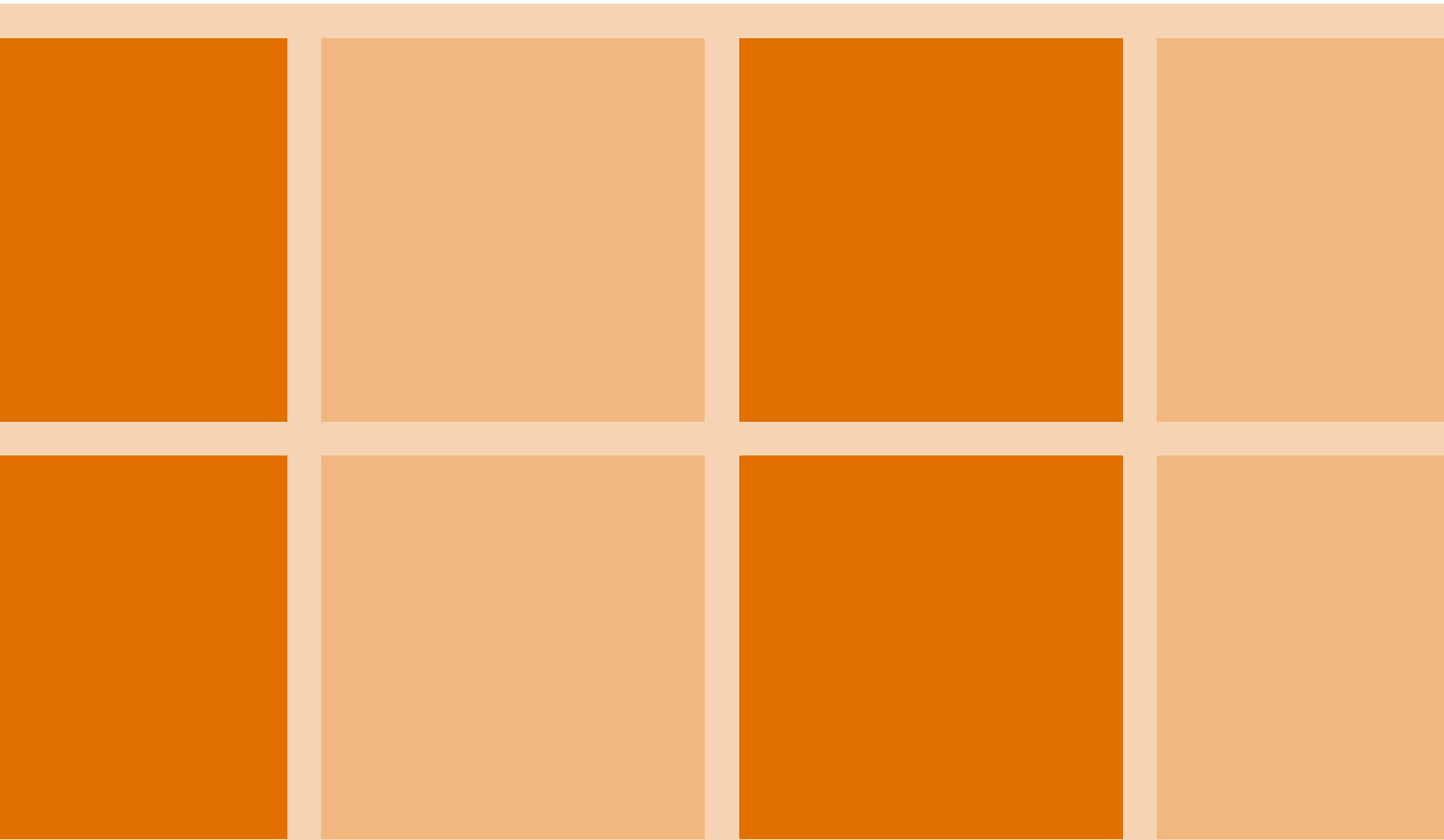


Technical Paper - Historic Environment



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1 Introduction

1.1 This paper sets the national and local planning context for the protection of the borough's built heritage and provides a summary of the evidence used to formulate the policies and designations within the Telford & Wrekin Local Plan. It demonstrates why the Local Plan's housing and employment site allocations have been identified and justified having regard to heritage matters. It also reviews relevant submissions received on the evolving plan and explains how the Council has responded to them in the finalisation of its heritage policies.

2 National and local considerations

What is the historic environment?

2.1 The historic environment is one of the borough's most important assets, providing a finite, irreplaceable source of information about the past. It provides the borough with character and a sense of local distinctiveness which creates a high quality environment. The historic environment includes archaeology, individual buildings and settlements and the wider landscape. Understanding the role of Telford and Wrekin's built and cultural heritage and how it can be protected and enhanced is vital to the success of delivering the vision of the Local Plan.

Legislation and Planning Policy

2.2 There is a comprehensive set of national legislation and guidance that informs how the historic environment is to be protected and managed. This has and will continue to evolve over time. The key components at the national level are currently:

- Planning (Listed Building and Conservation Areas) Act 1990;
- Ancient Monuments and Archaeological Areas Act 1979;
- The National Planning Policy Framework; and
- The National Planning Practice Guidance

2.3 The National Planning Policy Framework (NPPF) is very clear that the historic environment is a key part of sustainable development. There are three dimensions to sustainable development: economic, social and environmental. The NPPF states that local authorities should strive to "conserve and enhance the historic environment" and ensure that local plans set out positive policies for conservation of these assets. This can include heritage assets that are at risk of decay, neglect and other threats. The term 'heritage assets' can apply to a variety of buildings and features that are situated in a landscape, this can include- registered parks and garden, listed buildings, local interest buildings, conservation areas, scheduled ancient monuments and World Heritage Sites.

2.4 The NPPF recognises that heritage assets are irreplaceable and should be conserved in a manner that is appropriate for their significance. Through the conservation of these historic assets benefits to the local community in terms of enjoyment, cultural identity and economic regeneration can be delivered.

2.5 Local Plans should have a positive strategy in which heritage assets are brought back to life and into a use which is consistent with their conservation that contributes to wider sustainability aims. The core principle that should underpin Local Plans and decision making is that heritage assets are conserved in a way appropriate to their significance to society and so they can be enjoyed for the quality of life they bring to future generations.

2.6 Identifying assets are paramount to determining planning applications, designated heritage assets such as listed buildings, registered parks and gardens and scheduled ancient monuments are already identified on the National Heritage List for England, or locally via a List of Buildings of Local Interest. However during the development control process other assets may be identified and added to those records.

Duty to Co-operate

2.7 In accordance with the Localism Act 2011, the Local Plan should undergo informal consultation within the Council and with a range of external partners. The Council have been in discussions with Shropshire Council in respect of this authority's positioning alongside the borough's boundary and have also drawn on their archaeological expertise which the Council receives under a Service Level Agreement. Historic England are the national adviser on heritage matters and have also taken a particular interest in the Ironbridge Gorge World Heritage Site. Discussions have been ongoing through the various stages of the evolution of the Local Plan.

Assessment of Heritage Assets in Telford & Wrekin

2.8 The mix of old and new in the borough's built environment is a legacy of its industrial past, its rural heritage and the creation of Telford New Town in the second half of the 20th century. Heritage assets within Telford and Wrekin are both designated (listed buildings, conservation areas, registered parks and gardens and scheduled ancient monuments etc) and non-designated. These are protected through planning legislation helping to ensure their conservation, management and enhancement. The types of assets that exist are listed below:

- Ironbridge Gorge World Heritage Site
- Listed Buildings
- Conservation Areas
- Scheduled Ancient Monuments (SAMs)
- Registered Parks and Gardens
- Buildings of Local Interest

Ironbridge Gorge World Heritage Site (IGWHS)

2.9 The Ironbridge Gorge has a rich industrial history dating as far back as the medieval times and from then the industry in the area developed to when the first cast iron bridge was created in 1776. The Council recognises that the Gorge is unique in its nature and therefore requires policies to ensure that new development is appropriate.

2.10 In 1986 Ironbridge was recognised for its role in the industrial revolution and the Ironbridge Gorge was designated as a United Nations Educational, Scientific and Cultural Organisation (UNESCO) World Heritage Site. The majority of the IGWHS lies within the Telford & Wrekin borough boundary with a small section (south of the authority boundary) within

Shropshire Council. The managing authority of the IGWHS is Telford and Wrekin Council and since 1994 it has been UK Government policy that all UK World Heritage Sites should have Management Plans.

2.11 The first Management Plan was developed in 2001. This plan is currently being reviewed. The Council propose to establish a Supplementary Planning Document (SPD) that will provide detailed development guidance for each of the character areas assessed in the Conservation Area Appraisal.

2.12 In 2012 the Council also developed an SPD for owners and developers who have businesses that are located within conservation areas - "Shop Fronts, Signage and Design Guidance in Conservation Areas". It provides guidance in regards to signage and shop fronts which are subjective features that can change the face of a streetscape.

2.13 The Council has also issued an Article 4 direction restricting some permitted development rights in the World Heritage Site area.

Listed Buildings

2.14 The borough has approximately 800 listed buildings (refer Table 1) which contribute to the borough's quality of life and its historical significance. These include churches, houses, schools, cottages, manors and farm houses. These buildings and structures are listed by the Secretary of State, subject to their historical and archaeological interest.

2.15 These grades represent:

- Grade I: Exceptional Interest
- Grade II*: Particularly important
- Grade II: Special interest, warranting every effort being made for their preservation

Table 1 Statutory Listed Buildings in Telford & Wrekin

Designated heritage asset ⁽¹⁾	Total number of heritage assets in Telford & Wrekin
Grade I	12
Grade II*	52
Grade II	744

2.16 Some of the borough's listed buildings are included on Historic England's Heritage 'Heritage At Risk' Register'. The register records the condition of the built heritage in England and assesses the building through using a built structures assessment. Buildings that are considered places of worship are assessed against the places of worship assessment.

2.17 The Council therefore consider it appropriate to provide locally distinctive policy in this context.

1 actual number is subject to change and accurate at time of writing

Conservation Areas

2.18 There are seven Conservation Areas in the borough, all of which have Conservation Area Appraisals and Management Proposals except Wrockwardine and Horsehay & Spring Village for which new appraisals are currently being prepared.

Table 2 List of Designated Conservation Areas in Telford & Wrekin

Location	Date designated
Severn Gorge	1971 (extended Oct 1980)
Wrockwardine	April 1999
Horsehay and Spring Village	April 1999
Wellington	January 1982
Newport	1970 (extended November 1976)
Edgmond	March 1981
High Ercall	March 1981 (extended 2010)

2.19 Within the Severn Gorge Conservation Area there are over 400 listed buildings of which two are Grade I and eighteen are Grade II*. In addition, there are seven Scheduled Ancient Monuments (SAMs). There are also two Sites of Special Scientific Interest (SSSI) within the World Heritage Site.

2.20 Elsewhere in the borough, the heritage in the borough is diverse with urban conservation areas in Newport, Horsehay and Wellington. Wellington was built near Watling Street which is a Roman road linking London with the city of Virconium (now Wroxeter). Wellington has grown over the years since its early days as a medieval market town. It has retained its medieval street layout and narrow street pattern. Horsehay and Spring Village is rich in industrial heritage, being a former site of the Coalbrookdale Company's furnaces. Rows of workers cottages built by the Darby family form part of the Conservation Area as well as other examples of structures linked to the 'Horsehay Works'.

2.21 Newport is a medieval market town which has a unique spatial quality due to its surviving medieval street patterns. Some of Newport's medieval buildings still remain. However, some have 18th century facades in Regency and Georgian styles covering their original features. A few half timbered buildings still exist from the medieval and Tudor times which add variation to Newport's landscape.

2.22 The rural conservation areas of High Ercall, Edgmond and Wrockwardine complement the borough with their historic village centres. The properties in High Ercall are mostly large detached properties that sit in big plots which are set back from the road. These properties characterise the conservation area due to them having period appearance, dating from the medieval century to the 19th century. Wrockwardine Conservation Area encompasses almost the entire village. It has remained relatively unchanged with several historic landmark buildings still in use and noticeable lack of pavements and narrow roads contributing to its rural character

and setting. The Edgmond Conservation Area covers some 75 properties with a variety of styles ranging from Yeoman's cottages, farmsteads, grand country houses to Victorian style villas. These properties are normally set back from the road behind boundaries which are mature trees and sandstone walls.

Registered Parks and Gardens

2.23 There are numerous historic parks and gardens in the borough. However, three of these are registered Historic Parks and Gardens which are all listed as grade II listed. These are:

- Lilleshall Hall
- Orleton Park
- Chetwynd Park.

2.24 Parks and gardens within the borough should be preserved and enhanced where possible to ensure they can be enjoyed by future generations. These parks and gardens should be retained as they contribute to the culture of the adjoining urban and rural landscapes.

Scheduled Ancient Monuments (SAMs)

2.25 There are 29 Scheduled Ancient Monuments in the borough, some of which are listed on Historic England's 'Heritage At Risk' Register'. The purpose of this register is to record listed buildings as well as those heritage assets which are at risk of deterioration and could be possibly lost for ever if work is not carried out. For example, the Roman Camp on Red Hill is a monument which is recorded as being 'at risk' as the site is considered vulnerable due to development being proposed nearby. Therefore it is vital that planning applications in the borough that may affect these sites consider these assets to ensure no additional harm comes to them. For this reason, SAMs should be clearly identified on Local Plans Policy Maps.

Buildings of Local Interest

2.26 The Council has historically collected a list of buildings of Local Interest. All of these 500 buildings have received protection through policy and the Council consider this is especially important that such protection follow through into the new Local Plan especially given that Telford is a new town. Examples of local interest buildings in the rural area include Duke of Sutherland style cottages which have distinctive and attractive features that are unique to the borough's historic rural environment.

3 Local Plan heritage policies

Local Planning policy considerations

3.1 Arising out of the foregoing analysis, the Local Plan has identified heritage objectives and a suite of heritage policies.

3.2 The three heritage objectives are:

- 25. Achieve high quality urban design which responds to local context and provides opportunities for innovation;

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- 26. Safeguard the character and setting of the borough’s built and natural heritage, including Ironbridge Gorge World Heritage Site and the Wrekin;
- 27. Protect and enhance the borough’s local distinctiveness.

3.3 It is also appropriate to prepare policies covering the following types of heritage assets:

- Ironbridge Gorge World Heritage Site (Policy BE3)
- Listed Buildings (Policy BE4)
- Conservation Areas (Policy BE5)
- Buildings of Local Interest (Policy BE6)
- Parks and Gardens of Historic Interest (Policy BE7)
- Scheduled Ancient Monuments (SAMs) and archaeology (Policy BE8)

3.4 Brief commentary is offered on each of these topic areas below. As the numbering of the heritage policies has changed during the evolution of the Local Plan, policy reference numbers quoted in this paper are those in the Regulation 19 (Publication) Version of the plan.

3.5 It is also necessary to provide a justification for the various employment and housing allocations in the Local Plan.

Assessment of heritage policies in the Telford & Wrekin Local Plan

3.6 Paragraphs 126 to 141 of the NPPF set out national policy for plan making with regard to heritage. Paragraph 126 directs councils to adopt a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk. Such a strategy should: seek to secure viable uses for heritage assets consistent with their conservation; recognise the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; make sure new development makes a positive contribution to local character and distinctiveness; and show the opportunities the historic environment makes to the character of a place. A strategy for the historic environment needs to be based on a clear understanding of the historic assets in the area, including assets at risk. The overview above provides such an understanding.

3.7 The table below demonstrates how the Council, through a number of Local Plan policies, have recognised the above assets and addressed the requirements of national planning policy.

Soundness test and key requirements	Possible evidence	Evidence provided
Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk	A strategy for the historic environment based on a clear understanding of the historic assets in the plan area, including assets most at risk.	Policies BE3, BE4, BE6, BE7 and BE8 deal with the management and protection of the boroughs designated and non designated heritage assets. BE3 gives the opportunity further policy to be created for the World Heritage Site. The Ironbridge World Heritage Site Management will be revised and updated.



Soundness test and key requirements	Possible evidence	Evidence provided
	<p>A local list of historic assets that can be obtained from the Council.</p> <p>Policies which promote new development that will make a positive contribution to character and distinctiveness to historic assets.</p>	<p>Conservation area appraisals suggested in BE5 which will identify the conservation area features. These documents will be regularly updated and will eventually be created into SPD's.</p> <p>This paper identifies and describes the heritage assets within the borough, including those assets at risk. The significance of individual assets is described and opportunities to draw on the industrial heritage.</p> <p>BE6 states that the list will be reviewed on a periodic basis by the Council, and additional buildings will be added to the list following an assessment.</p>

Site allocations

3.8 The Local Plan has allocated 17 housing and 28 employment sites for future development. Before deciding whether or not these sites were suitable for allocation, each site under went a mapping exercise. This exercise identified the number of heritage assets (as well as other constraints) located within an allocation and the number of assets located within 200m of a sites boundary. This exercise gave an insight into the setting and character of each site area to ensure that the chosen sites would not have a detrimental effect on existing heritage assets or the setting of them. The results of the exercise are listed below. These showed that the only sites to feature a listed building were H2 – The Woodhouse Priorslee and H5 – Beeches Hospital.

Employment Sites

3.9 E3 is located at Hortonwood West and E11 and E12 are located at Hadley Park East, these are the only employment sites with heritage assets within 200m of their boundaries. These listed buildings are the Hadley Park Windmill and Hadley Park House, both of which are grade II listed. The windmill and the house are situated on the same estate and their origins and date back to the 18th century. By reason of their close proximity development at these sites will be required to give special consideration to design, materials and how the site affects the setting of the heritage asset.

3.10 Housing Allocations

3.11 H1 Land at Muxton, Telford: Within 200m of the site boundary there are 18 buildings of local interest and 8 listed buildings.



- 3.12** H2 - The Woodhouse Priorslee: Within 200m of the site boundary there are two scheduled ancient monuments and one listed building. Historic England advice was sought on a planning application to develop parts of this site. The advice confirmed that Historic England did not have any objection to this proposal.
- 3.13** H3 Sutherland School, Gibbons Road: Within 200m of the site boundary there are three Listed Buildings of Grade II status.
- 3.14** H4: Plot D, Pool Hill Road, Dawley; Within 200m of the site boundary there are two listed buildings
- 3.15** H5 Beeches Hospital: The site is the only allocated site to have a grade II listed building located on it.
- 3.16** H6 Former Madeley Court School Site: There are no listed buildings located within 200m of the sites boundary; however the Ironbridge Gorge Conservation Area is within 200 m of the site. This site is the former Madeley Court School which has now moved to another location. Some of the site has been developed for A1 (shop) and A5 (take away uses). It is proposed to allocate the rest of the site for housing. Being conscious of this asset nearby and through careful planning, development should not cause harm to the setting to the Conservation Area.
- 3.17** H7 The Former Phoenix Secondary School Site: No historic assets within 200m of the site's boundary.
- 3.18** H8 The Charlton School, Seven Drive, Dothill: There is one Grade II listed building within 200m of the site's boundary which is Dothill House North Road .
- 3.19** H9 The Former Swan Centre, Grange Avenue, Stirchley. No historic assets within 200m of the site's boundary.
- 3.20** H10 Land at the Hem, Telford: No listed buildings within 200m of the site's boundary, however there is one local interest building called Nedge Farm House.
- 3.21** H11 Land at Holyhead Road, St Georges: and H12 Land North of Priorslee Roundabout has only one listed building within 200m of the site's boundary which is St Peters Church, a Grade II listed building.
- 3.22** H13 Land south of Springfield Industrial Estate, Station Road, Newport:.Within 200m of the sites boundary there are three Grade II listed buildings.
- 3.23** H14 Blessed Robert Johnson, Whitchurch Drive: There are no heritage assets located within 200m of this site's boundary.
- 3.24** H15 Land off Majestic Way, Aqueduct: No heritage assets are located within 200m of this site's boundary.
- 3.25** H16: Old Park 2, Park Lane: One building of local interest is located within 200m of the site boundary.

3.26 H17: Lawley West: 1 building of local interest named Lawley Primary School is located within 200m of the site boundary.

3.27 This selection process clearly demonstrates that the location of existing heritage assets has been carefully considered through the allocation of housing and employment sites.

3.28 The Council is of the view that all of these sites could be developed having regard to their heritage status or proximity to heritage assets. Historic England have indicated in connection with housing site H2 that they did not have an objection to this being developed. Site H5 will be more sensitive to develop because of the location close to a listed building but it is submitted that some enabling development is needed to restore the Beeches, a long vacant listed building.

4 Review of Regulation 18 and Regulation 19 representations

Regulation 18 (Consultation Version) Local Plan policy representations

4.1 A limited number of comments were received during the Regulation 18 consultation.

4.2 Historic England wrote a comprehensive range of comments on these policies, the thrust of which is to amend slightly the wording associated with the individual policies. Other representations referred to the fact that the scope of this part of the chapter was not wide enough. It should aim to protect historic but unlisted buildings in Wellington such as Haybridge Hall and the Clifton cinema and promote projects such as the restoration of the Shrewsbury & Newport canals. There were no objections to a policy on locally listed buildings (Policy BE4) but one architect suggested that there should be an opportunity for owners to be part of a process deciding what building is included and why as a means of securing their support to preserve these buildings. Again, there was broad support for the policies for Listed Buildings, Conservation Areas and Parks and gardens of historic interest (Policies BE3, BE5 and BE6) but two residents wrote in to ask for it to be strengthened to prevent demolition. Five representations were received in connection with Policy BE7 (Ironbridge Gorge World Heritage Site). None opposed the policy but made suggestions to improve it or to express support for a future Supplementary Planning Document. One representation questioned the consistency of the policy with the site allocation at The Beeches (Site H5).

4.3 In light of these comments received the historic environment section has been re-structured to emphasise the World Heritage Site above other assets. Additional photographs were added to give examples of different types of assets. The area of the allocation at Site H5 was reduced.

Regulation 19 (Publication Version) Local Plan representations

4.4 Historic England wrote a further set of detailed comments on this draft of the Plan, the thrust of which is to recommend further slight amendments to individual policies. One developer opposed Policies BE4 to BE6 on the grounds stating that they are inconsistent with the NPPF. A local councillor and one local resident recommend additional controls on conservation areas. Two representations have been received which state that the Local Plan has not taken account of the desire to protect and restore the Shrewsbury to Newport Canal. Historic England did not object to Policy BE7 Parks and gardens of historic interest but have advised on the need to use the new title of the relevant expert consultee body.

Responses to submissions made

4.5 The Council has carefully considered all representations made on this section. It proposes minor modifications to address points of clarification around the protection of archaeological assets and registered parks. No other changes are deemed necessary to address a soundness matter.

4.6 The Council strongly disagrees with the submission that its policies covering listed buildings, conservation areas and locally listed buildings are inconsistent with the NPPF. The policies are clearly locally applicable and pertinent to the borough. The tests for Policies BE4 and BE5 (Listed Buildings and Conservation Areas) have drawn on the legal tests set out in the Planning (Listed Building and Conservation Areas) Act 1990 and no more. By contrast, the policy test for Policy BE6 (Buildings of local interest) is lower.

4.7 Two other outstanding areas of difference exist between the Council and other groups. These cover the status of the Shrewsbury to Newport Canal and Site Allocation H5. Brief comments are offered on each of these below.

Shrewsbury to Newport canal

4.8 The route of this disused canal contains a number of heritage assets including at Longdon on Tern (scheduled ancient monument), Wappenshall (canalside listed buildings and a scheduled ancient monument) and Newport (a scheduled ancient monument comprising a Roving bridge and lock). These are already protected in law. However, no justification has been provided for designating the whole of the canal route or any part of it as a heritage asset or writing a heritage orientated Local Plan policy to restore the canal.

Site Allocation H5

4.9 The Council recognises there is a Grade II listed building on site allocation H5 (The Beeches) although with effective management and mitigation it is the Council's view that this site is acceptable for allocation with any housing being sited to the north of a distinct band of trees on site.

4.10 The listed building was originally called the Madley Union Work House and was converted into an NHS Beeches hospital in 1948. It sits on substantial grounds. Since the NHS vacated the site it has remained derelict and in urgent need of repair and is in the process of being sold. Given the relatively low values for housing land in the borough, the buildings are not likely to be restored without some enabling development.

4.11 Although the site is located within the Ironbridge World Heritage Site and Severn Gorge Conservation area, the NPPF makes clear that LPAs should look for opportunities for new developments within the setting of heritage assets to enhance or better reveal their significance. Allocating this site for housing will provide the opportunity to bring the site back into use, improve the condition of the listed building on site and create a new community within Ironbridge.

5 Conclusion

5.1 The Council has had careful regard to national planning policy and relevant primary legislation in the drafting of its heritage policies. This paper shows the Council has a good grasp of heritage matters locally and has drafted a suite of policies that reflect local conditions. It has attempted to address relevant representations where it is expedient to do so for reasons of soundness and to help clarify policies.

5.2 The Council recognises there are some outstanding objections but has clarified its policy position and explained why it cannot support them.