the enclosure and the annexe. A curving ditch, 0.7m wide and 0.3m deep was sectioned, and this had been cut by two parallel v-profiled ditches that were 1.2m wide and 0.65m deep. No finds or dating evidence were recovered from any of these features, which were sealed beneath a buried plough soil that contained medieval and post-medieval pottery. Given these results and those from other similar sites elsewhere, combined with the temporary nature of such sites, it is likely that the principle remains of the camp are likely to comprise the below ground remains of the perimeter ditches and gates and possibly other negative cut features such as bread ovens. The troops stationed within the camp are likely to have been housed in tents and it is therefore unlikely that any buildings were constructed within it.

Whilst it is considered that an employment use on SHR166 would have a direct effect on the non-designated Roman marching camp, resulting in its partial or total loss, mitigation could be provided by excavating the site prior to development. This would have the potential to significantly advance knowledge of the military conquest period in the middle Severn Valley and the early Roman period in the region in general. A phased approach would be necessary, comprising an initial desk based assessment and field evaluation consisting of a geophysical survey and evaluation trenching prior to submission of any planning application, together with a main phase of mitigation secured by a planning condition, the design of which would be informed by the results of the desk based assessment and field evaluation.

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22.02.21