



## TELFORD AND WREKIN LOCAL PLAN EXAMINATION 2016

### Historic England (HE) Statement

#### 1.0 Overview

- 1.1 Historic England made representations to the Telford and Wrekin Local Plan at both Regulation 18 and Regulation 19 stages. It was noted that various changes to the Plan had been made between stages and these were noted in our Regulation 19 response.
- 1.2 Within its representations, Historic England has welcomed the approach to the historic environment, heritage assets and their setting in so far as Policies BE3, BE4, BE5, BE6, BE7 and BE8 of the Submission Plan set out a positive strategy for the historic environment in line with NPPF requirements (Paras 126 and 157). However, this has not remained constant in other parts of the Plan namely site selection.
- 1.3 Historic England raised concern at the Regulation 19 stage about an additional part to Policy EC12 which introduced the potential for a major hotel development within or immediately adjacent to the Ironbridge Gorge World Heritage Site. We are aware that the Submission document suggests the removal of the word 'major' from the text.
- 1.4 Concerns relating to the site selection process for housing sites were maintained throughout the representations. In particular H5 The Beeches site since the existing Grade II former workhouse Listed Building at that site could potentially be considered for any additional hotel requirement associated with the Ironbridge Gorge World Heritage Site indicated within Policy EC12 which was revised during the Regulation 18 and 19 consultation stages.
- 1.5 Historic England has offered to discuss the approach to site selection with the Local Authority at the consultation stages but this offer has not been taken up. A meeting has taken place at which Telford and Wrekin Council advised of the likely changes to be made at the Regulation 19 stage.
- 1.6 Historic England is aware that the Inspector will consider our previous comments in addition to this statement and submits that these

representations clarify our position without the need for attendance at Week 2 hearings. However, should the Inspector consider clarification on any points is required at the round table discussions we would be happy to attend to discuss matters in person.

- 1.7 Please note that elements of Matters 6 and 8 are addressed within this statement rather than separate statements since we are of the view they are interconnected.

## **2.0 HE Current position in relation to the Matters, Issues and Questions Paper**

- 2.1 With regard to the Inspector's Matters, Issues and Questions Paper, Matter 6 Environment, Issue 6.4 Historic England is satisfied that the key policies relating to the Historic Environment (BE3 – BE8 inclusive) fit with the requirements of NPPF Para.132 and would provide a sound base for the consideration of development proposals affecting the historic environment.
- 2.2 However, with regard to Issue 6.4 and Matter 8 Site Allocations Issue 8.2 Historic England maintains its' previously expressed concerns about the approach to site selection and questions the soundness of the plan.

## **3.0 HE Current position in relation to the Telford and Wrekin Local Plan**

### **3.1 *Site Selection* -**

3.1.1 Our concerns in relation to the overall site selection methodology are maintained. The information available in relation to site selection, taking into account the evidence base documents for the plan available during the process, does not demonstrate that the impact on, or harm to, the significance of the historic environment, heritage assets and their setting has been considered in a robust and transparent manner.

3.1.2 The Historic Environment Technical Paper sets out that the historic impact assessment was undertaken as a mapping exercise, with a 200m radius around sites. The document contains no justification as to how the figure of 200m was decided upon, or how this takes into account setting which could be from further afield if considering views in to and out of sites. Furthermore, the document then goes on to list heritage assets

in relation to site allocations with no further assessment of how any impact on or harm to the significance of the heritage asset, or its setting, has been considered.

- 3.1.3 As set out in HE's Advice Note 3: The Historic Environment and Site Allocations in Local Plans *'It is important to understand the significance of any heritage assets that would be affected by a potential site allocation. This involves more than identifying known heritage assets within a given distance, but rather a more holistic process which seeks to understand their significance and value'*. There is no evidence to demonstrate that this has taken place, and in cases where potential harm could occur it has not been demonstrated how any harm has been considered. As such, it is submitted that the approach to site selection within the plan does not meet the requirements of NPPF Para.132.

## 3.2 Housing Allocation H5 –

- 3.2.1 HE maintains its concerns about the site selection methodology particularly in relation to The Beeches site since the evidence base suggests the level of development proposed would be for 'enabling' reasons which have not been demonstrated since the heritage asset is not deemed Heritage at Risk. Our previous comments set out that alternative uses for the site e.g. hotel as per Policy EC12, have not been considered in the supporting evidence. In addition, concerns about site selection methodology apply to this site, as with others in general as per our previous comments and those set out in 3.1 above.
- 3.2.2 Since our previous comments on the Plan were made, planning and listed building consent submissions have been made to the Local Planning Authority (LPA) (TWC/2016/0562 and TWC/2016/0563). HE was consulted on the application and, whilst there were no serious concerns regarding the scheme, advice was provided in relation to consideration of the World Heritage Site, Conservation Area and their settings, and it was recommended that appropriate conditions be attached to a permission if the LPA was minded to approve the submissions to ensure quality materials and landscaping. The scheme proposes No.53 new dwellings plus the conversion of the existing building into No.36 residential units, so a total of No.89 residential units. Local Plan Table 21 Housing Site Allocations sets out an indicative yield of 106 dwellings at the site. It is noted that the Submission Plan proposes a site size increase

from 2.085ha to 3.445ha with no additional assessment of impact on heritage assets including the Ironbridge Gorge WHS OUV's. Notwithstanding the fact that a formal planning proposal has been submitted, HE's concerns to the site selection approach to the historic environment within the Plan remain the same as previous.

3.3 *Policy EC12* - Our current concerns in relation to Policy EC12 remain. The policy wording states that 'The Council will support' hotel development 'within or immediately adjacent to the Ironbridge Gorge World Heritage Site'. HE is not aware of any evidence base or impact assessment having been undertaken in respect of the historic environment, in particular the Outstanding Universal Values of the World Heritage Site, or any alternative considered sites/areas for such development, to inform the decision that any such development will be supported. Since the plan was submitted the Ironbridge Gorge World Heritage Site Management Plan Draft has been out for consultation (28 June – 5 August 2016) and whilst this addresses tourism it does not indicate any urgent need for a new/additional hotel so does not provide further assistance as an evidence base. As such we maintain our view that this aspect of Policy EC12 is not justified or sound.

#### 4.0 Summary

- 4.1 Historic England maintains its concerns about soundness of the Plan in terms of the approach to site selection. We are aware that the Historic Environment Technical Paper was revised in June 2016 (*B5a Technical Paper within Examination Library*) to include responses to representations. The additional text refers to the site allocation work including that for The Beeches site, briefly setting out what work has already been done, and does not refer to HE comments on Policy EC12. As such, the Paper does not overcome HE's concerns about soundness of the Plan raised previously and above.
- 4.2 In terms of Policy EC12 it may be appropriate to remove the Ironbridge Gorge from the current paragraph and have a separate subsequent sentence or paragraph to address Hotel development, whether conversion or new development, within the Ironbridge Gorge to clarify that such development proposals may (rather than the current 'will') be supported subject to historic environment considerations.
- 4.3 In terms of the approach to site selection it is evident that heritage assets which may be affected by potential site allocations have been

identified. However, there is a lack of evidence to demonstrate that the contribution of the site in its current form in relation to the significance of the heritage asset(s) has been considered, and also what impact the allocation might have on that significance. Nor has it been clearly demonstrated that opportunities to avoid harm have been considered. As such, the Plan is not consistent with national policy in the NPPF, including the need to conserve heritage assets in a manner appropriate to their significance (NPPF Para.132).

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