

Telford & Wrekin Local Plan
Examination in Public
Matter 6, Question 6.4 EiP Ref: K25a

- 1. Can the Council respond to the concerns raised by Historic England (HE) in respect of the site selection methodology (see section 3.1 of document J6/24/21)?**
- 1.1 The Council has taken a proportionate approach to its site selection methodology having regard to the proximity of heritage assets¹.
- 1.2 From the outset, this approach was underpinned by a desire to be satisfied that the allocations would sit well within their surrounding context taking account of a site's topography and surrounding uses, urban grain and proximity to landmarks.
- 1.3 The Council first checked and was able to confirm that none of the proposed allocations were in a Conservation Area or the World Heritage Site.
- 1.4 Thereafter, and in the absence of any distance from the relevant Historic England guidance note², the Council chose a 200m radius to assess other potential heritage impacts. This radius was chosen as an acceptable distance to allow officers to have an appropriate experience of any potential assets including views from, towards, across and, including the asset. There are a number of local factors pertinent to the borough to justify this distance. First, it reflects the fact that Telford & Wrekin - unlike many other predominantly urban areas - is not a local authority where high rise development predominates and the Council is not planning for such development either in its allocations. Furthermore, the 200m radius takes account of the fact that within Telford all of the employment allocations and a number of the housing allocations³ benefit from section 7(1) New Towns Act consents and could be built out without the need for further planning permission or have buildings on them already.
- 1.5 Other emerging Local Plan policies (Policy SP4, BE1 and the other built environment and heritage policies) serve as controls to restrict high rise or other forms of development that would be potentially incongruous in their surrounding context and harm the setting of nearby designated or non-designated heritage assets. The housing allocations have generally assumed 30 dwellings per hectare development (except where there are constraints and the indicative

¹ Doc B5a

² <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets>

³ Sites H4, H10, H11, H12, H15, H16 and H17

yields are lower). The indicative housing yields therefore implicitly assume suburban type housing.

1.6 Thus, a 200m radius is an appropriate starting point in Telford & Wrekin for assessing whether there is likely to be any conflict between proposed employment and housing allocations and heritage assets.

1.7 The Council's assessment (summarised in the Historic Environment Technical Paper) revealed the following results:

- Three employment sites (E3 and E11/E12) are within 200m of two listed buildings in the grounds of Hadley Park to the south Sites E11 and E12. All of the employment sites benefit from Section 7(1) consents for employment use and Site E3 also has a further detailed planning permission for development⁴. In the context of the surrounding built form including the A442 bypass constructed (see Figure 1 overleaf), the Council is satisfied new build development on these three sites could be approved without affecting the setting of these listed buildings subject to an appropriate buffer and the control of the heights of any new buildings on these sites. A detailed appraisal of any future development against Local Plan policies at the planning application stage will ultimately set these parameters.
- Two of the housing allocations (H14 – Former BRJ School site; and H15 – Land of Majestic Way, Aqueduct) are not located within 200m of any designated or non-designated asset;
- Three of the allocations (H10 – The Hem, H16 – Old Park 2, Park Lane, and H17 – Lawley West) are within 200m of a locally listed building. The policy test for Locally Listed buildings in Policy BE6 is lower than that for statutorily listed buildings and new housing of a suburban scale would be compatible with the sites' allocations.
- Eight of the housing allocations (H1, H3, H4, H8, H11, H12 and H13) have one or more listed buildings within 200 m of the site. It is submitted that suburban style housing would not affect the setting of any of these heritage assets either.

⁴ Refer Doc K14 for details

Figure 1 Site Allocations E3, E11 and E12 in the context of the listed building at Hadley Park



- Sites H2 (Priorslee) and H5 (The Beeches) have a number of listed buildings and scheduled ancient monuments within the boundaries of the site. Both schemes have planning permission for development. Historic England was consulted on both applications and did not object to either of them (see Appendix 1)
- Site H6 (Former Madeley School Site) is within 200m of the northern edge of the Severn Gorge Conservation Area and the Ironbridge Gorge World Heritage Site. The site is screened from these heritage assets by a site allocated for retail development in the Madeley Neighbourhood Plan; and, secondly, land levels fall significantly north of the retail development along Court Road so that the site is not visible from the World Heritage Site. Development of this site for suburban density housing was not assessed as likely to have an adverse impact on the character or appearance of the Conservation Area or the Outstanding Universal Value of the World Heritage. The site received planning permission for housing in June 2016⁵.

1.8 Site allocation status does not guarantee that planning permission will be granted. Ultimately, a proposal can only be properly assessed at the planning application stage when all relevant documentation has been submitted and a detailed evaluation can be made against all of the policies in the adopted development plan, paragraph 132 of the NPPF, relevant statutory tests and other material considerations.

2. Can the Council also comment on HE's concerns regarding housing site H5 (see section 3.2 of document J6/24/21)?

2.1 Site H5 (The Beeches) is unique of all the allocations in that it contains a Grade II listed building - originally a workhouse and later a nursing home - which is part of the overall allocation and expected to deliver some of the Local Plan housing requirement. The site now benefits from planning permission for the "erection of 53no. dwellings, conversion of former Lincoln Grange Nursing Home into 36no. dwellings following demolition of parts of Lincoln Grange Nursing Home, with associated internal and external works, access road and landscaping"⁶.

2.2 The Local Plan Strategy and Options paper supported the re-use of heritage assets. Concurrent with the working up the Local Plan to the Regulation 18 draft, there was an extensive history of pre-application discussion and evaluation before the allocation. The site has a number of fundamental

⁵ <https://secure.telford.gov.uk/planning/pa-plansboard-public.aspx?ApplicationNumber=TWC/2016/0165>

⁶ <https://secure.telford.gov.uk/planning/pa-documents-documents-public.aspx?Applicationnumber=TWC/2016/0562>

constraints that mean that the former nursing home could only be brought back into use through enabling development. The main constraint is that it would not be economically viable to convert the building to flats. The SHMA shows there is a very limited market for flats and prices are noticeably lower than that for houses. The building had a number of insensitive additions and the surrounding area has potential geo-technical challenges, a legacy of the mining in south Telford⁷.

Figure 2 Site H5 - The Beeches



2.3 The listed building is separated from other land within the site allocation boundaries to the north by a distinct conifer row of planting which serves to curtail abruptly the visual setting of the buildings (see Figure 2). On the basis

⁷ Although there are no known shallow mine workings on the site.

of this assessment, the Council contends that this site could in principle be developed for new housing.

- 2.4 The Council consulted Historic England on applications for listed building consent and planning permission to develop the site. Historic England did not object to the either proposal at that time.
- 2.5 The final approved scheme will deliver fewer homes than the indicative yield in the Local Plan. This reflects the discretion given to officers to negotiate a final detailed scheme that responds sensitively to its sensitive surrounding context.
3. **Can the Council justify the Local Plan’s support (policy EC12) for hotel accommodation within or immediately adjacent to the Ironbridge Gorge World Heritage Site (WHS)? Specifically, is this approach consistent with (1) national policy on the location of main town centre uses (notably paragraphs 23 and 24 of the National Planning Policy Framework) and (2) the Plan’s approach to protecting the value of the WHS?**
 - 3.1 The evidence base for the need for hotel accommodation comes principally from two studies into hotel market and the branding of the borough commissioned in 2013 and 2014⁸. These studies highlight that Telford town centre has the bulk of the borough’s hotel accommodation and the Council accepts it is appropriate that it should continue to do so by designating a Conference and Exhibition Area within Telford Town Centre. It is implicitly accepted also that the Central Strategic Employment Area (covered by Policy EC1) will continue to support a hotel market as uses ancillary to the surrounding business parks.
 - 3.2 The Council has taken a “policy on” decision to encourage new hotel development in Newport and Wellington town centres too but recognises that the market for such development would be far smaller.
 - 3.3 Ironbridge is a major tourist attraction but with a limited hotel offer in part due to constraints accessing the World Heritage site and the lack of parking. It has a number of bed and breakfast establishments and only one large hotel (The Best Western Valley Hotel with 44 bedrooms). Despite its appeal to visitors from across the world, it has fewer hotels than either Newport or Wellington. The Ironbridge Gorge World Heritage Site Management Plan recognises that maintaining and strengthening the economic base of the Gorge is essential to the long-term protection of the area’s character and importance. It is therefore appropriate that some policy support should be given to new hotel development especially following the decision to upgrade Ironbridge to a District Centre.

⁸ Docs C1g and C1i

- 3.4 The evidence base currently suggests the market for new hotels in Ironbridge is limited. It may be the case that new hotel development over the lifetime of the Local Plan is limited to extensions to existing sites or one or two modest “boutique” hotels. However, it does not follow that hotel accommodation should not be encouraged in Ironbridge nor that hotels should only be promoted within the district centre either. To clarify its policy intention, the Council has already offered a modification to remove the term “major” from hotel development in the Ironbridge area in Policy EC12.
- 3.5 The Council met with Historic England following receipt of its MIQ statement (J6/24/1) and negotiated further modifications in January 2017 that clarify other assessments that will be taken account when assessing such proposals⁹. Modest hotel development need not be incompatible with the Outstanding Universal Value of the World Heritage Site and could actually be beneficial to it.
- 4. Can the Council clarify whether the Plan’s approach to the protection of heritage assets (notably policies BE3-8) is fully consistent with that set out in the Framework (paras 132-140)? Specifically, how does the Plan incorporate the balances against public benefits that are set out in the Framework?**
- 4.1 The Council has broadly relied on the statutory tests for Policies BE3, BE4, BE5, BE7 and BE8 when assessing whether proposals affecting heritage assets are acceptable. It has drafted its Local Plan on the basis that proposals would comply with these statutory tests. The Council had assumed that the public protection tests that need to be applied in policy if a proposal is considered to harm a designated or non-designated heritage asset would be covered in Policy SP4.
- 4.2 However, the Council accepts that Policies BE3 to BE8 could be improved by a form of words that acknowledge the balancing test the Council must make when a proposal is likely to harm such an asset. It therefore proposes the following wording to be applied to each of these policies.

Any harm to the significance of a designated or non-designated heritage asset must be justified. Proposals causing harm will be weighed against the substantial public, not private, benefits of the proposal and whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long term use of the asset.

⁹ Doc K17

In those exceptional circumstances where harm to any heritage assets can be fully justified, and development would result in the partial or total loss of the asset and/or its setting, the Council will require the developer to record and analyse of that asset, and archaeological excavation where relevant, in accordance with a scheme to be agreed beforehand to be deposit on the Council's Historic Environment Record.