

Telford & Wrekin Council – Responses to Matters, Issues and Questions

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Matter 6, Issue 8

Issue 8: Whether the policies for the historic environment (HE) are justified, effective and consistent with national policy and guidance.

Q136.(a) Are the HE policies justified by a proportionate evidence base? (b) To be effective, does the Plan make sufficiently clear what the Historic Environment Record comprises, and where this can be viewed?

(a) - Yes, there are several sources of information that have assisted the Council in preparation of the Historic Environment's policies.

The policies relating directly to the Historic Environment are based upon the following legislation and guidance:

- Chapter 16 of the National Planning Policy Framework (NPPF) 2024,
- Planning Policy Guidance 15 (PPG15): Planning and the Historic Environment 1994,
- Planning Policy Guidance 16 (PPG16): Archaeology and Planning 1990,
- Planning (Listed Buildings and Conservation Areas) Act 1990,
- Ancient Monuments and Archaeological Areas Act 1979,
- Historic England Advice Notes, Policies and Guidance,
- UNESCO's Operational Guidelines for the Implementation of the World Heritage Convention 2025.
- The Garden's Trust Guidance documents.

Further sources of information and documents contribute to the HE evidence base:

- National Heritage List
- Historic Environment Record
- Conservation Area Appraisals
- Heritage Impact Assessment
- Register of Local Interest Buildings
- Ironbridge Gorge World Management Plan
- Ironbridge Gorge World Heritage Site Supplementary Planning Document

(b) - Access to the historic environment record and wider heritage asset information is provided in 13.9. In order to make this effective a footnote to the Historic Environment Record is recommended under Paragraph 3.9.

Link: [Historic Environment Record | Shropshire Council](#)

137. Is the wording of each of the HE policies consistent with national policy on proposals affecting heritage assets and considering potential impacts?

Yes, the wording is consistent with existing National Policy and Historic England Guidance.

Policies have been developed and reviewed alongside Historic England to ensure conformity with national policy. The Council have suggested several alterations to wording within the Historic Environment chapter and are contained within the Councils Core Submissions Documents (CD08).

Policy HE1 – Heritage assets

Q138. Is the supporting text accurate and comprehensive when listing different categories of heritage asset, such as registered parks and gardens and non-designated assets not on the local list?

Yes, paragraph 13.4 outlines the types of designated and non-designated heritage assets (Local interest buildings) which are relevant to the Telford and Wrekin Borough.

Within the Submission Version of the Local Plan (CD08) Historic Parks and Gardens has been modified to Registered Parks and Gardens and further clarification on non-designated assets has been suggested.

Policy HE2 – Ironbridge Gorge World Heritage Site (WHS)

Q139. Is reference to the WHS Supplementary Planning Document and/or WHS Management Plan and/or Severn Gorge Conservation Area necessary within the policy for it to be effective?

Yes, all three of the documents referenced in the explanatory text to Policy HE2 provide further guidance on the application of policy and protecting and enhancing the Outstanding Universal Value of the WHS. A key point raised under criterion 4 of the policy.

In the absence of direct World Heritage Site legislation from central government, local protections including the Conservation Area Article 4(2) Direction, and local policy guidance documents including the Supplementary Planning Document and WHS Management Plan are essential to comply with the UK's obligations towards a UNESCO designated site. Therefore, their inclusion in the local plan is warranted as a renewed commitment by the borough to these protection principals.

Q140. To be effective: (a) is reference to the significance of the WHS and its Outstanding Universal Value in part 4 sufficiently clear? (b) Are the design criteria in

policy DD1 specific enough to the needs and character of the WHS (as referred to in part 7)? (c) Does the policy need to include criteria specific to allocated sites within the WHS and its setting?

(a) - This policy is written in accordance with UNESCO's Operational Guidelines 2025 paragraphs 79-95. The policy directly references the Authenticity and Integrity, which is outline in the WHS inscription documents, accessible on the WHS website and UNESCO's website.

Suggested modifications (CD08) provide further explanation on the significance of the WHS and where to find this information. Further suggestion to include foot note to Statement of Outstanding Universal Value.

(b) - Yes, the design criteria in policy DD1 follow design principles consistent with the good management of heritage assets, including consideration of character, and the local built and natural environment. This policy is consistent with established conservation principles of built form and street scene considerations and is considered robust enough to deter inappropriate design within the World Heritage Site.

(c) - No, sites have all been assessed on their impact to the historic environment. Allocations situated close to or within the WHS have been assessed accordingly in the site selection process. In addition, the Council submitted a Heritage Impact Assessment further assessing the impact of site allocations to the historic environment and the mitigation required. In addition, the referenced design criteria and wider WHS policy is considered sufficient to guide developers to protect the WHS from inappropriate development whilst allowing flexibility in the future development within the UNESCO protections.

Policy HE3 – Listed buildings

Q141. Are the criteria in part 3 sufficiently clear and distinct to be effective?

Yes, the criteria is sufficiently robust and clearly articulates the policy requirements for the protection of listed buildings and their settings in line with established conservation practices outlined by Historic England.

Policy HE5 – Buildings of local interest

Q142. Is the policy consistent with national policy, including Framework paragraph 216?

Yes, the Council have drafted this policy in close liaison with Historic England. Policy HE5 encourages the consideration of the significance of local interest buildings, a form of non-designated heritage asset. This approach is consistent with Paragraph 216 which outlines that "*a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset*". The policy encourages applicants to consider the elements of their proposal and how these

contribute to the buildings character and significance. Elements that are generally of higher architectural, historic, archaeological or artistic interest are specifically identified for protection by this policy, ensuring that the significance of these elements remains a key consideration.

Policy HE6 – Historic parks and gardens

Q143. Are references to registered parks and gardens accurate and consistent with national policy?

Yes, paragraph 213 of the NPPF records Registered Parks and Gardens as amongst the assets with the highest significance. The protections afforded in this policy are consistent with established Conservation Principles set out by Historic England and The Gardens Trust. This policy is also consistent with the wording of Paragraph 212-214 of the NPPF.

Suggested modifications (CD08) provide further clarity in resisting development that would harm or be detrimental to the setting, character, quality and historic integrity of Registered Parks and Gardens.