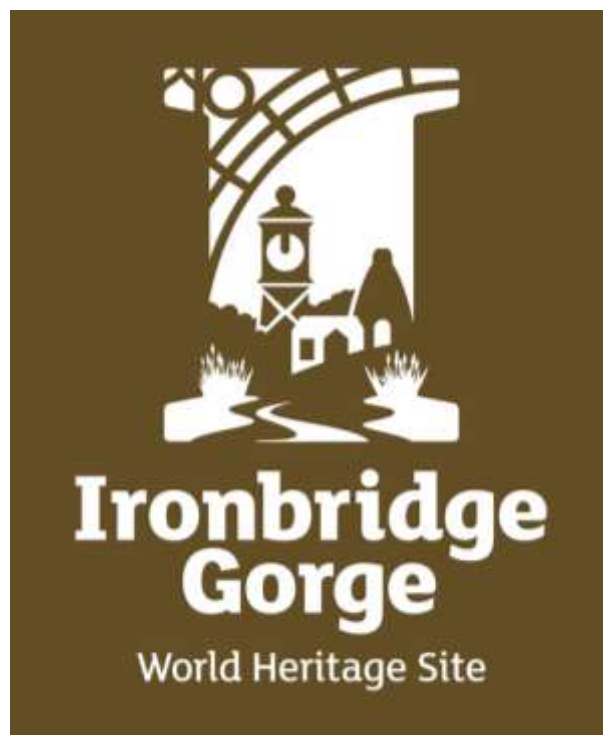


Ironbridge Gorge World Heritage Site Supplementary Planning Document Consultation Statement



July 2023

Introduction

The Ironbridge Gorge World Heritage Site (referred to as the 'IGWHS' or the 'Site' throughout this document) is an extraordinarily important place, and was designated in 1986, as one of the United Kingdom's first World Heritage Sites by the United Nations, Educational, Scientific and Cultural Organisation (UNESCO). This was in recognition of its leading role in the Industrial Revolution and the unique landscape that provided the raw materials.

The overarching aim of this SPD is to provide guidance for the application of policies within Telford & Wrekin and Shropshire Council's current and emerging Local Plans in order to support the protection and enhancement of the Outstanding Universal Value of the IGWHS, support the prevention of loss through deterioration and disappearance of its heritage value, and provide a consistent set of guidelines to help businesses and residents play their part in maintaining what makes the IGWHS so universally special.

Purpose of this Consultation Statement

This Consultation Statement has been prepared in accordance with Regulation 12(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

It sets out the following for the public consultation on the draft SPD:

- The persons the local planning authority consulted when preparing the supplementary planning document
- A summary of the main issues raised by those persons
- How those issues have been addressed in the supplementary planning document

Public Consultation

Telford & Wrekin and Shropshire Council consulted on a draft Supplementary Planning Document which aims to protect and conserve the Outstanding Universal Value of the Ironbridge Gorge World Heritage Site (IGWHS). The consultation took place for a total of 6 weeks between **Monday 9th January and Monday 20th February 2023**. A number of methods were used to seek responses as follows:

- **Emails and Letters:** information was sent out to hundreds of individuals and organisations on the Telford & Wrekin Council and Shropshire Council database, including specific and general consultation bodies and councillors. A copy of the letter sent out to consultees for both Councils is shown in **Appendix 2**.
- **Website:** the IGWHS SPD was published on both Telford & Wrekin Councils website (https://www.telford.gov.uk/info/20451/development_plans/128/supplementary_planning_documents_spds/2) and Shropshire Councils website (<https://www.shropshire.gov.uk/get-involved/draft-ironbridge-gorge-world-heritage-site-supplementary-planning-document/>) as well as being held on the Ironbridge Gorge World Heritage Site website (<https://www.ironbridgegorgewhs.co.uk/site/index.php>)
- **Physical copies:** the SPD was also made available physical at several locations within the WHS boundary.
- **Press Release:** on the day of the consultation starting, both Telford & Wrekin Council and Shropshire Council published a joint press release on their respective websites, this was then also covered on Shropshire Live.

Public Drop In Sessions

In addition to the above six public drop in sessions were held throughout the IGWHS to allow the public to view the document and learn more about the document with experts from Telford & Wrekin and Shropshire Councils available to speak to.

Each session was held over a 3 hour period and were held at the following locations:

- **Jackfield Village Hall**
- **Furnace Kitchen, Coalbrookdale**
- **Coalport Village Hall**
- **Anstice Ballroom, Madeley**
- **Buildwas Village Hall**
- **Tontine Hotel, Ironbridge**

The locations of these drop in sessions were advertised on posters at each of the venues, as well being detailed on both Council's websites as well as the Ironbridge Gorge World Heritage Site website.

Materials taken to each of the public drop in sessions were as follows:

- Presentation detailing information included within the SPD (on a timer and repeat)
- Map Graphics including:
 - IGWHS Boundary.
 - IGWHS Boundary with additional boundaries of both Telford & Wrekin and Shropshire Councils administrative areas, detailing what parts of the IGWHS fall within each Councils administrative area.
 - Severn Gorge Conservation Area Boundary.
 - Locations of Listed Building and Scheduled Monuments within the IGWHS.
- Contact details and response forms (box to submit comments) for those looking to formally comment.
- Physical Copies of the IGWHS SPD for people to read.
- Fliers advertising how to respond to the consultation online.
- Information Boards:
 - Summary of why we were undertaking the public drop in sessions.
 - How to respond to the consultation.
 - Main Topics covered within the SPD.

In total approximately 131 people attended the six drop in sessions, outlined below are the subjects raised during those sessions:

- The purpose of the SPD?
- What the split of the WHS was between Shropshire and Telford & Wrekin Council administrative areas?
- Did the Councils work together on creating the document?
- What alterations and other works people can undertake on their homes within the IGWHS? (particularly windows / uPVC options and renewable energy / electric vehicle charging points)
- How does the SPD impact current development?
- Can the SPD provide further protection for woodland?
- What does the SPD say about setting?
- How can the SPD impact the effects of tourism, particular short term lets?
- What the SPD addresses with regard to design?

- What is happening with the Severn Gorge Conservation Area Boundary?
- How does the SPD tackle electric vehicle charging and methods of renewable energy (particularly solar)?

Timeline of Events during the Public Consultation

Set out below is a timeline of events leading up to the start of the public consultation through to its conclusion.

Date	Action Taken
13 th Dec	Cabinet was held for Shropshire Council
14 th Dec	Cabinet was held for Telford & Wrekin Council The SPD document was approved for consultation at both Council cabinet meetings. As such, officers scheduled a meeting for early in the new year to prepare consultation material.
3 rd January	Officers of both Telford & Wrekin Council and Shropshire Council undertook internal discussions regarding the approach to consultation to inform a joint discussion the following day.
4 th January	The overarching approach to the consultation was discussed and agreed by officers from Telford & Wrekin and Shropshire Council.
5 th and 6 th January	The more detailed requirements of the consultation were finalised, including specific content of webpages and dates for drop-in events.
9 th January	Consultation Began Consultation went live. Telford & Wrekin and Shropshire Councils were notified that the primary consultation response email address was experiencing an error. Telford & Wrekin and Shropshire Councils published a notification of this issue on their websites and as an interim measure advised respondents to submit any consultation responses using either Council's Planning Policy Email Address. This notification also confirmed that the document and supporting information was still available to view. Shropshire Live covered the consultation from the Press Releases issued on both Council websites.
10 th January	Issue experienced by the primary contact email address was resolved. Both Telford & Wrekin and Shropshire Council's websites amended in response. Telford & Wrekin and Shropshire Council's ensured that all notification correspondence had been issued.
12 th January	Telford & Wrekin and Shropshire Council officer meeting held to discuss the start of the consultation, as well materials required for the forthcoming public drop in sessions.
13 th January	Officers prepared materials for the first public drop in session. Officers commenced liaison with flooding services regarding the Jackfield event to ensure that it was safe and appropriate to undertake the event given ongoing weather conditions.
16 th January	Jackfield Village Hall contacted to confirm the drop in session was to go ahead as weather conditions and associated flooding were no longer considered an issue. Liaised with the Council's communication teams to confirm the drop in session was to go ahead and discuss how best to advertise the public drop in session(s).

17 th January	Telford & Wrekin and Shropshire Council officers prepared the majority of materials for the first public drop in session including display boards, fliers, materials such as pens etc.
18 th January	Drop in session materials were circulated amongst the Telford & Wrekin and Shropshire Council officer group to finalise.
19 th January	Finalised materials for drop in session. Officers from both Telford & Wrekin and Shropshire Council travelled to the first venue and undertook the session.
20 th January	Materials taken back to Council offices and physical copies taken to Madeley for the public to view.
23 rd January	Comments received to date were summarised in a consultation response summary document. Held second public drop in session.
24 th January	Notes on the second session prepared. Telford & Wrekin and Shropshire Council officers met to review drop-in sessions thus far and agree arrangements for subsequent sessions.
2 nd February	Third session took place.
8 th February	Notes on the third session prepared. Telford & Wrekin and Shropshire Council officers met to review drop-in sessions thus far and agree arrangements for subsequent sessions. Fourth session took place.
13 th February	Fifth session took place.
15 th February	Final officers meeting to discuss the public drop in sessions was held and attendees for final event was confirmed.
16 th February	Final session took place.
20 th February	Consultation ended

Consultation Responses

As mentioned, in total approximately 131 people attended the 6 public drop in sessions, in addition a total of 29 formal responses were received from local residents, interested individuals, interest groups, organisations, and statutory consultees. These statutory consultees, included:

- **Historic England**
- **ICOMOS UK**
- **The Environment Agency**

A summary of these responses and a joint response from Telford & Wrekin Council and Shropshire Council is shown in Appendix 1.

Conclusion

The production of the Ironbridge Gorge World Heritage Site Supplementary Planning Document has involved extensive preparation up to and during the public consultation. This consultation has directly influenced the final draft of the document which will now proceed to Cabinet at both Telford & Wrekin Council and Shropshire Council, with a recommendation that it be adopted to provide guidance on application of Local Plan policies and form a material consideration in the planning application process. It is therefore concluded that the process has complied with the relevant Government Regulations.

Draft Ironbridge Gorge World Heritage Site (IGWHS) Supplementary Planning Document (SPD) - Summary of Consultation Responses

Consultation on the draft IGWHS SPD commenced on the 9th January and concluded on 20th February. This schedule provides a summary of the consultation responses received and Telford & Wrekin and Shropshire Council's response.

Respondee Reference	Nature of Comment	Part of the Document	Summary of Response	Telford & Wrekin & Shropshire Council Response
001	No Comment	General Comments	Canals and waterways contribute to the health and wellbeing of communities and economies. They also represent historic, natural and cultural assets. Based on information available the substantive is no comment needed.	Noted.
002	Observations	General Comments	Figure 7 of the draft SPD indicates that the boundary of the Severn Gorge Conservation Area does not include areas within Shropshire, however para 5.65 suggests that it does and that the areas within Shropshire are shaded pink. There is no reference to Broseley Conservation Area, such a reference/statement should be included. The geology and potential for further landslips needs to be recognised. Welcome the document but it does not appear to effectively integrate the two administrative areas.	Figure 7 will be updated to appropriately reflect the reference to the shaded pink area (as seen in Figure 6). The 'box' following paragraph 3.5 of the draft IGWHS SPD includes an explanation of the relationship between Broseley and the IGWHS. For clarity a reference to the Broseley Conservation Area will be integrated into the relevant paragraph. Annex 2 Guidance for Development in the IGWHS includes a specific section on the geology, geomorphology and topography of the IGWHS and the implications for ground instability. Telford & Wrekin Council and Shropshire Council have worked collaboratively and proactively on the preparation of the draft IGWHS SPD and it is considered it appropriately reflects the current and emerging planning context and the characteristics of the two Local Planning Authorities and the extent and components of the IGWHS within each Planning Authority.
003	Observations	Part 3: Description of the World Heritage Site Para 3.8	Para 3.8 - The setting of the IGWHS is ruined by excessive fossil fuel traffic. Para 3.4 - Ignores sustainable / active travel routes NCR45 and NCR55. No plan to improve, maintain or promote them. Para 3.4 - The area North of the Iron Bridge suffers greatly from excessive motorcycle parking sometimes to the extent of preventing easy pedestrian movement. Reference to T&W Sustainable Transport Action Plan Consultation. Reference to Shropshire Council Climate Action - Transport Document. Reference to the WHC-15/20.GA/INF.13. The draft SPD fails to protect or enhance the IGWHS's Outstanding Universal Value.	Comment on Para 3.8 noted. However impacts on the setting of the WHS are taken into account throughout the document. More specifically guidance for development affecting the setting is covered within Annex 2 under section 10.6. Para 3.4 provides a description of the boundary of the WHS, considered relevant settlements, proportion of land falling with both Council areas, and its historic assets. The draft IGWHS SPD also includes specific guidance on electric vehicle charging point provision - both domestic and within public car parks. The draft IGWHS also provides guidance on the maintenance and enhancement of highway infrastructure and recognises the role of park and ride opportunities and public transport. Specific reference will be included to Climate Change Action Plans within the Policy Documents section and a specific reference will be added to active travel within Annex 2 of the document. The IGWHS Draft SPD identifies the opportunity to develop multi-disciplinary Local Authority working groups to coordinate issues such as highway improvements and public transport provision.
004	Observations	General Comments	It is important to have sustainable means for visitors travelling to the site. Thought needs to be given to mitigating the environmental effects of future residents of the Former Ironbridge Power Station travelling to and from the IGWHS - increasing demand for transport. Bringing the railway back into use is a large part of the answer. Consider there is a good case for government assistance under the 'restore your railway' initiative. A light rail demonstration is ongoing and it would be a missed opportunity not to explore the potential for re-opening the railway line.	The draft IGWHS SPD includes specific guidance relating to the setting of the IGWHS. The draft IGWHS also provides guidance on the maintenance and enhancement of highway infrastructure and recognises the role of park and ride opportunities and public transport. The Former Ironbridge Power Station site is not located within the IGWHS, however proposed site guidelines for this site within the draft Shropshire Local Plan include provision of appropriate pedestrian and cycle links to and through the site; provision of necessary highway improvements to the local and strategic road network. The provision of rail services to the site is also being actively investigated.

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005	Support	General Comments Page 120	'Highways' include PRoW in the vicinity. Support maintenance and repair of surfaces in a way that is in-keeping with the heritage and character of the area. May be paths within the IGWHS with unrecorded or under recorded rights. These are arguably heritage assets (considering the significance of horse power in historic industry) and determining their correct status may improve the infrastructure and accessibility for vulnerable road users, including equestrians, and mitigate pressure on the road network by providing more sustainable travel and leisure options.	The draft IGWHS provides guidance on the maintenance and enhancement of highway infrastructure and recognises the role of park and ride opportunities and public transport. However, a specific reference will be added to active travel within Annex 2 of the document.
006	No comment	General Comments	No comment. Welcome inclusion in any following communications regarding the SPD and associated consultations.	Noted.
007	No comment	General Comments	No comment. More detailed comments can be provided when plans are further developed. General overview of the role of Severn Trent Water provided with regard to wastewater, surface water, sustainable drainage, blue/green infrastructure, water quality and resources, and water supply.	Noted.
008	Observations	Paragraphs 10.32 and 10.53	Consider that there should be a presumption in favour of provision of solar panels on south facing roofs that face roads (such as the respondents property adjoining Church Hill) where the dwelling is not listed. This is because there would be no visual impact on the built environment and there is urgent need for climate action. Need to ensure that the built environment of the Coalbrookdale Works site (now with UNESCO) accurately reflects the WHS in terms of layout (i.e. terraces, smaller houses with gardens and some larger houses) and materials (i.e. bricks, tiles, fenestration, water goods etc). The current proposal is not reflective of the WHS.	Telford & Wrekin Council and Shropshire Council recognise the importance of ensuring an appropriate balance between conserving the IGWHS and facilitating appropriate forms of renewable energy within the IGWHS. The draft IGWHS SPD provides specific guidance on this matter. However, it would not be appropriate to provide a presumption in favour of solar panels on roofs that are facing main roads as this is generally not considered to strike an appropriate balance between conserving the IGWHS and facilitating appropriate forms of renewable energy. Implementation of renewable energy sources will be assessed on a case by case basis. The draft IGWHS SPD provides guidance to inform the design, layout and use of materials for development within the IGWHS. The Coalbrookdale Works Site is currently the subject of a Planning Application and the appropriateness of the proposed design, layout and materials are therefore a matter for this process.

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Respondee Reference	Nature of Comment	Part of the Document	Summary of Response	Telford & Wrekin & Shropshire Council Response
009	Additions	General Comments	<p>Explanation of the role of the Woodland Trust, summary of the importance of woodland, and statistics on tree cover in Shropshire.</p> <p>Consider woodland creation should be a major priority for an SPD - particularly in the context of the amount of tree cover in Shropshire.</p> <p>Recognise non-native trees have a role in meeting near-term targets and responding to specific concerns like air pollution, but priority should be locally sourced native species to reduce import of pests/disease and maximise wider flora/fauna benefits. This also has social and economic benefits.</p> <p>Trees have an important role in addressing the climate and nature crises (which should be jointly addressed).</p> <p>Encouraged by recognition within the draft SPD of trees contribution to biodiversity and biodiversity net gain (BNG), however this should go further establishing specific biodiversity net gain targets and seeking to grasp opportunities afforded by Local Nature Recovery Strategies (LNR's).</p> <p>Consider the SPD should be expanded on the following issues:</p> <ul style="list-style-type: none"> - Protection of valued habitats including ancient woods and veteran trees from loss and damage (encourage an inventory, establish minimum buffers, policy protection and give weight to LNR's). - Going beyond minimum requirements for BNG and be an example of best practice (20% BNG requirement, consider funding sources to meet BNG targets and require BNG to be maintained for 50 rather than 30 years). - Giving strong weight to LNRs required by the Environmental Act (2021) for development site allocation at a local level (essential to avoid impact on ancient woodland and sensitive natural assets as allocations are more likely to be developed and can prioritise green infrastructure investment). - Setting standards for high quality green infrastructure for development (everyone should be able to see a tree from their home, be no more than 300m from the nearest natural green space with safe/accessible routes to it and have a small wood of at least 2ha within 4km of their home). 	<p>Noted. The key purpose of the draft IGWHS SPD is to provide additional guidance on the application of relevant policies within the existing and emerging Development Plans for both Telford & Wrekin and Shropshire Council, in order to further protect and enhance the Outstanding Universal Value (OUV) of the IGWHS.</p> <p>Importantly, SPD's cannot create new policy, rather they provide guidance to assist in the implementation of policies within adopted / emerging Development Plans.</p> <p>Given the above, it is considered that the SPD provides an appropriate level of guidance on trees and woodland, recognising the focus of the document is providing guidance on relevant policies relating to the protection and enhancement of the OUV of the IGWHS. The document cannot introduce new policy requirements, including relating to woodland.</p>
010	Objections	Annex 2	<p>The draft IGWHS is a very depressing and negative document.</p> <p>Much emphasis was given to the Outstanding Universal Value of the area, which is not universally important.</p> <p>The document restricts the ability to introduce measures to respond to the changing climate, despite being the birthplace of climate change. The importance of responding to climate change outweighs any visual impact.</p> <p>The two most obvious options are installation of solar panels and conversion to electric vehicles (EVs), but the guidance is overly restrictive and inconsistent on these matters.</p> <p>With regard to solar panels, requirements for them to be in locations that are not visible and yet still non-reflective is logically inconsistent and rule out all of Ironbridge. Also consider that this is contrary to permitted development rights and potentially legally challengeable.</p> <p>With regard to EV charging, guidance would rule out 70% of houses in Ironbridge. It is also inconsistent with the approach at the Bothy on Dale End Park.</p>	<p>Noted. The draft IGWHS SPD provides guidance on how solar panels and EV charging points can be provided within the IGWHS in a way that is complementary to the fact that it is a WHS and that there is a need to protect and enhance its Outstanding Universal Value (OUV).</p> <p>The IGWHS was designated by UNESCO. The designation is a recognition that the cultural significance of the Ironbridge Gorge is so exceptional that it transcends national boundaries and is of common importance for present and future generations of all humanity - as such it constitutes outstanding universal value. It is the UK's government role to ensure the OUV is not compromised.</p> <p>It is considered that the guidance appropriately supplements local policy and is consistent with national guidance, policy and legislation.</p>

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011	Concerns	Description of the WHS. Paragraph 3.3	Concerned about woodland ride management policies currently being pursued by the Severn Gorge Countryside Trust which is generic and fails to recognise the distinctiveness of different woodland walks. The SPD rightly draws attention to the relationship between heritage assets and settings, but the distinction drawn between them however is not clear cut. For example, whilst the Sabbath Walks contain certain archaeological features which could be considered heritage assets, consider that the walk itself should be considered a heritage asset and subject to heritage or environmental designation. The same principle applies to other such woodland walks. This should be recognised within the draft IGWHS SPD.	The importance of woodland walks to the WHS will be strengthened in the context of their role as part of the public realm and the setting of the WHS.
012	No comment	General Comments	The IGWHS contains surface and shallow depth coal mining features which may pose risk to public safety and surface stability. There are also coal resources present in the area, although this should not be taken to imply that mineral extraction would be economically viable, technically feasible or environmentally acceptable. Relevant bodies will have appropriate policies on mineral safeguarding. In this context, indicated surface coal resource should be given relevant consideration. Have no specific comments to make on the draft IGWHS SPD.	Noted.
013	Observations	Chapter 4 Paragraph 4.17	Concerned about plans to fell large numbers of trees along the Sabbath Walks in Dale Coppice, Coalbrookdale. Any such plans need to be scrutinised in accordance with the principles outlined in this SPD. Specifically, the tangible and intangible assets of the woodland walk (in terms of landscapes and traditions) need to be balanced with woodland management regimes currently in use. Proposals for the Sabbath Walks seem to contradict the principle of reinforcing "the cultural importance of the special areas" within paragraph 5.89 of the draft IGWHS SPD. Sabbath Walks is an important community and historic asset. Hopeful the draft IGWHS SPD has the power to emphasise the importance of woodland (particularly the Sabbath Walks) in terms of the significance of setting within the attributes defining Outstanding Universal Value.	The importance of woodland walks to the WHS will be strengthened in the context of their role as part of the public realm and the setting of the WHS.
014	Observations	General Comments	The draft IGWHS SPD is a very well researched and presented document. However, it seems to be aimed at planners rather than residents of the WHS that want to make alterations to their property. Are residents expected to read all the information within the draft IGWHS SPD and do they realise that it is intended to be used as a material consideration on relevant planning applications within the WHS? Consider an subsequent A4 leaflet should be prepared highlighting key points and sent to all properties in the IGWHS. This way, every household will have some guidance as to what is acceptable. Concerned about the current Shropshire Homes Planning Application and its implications for the IGWHS and compliance with the draft IGWHS SPD. ICOMOS have indicated the current proposal would harm the WHS and if UNESCO consider the WHS is not being appropriately protected this status can be reviewed and removed. The draft IGWHS contains strong guidance on alterations to existing buildings but guidance is weak in the context of new development - this is reflected in current schemes where design has not been reflective of the WHS and uPVC allowed. Success of the draft IGWHS and protection of the Outstanding Universal Value of the IGWHS is dependent on residents engaging in the planning process rather than simply making changes / effective enforcement.	It is acknowledged that the issues addressed within the draft IGWHS SPD are often complex, but this is unfortunately unavoidable and comprehensive and accurate guidance cannot be provided without some technical content. The draft IGWHS SPD seeks to provide guidance for both decision makers and the local community. Telford & Wrekin Council and Shropshire Council consider that an appropriate balance is struck so that it is suitable for both audiences. However, the suggestion of a short summary is welcome and it is considered that the webpage hosting the document provides an ideal opportunity for such text. Comments on current and past Planning Applications are noted, but such applications are subject to consideration through the Planning Application process, which of course includes appropriate public consultation. The intention of this draft SPD is to provide further guidance on the application of relevant policies within adopted / emerging Local Plans within the IGWHS.

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015	Observations	General Comments	<p>Paragraphs 10.27-10.29 suggest the AGA site lacks authenticity / integrity and paragraph 28 states it is difficult to understand the original site and its early development, without any suggestions for how this can be improved.</p> <p>The AGA site has been used for industrial purposes since first developed, whilst current buildings are not the original buildings they are industrial in nature and use, represent relatively recent representations of past uses of the site, and where in existence when the WHS was designated.</p> <p>Any change to the AGA site would radically change the “feel” of that part of Coalbrookdale and have a massive impact on views across the valley from Church Road in Coalbrookdale, Paradise and Bentall Woods.</p> <p>Consider the draft IGWHS SPD is predisposed to being opposed to the buildings on the AGA site.</p> <p>The Council seeks to preserve the “feel” of the IGWHS through detailed requirements for works to existing buildings (e.g. how residents can change windows that need replacing/modernising). The same sentiment should apply to the buildings on the AGA site, they are part of the story of the IGWHS.</p> <p>Buildings that are being conserved in the IGWHS do not all date from the eighteenth century.</p>	<p>Noted.</p> <p>This is a matter for the Planning Application process.</p> <p>The intention of the draft IGWHS is to provide guidance to all on the application of adopted / emerging Development Plan policies within the IGWHS.</p> <p>New development within the WHS is considered under section 10.3 of Annex 2 which looks to protect and enhance the natural built and historic environment as set out within the National Planning Policy Framework.</p>
016	Observations	Chapters 2 and 5. Paragraphs 2.11 and Chapter 5: Planning Context box following paragraph 5.19	<p>Paragraph 2.11 which explains the origins of the Gorge is incorrect. The correct explanation appears later in the document within paragraph 10.7. Paragraph 2.11 should be updated to correctly explain the origins of the Gorge.</p> <p>Paragraph 2.11 also states that limestone is Carboniferous, however it should read Silurian. However, it would be correct to use Carboniferous for the ironstone and clay subsequently referenced in this paragraph. This should also be corrected.</p> <p>In the Planning Context box following paragraph 5.19 bullet ‘iii’ references Local Wildlife Sites, however there is no mention of Local Geological Sites of which there a number within the Gorge. This should be appropriately corrected.</p>	<p>Details will be checked to check accuracy of the text.</p> <p>Paragraph 5.19 is a quote of policy and therefore cannot be changed.</p>

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Respondee Reference	Nature of Comment	Part of the Document	Summary of Response	Telford & Wrekin & Shropshire Council Response
017	Observations	General Comments	<p>Consider that the document is likely comprehensive, but concerned with the manner information is presented and the fact that it focuses on the restrictions that apply within the IGWHS. This is likely to appear excessive/oppressive to the general public.</p> <ul style="list-style-type: none"> -Recognise that the WHS is also a Conservation Area, but the distinction is difficult to follow and not explained. Specifically, the implications of WHS status and lack of associated statutory powers are not explained, and neither is the basis for these designations - special architectural or historic interest for the basis for Conservation Area status whilst Outstanding Universal Value is the basis for the WHS. -Little attempt to explain the manner in which development may harm the Conservation Area or WHS. -Various references to designated and non-designated heritage assets, but the fact that the WHS and Conservation Areas are both designated assets is not clear. -The document assumes the stance of maintaining heritage assets in their current form, providing no explanation of what 'character' and 'appearance' are and how they differ. Nor does it explain how development might affect them to a degree that is regarded as harmful. -The document is unclear what 'character' is to be preserved, nor does it explain how 'character' has changed over time: from the birth of the industrial revolution, to changes to technology/competition from other areas that led to depressed economic circumstances, to the period of great depression, to subsequent gentrification, to the implications of the new town corporation and more recently to its role as a tourist destination. -The area has undergone change and as such businesses are uncharacteristic of the site they are situated in. -The draft SPD needs to clearly state the aims of the Council rather than simply protecting the character of the area. -The draft SPD duplicates other existing guidance. 	<p>Noted.</p> <p>It is acknowledged that the issues addressed within the draft IGWHS SPD are often complex, but this is unfortunately unavoidable and comprehensive and accurate guidance cannot be provided without some technical content. However, the draft IGWHS SPD seeks to provide guidance for both decision makers and the local community. Telford & Wrekin Council and Shropshire Council consider that an appropriate balance is struck so that it is suitable for both audiences.</p> <p>It is considered that there is a clear explanation of the extent and purpose of the WHS and similarly the location and extent of other heritage assets (including the Conservation Area) within the draft IGWHS SPD. Specifically, Chapters 2, 3 and 4 explain the extent and purpose of the WHS designation and Chapter 6 addresses the extent and purpose of other heritage designations within the WHS, including the conservation area, listed buildings, scheduled monuments and non-designated heritage assets.</p> <p>The draft IGWHS SPD also provides extensive information on the Outstanding Universal Value (OUV) of the WHS (including criteria for its inscription, conditions of authenticity, conditions of integrity and the attributes of the IGWHS) in this way it establishes the context for protecting and enhancing the OUV of the IGWHS.</p> <p>Chapters 7 and 8 provide extensive guidance on the decision making process and process of submitting Planning Applications within the WHS. Annex 2 of the draft IGWHS SPD then provides extensive guidance on the considerations within the WHS to ensure that development protects and enhances rather than detracts from the OUV of the WHS. In doing so, it explains how the wrong development can negatively affect OUV.</p>
018	Observations	General Comments Continued	<ul style="list-style-type: none"> -There is recognition that the majority of the WHS is privately owned and as such is reliant on private investment for present character to be maintained. But the draft IGWHS does not encourage such investment. Indeed, the restrictive requirements are likely to discourage investment. -Unlikely to be great objection to the principle of protecting the appearance of the WHS (and its character if this is established) but the Council need to establish how they can assist - reference is made to Pre-apps but this is viewed as an additional layer of bureaucracy. -The aim of protecting character and appearance within the draft IGWHS SPD implies residents are seeking to cause harm. The Council should be seeking local support. 	<p>Telford & Wrekin Council and Shropshire Council offer pre-application services in order to assist with understanding what forms of development may or may not be appropriate, including within the IGWHS. This is not additional bureaucracy but in actuality can save considerable time and effort during any subsequent Planning Application process and importantly is considered to lead to better outcomes with regard to development proposals. In terms of duplication, it is recognised that there are a number of documents related to the WHS and inevitable that there will be some duplication. The aim of the SPD is to provide supplementary guidance on the application of policies within the adopted and emerging Local Plans for Telford & Wrekin Council and Shropshire Council.</p>

Draft Ironbridge Gorge World Heritage Site (IGWHS) Supplementary Planning Document (SPD) - Summary of Consultation Responses

Consultation on the draft IGWHS SPD commenced on the 9th January and concluded on 20th February. This schedule provides a summary of the consultation responses received and Telford & Wrekin and Shropshire Council's response.

Respondee Reference	Nature of Comment	Part of the Document	Summary of Response	Telford & Wrekin & Shropshire Council Response
019	Observations	Introduction Paragraphs 2.5 and 10	<p>Stated aims of the draft IGWHS SPD include protecting and conserving historic buildings and encouraging inward investment.</p> <p>The Council and community have to rely on owners to do the work and bear the costs. Those who own historic buildings need encouragement and more help to do the right thing as costs are very high.</p> <p>Adding large quantities of guidance/charging for advice will only deter property owners from doing the right thing.</p> <p>The Council do not offer sufficient support to property owners, with advice/site visits only available if paid for through a Planning Application.</p> <p>Consider the limitations on energy efficiency and renewable energy technologies in Annex 2 are too prescriptive. This needs to recognise the climate emergency.</p>	<p>Noted.</p> <p>The draft IGWHS SPD provides guidance on how solar panels and EV charging points can be provided within the IGWHS in a way that is complementary to the fact that it is a WHS and that there is a need to protect and enhance its Outstanding Universal Value (OUV). It is considered that the guidance appropriately supplements local policy and is consistent with national guidance, policy and legislation.</p> <p>The nature of historic buildings is that works to them often is more costly than to a newer property and that where such buildings are within a WHS works need to be responsive to the OUV of the area.</p> <p>Both Telford & Wrekin Council and Shropshire Council have declared climate emergencies and it is appropriate that this is referenced within the draft IGWHS SPD.</p> <p>Telford & Wrekin Council and Shropshire Council offer pre-application services in order to assist with understanding what forms of development may or may not be appropriate (see Chapter 8), including within the IGWHS. This can save considerable time and effort during any subsequent Planning Application process and importantly is considered to lead to better outcomes with regard to development proposals.</p>
020	Objections	General Comments	<p>The draft IGWHS SPD (specific reference to paragraphs 10.70 and 10.81) recognises the WHS is subject to flooding and land movement and the links between these factors and climate change. There are also numerous other references to climate change (specific reference to paragraphs 10.155-10.156, the box after para 10.159, and 10.160-10.162). The draft IGWHS also (specific reference to paragraph 2.17-2.19) recognises "The requirement to conserve natural, tangible and intangible cultural heritage is now going to require engagement with climate change in order to meet the most basic of these objectives."</p> <p>Section 14 of the National Planning Policy Framework (NPPF) addresses meeting the challenge of climate change and flooding and at paragraph 152 explains the role of the planning system in supporting the transition to a low carbon economy.</p> <p>The draft IGWHS SPD is a great opportunity to translate this issues into planning decision making within the IGWHS and also to identify actions to address climate change that fall within the planning context.</p> <p>Strongly object to the draft IGWHS SPD on behalf of the residents of the WHS, of Telford & Wrekin and of Shropshire on the grounds that it does not use the planning system to set out practical actions within the WHS to reduce local carbon emissions to the atmosphere that are contributing to the changing climate, for example promoting the retrofitting of solar panels on to existing roofs and fitting panels onto new roofs in a wider set of circumstances that is set out in paras 10.53 and 10.54.</p> <p>Also object to the draft IGWHS SPD on the grounds that it does not meet the requirements of section 14 of the NPPF.</p> <p>Recognise concerns about visual amenity, but a climate emergency has been declared and all need to contribute to reducing carbon emissions (local residents are keen to contribute).</p> <p>The draft WHS SPD could do more to shape the WHS in ways that contribute to radical reductions in greenhouse gas emissions. The draft IGWHS SPD would be improved if climate change had a much greater prominence in Section 7 and in Section 10 (Annex 2).</p> <p>The Climate Action Team should be more involved in the preparation of this draft SPD.</p> <p>The draft IGWHS SPD provides an opportunity to recognise links between the natural environment and industrial processes that occurred within the WHS.</p> <p>The draft IGWHS SPD should be strengthened regarding the natural environment.</p>	<p>Officers from both Telford & Wrekin and Shropshire Council's climate change team have had input into the draft IGWHS SPD.</p> <p>Importantly, SPD's cannot create new policy, rather they provide guidance to assist in the implementation of policies within adopted / emerging Development Plans.</p> <p>Both Telford & Wrekin Council and Shropshire Council have declared climate emergencies and it is appropriate that this is referenced within the draft IGWHS SPD.</p> <p>Reference to natural heritage to the north of the IGWHS will be included within a relevant part of the document. Specific references to the sites mentioned will be reviewed.</p>

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Respondee Reference	Nature of Comment	Part of the Document	Summary of Response	Telford & Wrekin & Shropshire Council Response
021	Objections	General Comments Continued	<p>With regard to the text box on page 15 of the document:</p> <ul style="list-style-type: none"> -There are references the natural heritage to the south of the gorge but not the north (for example woodlands in Coalbrookdale and Lloyds Coppice), this too should be recognised. -Benthall Edge woodland is referenced as a SSSI, but the actual SSSI is named Tick Wood and Benthall Edge SSSI. Furthermore it is described as being in Benthall Parish, but a small part is in the Gorge Parish. This should be corrected. -Lincoln Hill SSSI which is a nationally important geological site and provided huge quantities of limestone for use in the blast furnaces is not referenced within the draft SPD and should be. -There is no reference to Blist Hill pit mound that is part of the Madeley Pit mounds Local Nature Reserve, this should be included. -There is reference to Local Nature Reserves (LNRs), but this should name the specific LNRs. <p>Would welcome further information on how responses will be considered, whether there will be further consultation and process of adoption. Request to be notified upon adoption.</p>	See above.
022	Observations	Section 4	<p>The Outstanding Universal Values suggest there is variety in the WHS, but falls short of expressing the diversity of materials and design that exists within the Gorge. The historic buildings follow many design styles and use many different materials, e.g. colours and types of bricks and brickwork and have many different levels of decoration.</p> <p>More recent new builds have consisted of groups of similar designs with unrealistic/plastic features which detract from the WHS. There needs to be more diversity of design and material with each property unique - if this is not achievable then new design should respond to the Victorian arts and crafts principles of function and beauty which represents the majority of the historic estate.</p>	Noted. The intention of the draft IGWHS SPD is to provide guidance to all on the application of adopted / emerging Development Plan policies within the IGWHS. The draft document includes a section regarding new development within the IGWHS.
023	Observations	General Comments	<p>The document in general seems sound with clear and rational guidance.</p> <p>The SPD advice is helpful regarding new planning applications, but anxious about Telford & Wrekin Council's ability to monitor compliance (and enforce if necessary) given resources and pressures on Councils.</p> <p>With regard to renewable energy, with ground source heat pumps being less effective than first thought, it is possible more work on this may be needed at a later stage. Since one might consider the Gorge to have been the Silicon Valley of its day, the possibility of newer (as yet unknown) solutions to the cost of energy should be welcomed into the Gorge to carry on innovation and development, subject to the conditions set out.</p> <p>Issues around transport into and around the Gorge and the resultant pollution needs serious consideration.</p> <p>In the reference to Jackfield and the tileworks the spelling of Craven Dunnill should be corrected.</p> <p>Concerned about the Shropshire Homes application on the AGA site. The underlying archaeology of the water course/lower pools there remains important, although it has not been visible for a very long time (now only in old maps). Historic England's lack of concern about ICOMOS' view on this Planning Application is disappointing and we do not want to lost WHS status (like Liverpool).</p>	<p>Reference to Telford & Wrekin resources is noted.</p> <p>The draft IGWHS SPD provides guidance on how energy efficiency renewable energy and EV charging points can be provided within the IGWHS in a way that is complementary to the fact that it is a WHS and that there is a need to protect and enhance its Outstanding Universal Value (OUV). It is considered that the guidance appropriately supplements local policy and is consistent with national guidance, policy and legislation.</p> <p>The draft IGWHS also provides guidance on the maintenance and enhancement of highway infrastructure and recognises the role of park and ride opportunities and public transport.</p> <p>The spelling of Craven Dunnill within the document will be corrected.</p> <p>With regard to the AGA site, this is a matter for the Planning Application process.</p> <p>The intention of the draft IGWHS is to provide guidance to all on the application of adopted / emerging Development Plan policies within the IGWHS. The guidance includes a section regarding new development within the IGWHS.</p>
024	Observations	General Comments	Should consider including Broseley within the WHS boundary. This may be beneficial for the Conservation of the character of the town, and in turn its economy. It is a key part of the Outstanding Universal Value of the WHS, but unusually not within its boundary.	Noted. However, it is not thought necessary to revisit the boundary of the IGWHS at this time nor is this within the scope of the draft SPD.
025	Observations	General Comments	Make slight changes to format of text and a run over factual lines.	Factual text has been reviewed and edited as well as making minor changes to the text where there was a grammatical error.
026	Observations	General Comments	Page 64 Planning Fees, the planning portal does not offer the reduced fee for applications for works that would normally be permitted development.	Links are provided in the document and it concluded that this is not an issue that can be covered within the SPD.

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Respondee Reference	Nature of Comment	Part of the Document	Summary of Response	Telford & Wrekin & Shropshire Council Response
027	Observations	General Comments	Should we not be saying visible concrete walls as highways do use concrete but then face with brick or stone ie Madeley road.	Agreed and amendments made to the document.

Schedule: Historic England Response

Respondee Reference	Part of the Document	Summary of Comments	Telford & Wrekin & Shropshire Council Response
16.1	Figure 1	Aware the mapping for the World Heritage Site (WHS) is currently being checked as part of the production of the draft IGWHS SPD, which is welcomed. Historic England will be pleased to continue to assist this process.	This is beyond the scope of the draft IGWHS SPD. It is understood that Historic England require the extent of the WHS to be illustrated on a more detailed base map rather than the extent of the WHS being reviewed.
16.2	Paragraphs 2.2 and 5.78	Welcome inclusion of text explaining the potential impact of change that would affect the Outstanding Universal Value (OUV), Authenticity or Integrity of the property as it is important that the implications of maintaining WHS status are understood when decisions are being taken.	Noted.
16.3	Paragraph 2.23	Paragraph 2.23 relates to the 2017 Management Plan. It would be useful if this paragraph also referenced any emerging Management Plan review, the review process, or any Management Plan document that will be valid for the life of the draft IGWHS SPD.	Noted. Paragraph 2.23 will be updated to reflect the fact that there will be updates to the Management Plan in the future.
16.4	Paragraph 2.6 and throughout	The draft WHS SPD should reflect latest guidance produced by UNESCO and the Advisory Bodies to the World Heritage Committee on assessing impacts in a WHS context. It should also ensure all references and advice relate to the newest published guidance.	The document will be reviewed and appropriate updates integrated.
16.5	Paragraph 2.6	The Operational Guidelines for the Implementation of the World Heritage Convention are published by UNESCO's World Heritage Committee. This appears to be the first place they are mentioned therefore we would recommend naming the document in full.	See above.
16.6	Paragraph 2.7	Consider amending 'preserved' with 'protected'. The National Planning Policy Framework uses the term 'protect' and it would be useful if the draft IGWHS SPD reflected this throughout.	Within paragraph 2.7 of the draft IGWHS SPD, the word preserved will be replaced with the word protected. The rest of the draft IGWHS SPD will also be reviewed and further references to the word preserved will be replaced with the word protected.
16.7	Chapter 3	Welcome amendments to 'setting' and the references to HE GPA 3 within the draft IGWHS SPD. A link as a footnote may be helpful.	Noted. A Link to HE GPA3 will be included as a footnote within Chapter 3 of the document.
16.8	Paragraphs 3.11-3.12	With the introduction of the National Planning Policy Framework in 2012 and subsequent Planning Practice Guidance, the Circular document was cancelled and has no formal status in the planning process. If referred in the final version of the draft IGWHS SPD its status should be made clear with an indication that it remains published only for reference purposes. A definition of the setting of a WHS can be found in the Operational Guidelines or the UNESCO 2022 Guidance and Toolkit which would represent a more up to date reference.	Noted. Paragraphs 3.11 and 3.12 will be updated to reference the definition of the setting of a WHS from the Operational Guidelines or the UNESCO 2022 Guidance and Toolkit.
16.9	Paragraph 3.18	Paragraph 3.18 is useful but it needs to be clear within the document that a consideration of setting and an assessment on how that relates to the OUV of the WHS/significance of assets, needs to be included within any Design and Access Statement/Heritage Statement.	Noted. Paragraph 3.19 explains that Proposals likely to affect the IGWHS or its setting must be accompanied by a proportionate Heritage Statement / Heritage Impact Assessment which clearly identifies the potential impact of the development on the WHS's significance.
16.10	Paragraph 3.19	Recommend paragraph 3.19 is amended from '...or its setting' to 'within its setting', to make clear it is the contribution the setting makes to OUV and significance that is important, not the setting itself. This comment relates to all areas within the document where this wording is found.	Noted. The wording of paragraph 3.19 of the draft IGWHS SPD will be amended from '...or its setting' to 'within its setting'. Similar wording within the draft IGWHS SPD will be similarly amended.
16.11	Chapter 4	Would be useful to add a link in Chapter 4 to Historic England's Good Practice Advice Note 2: Managing significance in decision-taking, available at https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/gpa2/ which provides further explanation on the concept of significance and how to assess it.	Noted. Chapter 4 will be updated to include an appropriate referenced to Historic England's Good Practice Advice Note 2.
16.12	Chapter 5	It is useful to set out the role of the SPD, its purpose as a material planning consideration and which parts of the NPPF are relevant, as well as the role of both Local Plans.	Noted. Chapter 2 contains a comprehensive explanation of the role of the draft IGWHS SPD, whilst Chapter 5 explains the relationship to and most relevant components of national and local planning documents.
16.13	Paragraph 5.8	Additional detail around what is meant in this paragraph should be provided.	Paragraph 5.8 of the draft IGWHS SPD contains an extract of Paragraph 207 of the National Planning Policy Framework (NPPF). Any additional explanation of this paragraph would be best contained within the NPPF itself.
16.14	Paragraph 5.10	Paragraph 5.10 should include clarification that reference to paragraph 27 is to paragraph 27 of the PPG. Paragraph 27 of the PPG should either be included in the draft IGWHS SPD or a link to it provided in the footnote to ensure the appropriate reference can be located.	Noted. Paragraph 5.10 is listed under the heading PPG and explains that it relates to the PPG. However for further clarity the paragraph will be amended to reference Paragraph 27 of the PPG. A link to the relevant PPG will be included within a footnote of Chapter 5 of the draft IGWHS SPD.

Schedule: Historic England Response

Respondee Reference	Part of the Document	Summary of Comments	Telford & Wrekin & Shropshire Council Response
16.15	Paragraph 5.12	Additional detail on how to assess the impacts of proposals on the WHS will be required, to ensure that the most up to date and appropriate information, prepared by a qualified professional, is provided at the appropriate time in the decision-making process.	Paragraph 5.12 of the draft IGWHS SPD forms part of the summary of relevant PPG. Chapters 7 and 8 of the draft IGWHS SPD provide details on how to assess the impacts of proposals on the WHS and what will be required, to ensure that the most up to date and appropriate information, prepared by a qualified professional, is provided at the appropriate time in the decision-making process. No additional references are considered necessary.
16.16	Paragraph 5.13	Reference to UNESCO 2022 guidelines should be included within paragraph 5.13.	Noted. A reference to the UNESCO 2022 guidelines will be included within paragraph 5.13 of the draft IGWHS SPD.
16.16	Paragraph 5.21	Amend Scheduled Ancient Monuments to Scheduled Monuments.	Telford & Wrekin Council and Shropshire Council acknowledge that reference to Scheduled Monuments now excludes the word Ancient. However, paragraph 5.21 quotes the names of policies within the adopted Telford & Wrekin Local Plan (2018), as such it cannot be updated.
16.18	Section 5.4/5.5	Useful to have such a thorough section on relevant Local Plan policies, which is supported. May be useful to include a sentence explaining these are the key policies development proposals will be decided against and it is essential any future proposals accord with them, alongside the guidance on how to do this, which is set out in the SPD.	Noted. Paragraphs 5.17, 5.27 and 5.33 of the draft IGWHS SPD explain that referenced policies are those of greatest relevance within the IGWHS. Appropriate amendments will be made to these paragraphs to recognise that it is essential any future proposals within the IGWHS and its setting accord with them, alongside the guidance on how to do this, which is set out in the SPD.
16.19	Paragraph 5.39	Useful to note the WHS Management Plan is a material planning consideration.	Noted.
16.20	Paragraph 5.77	Would be useful if the title of this section also included the term 'Committee' to reflect the contents of paragraph 5.77.	Noted. The sub-title before paragraph 5.77 will be updated to include the term Committee.
16.21	Paragraph 5.79, 5.82, 5.86	Support the inclusion of this clause. Has the role of DCMS as State Party been explained earlier in the document? The role of DCMS should be clearly set out within the draft IGWHS SPD. Consider re-ordering the paragraphs so that the role of DCMS is fully understood earlier on rather than details appearing about how DCMS operates and procedure, before their role is established. Paragraph 5.79 should be clear that all liaison is to go to DCMS. They will then in turn liaise with the World Heritage Centre. Also, relevant to paragraph 5.86.	The section under sub-heading 5.8 'Stakeholders' will be re-ordered to establish the role of DCMS when the organisation is first referenced. Paragraphs 5.79 and 5.86 will be updated to clarify that all liaison with Historic England is to be copied to DCMS, that in turn will liaise with the World Heritage Centre.
16.22	Section 6	Support inclusion of paragraph 6.11.	Noted.
16.23	Section 6.4 Non designated heritage	Consider it is important to reinforce the wording around non-designated heritage and its contribution to the OUV within section 6.4 of the draft IGWHS SPD. Whilst the assets themselves may be non-designated (still worthy of protection) they are critical elements of the industrial landscape and overall OUV of the WHS and need protecting for the contribution they make to WHS status.	Noted. Paragraph 6.4 will be appropriately updated to recognise that non-designated heritage assets within the WHS of course contribute to the WHS and as such need to be protected.
16.24	Paragraph 6.26	The meaning of 'plans' in paragraph 6.26 needs to be clarified. Any additional heritage assessment/findings should be added to the Historic Environment Record (HER) as a minimum.	Noted. This paragraph will be amended to make it clear that the reference is to plan/maps rather than plan/future document.
16.25	Paragraph 6.30	Support inclusion of permitted development right details within the draft IGWHS SPD and note these relate to the Telford and Wrekin Council area. Are there any similar restrictions within the Shropshire Council area? Is this relevant? If no restrictions exist, it may be useful to detail this.	The Article 4 direction is located within the Telford & Wrekin Council administrative area. There is no similar direction in Shropshire Council's administrative area, reflecting the nature of this component of the WHS. It is considered that this is sufficiently clear within paragraph 6.30.
16.26	Figure 11	Very useful to include photograph imagery setting out good practice examples to aid prospective developers. Do you have additional detail on how these alterations have been achieved and what materials they have used, to aid clarity?	Extensive further guidance on how to appropriately undertake alterations, extensions and refurbishments of existing buildings is provided within Annex 2 of the draft IGWHS SPD and no change is deemed necessary.

Schedule: Historic England Response

Respondee Reference	Part of the Document	Summary of Comments	Telford & Wrekin & Shropshire Council Response
16.27	Paragraph 7.28	<p>Would be useful to include additional detail on how this can be achieved and what a positive Heritage Statement looks like. Throughout the document there is some additional detail about HS/HIA yet it would be useful to have it all in one place in a clear way. For example, what a statement of significance is and the need for one does not appear until later in the document. Additionally, there is further detail in the Annexes in Section 10 but difficult to tell overall what is required to be submitted as different aspects are discussed in different areas of the document. This section should also refer to the UNESCO 2022 guidelines.</p> <p>As an additional point the wording relating to HE/HIA is very focussed on the impacts to significance, and whilst important, in the context of the draft IGWHS SPD consider that wording should be incorporated to ensure that it is impacts to the OUV that is addressed.</p>	The guidance on Heritage Statements will be reviewed and appropriately clarified.
16.28	Paragraph 7.32	Where is the HER information for Telford and Wrekin? This should be clear in the draft IGWHS SPD.	The Shropshire Historic Environment Record covers both Shropshire Council and Telford & Wrekin Council administrative areas. This is clearly explained within the topic box following paragraph 6.27 of the draft IGWHS SPD.
16.29	Paragraph 7.44	Unclear what is meant in the first sentence re ‘no spectrum of degree of harm’.	Legal decisions have established that where less than substantial harm to a heritage asset is established there is no consideration of where on the spectrum (high or low end) such harm exists, it is simply less than substantial harm.
16.30	Paragraph 7.61	This should refer to UNESCO 2022 guidelines (as it should in any reference throughout the document).	Noted. An appropriate reference to the UNESCO 2022 guidelines will be added to paragraph 7.61 of the draft IGWHS SPD.
16.31	Paragraph 8.8	Recommend re-phrasing this sentence, as it is not clear.	This sentence includes a typo which will be corrected to ensure clarity.
16.32	Paragraph 8.22	Welcome inclusion of Historic England in the list set out within this paragraph.	Noted.
16.33	Paragraph 8.23	Support the inclusion of paragraph 8.23.	Noted.
16.34	Section 10	Support reference to Historic England guidance throughout this section, for example, Historic England advice on heritage assets and flooding.	Noted.
16.35	Section 10: Guidance for new development	<p>The text box on page 88 containing guidance for new development, in parts read like new policy. It should be clear the guidance points follow from Local Plan policies.</p> <p>For example, ‘proposals should avoid loss of green space’ should be linked to where this is in policy and for the draft IGWHS SPD to then give guidance on how this can be achieved.</p> <p>Also, it should be clear these are examples of what should be included/avoided and not an exhaustive list.</p>	This section is intended to provide detail/guidance on policy within the adopted Local Plans. The text box will be amended to clarify the fact that they are not policies but guidance.
16.36	Section 10	<p>Would information in Section 10 (Annex 2) be better suited for inclusion in the main body of the SPD?</p> <p>These are key areas of information which planning applications will need to adhere to</p> <p>Should it be linked to the section on Local Plan policies.</p> <p>See previous comments raised in June 2022.</p>	Annex 2 will be integrated into the document as an extra chapter after Chapter 9.
16.37	General comment	There are a few areas within the draft IGWHS SPD where the numbering is out of order and will need revising.	Noted. This will be reviewed.
16.38	General comment	Within the document there is a need to reference the Technical Review Process and the Reports that are prepared as part of this process, in relation to individual applications. These reports can be considered a material consideration in the planning process and help to inform appropriate development.	Noted. An appropriate reference to the Technical Review Process and the Reports that are prepared as part of this process, in relation to individual applications will be included within the draft IGWHS SPD.

Schedule: ICOMOS Response

Respondee Reference	Part of the Document	Summary of Comments	Telford & Wrekin & Shropshire Council Response
21.1	General Comments	ICOMOS-UK is an independent charity with a UK-wide and international mission to promote and support best practice in the conservation, care and understanding of the historic environment. ICOMOS (International) has a special responsibility to UNESCO as an official adviser on cultural World Heritage Sites and ICOMOS-UK plays an essential role in advising on aspects of World Heritage and Sites for nomination across the UK.	Noted. For clarity the role of ICOMOS will be emphasised in the section under sub-heading 5.8 'Stakeholders' of the draft IGWHS SPD.
21.2	General Comments	The SPD offers an excellent opportunity to translate the obligations under the World Heritage Convention into clearly understandable guidance which will carry considerable weight as a material consideration in decision making in the planning process.	Noted.
21.3	General Comments	The SPD should offer clarity on the nature of development likely to be appropriate within the WHS and its setting thereby providing an invaluable reference document for developers, householders, utility companies and others. It should also provide a framework for planners and local councillors to assist them in making planning decisions that protect and enhance the IGWHS and its attributes of OUV.	Noted. This is the intention of Chapter 10: Annex 2, which is considered to effectively draw out the key considerations for the various types of development that may be considered within the IGWHS.
21.4	General Comments	Importantly the SPD should explain simply and comprehensively the spatial implications of the international designation and any planning considerations it brings in addition to those related to national and local designations.	Noted. It is considered that the draft IGWHS SPD effectively achieves this expectation.
21.5	General Comments	The SPD is a comprehensive draft with numerous pertinent and helpful elements. Subsequent comments are overarching points relating to focus, organisation and content designed to help increase the clarity, coherence and ease of use of the SPD.	Noted.
21.6	General Comments	<i>International and National Obligations</i> It would be helpful to include a summary explanation of the international obligations and how these are met both through adhering to requirements on the Operational Guidelines for the Implementation of the World Heritage Convention (2021) and undertaking Heritage Impact Assessments (HIA) in line with the UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context (2022).	The guidance on Heritage Impact Assessments will be reviewed. The fact that Heritage Impact Assessments should be proportionate and particularly for major development should be based on the UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context (2022) or other best practice will be included.
21.7	General Comments	<i>International and National Obligations</i> A clear and simple explanation is needed at the start of the document on how national and local planning policy, heritage designations such as Conservation Areas, Listed Buildings, Scheduled Monuments and Natural Designation contribute to the protection of the OUV. Currently the detail provided on these other aspects and designations tends to overwhelm what should be the prime focus of the document – the WHS and its OUV. Although key to its protection, current long explanations of these other designations distract from gaining clarity on the implications of WHS inscription. They might be better separated out and included after the section on the overarching WHS or included as annexes to avoid the draft IGWHS SPD losing focus and becoming simply an historic environment SPD. Heritage assets and other aspects of the IGWHS and its setting should be linked back to the OUV and the attributes of OUV.	The guidance on Heritage Impact Assessments will be reviewed and the role of OUV in undertaking such assessments within the IGWHS explained.
21.8	General Comments	Paragraph 172 of the Operational Guidelines for the Implementation of the World Heritage Convention (2021) invites the State Party to inform the World Heritage Committee of an <i>'intention to undertake or to authorise in an area protected under the Convention major restorations or new constructions which may affect the Outstanding Universal Value of the property. Notice should be given as soon as possible (for instance, before drafting basic documents for specific projects) and before making any decisions that would be difficult to reverse, so that the Committee may assist in seeking appropriate solutions to ensure that the Outstanding Universal Value of the property is fully preserved.'</i> This responsibility should be included in the SPD with clarity on the role of the local planning authority in passing on this information to Historic England/DCMS. A flow chart outlining responsibilities and timing would be helpful.	Noted. The section under sub-heading 5.8 'Stakeholders' will be amended to clarify the role and responsibility of ICOMOS to notify the World Heritage Committee and the need for Local Planning Authorities to pass relevant information to Historic England/DCMS.

Schedule: ICOMOS Response

Respondee Reference	Part of the Document	Summary of Comments	Telford & Wrekin & Shropshire Council Response
21.9	General Comments	<i>OUV, including integrity and authenticity and attributes of OUV</i> It would be helpful to bring together all elements relating to the WHS including a concise description of the site, its Statement of OUV, including integrity and authenticity, as well as its attributes that convey OUV at the start of the document.	Telford & Wrekin and Shropshire Council consider that these matters are appropriately addressed within Section 4 of the document. This is a logical location for this information.
21.10	General Comments	<i>OUV, including integrity and authenticity and attributes of OUV</i> The concepts of authenticity and integrity would benefit from being explained more simply and clearly related to the attributes of OUV to allow users of the draft IGWHS SPD to understand and engage with them and grasp their relevance to their particular development. This can be challenging as exemplified at paragraphs 4.19 and 4.24.	Reference will be included to the definitions within the UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context (2022).
21.11	General Comments	<i>Guidance for Development in the IGWHS</i> The draft IGWHS SPD needs to make clear the nature of the IGWHS's OUV and its spatial implications. It would be very helpful to elaborate on these and the kinds of development that might be appropriate and the kinds that might challenge them. As this is possibly the most important element of the SPD, it appears counterintuitive that currently this is placed in Chapter 10: Annex 2 - Guidance for Development in the IGWHS. It would seem more appropriate that this formed the focus of the document or at least a summary were provided earlier. The table outlining the attributes of OUV at paragraph 4.19 would provide a useful starting point. Additional columns could be added summarising how and what kinds of development might have a harmful impact on each attribute, an additional column could outline enhancements and a third, show the type of assessment required from developers to ascertain these impacts. Chapter 10 Annex 2 - Guidance for Development in the IGWHS does partially achieve this but bringing it together in relation to the attributes of OUV early in the document would help to increase focus and clarity around this additional level of international designation and its implications. Adding an additional column listing which national designations are relevant would not only tie these protections together, but provide a useful gap analysis exercise pointing out where additional assessment and consideration is required to protect the attributes of OUV. This may be particularly helpful for attributes i,j,k,l and m which include intangible and landscape aspects not neatly or comprehensively covered by national designations.	Annex 2 will be integrated into the document as an extra chapter after Chapter 9. It is important to note that the SPD is not policy, rather it provides supplementary guidance on the application of policies within the adopted / emerging Development Plans for Telford & Wrekin and Shropshire Councils. Furthermore there is a risk that if the document seeks to define forms of development that are inappropriate, it implies that anything not discussed is appropriate. Finally, such a list may cause the document to become obsolete.
21.12	General Comments	Further work on establishing where development in the setting would be likely to impact on OUV and the type of development that would be inappropriate and how to assess this would be useful.	It is important to note that the SPD is not policy, rather it provides supplementary guidance on the application of policies within the adopted / emerging Development Plans for Telford & Wrekin and Shropshire Councils. Furthermore there is a risk that if the document seeks to define forms of development that are inappropriate, it implies that anything not discussed is appropriate. Finally, such a list may cause the document to become obsolete.
21.13	General Comments	A flow diagram of whom to consult when considering development in the IGWHS and its setting would be helpful for developers.	A high level flow diagram on the planning application process within the IGWHS will be included. This is then expanded upon within the text of the document.
21.14	General Comments	<i>Relationship of SPD to the Management Plan</i> Much of the detailed description of the site and the more detailed discussion of setting and other issues may be better suited to inclusion in the evolving update of the IGWHS Management Plan. It would be helpful to discuss this with the Coordinator and Steering Group to ensure that relevant information is not missed out, but also not repeated if covered elsewhere. The relationship of the draft IGWHS SPD to the Management Plan and its policies should be clarified in both documents.	It is appreciated that there is duplication and that this is perhaps inevitable and ultimately necessary.

Schedule: ICOMOS Response

Respondee Reference	Part of the Document	Summary of Comments	Telford & Wrekin & Shropshire Council Response
21.15	General Comments	<p><i>Heritage Impact Assessments</i> Consistency over when a Heritage Impact Assessment based on the UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context (2022) would be required is needed throughout the document. It should be emphasised that this assessment focuses assessment on impacts on the attributes of OUV.</p>	<p>The guidance on Heritage Impact Assessments will be reviewed. The fact that Heritage Impact Assessments should be proportionate and particularly for major development should be based on the UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context (2022) or other best practice will be included.</p>

Schedule: Environment Agency Response

Respondee Reference	Part of the Document	Summary of Comments	Telford & Wrekin & Shropshire Council Response
26.1	Hydrogeology IGWHS	<p>The IGWHS is predominantly located on the bedrock of the Halesowen Formation (mudstone, siltstone and sandstone), designated a Secondary A aquifer by the Environment Agency. Secondary A Aquifers comprise permeable layers that can support local water supplies, and may form an important source of base flow to rivers. Superficial Alluvium deposits are also indicated to be present within the IGWHS. These are associated with the River Severn, which flows through the centre of the IGWHS. These Alluvium deposits are designated as a Secondary A Aquifer and are likely to be in hydraulic continuity with surface water features in the area. Some lower permeability Glacial Till deposits are also indicated to be present towards the north of the IGWHS area.</p> <p>There are no groundwater Source Protection Zones designated within the area covered by the IGWHS.</p> <p>There are numerous surface waters features within the area, which drain to the River Severn.</p> <p>In considering the guidance for development within the Ironbridge Gorge World Heritage Site recommend that land quality and groundwater quality issues should be considered in conjunction with surface water impacts so as to protect and enhance controlled waters.</p>	<p>Noted. Flood guidance will be reviewed and appropriate references to land quality and groundwater quality issues/considerations (in the context of the IGWHS) included.</p>
26.2	Hydrogeology IGWHS	<p>The draft IGWHS SPD appropriately highlights that the former industrial use of land within the IGWHS is likely to have left residual substances within the ground. These are likely to be mobilised during development presenting a risk to controlled waters (Chapter 10, Annex 2).</p> <p>Recommend that policies relevant to redevelopment within the IGWHS should provide specific references to the hydrogeological environment and to issues such as groundwater and surface water protection (quality and quantity), contaminated land assessment (and clean-up where needed) and indeed the legislative drivers underpinning all this, such as Environmental Permitting Regulations and Water Framework Directive.</p> <p>Recommend that reference is also made to the publication 'The Environment Agency's Approach to Groundwater Protection' (2018). This document sets out a framework for our regulation and management of this precious resource.</p>	<p>Noted. However the referenced document on groundwater protection requires a subscription or payment to access and therefore it is not considered appropriate to reference within the draft IGWHS SPD.</p>
26.3	Renewable and Low Carbon Energy	<p>Certain proposals for renewable and low carbon energy generation may require an environmental permit under the Environmental Permitting (England & Wales) Regulations 2016, unless an exemption applies.</p> <p>for such proposals, we recommend that the applicant contacts the National Permitting Service on telephone 03708 506 506 for further advice and any pre-permit discussions.</p>	<p>Noted.</p>
26.4	Sustainable Drainage Systems	<p>Due to the potential legacy of contaminated land in the IGWHS from historic mining and heavy industry there is a risk of causing contamination to groundwater and/or surface water if SuDS are not properly designed. The presence of contaminated land needs to be considered when designing SuDS features.</p> <p>National guidance such as the CIRIA SuDS Manual C753 provides guidance for the application of SuDS on contaminated land.</p>	<p>Noted.</p>
26.5	Ground Source Heat Pumps	<p>Both closed and open loop systems can result in changes in groundwater flow and quality – this can also happen during drilling and installation and mobilise contaminants if installed inappropriately on contaminated sites.</p> <p>Discharge of water to ground or surface water with a significantly changed temperature may also cause pollution.</p> <p>Recommend following the advice and good practice guidance available via: Ground Source Heat Pump Association.</p> <p>It should be noted that Open loop systems are regulated by the Environment Agency under the Environmental Permitting Regulations (EPR). The following link may be of use:</p> <p>Open-loop heat pump systems: permits, consents and licences - GOV.UK (www.gov.uk)</p>	<p>Noted. The ground source heat pump text will be reviewed and appropriately updated to ensure consistency with guidance.</p> <p>The guidance on the Ground Source Heat Pump Association website is a paid resource for non-member and therefore it is not considered appropriate to reference within the draft IGWHS SPD.</p>

Schedule: Environment Agency Response

Respondee Reference	Part of the Document	Summary of Comments	Telford & Wrekin & Shropshire Council Response
26.6	Flood Risk	<p>The descriptions of the nature of flooding in the Ironbridge Gorge and the understanding of the responsibilities of the relevant risk management authorities is suitably conveyed.</p> <p>A key element of the National Planning Policy Framework is for development to reduce flood risk overall where possible, demonstrating that the measures go beyond managing flood risk from the development alone.</p> <p>The Environment Agency also puts preference on natural flood management and will pursue naturalisation of watercourses through culvert and weir removal where appropriate.</p> <p>Suggest adding the aims of flood risk reduction and naturalisation of watercourses through new development to the 'Flood Risk – Key Guidance Points' (Annex 2).</p>	Noted.

Appendix 2

Telford & Wrekin Email to all consultees

Email Subject: Draft Ironbridge Gorge World Heritage Site Supplementary Planning Document – Consultation

Dear Sir/Madam

**Draft Ironbridge Gorge World Heritage Site Supplementary Planning Document
Public Consultation 9th January to 20th February 2023**

Dear Sir/Madam,

Telford & Wrekin Council and Shropshire Council have launched a public consultation on the draft Ironbridge Gorge World Heritage Site (IGWHS) Supplementary Planning Document (SPD) which aims to further protect and conserve the Ironbridge Gorge UNESCO World Heritage Site

The site is spread over 550 hectares and is internationally recognised as the birth place of the industrial revolution as well as home to a thriving community of residents and businesses.

The document has been created to provide guidance and information to support the implementation of policies within the adopted and future Local Plan's for both Council areas. The document also outlines how the site will be protected and managed and includes guidance for local residents and businesses on matters such as adapting to climate change, where planning permission is required.

Telford & Wrekin Council and Shropshire Council are inviting comments on the draft IGWHS SPD. **The consultation will run for a period of 6 weeks, starting from 9th January until 5pm on 20th February 2023.**

The IGWHS SPD can be viewed online and comments submitted via a response form available at: www.ironbridgegorgewhs.co.uk/spd.

There will also be a number of informal public drop in sessions which will be hosted across the WHS on the following dates:

- Thursday 19th January – 5pm to 8pm – Jackfield Village Hall
- Thursday 26th January – 5pm to 8pm - The Furnace Kitchen, Coalbrookdale
- Thursday 2nd February – 5pm to 8pm - Coalport Village Hall
- Wednesday 8th February – 5pm to 8pm - The Anstice Ballroom, Madeley
- Monday 13th February – 5pm to 8pm – Buildwas, Village Hall.
- Thursday 16th February – 5pm to 8pm – The Tontine, Ironbridge

Following the public consultation period, responses received will be analysed and reviewed and any amendments will be made to the IGWHS SPD. The final document will then be considered by both Telford & Wrekin Council and Shropshire Council Cabinets for adoption. It will then be used to determine any planning applications for development within the IGWHS.

Please note you are receiving this letter because you have previously requested to be included on Telford & Wrekin Council's Planning Policy Consultee Database; to be notified with regard

to planning policy consultations and published documents. If you no longer wish to be contacted about planning policy issues, please let the Strategic Planning Team know by Telephone on 01952 384241 or emailing: DevelopmentPlans@telford.gov.uk


Yours faithfully

Gavin Ashford

Strategic Planning Team Leader

Housing, Employment & Infrastructure

Telford & Wrekin Council

 01952 384241

 www.telford.gov.uk

Telford & Wrekin mail merge to all consultees



Telford & Wrekin
Co-operative Council

Protect, care and invest
to create a better borough

Strategic Planning Team
Telford & Wrekin Council
PO Box 457
Telford
TF2 2FH

Tel: +44 (0)1952 384241

E-mail: DevelopmentPlans@telford.gov.uk

Contact: Strategic Planning Team

Telephone: 01952 384241

Your Ref:

Our Ref: IGWHS SPD

Date: 9th January 2023

Dear Sir/Madam

Draft Ironbridge Gorge World Heritage Site Supplementary Planning Document Public Consultation 9th January to 20th February 2023

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The IGWHS SPD can be viewed online and comments submitted via a response form available at: www.ironbridgegorgewhs.co.uk/spd.

Alternatively, if you are unable to access the internet to view the document please contact the Strategic Planning Team on 01952 384241. Written responses can be sent to:

Strategic Planning team

Telford & Wrekin Council
Wellington Civic Offices
PO BOX 457
Telford
TF2 2FH.

There will also be a number of informal public drop in sessions which will be hosted across the WHS on the following dates:

- Thursday 19th January – 5pm to 8pm – Jackfield Village Hall
- Thursday 26th January – 5pm to 8pm - The Furnace Kitchen, Coalbrookdale
- Thursday 2nd February – 5pm to 8pm - Coalport Village Hall
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Following the public consultation period, responses received will be analysed and reviewed and any amendments will be made to the IGWHS SPD. The final document will then be considered by both Telford & Wrekin Council and Shropshire Council Cabinets for adoption. It will then be used to determine any planning applications for development within the IGWHS.

Please note you are receiving this letter because you have previously requested to be included on Telford & Wrekin Council's Planning Policy Consultee Database; to be notified with regard to planning policy consultations and published documents. If you no longer wish to be contacted about planning policy issues, please let the Strategic Planning Team know by Telephone on 01952 384241 or emailing: DevelopmentPlans@telford.gov.uk

Yours faithfully



Gavin Ashford
Strategic Planning Team Leader

Shropshire Council Consultation Notification

Dear Sir/Madam,

Draft Ironbridge Gorge World Heritage Site Supplementary Planning Document – Consultation

You are receiving this email because you have previously requested to be included on Shropshire Council's Planning Policy Consultee Database or responded to the 'Regulation 19' Pre-Submission Consultation. If you no longer wish to be contacted about planning policy issues, please let us know by emailing: planningpolicy@shropshire.gov.uk with **Remove** in the subject field.

Telford & Wrekin and Shropshire Council are both consulting on a new draft of a supplementary planning document (SPD) which aims to protect and conserve the Ironbridge Gorge World Heritage Site (IGWHS). The consultation takes place between 9 January 2023 and 20 February 2023.

The key purpose of this SPD is to provide additional guidance to existing and emerging Development Plan policies for both Telford & Wrekin and Shropshire Council's protecting and enhancing the Outstanding Universal Value of the Ironbridge Gorge World Heritage Site. This SPD is therefore intended to be used as a material consideration on relevant planning applications within the WHS and, where appropriate, within its' setting.

The Supplementary Planning Document clarifies why the protection of the Outstanding Universal Value is of such importance and it will form part of a suite of documents including the aforementioned Development Plans and the World Heritage Site Management Plan that set out how the area will be protected and managed.

To view the draft SPD and to find out more information on how to get involved please go the following dedicated consultation page [Ironbridge Gorge World Heritage Site - Ironbridge Gorge WHS](#)

Have Your Say

The dedicated consultation website provides information on how to have your say, including where to send your comments. It also provides information on a number of public drop in sessions. The drop in sessions will be held at the following locations and times:

- Thursday 19 January 2023 – 5pm to 8pm – Jackfield, Village Hall
- Thursday 26 January 2023 – 5pm to 8pm – Coalbrookdale, Furnace Kitchen
- Thursday 2 February 2023 – 5pm to 8pm – Coalport, Village Hall
- Wednesday 8 February 2023 – 5pm to 8pm – Madeley, Anstice Ballroom
- Monday 13 February – 5pm to 8pm – Buildwas, Village Hall.
- Thursday 16 February 2023 – 5pm to 8pm – Ironbridge, Tontine Hotel.

Kind regards,

Planning Policy e-mail: planningpolicy@Shropshire.gov.uk