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Dear Andrew

13/04990/FUL Change of use of Pontesford Hill from harvested woodland area to an outdoor creative and educational area, creation of a natural outdoor amphitheatre, a replica working Iron Age camp, provision of additional parking area, Natural Burial ground

While the AONB Partnership is in general supportive of small educationally orientated tourism and visitor initiatives, it is important that such developments are at appropriate locations. **In the case of this proposal there are serious concerns in regard to its suitability at the Pontesford Hill location and the AONB Partnership strongly objects.**

The level of supporting documentation is inadequate and contains some serious errors. In addition there appears to have been little or no consultation with relevant bodies or the local community in advance of the proposal submission. Paragraph 115 of the 2012 National Planning Policy Framework states that *"Great weight should be given to conserving landscape and scenic beauty in... Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty."*

The AONB Partnership considers that this development will have a negative impact upon a sensitive area within the Shropshire Hills AONB. In more detail the AONB Partnership objects to the elements of the proposal as follows:

Outdoor Amphitheatre:

The proposal here is to reinstate a turf-covered drystone wall, within an area of regenerated deciduous woodland and to construct an open amphitheatre. The location for these works is centred at NGR 340797,305442 within 40m of the constraint area for the Scheduled Ancient Monument SAM 33839, (Pontesford Hill Camp, a small multivallate defended enclosure). There is no given rationale for the reconstruction of the drystone wall and though probably of comparatively recent origin, the proximity of this feature to the SAM makes it part of the historic landscape development, as such it accrues archaeological significance. The proposed construction of the outdoor amphitheatre lies against this wall, between the wall and the SAM boundary. There are no details given for the size of this structure, the nature of its construction or how many individuals it is designed to seat. There are implications in terms of access and services if a substantial number of individuals are to be visiting such a site at any single time and this consideration is not addressed within the proposal.

Replica Iron Age Camp:

There are important considerations relating to any construction in a location with such a high level of archaeological sensitivity. The site given as an example for such a reconstruction is Castell Henllys in Pembrokeshire, located between Newport and Cardigan. Here a series of replica Iron Age huts have been

built within a small defended settlement. The reconstructed circular huts are built on the sites of original huts which have been fully excavated and recorded.

The nature of such invasive archaeological recording destroys the integrity of the site, rendering it effectively archaeologically sterile and so available potentially for some form of reconstruction. In the case of the proposed structures and location this is not the case. The proposed development site lies only 80m south-west of SAM 33839, Pontesford Hill Camp, a small multivallate hillfort. This area of relatively flat land, south of the enclosure entrance, has clear potential for intact archaeological deposits. Prehistoric hut structures are usually built using structural wall posts sunken into the ground to a depth of 0.5m or so, this is the case in the given example of Castell Henllys. Where there are potentially intact archaeological deposits the excavation of such post holes would be damaging to any surviving archaeological evidence. A further consideration is the potential for confusion that such a reconstruction could create for any long term future archaeological investigations.

Iron Age Hillfort:

The monument identified in drawing AH 01 is the scheduled ancient monument (SAM) 33839 old ref Salop 98 designated as a small IA multivallate hillfort. The site currently lies under a vegetation cover of grass and bracken with some hazel and several middle aged oaks. The only evidence of any activity on the site when visited was an old bonfire site and there was no sign of any litter. While it would benefit from some management, bracken removal and perhaps some limited tree and scrub thinning the current regime is considered appropriate to both the SAM and its landscape context. The proposal documentation states that the application is for a change of use to Class D1 museums and education centres for this area. There is a proposal to investigate the site using a combination of remote sensing techniques to include LiDAR, resistivity and magnetometry with the intent of recording the interior layout of the site.

Scheduled Monument Consent (SMC) will be required from English Heritage (EH) for all of the above, as will any future use of the site. It should be noted that unless LiDAR data is already recorded such airborne remote sensing will be prohibitively expensive and is more appropriate to landscape based investigation. The monument itself is 164m SW-NE by 125m NW-SE, a comparatively small site. A more appropriate and cost effective method of recording would be to undertake a conventional instrumental topographic and hachure survey, to be carried out by an experienced archaeological surveyor. The ground remote sensing methods proposed for sub-surface recording; resistivity and magnetometry are likely to be problematic in regard to the close proximity of the underlying rock to the ground surface, evidenced by outcropping around the west side of the enclosure and by exposures in the side of the flanking hollow way on the south-east.

The proposal goes on to state an objective of recreating the internal layout of the hillfort, by placing surface mounted replica buildings within the fort. The visualisation example for such a reconstruction provided on page 5 of the provided 'Design and Access Statement' is not, as labelled, a hillfort but is an example of a medieval motte and bailey castle dating from around the 12th Century AD.

For any meaningful reconstruction, a high level of evidence would be required. The suggested techniques for non-invasive investigation are in this case unlikely to provide a sufficient level of information to support such a reconstruction. However it is considered that such physical works within the monument would detract from the character of the monument and its setting rather than enhancing it. It seems also likely that such an approach would create a target for vandalism, unless fenced off from public access, any such security measures would again damage the setting of the monument.

Natural Burial Ground

The area identified as a potential natural burial ground is c19ha in area and occupies most of the woodland area on the NW flank of the hill, running from 340942,305490 in the NE to 340565,304740 in the SW. This is a steeply sloping hillside falling from 280m AOD in the SE to 190m AOD in the NW, a fall of 90m in 250m. The slope is in places covered with igneous stone scree, immediately below the leaf litter. Outcropping stone and exposures also show that the sub-surface stone and bedrock is close to the surface. These are physical, geological conditions which seem likely to make the site unsuitable as a burial ground.

There are also concerns in respect to the natural drainage of the hill and possible contamination of ground water aquifers which supply water to local properties. A detailed geological and environmental survey would be a prerequisite of any such development.

Access and car parking

The existing informal car parking area is small and the proposal includes the creation of a further 13 parking spaces by extending the existing spaces into the woodland. A further 27 over-spill spaces are proposed in an area of coniferous plantation at 341023,305390, which is in separate ownership. It lies some 346m to the south with access along a public bridleway. This is currently a narrow, steep and muddy track which would require extensive widening and surfacing to facilitate this car parking area. This right of way is nevertheless very well used by the local community and visitors to the hill. Mixing pedestrian, horse and motor vehicle is likely to create considerable problems and potential safety risks. The proposed over-spill car park would significantly change the character of a sensitive area on the approach to the very popular Earl's Hill Nature Reserve, and yet seems too far away from the other proposed facilities to function well for its intended role.

Though no information is given in relation to visitor numbers, it is possible from the proposed number of 40 car parking spaces, to estimate a visitor throughput range from a minimum of 40 to a maximum of 160 at any one time. The public access road to the hill is a narrow lane and a significant increase in traffic could be problematic.

In summary

The proposal in its present form appears ill-conceived and under developed and the AONB Partnership has no choice but to object to the proposal. There is however scope to improve and enhance the access, understanding and management of the site, and our Stiperstones and Corndon Hill Country Landscape Partnership Scheme, funded principally by the Heritage Lottery Fund, may be able to assist with this. Given the proximity to the village and the high level of public use, any scheme designed to make significant changes to management should include at the earliest stage full consultation with all relevant public bodies and the local community.

Yours sincerely

G Barratt
Planning & Landscape Officer
On behalf of the Shropshire Hills AONB Partnership