



Historic England

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Our ref: PL00536983

3 October 2022

Dear Vicky

DRAFT HEREFORDSHIRE MINERALS AND WASTE PLAN - CONSULTATION ON HERITAGE IMPACT ASSESSMENTS (HIA)

Thank you for the information sent through to me on 25 August 2022 in relation to the above. We have had opportunity to assess the further HIA information for the four sites we previously raised issues about and our comments on the information are set out below. We refer also to previous correspondence on the draft Plan.

Shobdon and Upper Lyde allocations - The reports for both sites set out current knowledge on these important, non-designated archaeological landscapes known for the quality and preservation of their archaeological features. The reports provide a valuable evidence base for the draft Plan in respect of the historic environment issues for the proposed allocations and address earlier concerns in respect of these sites. The proposed policy criteria (archaeology) for both sites would assist with setting out the Council's aspirations for the site allocations in terms of meeting NPPF para 194 requirements at planning application stage.

Leinthall - The HIA is light on consideration of the values of the setting that contribute to the significance of Croft Ambrey, both as an IA hillfort and also as a feature and prospect in the designed landscape to Croft Castle, and also in respect of other assets. However, the report does identify our principle concern that there will be a moderate to high impact on Croft Ambrey through this proposal in its setting.

Our previous position was an objection to the soundness of the allocation due to the lack of early regard for the significance of heritage assets, ie Plan process, rather than an objection to the allocation in principle. We would recommend revised policy criteria wording to ensure that an appropriate mitigation strategy is embedded in the working of any quarry at the proposed extension site. In this case it will be managing the cumulative visual harm within the setting of heritage assets.

This could include landscaping through tree planting, though as highlighted in the report tree planting would have minimal mitigation benefit. Another option could be seeking restoration to be delivered alongside extraction to ensure that the extent of



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working areas is restricted so that the cumulative visual harm is managed.

We do not agree with the current wording in relation to heritage assets in Policy M4 since the Plan should already be able to demonstrate that the allocation site would be deliverable and developable in respect of historic environment matters, including impact on heritage assets and/or their setting. We would be happy to discuss revised policy criteria wording ahead of the EIP.

Wellington - It is noted that the conclusion of the HIA for Wellington is that there is likely to be archaeology of similar quality and significance to that encountered in the existing extent of quarrying at Wellington, ie regional significance.

The HIA recognises that the Lugg is a demonstrated extensive and rich archaeological landscape, that previous work has identified a complicated multi-period site with extensive and unique archaeological remains and that there is strong indication that this archaeology would continue into the proposed quarry extension.

We note that Policy M3 includes a relevant policy criteria for archaeology which sets out that mitigation for direct impact will include recording, protection or recovery of any assets.

In terms of setting impacts, the HIA considers negative setting impacts to Sutton Walls Iron Age hillfort and to St Marys Church (GI), Marden. We note that the HIA considers potential for mitigation through bunding or planting. The relatively open and level landscape makes a positive contribution to the setting of Sutton Walls Iron Age hillfort preserving the topography of the floodplain environment that it overlooked. Based on archaeological evidence this was a landscape of settlements and individual farms during the Iron Age and the landscape would have been significantly farmed with a mix of arable and pasture fields, interspersed with pockets of woodland much as today.

Whilst sitting more with the decision making process for an application, rather than the draft Plan, we would wish to set out a marker that we would advise against bunding as this introduces an alien landform into the setting. In terms of tree planting, we suggest this could be designed to reflect local character and using small pockets of trees to diffuse keys views rather than block the site would be likely to work better with local character. We appreciate this level of detail would not be appropriate to include in the Plan as a criteria at present but wished to highlight based on the HIA information presented as part of the Plan evidence base.

As with the Leinthall site, and our previous correspondence, we do not agree with the current wording in relation to heritage assets in the Policy for the site since the Plan should already be able to demonstrate that the allocation site would be deliverable and developable in respect of historic environment matters, including impact on heritage





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assets and/or their setting. We would be happy to discuss revised policy criteria wording for 'heritage assets' ahead of the EIP.

I hope that this information is of use at this time. We look forward to discussing further in due course. Do not hesitate to contact me should you have any queries.

Yours sincerely,

Rosamund Worrall

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