

TWC/2021/0356

Site of AGA Rayburn, Coalbrookdale Works, Wellington Road, Coalbrookdale, Telford, Shropshire

Development of 101no. dwellings with associated access, infrastructure and demolition (to include the rebuilding of 1no listed building and conversion of 1no. listed building, to provide 3no dwellings), and the creation of an open watercourse, and publically-accessible historic interpretation zone (Full Planning Application) ***
AMENDED AND ADDITIONAL PLANS RECEIVED ***

APPLICANT

Shropshire Homes Ltd

RECEIVED

20/04/2021

PARISH

The Gorge

WARD

Ironbridge Gorge

THIS APPLICATION HAS BEEN REFERRED TO PLANNING COMMITTEE AS THE APPLICATION HAS BEEN VALIDATED AS A NON-DETERMINATION APPEAL BY THE PLANNING INSPECTORATE (PINS) AND IT IS NECESSARY FOR THE PLANNING COMMITTEE TO CONFIRM TO PINS THEIR LIKELY DETERMINATION; HAD THE APPLICATION BEEN PRESENTED TO THEM WITH A RECOMMENDATION.

OFFICERS CONSIDER THAT THE LEVEL AND NATURE OF REPRESENTATIONS WOULD HAVE WARRANTED A COMMITTEE DECISION.

It should be noted that the reason the application had not proceeded to determination by the LPA is set out in full below but in brief, concerns were raised by ICOMOS (International Council on Monuments & Sites) about whether the proposal sustains the Outstanding the Universal Value (OUV) of the World Heritage Site (WHS) by ensuring that the idea of an industrial landscape is perpetuated. The Department for Digital, Culture Media and Sport (DCMS) advised the LPA that they should endeavour to address the ICOMOS concerns as far as is feasible. They further advised that should the development go ahead and ICOMOS concerns remain, there was a risk that the World Heritage Committee could judge the WHS to have been severely compromised and put the site on the UNESCO List of World Heritage in Danger. This concern remains and therefore the recommendations of this report to Committee are on the basis that these concerns have been considered, but they are not material planning grounds that would allow refusal of the application.

Online planning file (full planning application):

<https://secure.telford.gov.uk/planning/pa-applicationssummary.aspx?ApplicationNumber=TWC/2021/0356>

a) The purpose of this report is to:

- i. advise Planning Committee of the recently received Non-determination appeal in regards to this application,
 - ii. outline how this has arisen, and to assist the appeal process,
 - iii. seek guidance on the issues relating to how the Council's case should be presented at appeal, and;
 - iv. ask the Committee to indicate what resolution they would have made on this matter.
- b) The Local Planning Authority will need to write a Statement of Case, which is due on the 1st May 2024, with the appeal programmed as a hearing to take place on Tuesday 25th June 2024. This Statement of Case will outline the position of the Local Planning Authority and will need to set out the decision that would have been made by Planning Committee, should the application have been presented. In cases of non-determination appeals, it is important to gauge the views of the Planning Committee.
- c) In respect of the appeal process, all persons who were notified or consulted about the application, and any other interested persons who made representations regarding the Applications, have been written to and informed of the appeal.
- d) Any interested parties have sufficient time to respond formally to the Inspectorate (also by the 1st May 2024), and as such any comments received by the Planning Inspectorate by this time will form part of the appointed Inspector's deliberations. All existing representations made to date, will be sent to the Inspectorate.
- e) The jurisdiction to determine this application now lies with the Planning Inspectorate.

A REPORT HAS BEEN PRODUCED BELOW WHICH WILL FORM THE BASIS OF THE COUNCIL'S STATEMENT OF CASE PREPARED FOR THE APPEAL.

1. SUMMARY RECOMMENDATIONS

IT IS RECOMMENDED THAT THE COMMITTEE ADVISE WHETHER THEY WOULD HAVE BEEN MINDED TO GRANT THE APPLICATION FOR THE REASONS BELOW TO ASSIST THE COUNCIL'S RESPONSE TO THE NON-DETERMINATION APPEAL.

- 1.1 It is considered that should a formal recommendation have been made to the Planning Committee it would have set out a recommendation to:
- 1.2 Grant DELEGATED AUTHORITY to the Development Management Service Delivery Manager to **GRANT FULL PLANNING PERMISSION** subject to conditions, informatives and the applicant entering in to a S106 agreement, as set out in the detailed recommendations below, and to;

- 1.3 Grant **DELEGATED AUTHORITY** to the Development Management Service Delivery Manager to **GRANT LISTED BUILDING CONSENT** subject to conditions, informatives as set out in the recommendation set out under TWC/2021/0358 for the reasons outlined below.
- 1.4 This report should be read in conjunction with the Listed Building Consent Application (TWC/2021/0358), and will cover all material planning and Listed Building matters.

2. APPLICATION SITE & SITE HISTORY

- 2.1 The site subject to this application is located at the former AGA site, Wellington Road, Coalbrookdale and lies to the south of Telford.
- 2.2 The application site is located within the built up area of Telford & Wrekin and is a brownfield previously developed site. It forms part of the World Heritage Site (WHS) and Severn Gorge Conservation Area (SGCA). There are two listed buildings located to the north of the site, known as the Pattern Shop and the Compressor House. The wingshop, is located to the south-east of the development and is a non-designated heritage asset.
- 2.3 Until November 2017, when the former owners AGA ceased operations, the site had always been used for commercial use. The closure of the AGA factory brought the end of three centuries of ironwork on the site, which was started by industrialist Abraham Darby I in 1709.
- 2.4 Known then as The Coalbrookdale Company, the site has been utilised to mark many historically recognised moments such as the smelting of iron ore using coke instead of charcoal to ease mass-production of cast iron; the creation of the world's first Iron bridge (whose beams and ribs are thought to have been cast at the foundry) by design of Abraham Darby III; the world first steam railway locomotive was engineered at the foundry by Cornish engineer Richard Trevithick and during World War II, the foundry was used by Fisher & Ludlow to make the wings for Lancaster bombers. The site became known as the AGA Foundry, in 1946. Following sale of the site in 2015 to an American based company (Middleby Corporation), it became apparent that production at the Coalbrookdale site was no longer economically viable, with another local site in Ketley to remain in operation as the local base.
- 2.5 Following the closure, the site was marketed and it is the applicants, Shropshire Homes, whom secured its purchase and have been working alongside both the Local Planning Authority and Historic England to endeavour to secure its optimal viable use.

3. APPLICATION DETAILS

- 3.1 These applications seek full planning and listed building consent for residential development of 101no dwellings which includes the conversion of the existing wingshop and compressor house/pattern shop buildings.
- 3.2 The application comprises of a varied mix of development from conversion of the listed building and non-designated heritage assets to 1 and 2-bed apartments, in addition to the erection of a mix of 2, 3 and 4 bedroom homes.
- 3.3 The application is supported by and overall site layout which has been produced in liaison with Historic England during separate pre-application discussions.
- 3.4 A separate listed building consent application (TWC/2021/0358) has been submitted for the works proposed specifically to the Compressor House and Pattern Shop and any associated works in relation to the remainder of the site classed as within their curtilage. These are discussed concurrently within this report.

4. PLANNING & SITE HISTORY

- 4.1 Prior to the takeover of the AGA factory by Middleby Corporation in 2015, AGA were in discussions with the LPA over their continued investment into the site. Various options were considered including the closure of the Ketley AGA premises which finished the product, relocating almost all workings to Coalbrookdale and strong intentions of this are evidenced by the erection of a new 16m high sandblasting plant in 2014 kick-starting a £4.5m investment. However, as the site have become financially unviable the new owners decided to amalgamate casting to exiting sites across the UK, and announced the foundry's closure.
- 4.2 It should be noted that prior to the purchase of the site by the applicants (Shropshire Homes), the 'wingshop' (a c.1900 building marking the southernmost extent of the industrial buildings on site) was in separate ownership to the AGA site, owned by the Ironbridge Gorge Museum Trust (IGMT). There were no clear boundaries of land ownership and the building has been sat in a state of disrepair for, in excess of, 50 years.
- 4.3 Jones Lang LaSalle were appointed by Middleby Corp to review and consider the future of the site, and in 2017 approached the LPA to discuss the sites

potential and constraints if the site was to be marketed. It was made clear by the LPA, that commercial development was the preferred approach, or a mixed use development that integrated the sites unique location and history with individual users. Concerns were raised over the principle of housing as a standard 'housing estate' would not be appropriate here.

- 4.4 It was however recognised by the LPA at that time that the Council had a significant amount of greenfield employment land (76 Ha) that is allocated and available for immediate investment across the Borough; being brought forward with strategic investment and delivery with Homes England. Additionally, there are a number of well-established Strategic Employment Sites where industrial processes are better suited. As such, the land is not a prime commercial development opportunity, particularly given its significant constraints and the abnormal costs associated with these. Whilst historically the site and all the land surrounding it, was part of the industrial revolution, it is recognised that this location no longer lends itself to the modern day working of such activities. The access and its surrounding highway network hinders HGV movements and the existing commercial units themselves are not fit for purpose or conversion; its redevelopment of any nature would have environmental and technical constraints which will increase costs significantly. Additionally, past commercial workings were considered a substantial nuisance to neighbouring residential premises, with complaints such as noise, traffic and stability issues with the movement of HGVs.
- 4.5 One thing is clear, the LPA do not wish to see the site remain derelict and further dilapidate, becoming an eyesore in the World Heritage Site (WHS), which has been identified as an issue with the Wingshop. As such, The LPA have had to remain open to all redevelopment proposals with a positive stance to finding a sustainable option, as set out in the NPPF, thinking creatively to secure and improve economic, social and environmental conditions of the area, whilst protecting the Outstanding Universal Value.
- 4.6 In 2019, the current applicants Shropshire Homes, showed interest in the site and a willingness to purchase for residential development. Shropshire Homes are a well-established independent local housebuilder with a history of undertaking heritage projects sensitively; with examples in both Coalport (Reynolds Wharf – adjacent to Grade II* LB and within the WHS) and Upper Coalbrookdale/Madeley (The Beeches Hospital – Conversion of Grade II LB near to the WHS). They have also converted Shelton Hospital in Shrewsbury (conversion of a Grade II LB), amongst other heritage projects. They have a willingness to adapt their designs to suit the site constraints, and are not governed by a national standard of housetypes.

- 4.7 In 2019, they submitted a pre-application enquiry to the LPA. On the basis of the above points, taking account of the known site constraints and abnormal costs (discussed below), the principle of residential development was accepted. However, the design needed significant work and the applicants were advised to engage early with Historic England.
- 4.8 A direct pre-application enquiry was subsequently opened with HE during 2019 and has spanned over 18 months being led by the applicant's Heritage Consultant Edward Nash of Nash Partnerships. Nash Partnerships have been recently instructed by IGMT in respect of the Coalport scheme and are therefore also well established locally as being experienced in heritage schemes in the Gorge. The LPA were not party to these discussions, but received sight of a draft Heritage Impact Assessment issued by Nash Partnership to various Stakeholders in 2020 which gave a summary of those discussions and the approach to which the applicants would take to the site's development. Key points made during the discussions with HE were:
- The wingshop should be retained;
 - The new development should make homage to the industrial history of the site and seek to tell the story of the application site;
 - The character of the industrial valley floor is different to the residential sloping sides of the Gorge and this should be recognised.
- 4.9 The applicants acquired the wingshop to allow the site to come forward as one holistic site, which is something the LPA and HE had wholly supported.
- 4.10 HE have been broadly supportive of the residential development of the site; as can be seen from the consultee comments received to date and have worked alongside the applicants to find an appropriate solution for the general massing and layout of the site which is most appropriate for the WHS. They have accepted that whilst an industrial use would be the easiest path to sustain the Outstanding Universal Value (OUV), this was unlikely to be achievable or maintainable for the future. HE considered that it was therefore better to have positive engagement with this local developer who was known for having a good track record locally.
- 4.11 In parallel to the HE pre-application enquiry and prior to the purchase of the site, the applicants also sought to obtain funding from the West Midlands Combined Authority (WMCA). In 2020, a further pre-application enquiry was submitted to have the viability of the site independently reviewed by the LPA prior to the submission of an application.

- 4.12 It should be noted that since the closure of the factory there have been two fires on-site and whilst the applicants have invested in CCTV, security fencing and intruder proof alarms, this does not wholly deter trespassers and the threat of collapse to many on-site buildings, posing a risk to safety and instability.
- 4.13 Additionally, and in recognition of this, the applicants have continually monitored the structural integrity of the existing buildings on-site. An updated structural survey in 2021 highlighted that the wingshop and pattern shop were in need of urgent remediation to ensure their long-term survival, with roof collapses apparent. Following site visits from the Council's Building Control team, a Dangerous Structures notification was served which has resulted in the dismantling of the 'Pattern Shop' in its entirety, and works to the 'Wing Shop' included the demolition of the roof and the building being propped. All materials have been stored for re-use.
- 4.14 *EIA/2021/0001 – Screening Opinion for erection of 100no dwellings – Environmental Impact Assessment not required – Decision issued: 8th February 2021.*
An Environmental Impact Assessment Screening Opinion was undertaken in 2021 with the assessing determining that the development was not likely to have significant effects on the environment.

5. RELEVANT POLICY DOCUMENTS

- 5.1 National Planning Policy Framework (NPPF)
- 5.2 National Planning Practice Guidance (NPPG)
- 5.3 Telford and Wrekin Local Plan (2011-2031)
- SP1 Telford
 - SP4 Presumption in favour of sustainable development
 - HO1 Housing requirement
 - HO5 Affordable housing thresholds and percentages
 - HO6 Delivery of affordable housing
 - NE1 Biodiversity and geodiversity
 - NE2 Trees hedgerows and woodlands
 - NE5 Management and maintenance of public open space
 - C1 Promoting alternatives to the car
 - C2 Safeguarding rail and transport corridors
 - C3 Implications of development on highways
 - C4 Design of roads and streets
 - C5 Design of parking

BE1 Design Criteria
BE3 Ironbridge Gorge World Heritage Site
BE4 Listed Buildings
BE5 Conservation Areas
BE6 Buildings of local interest
BE9 Land stability
BE8 Archaeology and scheduled ancient monuments
ER11 Sewerage systems and water quality
ER12 Flood Risk Management

5.4 Other Planning Policy Documents:

Severn Gorge Conservation Area Management Plan 2016
Ironbridge World Heritage Site Management Plan 2017
Ironbridge Gorge World Heritage Site SPD 2023
Homes for All SPD 2022
Climate Change Guidance for Development SPD 2023

5.5 Sections 16(2), 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended).

6. LOCAL REPRESENTATIONS

6.1 The application has been publicised through a site notice, press notice and direct neighbour notification. It has been the subject of two rounds of public consultation following the receipt of revised plans and additional information requested by consultees.

6.2 During the first round of public consultation, The Local Planning Authority received 23 neighbour representation objecting to the full planning application and 58 objections to the listed building consent application (numerous objections from the same resident were not counted more than once). In addition to this, there were also some comments which did not express objection/support but commented on specific elements that were supported and/or needed further work. The following summarised issues were raised:

- Pressure on local services
- Impact on local wildlife
- Impact on local highway network
- Density of development
- Design of proposals
- Suggestions for allocated parking for nearby residents on Wellington Road

- Consideration of further double lining in the area
 - More affordable homes required
 - Clause required to prevent holiday homes
 - Strong contribution required to education and play facilities.
- 6.3 One representation was received supporting the scheme (the listed building consent application), and some comments not objecting nor supporting, made the following summarised points were made:
- Happy to see a local developer bring the site forward
 - Current site is an eyesore;
 - Respectful to the local area and well thought out;
 - Traffic will be no different to the former commercial use;
 - Appreciate daylighting of the culvert
- 6.4 During the second round of public consultation in October 2021, the Local Planning Authority received a further 61 neighbour representation objecting to the full planning application and 15 objections to the listed building consent application. The issues raised were in similar vein to those raised previously but with particular emphasis on highway impacts, the density of the development and flooding issues.
- 6.5 No further representations were received supporting the application(s).

7. CONSULTEE REPRESENTATIONS

Below are summaries of the statutory representations. Full comments can be read in full on the public planning file.

7.1 **Ward Member Cllr Healy – Object:**

Objects to principle of a wholly residential site given sites historic use for commercial development; lack of demolition details; risk of contaminants is not adequately addressed – concerns over airborne contaminants; concern over parking – site only meets the parking standards and could consider exceeding this to avoid overflow parking on Wellington Road; loss of on-street parking spaces on Wellington Road due to access realignment; density of development too great; lack of green space interspersed; no demand for 1 bedroom flats in this area – concern over use as holiday lets in the future; daylighting of culvert has benefits from landscape/biodiversity aspects but remain concerned over flooding; concerns over lack of information on surface water drainage; concern over loss of boundary trees and perceived ‘green vista’; gardens too small; lack of sustainability measures; off-site

improvements to local play area should be required; design unsympathetic to the area.

Further comments were received in October 2021 following the receipt of additional and revised information. A summary of these comments are set out below:

- The site has been the location for industry since the Industrial Revolution, and therefore some form of commercial (i.e. workshops) should be encouraged – not just residential;
- No demolition, construction of delivery details provided;
- Concern over buried contaminants which may be unearthed by the opened up watercourse;
- TWC parking standards have been met but are considered to be too low;
- Concern over the displacement of the on-street parking on Wellington Road – new spaces should be created within the development for this loss;
- New access, despite improved visibility, will be located on a blind bend. Preferable to retain the two existing accesses to improve safety at junctions;
- TWC model does not take into account poor road infrastructure;
- Density too high and apartment block too large – no demand for 1 bedroom apartments in this location, proposed gardens are too small – appears cramped and out of character with development in the Gorge;
- EA has requested modelling of the culvert which has not been received;
- Who will maintain culvert?
- Dale End Pump is at capacity for foul sewerage.
- Loss of trees/green vista along Wellington Road – particularly Maple tree;
- Danger of ‘closed community’ due to a single vehicular access;
- Off-site contributions towards local play should be requested;
- The site is visible from many vantage points, surrounded by listed buildings. The proposal will cause significant harm on the OUV of the WHS.
- Existing pattern of development is considered a mix of large detached dwellings and terraces, interspersed with allotments/grazing land/woodland;
- Accepted that the applicant has taken to mimicking the former rooflines of the foundry, but a greater proportion of the site is to be built on than at present - much more of the site was once open including the former pools. Layout should reflect this.

7.2 The Gorge Parish Council – Object:

Loss of parking to Wellington Road residents due to the proposed access arrangements; speed of traffic along highway; concerns over demolition

phase and handling of hazardous materials; concerns over construction phase relating to hours of working and weight limits to vehicles, as well as the impacts on the water course; flood risk concerns particularly downward flood risk once the culvert is daylighted; increased pressure on local services/facilities; density of development too great; insufficient affordable housing; dense unappealing roofscape; limited car parking; lack of renewables/consideration to climate change.

Similar comments were received in the second round of consultation, but can be read in full online.

7.3 Ironbridge Gorge World Heritage Site Steering Group - object

May 2021: We applaud the research that has underpinned the design process for the scheme but remain concerned at the volume and density of housing proposed. We also feel that the increase in traffic this volume of housing will generate, coupled with the additional traffic impacts from the Power Station development, will put undue pressure on the heart of the World Heritage Site and its resident community in Coalbrookdale. For these reasons we recommend that the scheme is referred to ICOMOS UK and Unesco before determination to ensure that any potential harm to the OUV of the World Heritage Site is mitigated by the highest standards of design.

October 2021: Same concerns re-expressed.

7.4 Highways - support subject to conditions.

Proposal is not considered to have a severe highway impact in accordance with para 111 of the NPPF. Traffic flows along Cherry Tree Hill will not be of a concern and the revised plans/TA demonstrate that the proposed site access is achievable and will not result in the loss of on-street parking on Wellington Road. There is an over-provision of parking spaces.

7.5 Arboricultural - support subject to conditions.

The proposal is considered acceptable. The loss of a stretch of trees to the rear of the 'wingshop' is regrettable but unavoidable given the proposed change in levels; it is not considered that any of these trees are worthy of a Tree Preservation Order (TPO). This loss will be mitigated through the provision of additional planting (to be conditioned) including some mature tree specimens. The trees to the north of the access (aligning the historic wall) will be retained in perpetuity and a management plan required. Appropriate planting alongside the proposed watercourse will also be expected and is conditioned.

7.6 Healthy Spaces - support subject to conditions.

Despite viability issues, the applicant has agreed to make a contribution towards play improvements at Cherry Tree Hill Play Area. These works will be secured by S106 agreement and paid prior to occupation.

7.7 Ecology - support subject to conditions.

Site is of low ecological quality with extremely limited impact caused by the development; with the daylighting of the culvert providing ecological benefits. Conditions proposed for on-site enhancements, LMP and BNG monitoring.

7.8 Education – comment

Contributions required to education facilities in the vicinity, both primary and secondary. However, it is noted and understood that the viability of the site results in these contributions not being sought.

7.9 Drainage - support subject to conditions

The hydraulic modelling undertaken shows there to be no increase in flood risk either on-site or downstream. As such, the proposals to develop the site are acceptable in principle however conditions will be required for further detailed drainage and channel designs, as well as the culvert abonnement strategy. Daylighting of the culvert is a benefit to the local area in terms of restricting flow and water storage.

7.10 Built Heritage - support subject to conditions

The scheme would deliver clear heritage benefits (both in terms of listed buildings and the SGCA/WHS) by ensuring the restoration and reuse of buildings relating to the 19th and 20th century industrial history of the site, reintroducing waterways, opportunities to reveal the significance of the building and building construction adopting rafting systems to avoid archaeological impacts. There is however some harm identified and in accordance with policy, this harm needs to be weighed against the public benefits of the scheme. ICOMOS concerns must also be fully considered in the planning balance.

7.11 Archaeology – support subject to conditions

A Written Scheme of Investigation (WSI) and Archaeological Management Plan (AMP) have been submitted in support of the application and found to be acceptable in principle subject to further investigations conditioned accordingly. During the course of the application, the applicants proposed the use of raft foundations on the northernmost part of the site to overcome concerns raised by ICOMOS and to avoid impacts to any historic remains which might survive, at this depth, in this location. This suggestion is supported. The history of the site is acknowledged, as is the presence of standing buildings and deep levels of overburden indicated in the

geotechnical reports. A phased programme of archaeological work is conditioned.

7.12 Environmental Health – Support Subject to conditions

Contamination: The preliminary reports undertaken by Georisk Management have confirmed unacceptable levels of contamination in respect of risks to human health. Conditions are imposed for further Phase 2 Site Investigations to take place following demolition which is necessary to make the site available/accessible.

Noise: Mitigation required in the form of acoustic glazing, vents and some small areas of fence/wall – to be conditioned.

7.13 Affordable Housing (Policy) – Support subject to conditions

Policy HO5 states that the Council will seek 25% affordable housing in Telford. The site will provide 20% discounted market dwellings, offered at 10% discounted market value for essential local workers, as defined in the NPPF. It is acknowledged that there are viability issues with the site and whilst a policy compliant affordable housing would be preferred, on balance, the proposed provision would still be at a reduced rate offering more affordable homes than at full market value. We would encourage the affordable housing to be aimed at key workers and secured by S106 agreement.

The provision of bungalows and homes that meet Building Regulations Part M4(2) or M(3), would be encouraged and the development should:

- Where possible, include the provision of bungalows and homes that meet Building Regulations Part M4(2) or M4(3);
- Achieve the Nationally Described Space Standards;
- Be tenure neutral and well integrated within the overall development;
- Be retained as affordable as in the long term.

7.14 Environment Agency – support subject to conditions

October 2021 - Following receipt of additional/revised information, previous objection can be removed and conditions recommended.

7.15 Severn Trent – Support subject to conditions

A Developer Enquiry Request demonstrates that there is capacity within the local sewer network and that improvement works are not required. The response to this Enquiry was received following consultation with STW in April 2021.

7.16 Historic England - comments

Historic England recognises both the difficulty of securing the reuse of this site, and the works of repair and enhancement that this could bring.

We appreciate that redevelopment of areas which may overlie deeply buried early industrial remains would preclude their archaeological research excavation in the lifetime of the development. The depth of cover and associated methodological difficulties in carrying out any such excavation make it unlikely in the foreseeable future. Taking into account that the present situation is that there are concrete slabs lying over these areas we would not see it as harmful versus the *status quo* to build over such areas with an appropriate raft based system leaving such remains as may survive at depth preserved *in situ*.

The design solution set out and narrated in greater detail across the most recently submitted documentation has been subject to previous comments by Historic England prior to application for consent. Of key importance is to convey through the proposed design the contrast between the valley floor at time of WHS inscription (a space of large broad industrial forms) as distinct from the character of both vernacular and higher status housing on the valley sides. Whilst the 18th Century character of early industry as a core attribute of OUV was one of piecemeal organic growth, that character was largely invisible on the AGA site at time of inscription. The early industrial remains on the AGA site insofar as they survive lie deep beneath the graded landscape of circa 1900 with its characteristic large structures and level rail served spaces. Overall, we consider the proposals embody a balance between development of a scale necessary to be viable and the conservation of the site. They advise the LPA to consider this advice, along with the concerns raised by ICOMOS when coming to a decision, weighing the public benefits that the proposal would bring, including some benefits to the conservation of the site, against the harm to the OUV that it would also entail.

7.17 Network Rail – No objection subject to informative

The applicants have entered into a Basic Asset Protection Agreement (BASA) and the previous holding objection has therefore been withdrawn.

7.18 Shropshire Fire Service – Comment

It is vital a robust Sept Path Analysis is undertaken throughout this development, in order to accurately track the suitability of access for fire appliances. This access must be fully compliant with the Building Regulations Approved Document B Volume 1 – Dwelling houses. As part of the planning process, consideration should be given to the information contained within Shropshire Fire and Rescue Service's "Fire Safety Guidance for Commercial and Domestic Planning Applications" document.

7.19 West Mercia Police – Object

WMP provided general design guidance but objected to the long pathways to the rear of gardens as they are strongly discouraged; proven to generate crime and antisocial behaviour.

7.20 The Coal Authority – No objection subject to informative

The site is located within the defined Development Low Risk Area and therefore is no requirement for a Coal Risk Mining Assessment to be submitted or for the Coal Authority to be consulted.

7.21 Cadent Gas – No objection subject to informative

Apparatus has been identified as being in the vicinity of proposed works (Low or Medium Pressure (below Bar 2) gas piped and associated equipment. Informative added.

Below are summaries of the non-statutory representations. Full comments can be read in full on the public planning file.

7.22 Severn Gorge Countryside Trust – Support subject to conditions:

Concerns were initially raised with respect to the site drainage and localised impacts downstream. Additionally, the likely increased recreational pressure on Dale Coppice was highlighted as a concern and a contribution requested towards the future maintenance and management of this woodland. The applicants have agreed to this contribution and the LPA have advised SGCT that the LLFA are happy with the drainage proposal. SGCT have confirmed withdrawal of their objection on this basis.

7.23 ICOMOS UK (International Council on Monuments & Sites) – comments

The World Heritage site was inscribed as an overall industrial landscape for the way it provided an outstanding reflection of the beginning of the industrial revolution. In particular the Coalbrookdale blast furnaces contributes to the justification criterion (i) for the way is 'perpetuates in situ the creative effort of Abraham Darby I who discovered the production technique of smelting iron using coke instead of charcoal in 1709. As an industrial landscape the site was also 'the focus of international attention from artists, engineers, and writers who came to view the new technologies. In sustaining OUV, it is essential that the idea of an industrial landscape is perpetuated, that all aspects connected with Abraham Derby and his production processes are conserved, and that the way this industrial landscape attracted artists and writers as well as engineers can still be appreciated. In ICOMOS-UK's view, the current proposal cannot be said to support these essential prerequisites for the following reasons:-

- a) The images supplied for the proposed development show with great clarity how the lower reaches of Coalbrookdale will be transformed

from an industrial landscape into a dense, high-rise housing estate, which the 'industrial design' of the dwellings cannot ameliorate, and which does not in any way reflect historical uses;

- b) The remnants of structures related to Abraham Darby, now overlain by waste materials, will not be preserved;
- c) The once in a lifetime opportunity to bring to life how the valley bottom contributed to Derby's iron production will have been lost;
- d) The views of the Dale from a network of paths and viewpoints will be highly compromised and thus their ability to promote understanding of industrial processes and their attraction for 18th century writers and artists.

8. APPRAISAL

8.1 Having regard to the development plan policy and other material considerations including comments received during the consultation process, the planning application raises the following main issues:

- Principle of development / Density
- Impact on the amenity of adjacent properties / uses
- Highways impacts
- Foul & Surface Water Drainage
- Ecology and Trees
- Contamination, Noise and Stability
- Viability
- Affordable Housing / Discounted Dwellings
- Healthy Spaces
- Heritage
- Design
- Planning obligations

Principle of development / Density

8.2 The site is a brownfield previously developed site located in the heart of Coalbrookdale. It falls wholly within the Telford urban boundary where the principle of residential development is considered acceptable.

8.3 The application site area (gross site area) is 3.85 hectares and the proposal seeks planning permission for residential development of 101 no dwellings.

8.4 Part of the site (on the western and southern edge) falls within the Green Network but these areas are being protected and enhanced as part of the public open space provision.

8.5 The mix of dwellings proposed is shown in Table 1 below, which results in a gross density of 26.2 dwellings to the hectare.

8.6 Excluding the open space area surrounding the culvert, and just considering the developable area (net site area), the site is 2.29 hectares. Resulting in a net density of 44.1 dwellings to the hectare.

Table 1: Mix of dwellings			
	Open-market	Affordable	% of total 101 dwellings
1 bedroom	10	4	13.86%
2 bedrooms	33	12	44.56%
3 bedrooms	16	6	21.78%
4 bedrooms	20	0	19.80%
TOTALS	79	22	

8.7 A Technical Paper (Density and net site area study – July 2015) was produced to support the adopted Local Plan which identifies pre-1900 settlements such as Coalbrookdale to have a medium density (i.e. between 30 and 50dph).

8.8 The same study identified an average density across the Borough as 40dph for net area and 37dph for gross area.

8.9 Of note is that smaller sites of less than 4 hectares, such as the application site, were more likely to have a higher net developable area and also that they tended to have a higher proportion of apartments, averaging 17% of the site, resulting in sites of less than 100 dwellings having a generally higher density (average 46dph net) than larger sites (average 39dph net).

8.10 It should also be noted at this time, that the general density and form of the development has evolved from early discussions with Historic England, with a view to recognising the historic roofscapes and high density development that has always been present on-site, with the roof forms chosen for the terraces scaled to recognise the multiplicity of roofs that the large footprint factory now shows.

8.11 It should however be noted that the density of this site has scaled back from what has occupied the site previously. A 1930-1940 aerial photograph is included in Fig 12 of the Historic Building Record (June 2019) which both demonstrate very little of the site being open; at stark contrast to the character and density of the Gorge as a whole. This same density of built form has been apparent for a substantial number of years, with Fig 19 showing the site in 1992 and Fig 20 following closure of the AGA foundry post 2017. The site has always had its own pattern of development and sense of place, in the context of the wider WHS.

8.12 The applicants describe the proposals in their Design & Access Statement as *“a post-industrial era recovery of a site from its most extreme industry era development through to a density of use which allows for the recovery of*

biodiversity and trees and a visible stream which removes the inherent risk of the deep culvert...”

- 8.13 It is therefore considered that in this location and in recognition of the sites viability concerns, the public benefits arising from opening the culvert which takes out a substantial proportion of the site, and giving consideration to the site’s design aspirations discussed below, that the density and mix of the development is acceptable, both from a local perspective and borough-wide. It is therefore considered that the proposal complies with policies SP1, SP4 and NE6 of the Local Plan and national guidance, in terms of principle.

Impact on the amenity of adjacent properties / uses

- 8.14 Inevitably, the change to the character of this site will have some impact upon neighbouring properties. Not necessarily one that is imposing or negatively impactful, but a change in their immediate setting and the likely activity associated with its use.
- 8.15 Until November 2017, when the former owners AGA ceased operations, the site had always been used for commercial use.
- 8.16 As such, it is recognised that a change of use to residential will mark a change in the vehicular trips; greater than currently exists, but of a lesser scale than the commercial vehicles which would have frequented the site previously. Surrounding properties will also experience a visual change to the site and that of noise impact will also differentiate from what once was present on-site.
- 8.17 It must be recognised that the AGA foundry closed in 2017, some 7 years ago, and therefore neighbouring properties may have become accustomed to a quieter, less impactful, neighbouring use but the level of activity and extant planning use to which this site has permission for, could be significant if such a use were to be re-established and this must be considered in the planning balance.
- 8.18 The majority of neighbouring properties are located to the east, on the opposing carriageway of Wellington Road. The application site is located at a lower level whereby existing properties are situated above the application site. As such, it is considered that the impact upon existing properties in terms of overlooking and overbearance are limited, albeit a visual change is notable.
- 8.19 Two semi-detached properties located on the eastern carriageway of Wellington Road (known as ‘the sweetshop’) fall immediately adjacent but outside of the application site boundary. These properties have a garden depth of approximately 13.5m with 19.6m from the rear elevation, to the rear elevation of the proposed wingshop conversion. Whilst this is marginally lower than the expected 21m, it must be recognised that this is a conversion scheme whereby the stipulation of such guidance should be flexible. Direct overlooking will occur from two windows; one of which is the existing arched windows which is a low-level window. The new window provides the only

natural light to bedroom two, and is therefore considered on balance to be acceptable given the 19.6m which is provided.

- 8.20 Views into the site can be achieved from Church Road (particularly adjacent the Holy Trinity Church) and glimpse views from Darby Road/Coach Road.
- 8.21 It is considered by Officers that whilst a marked change to the landscape, the changes are not impactful on the amenity of neighbouring properties by way of overlooking, loss of light, noise etc. and therefore complies with the relevant parts of the BE1 of the Local Plan and national guidance.

Highways

- 8.22 Access to the site is off Wellington Road, where an existing access currently exists. The application is supported by a Transport Assessment (TA) and Travel Plan (TP).
- 8.23 The application site has an extant industrial land use and some weight must be given to this argument. Existing traffic flows on Wellington Road are considered to be low, and as a result the proposed site access junction would operate within acceptable levels of capacity (as demonstrated in the TA).
- 8.24 The site access is being relocated further north in order to meet the access visibility requirements. There is some on street parking in this location, just as there was with the old access location, but road widths, parking behaviour and vehicle tracking has been considered with a conclusion that there would be no undue harm to road safety as a result of development. The revised vehicular tracking exercises also demonstrate that there will be no impact or loss of on-street parking on Wellington Road, following the minor realignment of the junction.
- 8.25 Existing turning counts in the locality of Darby Road and Wellington Road have established that the majority of traffic is to and from Jiggers Bank, away from the Wharfage and centre of Ironbridge. Extrapolation of these findings have to be considered with a little caution but it does give some idea as to expected patterns of movement. It is noted that Cherry Tree Hill is a traffic sensitive route to and from the A4169 but any increase in its use as a result of this development is expected to be slight and could not be considered severe.
- 8.26 At network peak times, the development is expected to generate circa 50 two-way vehicular trips. On average this is less than one per minute across a peak hour. Accordingly, in quantum terms this cannot be considered a severe impact under the NPPF tests.

- 8.27 Consideration has been given to the Ironbridge Power Station proposals but the traffic modelling associated with that site established a non-material impact on Wellington Road. However, in recognition of the general cumulative increase in vehicular movements in the Gorge associated with both this application and the recently approved Ironbridge Power Station (IPS), S106 contributions are being sought towards a traffic management scheme in Coalbrookdale. The contribution being sought is commensurate to that requested for the IPS application of £150/unit (plus indexation) with a payment trigger of 25% occupation.
- 8.28 The Local Plan adopted parking standards are exceeded by seven spaces; 191 are expected and 198 are being provided. As such, there are excess spaces which can be utilised by either visitors of the development, or the occupiers of Wellington Road properties on a first come, first served basis.
- 8.29 The internal road layout conforms to the standards expected for a development of this nature and in this location, aligning with the Manual for Streets guidance on design. The submitted vehicle tracking exercise for refuse and fire tenders are considered acceptable and demonstrate no particular issues in the opinion of the LHA.
- 8.30 Footpaths of 2.0m in width will be provided along both sides of the vehicular access bellmouth, tying in with the already established pedestrian network along Wellington Road. Additionally, a new pedestrian access has been shown from Wellington Road, south-west of the wingshop building, to provide interconnectivity with the wider community and its open spaces.
- 8.31 In sustainability terms the site is located adjacent to No.19 service bus stops on Wellington Road, is within 1km (11 min walk) of the local primary school and Co-op shop and within 1.5km (17min walk) of the amenities of Ironbridge High Street. Each property will be provided with a private shed/outbuilding to house cycles and EV charging points.
- 8.32 It should be noted that the existing railway line runs to the west of the site and is a protected transport corridor under Local Plan Policy C2. This route is separated from the site boundary by woodland/Green Network and will be unaffected by the development, with Network Rail raising no objection.
- 8.33 Overall, in recognition of the technical submissions made in support of this application and whilst acknowledging local infrastructure and the extant use of the site, the LHA consider that the local highway network can accommodate the traffic associated with this proposal and it is located within a sustainable built-up area of Telford. Additionally, the site design itself exceeds parking standard requirements and is designed in accordance with national and local design guidance. As such, the proposal is considered to be compliant with policies C1, C2, C3, C4 and C5 of the Local Plan, and national guidance.

Foul & Surface Water Drainage

Surface Water

- 8.34 The Coal Brook Main River is a designated rapid response catchment and crosses under the western boundary of the AGA site in a 10m deep culvert. The culvert is very old and in a very poor state of condition in places, having been subject to various remedial work over the years. The risk of collapse is deemed to be a long-term liability for future residents of the site.
- 8.35 Part of the site proposal is to de-culvert the Coalbrook within the boundaries of the AGA site and construct a new open channel section to benefit the amenity value, ecological potential and flood risk of the feature. This proposal is wholeheartedly supported by the LLFA and considered to have both ecological and flood risk benefits (both on-site and off-site).
- 8.36 To support this a hydraulic modelling study has been submitted outlining the pros and cons of different channel morphologies and the residual flood risk from the Brook. Detailed design shall be conditioned accordingly, but the preliminary design is one which will provide flood storage for the Coalbrook which will slow water flowing downstream and therefore provide an overall betterment to Coalbrookdale.
- 8.37 The site in question has areas in Flood Zone 3 and Flood Zone 2. The developer has submitted a Flood Risk Assessment (FRA) to understand current and future flood risk to the site and the surrounding communities.
- 8.38 Whilst the zone is currently shown as falling within Flood Zone 2 and 3, this is based on current site and flooding levels, and the data available from the Coalbrook flood mapping study.
- 8.39 Prior to the submission of the application, the applicants held meetings with the LLFA and the Environment Agency to discuss the proposal and review the existing data. The applicant has demonstrated that through hydraulic modelling, that the daylighting of the culvert and increasing site levels, the vast majority of the site will be located in “dry areas” and would not flood. On the basis, a sequential and exception tests are not required.
- 8.40 A preliminary site drainage strategy has also been submitted outlining the foul and surface water discharge rates and points from the site.
- 8.41 Storm water will be directed towards the new open channel at greenfield rates and not to the combined sewer which lies under Dale Road, which is known to surcharge in storm events and cause flooding. As such, storm water will not have any greater impact on sewer flooding. It is worth noting that the existing site likely discharges water rapidly through a convention drainage system, so redevelopment of the site is also a betterment in terms of runoff rates.
- 8.42 Following receipt of additional information, the LLFA are satisfied that the development can proceed without any impact on surface water flooding in the

local vicinity and that the daylighting of the culvert is supported by Policy ER12 (viii) and considered overall to be beneficial not just from a flooding or ecological perspective but also in increasing green infrastructure; promoting health and wellbeing for residents located in its proximity as a recreational route, and also visually. This will be particularly apparent when it's considered in association with the adjoining Green Network.

- 8.43 Applicants are not legally required to provide betterment on fluvial flood risk and we as a Planning Authority cannot request this nevertheless ongoing discussions are being held between the applicants and Environment Agency to see if further improvements to the channel and bank designs can be made to provide a flood risk betterment for the local area.

Foul Water

- 8.44 Foul water flows from the development directly towards the existing combined sewer in Wellington Road. Severn Trent Water (STW) were consulted as part of this application and whilst we received no further comments on the second consultation, original comments advised that they would support the application subject to conditions. These conditions require the detailed designs for both the foul and surface water drainage, in addition to a pre-occupation condition requiring the need or foul sewerage improvements have been investigated and any such improvements being fully implemented by Severn Trent Water Limited.

- 8.45 However, since receipt of STW comments in June 2021, the applicants have undertaken a Developer Enquiry Request with a response having been received on the 20th August 2021 (available on the public file). STW have confirmed that *"... the sewer records show a 525mm diameter combined sewer just within the site boundary. I confirm that foul flows from the redevelopment 138 dwellings (approx. 2.16 l/s @2DWF) should have no adverse effects upon the system. A connection/s are therefore acceptable to the Company in principle at any convenient location subject to formal S106 approval"*. It is therefore not considered necessary to implement the latter condition requiring upgrades.

- 8.46 Overall therefore, the LLFA are satisfied that the proposal meets the requirements of policies ER10, ER11 and ER12 of the Local Plan, and national guidance.

Ecology and Trees

- 8.47 The Council's Arboricultural Officer has been consulted on the application, and during both rounds of consultations, has raised no objection subject to appropriately worded conditions.
- 8.48 The 'Tree Plan and Protection' (ref: 172-P-TP) demonstrates the loss/retention of existing trees.

- 8.49 Those trees lying opposite 39 Wellington Road and leading north to the junction of Church Road will be retained in their entirety. These trees have grown from the embankment associated with a historic retaining wall which will be retained within the development.
- 8.50 It has been agreed with the applicant that a Woodland Management Plan will be conditioned to secure their future management and maintenance; in addition to the general Landscape Management Plan (LMP) being conditioned, due to their prominence in the streetscene.
- 8.51 Those existing trees surrounding the existing site access and leading south between the 'Sweetshop' and southern elevation of the 'Wingshop' will be removed to facilitate the development. Whilst it is appreciated that loss of existing mature trees is generally resisted, in these circumstances, due to the level changes which are necessary to facilitate the development, their loss is unavoidable. Whilst some of these trees are categorised in the Arboricultural Impact Assessment (AIA) as Category B, the Council's Arboricultural Officer does not agree with this assessment and considers them to be of lower quality, with the loss not being a significant concern. They will be replaced by a new boundary wall and specimen tree planting on the verge side of the highway.
- 8.52 Ongoing discussions have been held with the applicants to consider replacement tree planting across the site, with suggestion of mature feature trees at appropriate vistas, and ecologically friendly planting alongside the daylighted culvert.
- 8.53 Whilst a Landscaping Strategy Plan has been submitted with the application, this is not considered detailed enough at this time and does not take account of the requirements of the Tree Officer, as well as additional landscaping suggestions made by the Planning Officer such as native "spiky" hedgerows along the western boundary and hit-and-miss fencing to boundaries aligning rear accesses, both of which will assist with crime prevention. As such, a detailed Landscaping Plan and Management Plan will be conditioned, along with other appropriate conditions set out in the recommendations below.
- 8.54 From an ecological perspective, the site comprises 3.67 hectares of vacant industrial land with buildings, hard standing, fencing, tree belts and a small area of semi-natural woodland at the southern point of the site. There are two stands on Japanese Knotweed on the site.
- 8.55 The site is of low ecological value but the tree belts and woodland area form important habitat connectivity links within the local area. The Site Plan shows these features as retained and would be managed by a Landscape Management Plan.
- 8.56 There are 13 Local Wildlife Sites and 9 Ancient & Semi-natural Woodland sites in 1km of the site. These sites are often susceptible to impacts from increased recreational pressure. Most of these designated sites can be accessed by between 800m and 1km of on road/pavement walking from the

proposed development and have multiple access points which will spread recreational pressure and will therefore generally avoid high recreational impacts at any single access point.

- 8.57 One site, however, is more directly accessible (by around 200m of walking) and this site and the closest access point into it is likely to receive a more considerable increase in recreational pressure. The site is Dale Coppice within the Coalbrookdale Woodlands Local Wildlife Site and Ancient Woodland and on the edge of Rough Park Local Nature Reserve.
- 8.58 The woodland is managed by Severn Gorge Countryside Trust (SGCT) and in light of the likely increased recreational pressure associated with this development, SGCT have requested a financial contribution towards the maintenance and management of Dale Coppice. This has been agreed with the applicants and is set out in the recommendation below. SGCT have removed their objection from the application and our Biodiversity Team support this contribution.
- 8.59 The buildings on the site have poor bat roosting potential, activity surveys were carried out and no evidence of bat emergence was recorded. None of the trees on the site have potential to support roosting bats. There was evidence of the site boundaries providing foraging and commuting value for local bat populations. Lighting on the site should avoid illuminating the wooded boundaries on the site itself and the woodlands to the west of the development site and will be conditioned accordingly.
- 8.60 There are 3 ponds in 500m, two tested negative for great crested newts using the eDNA technique and the third was absent on the ground. No further consideration of great crested newts is required. The buildings and vegetation on the site have potential to support nesting wild birds. Vegetation removal should occur outside of the bird nesting season and appropriate conditions for additional landscape and bird boxes is secured. There was no evidence or habitats suitable for otters, dormouse or reptiles on the site, or badger on or within 30m of the site.
- 8.61 Overall, given the site's former industrial nature, the application site is considered to have low ecological quality, providing extremely limited habitats for protected species.
- 8.62 It is therefore considered that the proposal holds ecological benefits by way of enhancing existing opportunities through planting, the daylighting of the culvert and the various bat/bird boxes (and hedgehog garden passes) being proposed across the development site.
- 8.63 A biodiversity net gain assessment (metric 2.0) was undertaken and it is considered that the proposed development, subject to compliance with the current landscaping scheme, could deliver a net gain in excess of 100%. It should be noted that the linear assessment for hedgerows have been assumed as non-native which would not comply with our requirements and additionally, no consideration has been given to planting required alongside

the daylighted culvert. As such, when the landscaping is submitted for discharge, there is further opportunity to greater increase this level of net gain.

- 8.64 Taking account of the above, Officers are satisfied that the proposal are acceptable from an Arboricultural and Ecological perspective and satisfy policies NE1, NE2, NE4 and NE5 of the Local Plan.

8.65 Contamination, Noise and Stability

Contamination

- 8.66 The proposed development site is a former Foundry that can be dated back to at least 1572 and as such is considered as potentially contaminated land as a result of the legacy of the smelting processes and associated waste disposal. Made ground (overburden) is present across the entire site with the deepest areas to the south of the site (former Upper Forge Pool) and there is also a recorded landfill on this site; the made ground consists of foundry sand, ash, coal and clinker widespread with the Environment Agency holding records to the south of the site (former landfill) having taken foundry sand/slag waste, ferrous scrap and canteen waste.
- 8.67 The application is supported by two Site Investigation Reports, which have been independently assessed by an Environmental Health consultant instructed by TWC. The Phase 2 Report carried out further investigations across the site, targeting areas identified in the Phase 1 Report as contaminated 'hot spots'. In addition, gas monitoring boreholes were serviced and monitored in the area of the former landfill carbon dioxide was present in the southern portion of the site and thus, gas protection to buildings is required.
- 8.68 Soils were tested for a range of contaminants and the findings were broadly consistent with the Phase 1 Report which confirmed contamination was present above the relevant screening levels. A controlled waters risk assessment has been undertaken and reviewed by the Environment Agency. Further details are requested by condition.
- 8.69 Outline remediation measures have been put forward, that essentially leaves the made ground in-situ, and an engineered capping solution used, to protect end users. This results in the land levels being increased 1-2m across the entirety of the site.
- 8.70 The principles of the Outline Remediation Strategy are considered to be acceptable and a robust Remediation Method Statement would be prepared to support any updated investigations, as required by condition. The application is considered compliant with policy BE10 of the Local Plan.

Noise

- 8.71 The application is supported by Noise Impact Assessment which has been independently assessed by the Council's Environmental Health consultant and considers the background road traffic noise levels for future occupants.
- 8.72 The report outlines a number of mitigation methods including appropriate glazing specifications, acoustic vents and in a few locations (where the rear gardens face Wellington Road) a 2.2m acoustic fence/wall will be required. Subject to the details of these measures being conditioned, Environmental Health are satisfied that there will be no impact on the future occupiers of the site in terms of noise.

Stability

- 8.73 The Council's High Point Rendell / Jacobs reports highlights this site as an area of "*Industrial development ...and former tips*". It does not fall within one of the Zoned areas which require stability submissions to be made with an application. To the south and east are Zones 1 and 2 which are areas likely to be suitable for development (and would too, not necessitate submissions) and the woodland to the west, is characterised as Zone 3 which is likely to be suitable for development with mitigation measures.
- 8.74 The Council are therefore satisfied that the applicant has complied with policy BE9 of the Local Plan in not providing a specific stability assessment. An appropriately worded condition would be imposed to secure details of foundation design.

Viability

- 8.75 Prior to the submission of the planning and listed building consent applications, a pre-application enquiry was submitted which sought advice on the submitted viability assessment.
- 8.76 A Viability Assessment was submitted, along with a proposed Site Plan (very similar to that submitted within this application in terms of housing numbers and mix) and this was independently reviewed on behalf of the Council by Bruton Knowles.
- 8.77 The applicant's Viability Assessment concluded that due to the sites historic industrial activities, which has involved many years of changing levels and some highly contaminating uses, that the site would be unviable should any financial contributions be required.
- 8.78 The applicant's Viability Assessment's approach was to base the Residual Land Value (RLV) on non-policy compliant affordable housing provision and NIL S106 contributions.
- 8.79 It does however factor in 20% discounted market dwellings (90% of open market value) and a nominal sum (£15k) for the future maintenance of the daylighted culvert.

- 8.80 For a proposal to be considered viable and therefore provide policy compliant affordable housing and S106 contributions, the Residual Land Value (RLV) should exceed the Benchmark Land Value (BLV).
- 8.81 In this scenario, a BLV of £679,000 is given, factoring in the S106 assumptions and the Gross Development Value, whilst then deducting development costs, abnormals, fees and profit, a wholly affordable housing compliant scheme would result in a loss of circa £500k.
- 8.82 Bruton Knowles concluded that a policy compliant proposal derives a residual land value that is significantly below the BLV, confirming that this would be unviable.
- 8.83 The Applicant's scheme which is supported by WMCA grant funding, (as submitted) now generates a small surplus over BLV of £44,255, suggesting it to be a viable proposal – on the basis of it not providing any S106 contributions or housing the Local Authority would define as 'affordable housing'.
- 8.84 Whilst the Viability Assessment also considered a review of a wholly 100% open market proposal, which showed a viable proposal, this did not factor in the terms of the West Midland Combined Authority (WMCA) grant which is discussed below.
- 8.85 Any development which is awarded WMCA grant funding, has to provide a minimum of '20% affordable housing'. As such, the grant funding which was shown within this calculation, would not be achievable for a wholly 100% open market site and therefore, the residual land value would be significantly lower than the BLV and still making the site unviable.
- 8.86 In recognition of the small surplus this current proposal brings (approx. £44k), and in consideration of the impacts a development can make on local services/facilities, contributions have been sought to make specific improvements in the locality without causing a negative impact on the viability of the site.
- 8.87 S106 contributions are being sought towards a traffic management scheme in Coalbrookdale of £15,150.00 which is commensurate with the same per unit costs, acquired from the Power Station application), £10,000.00 towards the future maintenance and management of Dale Coppice for SGCT and financial contributions of £23,000 towards the installation of additional play equipment at Cherry Tree Hill Playground.
- 8.88 Officers are satisfied that an appropriate viability assessment has been undertaken and reviewed independently, and the S106 contributions requested are proportionate and acceptable. The applicant has agreed to these contributions.

Affordable Housing/ Discounted Dwellings

- 8.89 As is discussed above, the application does not provide a policy compliant affordable housing provision due to the financial constraints of the site.
- 8.90 In order to assist the delivery of redundant brownfield sites, the Council's Development Delivery Specialist has assisted Shropshire Homes in securing a WMCA grant of £1.5m to assist with the significant viability gap on this site.
- 8.91 One of the terms of this grant is that any development that is awarded funding, shall have a minimum of 20% affordable housing.
- 8.92 The WMCA definition of 'affordable' varies from the NPPF and is more flexible to enable some form of housing that is not full market value, whilst recognising that the very need for the funding in the first place is the lack of viability on difficult sites.
- 8.93 The WMCA have agreed with the applicants that they would accept 20% of the on-site properties to be for 'essential local workers' as defined by the NPPF, at a reduced cost of 90% of open market value.
- 8.94 As a term of the funding agreement, it was not essential that these terms are duplicated in the S106 agreement but the draft Heads of Terms put forward by the applicant seeks to include it, in an effort to provide assurance to the Council of the long-term provision of discounted dwellings on this site, and the definitions to which they relate.
- 8.95 These dwellings will be marketed as 'discounted dwellings' for 'essential local workers' as defined by the NPPF:
- Essential local workers:** Public sector employees who provide frontline services in areas including health, education and community safety – such as NHS staff, teachers, police, firefighters and military personnel, social care and childcare workers. (p67, NPPF 2021).*
- 8.96 Officers are satisfied that whilst viability constraints do not allow for a policy compliant affordable housing contribution, the applicants are seeking to provide long-term essential local worker housing to meet the needs of the local community, and in recognition of the NPPF and their funding requirements.
- 8.97 As such, Officers consider that the site complies with HO1 and HO4 of the Local Plan, and guidance contained within national policy, in terms of housing mix and tenure.
- 8.98 Healthy Spaces
- 8.99 It is essential that all new developments make full provision for the infrastructure/amenities and services which they create. New residents to the area will increase demand upon the existing recreational resources. There is a lack of onsite play and informal recreation provision as part of this proposal

to meet the needs arising from the development and this does not comply with Local Plan policy NE4.

- 8.100 Therefore, the applicant should look to meet these needs by instead improving and maximising existing play and recreation facilities off-site, as well as contributions towards nearby sport and recreation facilities.
- 8.101 The viability of the constraints have been recognised and the Healthy Spaces Team acknowledge that full off-site financial contributions cannot be secured. However, in liaison with the applicants, a small financial contribution has been agreed which allows for an upgrade of Cherry Tree Hill – this has been secured through S106 agreement.
- 8.102 Whilst Landscaping Strategy Plans have been submitted with the application, these are not considered to take account of all the comments raised by consultees and discussed above, nor does it correspond with a Long Term Landscape Management Plan (LMP) and therefore, detailed plans would be required by condition.
- 8.103 The initial proposal put forward by the applicants for subdividing plots was a standard close-boarded fence of natural stain across the majority of rear garden spaces. Given the sites location within the WHS, this was considered inappropriate. The applicants were also advised that the proliferation of 1.8m to 2.2m high fencing would be too obtrusive in this location, given the views into the site from higher ground. Various options were discussed, with a brick wall being considered too costly and likely to have significant impacts on the sites viability albeit it was recognised by the applicants that a standard close-boarded fence may be inappropriate.
- 8.104 The proposal now put forward, following negotiation, and considered appropriate is for a bespoke horizontal batten fencing. The fencing will be stained in a dark colour (to be conditioned) to make it appear more recessive and more commensurate of the industrial history of the site and its surrounding context. The first 3/4m of fence to the rear of each property will be at 1.8m in height to provide some privacy, with the remaining fence line being reduced to 1.5m to provide some social cohesion amongst residents and reduce visual impacts.
- 8.105 There are some areas of the site that shall remain as 2.2m high walls, as is required by the Noise Assessment and also to provide a sense of place in the Historic Interpretation Area.
- 8.106 Any properties which have a western boundary facing onto the proposed open space/daylighted culvert will consist of an 'intruder proof' native hedgerow, to

include 'spiky' species such as hawthorn, holly etc. and will be formally delineated with a timber post and rail fence which reflects the more natural appearance of the adjoining open space and newly landscaped area, providing a welcome transition between the developed site and the adjoining culvert/woodland.

8.107 All front gardens, with exception of the two semi-detached blocks on the site frontage, will remain open, retaining a sense of openness between each of the blocks of development. Officers are happy with this approach to boundary treatments, which reflects upon the varying character across the site and provides bespoke treatments to assist in recognising this.

8.108 Officers are satisfied that in relation to Healthy Spaces, the application complies with policies NE4, NE5, BE1 of the Local Plan and relevant national guidance.

8.109 Heritage

ICOMOS UK Concerns

ICOMOS-UK (International Council on Monument & Sites) is the UK national committee of [ICOMOS](#) (International Council on Monuments and Sites), which has a special role as official adviser to [UNESCO](#) on cultural World Heritage Sites. ICOMOS-UK play a vital role in advising on aspects of [World Heritage and sites](#) for nomination across the UK. They are 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.

8.110 As a non-statutory consultee, the LPA were not required to undertake formal consultation with ICOMOS-UK from the onset. The LPA consulted with Historic England for formal advice as is their role as a statutory consultee. If Historic England feel it appropriate (as was the case part the way through this application process), they would notify DCMS of the application, who thereafter notify ICOMOS. The LPA has undertaken the correct planning processes in this regard.

8.111 On the 1st November 2021, ICOMOS UK wrote to the LPA setting out their comments on the application and concluded with their summary of the potential impact of the proposals:

The World Heritage site was inscribed as an overall industrial landscape for the way it provided an outstanding reflection of the beginning of the industrial revolution. In particular the Coalbrookdale blast furnaces contributes to the justification criterion (i) for the way is 'perpetuates in situ the creative effort of Abraham Darby I who discovered the production technique of smelting iron

using coke instead of charcoal in 1709. As an industrial landscape the site was also ‘the focus of international attention from artists, engineers, and writers who came to view the new technologies.

In sustaining OUV, it is thus essential that the idea of an industrial landscape is perpetuated, that all aspects connected with Abraham Darby and his production processes are conserved, and that the way this industrial landscape attracted artists and writers as well as engineers can still be appreciated.

In ICOMOS-UK’s view, the current proposal cannot be said to support these essential prerequisites for the following reasons:-

- e) The images supplied for the proposed development show with great clarity how the lower reaches of Coalbrookdale will be transformed from an industrial landscape into a dense, high-rise housing estate, which the ‘industrial design’ of the dwellings cannot ameliorate, and which does not in any way reflect historical uses;*
- f) The remnants of structures related to Abraham Darby, now overlain by waste materials, will not be preserved;*
- g) The once in a lifetime opportunity to bring to life how the valley bottom contributed to Derby’s iron production will have been lost;*
- h) The views of the Dale from a network of paths and viewpoints will be highly compromised and thus their ability to promote understanding of industrial processes and their attraction for 18th century writers and artists.*

8.112 Following receipt of these comments, the LPA and HE met with representatives of ICOMOS UK to better understand their concerns and how to proceed with determining the application.

8.113 During this meeting, ICOMOS UK made it clear to the LPA that they were not objecting to the application; the meeting allowed for them to better understand the site and viability constraints and want to assist the LPA in making the best possible decision for the WHS and this site. Whilst they remain independent, they do not wish for the site to remain vacant and continue to deteriorate.

8.114 In consideration of these comments and following the meeting, the LPA provided a formal statement to Department for Culture Media and Sport (DCMS) through notification via Historic England (available on the public file) outlining how we consider that the application had reached a position whereby Officers could recommend to the Planning Committee that despite the concerns raised by ICOMOS UK, the proposed development was acceptable on balance taking account of site constraints and viability and did not negatively impact on the WHS as a whole. It is important for the LPA that the site does not remain vacant and continue to deteriorate in the manner in which it currently is – as ultimately, this would have a negative impact on the WHS.

8.115 However in response, on the 10th November 2022, DCMS wrote to the LPA (following receipt of a letter advising them that we were looking to recommend

approval) advising that: *“If the development goes ahead and ICOMOS’s concerns remain, there will be a risk that the World Heritage Committee judges the Outstanding Universal Value of the World Heritage Site to have been severely compromised. In those circumstances, it is likely that the site would be put on UNESCO’s List of World Heritage in Danger and, should the development continue, could ultimately be delisted as a World Heritage Site. If every attempt had not been made to address the concerns before the development commences we would have limited ability to oppose this. Any decision taken on planning should be taken with that context in mind.”*

- 8.116 Following receipt of this letter from DCMS, the LPA advised the applicants that although no material considerations to refuse the application, the LPA felt that they were no longer in a position to recommend approval of the application on the basis of the potential risk to the WHS status.
- 8.117 As part of this process, the applicants worked proactively with the Local Planning Authority, the World Heritage Site Co-ordinator and Historic England in collectively reviewing the comments raised in the full ICOMOS UK’s Technical Review (March 2022), with a review to responding to them.
- 8.118 Unfortunately what the ICOMOS review does not do, is fully consider the level of site constraints, the public benefits of the scheme, nor the viability issues which surround it. The idealistic view is that half of the site were to remain undeveloped and the “potential” archaeological remains from the 17th century be exposed. Bearing in mind that it is unknown whether such structures exist under the 10m+ of overburden and the cost alone for undertaking such extensive investigations, the LPA consider that the reality of this request has not been fully considered in the planning balance.
- 8.119 The applicants considered whether a viable scheme could come forward on just the southern portion of the site but when you factor in the WMCA funding (which is awarded on a ‘per unit’ basis), the cost of daylighting the culvert, remediation and the conversion of 3 heritage assets, and the higher level of quality required for a development in this location; it was simply unviable to reduce the scheme so significantly.
- 8.120 As such, the applicants have taken the intervening period to update their Heritage Impact Assessment and Archaeological Management Plan so that they aligning with the concerns raised by the ICOMOS Technical Review and update them so that they have been undertaken in accordance with the recently published ICOMOS Toolkit. A scoping version and final version of these assessments have been reviewed by Built Heritage Specialist and Historic England and the documents found to be a considered and structured manner which draws upon the Toolkit. The applicants have sought to demonstrate that:

- Even if the archaeological remnants remain, they will continue to be undisturbed by this development due to the high level of overburden; with appropriate raft foundations further minimising such impacts;
- They have provided a number of photomontages from networks/paths surrounding to demonstrate that the views of the Dale will not be compromised and they seek to justify why the proposal is appropriate for this specific location (being a very different landscape quality to the surrounding valley sides), and;
- How design of the site layout, properties and inclusion of landscape/art seeks to bring to life the sites history, and how the site has contributed to the OUV historically.

8.121 Historic England's final comments reiterate their previous comments in so much as they consider the proposals embody a balance between development of a scale necessary to be viable and the conservation of the site. They advise the LPA to consider this advice, along with the concerns raised by ICOMOS when coming to a decision, weighing the public benefits that the proposal would bring, including some benefits to the conservation of the site, against the harm to the OUV that it would also entail.

8.122 The Council's Built Heritage Specialist confirmed that the updated HIA (using the Toolkit) and the use of photomontages, gave a clearer indication of the change in built pass and how this would be viewed in the WHS. The HIA concludes that the proposal would have some 'minor negative impacts' on the WHS but concludes the overall development to have 'less than substantial' harm, on the OUV of the WHS. *"Whilst there may be some difference of opinion in the scale of harms identified to individual heritage assets, in particular the impact of the proposed character and mass of buildings on the character and appearance of the SGCA and setting of individual listed and non-designated heritage assets, 'less than substantial harm' can be agreed, given there would not be any total loss of any of the attributes that contribute to the WHS taken as a whole, substantial harm to setting of listed buildings, or substantial harm to the character and appearance of the conservation area taken as a whole."*

8.123 Despite these positive conclusions from consultees, and the overall assessment of the public benefits, the LPA found themselves in a position whereby the concerns raised by ICOMOS could not be overcome as required by DCMS (primarily because the archaeological investigation were cost prohibitive, as well as the need to keep half the site undeveloped) and thus, felt that they were unable to make a positive recommendation without potential risk to the WHS. This however is not a material planning consideration, and would not warrant the refusal of the application, and thus the LPA has also been unable to refuse the application to date and it has been held in abeyance. It is on this basis, that the applicants have submitted their non-determination appeal.

Archaeology

- 8.124 The proposed development site lies partly within a 17th to 19th century iron working complex, The Lower Works (Shropshire Historic Environment Record [HER] No. PRN 28208) developed after the construction of the New Furnace by Abraham Darby in 1718. The site also includes part of a complex of buildings south of the Lower Furnace Pool, Coalbrookdale (PRN 28210), and the Upper Forge complex (PRN 28212), including the Upper Forge Pool, associated with forging rather than smelting iron. The line of an early 18th century tramway (PRN 00673) runs along the eastern edge of the site and a culverted stream runs at some depth below the site. The proposed development site also lies c. 375 metres to the south of the Old Furnace at the Darby Ironworks, a Scheduled Ancient Monument (SAM Ref: 1006237, "Darby Ironworks, Coalbrookdale").
- 8.125 The vast majority of the site is likely to be of very low archaeological potential, given that there had been considerable build-up of overburden on the site (upto 16m) prior to the erection of the current early 20th century industrial buildings. Nevertheless some features associated with pre-20th century industrial activity may survive and could be impacted by the proposed development, particularly along the eastern and western edges of the site where the overburden is shallower.
- 8.126 During the course of the application, ICOMOS UK commented (02.11.2021) raising concerns that the proposal may have on archaeological remnants of the structures relating to Abraham Darby. These same concerns are repeated in the ICOMOS Technical Review (09.03.2022).
- 8.127 Historic England commented on the comments raised by ICOMOS relating to Archaeology which state that "*The remnants of structures related to Abraham Darby, now overlain by waste materials, will not be preserved*" and advised that if there are 18th century remains surviving, these will be at considerable depth but nevertheless remain important and contribute to the OUV. Noting the need to raise the ground levels of the site in any event, this further minimises the impacts of intruding into the 18th century land level.
- 8.128 HE advised that if they do exist, and the applicants were to pile through them during construction, then clearly this would be harmful. However, there is a need to firstly understand whether such remains may be present, and the likelihood of any future pilings works having an impact on such remains. And thus, further archaeological work needs to be undertaken (as is conditioned) before works commence.
- 8.129 In recognition of the concerns raised by ICOMOS, despite the level of made ground likely to avoid impacts, the applicants are seeking to provide raft foundations in the parts of the site where there may possibly be archaeological remains.
- 8.130 Any further investigative work prior to permission would be difficult under the circumstances, on the basis that the overburden is a significant depth in

places (upto 16m), unlikely to be one homogenous mass, varying across the site having three-dimensional complexities. It is likely that standard trial trenches would be of little use given the depth of the overburden and it may be that penetrating radar techniques may also be necessary. For safety reasons therefore, any existing industrial buildings must be removed prior to archaeological works taking place and a phased programme of archaeological investigations is therefore conditioned accordingly.

Built Heritage

- 8.131 The site lies wholly within the Severn Gorge Conservation Area (SGCA) and Ironbridge Gorge World Heritage Site (WHS).
- 8.132 On the northern boundary are two buildings known as the 'Pattern Shop' and the 'Compressor House' which are attached to the building known as the Assembly and Erecting Shop (now Enginuity Museum). These buildings form part of a Grade II listed building. As is discussed earlier in the report, the Pattern Shop was demolished early this year due to its unsafe nature and the potential impacts this could have on the listed building itself and those surrounding it. The sympathetic conversion/rebuild of these buildings is supported and welcomed, subject to detailed conditions on materials and a schedule of works.
- 8.133 The vast majority of buildings present on-site are 20th/21st century industrial additions which have been erected over the course of the sites more recent history as the 'AGA' Factory (purchased in 1946) and also uses prior to this. These buildings are to now in a state of disrepair and recent updates from the applicant's structural surveyor advise that they should be demolished as soon as possible.
- 8.134 To the south-east of the site is a building known locally as the 'Wing Shop'. This building is not statutorily listed, but has been identified as a non-designated heritage asset (built in 1901 as a cat iron goods warehouse and later used for the storage/repairs of Lancashire Bomber wings – hence its name) and it is considered that this is a key historic building that contributes to both the character and appearance of the CA, and the heritage significance of the wider site, being one of the last remaining industrial buildings of the historic Darby Coalbrookdale Ironworks site. The re-use and adaptation of this property is supported and discussed further in the design section below.
- 8.135 The eastern boundary of the site (north of the existing access) which aligns with Wellington Road, is supported by an 18th century retaining wall which is planted with mature established tree specimens. These feature will be

retained and repaired in its entirety and the woodland managed accordingly. The railings to the Wellington Road side will also be retained and repaired.

- 8.136 The general approach to the adaption of the heritage assets on site is supported, with detailed designs discussed further below.

Design

Form and Layout

- 8.137 Firstly considering the basics of design, all proposed dwelling meet National Design Space Standards (NDSS) internally, and exceed the level of parking provision required. Additionally, properties will be provided with electric vehicle charging points at their allocated parking spaces.
- 8.138 All properties with private rear gardens have been provided with private amenity space at an appropriate level. Due to the nature of their conversion, the pattern shop and compressor house have smaller private amenity space but are located in the north of the site whereby they benefit from informal amenity space surrounding them. Due to the nature of the build, the apartments to the north are not subject to any private amenity space but can take advantage of the communal open space which surrounds the culvert. Small informal areas of private amenity are located to the frontages of the wingshop units but in recognition of not wanting to provide unnecessary subdivision of the frontage of the heritage asset, will not be provided with boundary fences but delineated on the ground with appropriate hard surfacing details.
- 8.139 The scheme was discussed extensively at pre-application stage with Historic England, to ensure retention of the Wing Shop, and to establish a basic form and layout that reflects the former industrial buildings, especially in terms of the distinctive roof-scape which is visible in a number of views within the CA/WHS, and respects the former routes of tramways within the site. The approach of a large apartment block reminiscent of a 19th century manufactory, and terraced housing with multiple gabled roofs should avoid the appearance of an 'anywhere' housing development, and successfully reflect the linear forms and roofscapes of an industrial landscape. This is well illustrated in the proposed 3D aerial visuals.
- 8.140 The density of development has also been broadly designed to concentrate the terraces and apartment block in the approximate area of the existing and earlier industrial buildings, with looser development at the centre and south of the site where the site is currently open and the former mill pond (long since infilled) was located.

- 8.141 Although comments from ICOMOS suggest that the area of the earlier Darby industrial buildings should be kept free from development to enable below ground archaeology to be investigated and revealed, the proposed massing has been supported to date by Officers and Historic England; as maintaining, in very broad terms, the historic massing of development on the site and its presence within wider views of the site. Views across the valley to the wooded slopes on the opposite side of the Coal Brook stream would be maintained, although with development of a residential rather than industrial character in the foreground.
- 8.142 The incorporation of regular and uniform semi-detached houses in the southern part of site are less respectful of the general form of the Conservation Area; where buildings are generally more informally spaced, and form loose clusters or terraces. However to the southwest of the site, the Wing Shop would obscure views of these buildings from Wellington Road, but around the entrance to the site and the 'Interpretation Area' they are more apparent.
- 8.143 The applicant's rationale for the differing design in these areas is that historically this part of the site has not been developed; previously utilised as a landfill and historically the former mill pond and therefore, some artistic license was seen as appropriate. On balance, Officers are happy with this approach and consider that it helps in the interpretation of the sites and its varying character zones.
- 8.144 In terms of the highway alignment, this has been primarily dictated by two key points:
- The presence of an existing sewer and easement which runs alongside Wellington Road, and;
 - The alignment of the highway being designed to replicate the former tramway location (including the use of cast iron detailing within the highway, connecting it to the central historic interpretation zone).
- 8.145 Overall, the form and layout of the site is considered to respond to and respect the industrial character of the site, picking up on historic detailing throughout and keeping long simple rooflines that reflect the former industrial units present on site.

Compressor House & Pattern Shop

- 8.146 The design of the listed buildings (Compressor House and Pattern Shop) were revised to better reflect their former uses on the site. Window detailing for the Compressor House, which is of unique design given its former use, was revised to be kept simple and contemporary with steel lintels and plain glazing to read as later introductions and not detract from the original historic detailing. Additional new openings were kept limited, only to access and light ground floor habitable areas. The existing (former water storage) detail to the roof is to be decommissioned, repaired and made a feature.

- 8.147 The pattern shop (albeit now demolished) was also subject to the same treatment; all cast iron windows were to be retained insitu (and have therefore been stored on-site for rebuild following demolition), utilising only existing openings to facilitate the conversion. No additional floors or intervention to the roofscape is required, so externally it would remain largely unaltered from the form in which it last stood. The reuse of the building allows for the re-roofing of the pattern shop with more appropriate clay tiles. A schedule of works is required for both units, to ensure that the appropriate methods and materials are utilised for these listed buildings.
- 8.148 External works to create small gardens and a bridge access are acceptable for these properties, subject to appropriate details of materials and design (to be conditioned).

Wing Shop

- 8.149 The design approach has been amended substantially since first submitted. It appears that when the building was extended to the west in a steel framed form in the mid-20th century (presumably to allow the Lancashire bomber wings to fit), the whole of the west elevation of the brick-built building was removed.
- 8.150 Following suggestions made to the applicants, rather than base the west elevation on a hypothetical reconstruction of what previously existed (with no known historical photos showing this elevation in any event), the open nature of the elevation, with exposed cast iron columns is retained as is, and a new dark timber clad elevation set well back with simple openings, to read as a clearly modern addition and have a recessive appearance. This approach is supported and shows the evolution of the building; the 3D visuals better demonstrate this proposal.
- 8.151 The east elevation has also been amended to allow the distinctive tall arch-headed iron-framed windows to be retained in situ without adaptation, with new simple glazed doors and windows, to make the unit useable and practical, added to read as clear later introductions.
- 8.152 The side elevations of the building hold a variety of existing openings from various stages of its use, and the applicants have been advised to utilise existing openings in the adhoc manner in which they are present, rather than seeking to unify with mirroring window arrangements. It is considered that the revised elevations achieve this sympathetically.
- 8.153 The pitched roofs of the building benefit from large glazed openings spanning their width; which is a feature in the skyline. Whilst the preference would be for this feature to be retained in a fully glazed form, it is recognised that due to the reconfiguration of the conversion and building regulation requirements, that this is not feasible. However, the applicants have sought to provide glazed panels intermittently with the remainder infilled with some form of rubberised panels. It is considered that on balance, this approach is justified and seeks to retain the feature (albeit in an altered form) in its entirety.

Watercourse

- 8.154 Re-positioning the watercourse that is currently culverted to an open channel can be supported from a design and heritage perspective, given it originated as a fast-flowing stream that both attracted industrial activity and served the ironworking process. This would facilitate a more legible understanding of the site and its historic role as part of the Coalbrookdale Iron Works, although it would be relocated at a higher level above the existing culverted stream and so serve a 'narrative' purpose only.

Historic Interpretation Zone / Art Strategy

- 8.155 This central interpretation zone now has a more open character from previous iterations, allowing wider views through the site from the Wellington Road entrance and encouraging users into the site; feeding through to the daylighted culvert which tells its own narrative.
- 8.156 It should be made clear that it is not proposed for the development to become a gated community; residents and visitors alike would be encouraged into the development to better understanding the history of the site and its setting in Coalbrookdale. Following removal of the trees from the rear of the wingshop, an additional pedestrian access will be created further encouraging access into the site.
- 8.157 The former AGA gates will be carefully removed and re-set as a permanent feature in the streetscape, set back from the site entrance (with cast iron boots designed to sit atop; marking the closure of the AGA factory when former workers adorned the gates with their work boots). This proposal is shown on one of the approved drawings, but details/materials to be conditioned.
- 8.158 It is important that any interpretation reflects the evolution of the site, and incorporates any new evidence brought to light in archaeological investigations during the development works. The content and design of interpretation would be agreed by condition, in consultation with IGMT, TWC and the WHS Steering Group. An illustrative sketch of the area has been provided as part of the HIA.

Apartments / Randell Terrace / 7 & 9 Terraces:

- 8.159 Detailed discussions have achieved amendments to the design of the new units to remove overtly domestic characteristics and achieve brick detailing more typical of the historic area.
- 8.160 The first iteration of the apartments was far too domestic and urbanised in character; suggestions made to the applicants by the LPA have been included in the revised form and specifically include:
- Incorporation of metal clad roof beyond the parapet wall;
 - Simple cill/header details to give a more factory style appearance;

- openings and columns at ground floor (it is of note that these columns will be salvaged from the existing industrial buildings);
- narrowing windows to improve the brick/window ratios and staggering their depth down the building;
- removing soldier courses to improve verticality and remove domesticity;
- Reducing the number of balconies and where they remain, these are now in a recessive form with simple glazing.

8.161 Following the incorporation of these features, the LPA are satisfied that the design of the apartment building is suitable for this location taking design cues from its industrial past. Whilst a tall structure (4 storey in height) and of great massing, it would still lie under the ridge level of the adjoining Enginuity building and represents the presence of a large 3-storey building in this location, and of this orientation, in the early 1900s. Therefore, on balance, feel justified in support a building of this scale, in this specific location.

8.162 The terrace units have taken a residential model housing approach, with amendments made to incorporate chimneys, increase window sizes to better improve window/brick ratios and overhanging eaves. Side elevations (facing the main highway) were revised to be simple, retaining all property frontages on the main elevations. Columned porches have been included which utilise salvaged columns taken from the existing industrial buildings.

8.163 Officers are satisfied that the simple design approach seen on these terraces in the style of worker dwellings is appropriate, with their roofscape being representative of the former industrial buildings located on this part of the site.

Feltons & 4-Terraces

8.164 As mentioned above, these housetypes have been designed with a different character area in mind; one which does not reflect on the industrial nature of the site. During the course of the application, amendments have been requested on the design to better improve window/brick ratios; incorporating overhanging eaves to coincide with other properties and the rear gables of the Feltons reduced significantly to make them subservient to the main dwelling.

8.165 The 4-Terraces housetype is similar in form to those high quality dwellings seen in Bourneville, but it was considered necessary for further refinement to make them of a sufficient quality to sit within the WHS. These amendments requested the inclusion of chimneys; increasing the size of windows; the incorporation of bay windows as a feature to break up the gable; a shared central porch and overhanging eaves. Whilst a design of differing form to others in the site, these properties lie central to the site and provide a high-quality bespoke design when read from the Wellington Road streetscape.

Landscaping:

8.166 Great consideration has been given to the hard and soft landscaping proposal for this development and whilst the landscape is still only in strategy form (with details to be conditioned), a number of details have been agreed with the applicants, specifically in relation to boundary treatments.

- 8.167 To provide unity across the development, all separating rear garden boundaries will comprise of the same timber-clad fencing detail. However to ensure a high quality aesthetic, this will be bespoke horizontal clad timber stained in dark (almost black) stain. The first 3/4m of fence length would be standard 1.8m in height, thereafter staggering to 1.5m to reduce overbearance.
- 8.168 Frontages to all properties will remain open, avoiding domestic style influences and making greater presence of the architectural detailing of the units themselves. The only exception to this are the 4-terrace central to the site.
- 8.169 There are a handful of occasions across the site (where rear gardens face Wellington Road) where the use of a small stretch of 2.2m high brick wall has been incorporated to provide acoustic mitigation; the design of this will be conditioned. Properties facing to the east will have a rear boundary which varies in character, recognising its location adjacent the more natural boundaries of the culvert and woodland beyond. Their boundaries will consist of post and rail fencing and native hedgerows for security.
- 8.170 The proposed use of corten steel in the interpretation area and for the access bridge to the Pattern Shop and Compressor House is supported as an appropriate response to the industrial character of the site.
- 8.171 Given the importance of views looking down into the side and the thorough consideration given to hard and soft landscaping, it was felt important to cover more practical matters such as bin and garden storage – with placement and design of these being important to avoid ad-hoc proliferation of outbuildings in the future. The applicants have indicated locations on the site plan in which outbuildings may be erected. Like the boundary fences, it is expected that these would be stained a dark black colour to appear recessive more, with appropriate metal roofing material; details of which will be conditioned. Bins for the apartments would be stored undercover at ground level and for the wingshop in a brick wall enclosure to the south (details of which are to be conditioned).
- 8.172 On balance, Officers are satisfied that the applicants have worked proactively with the LPA, Built Heritage Specialists and Historic England in providing a design which is respectful of the site evolving historic character; taking cues from the various points in history which the site has contributed and is therefore compliant with policies BE1, BE3, BE4, BE5, BE6 and BE8 of the Local Plan, and national guidance.
- 8.173 It should be noted that ICOMOS have not raised any concerns with the detailed design of the proposed scheme.
- 8.174 Planning obligations
Any planning consent would be conditional on the agreement of a S106 agreement to secure the following (plus indexation):

- a) The provision of 20% discounted market dwellings (at 90% open market value, offered to key workers);
- b) £10,000.00 financial contribution towards the future maintenance and management of Dale Coppice (to be paid to Severn Gorge Countryside Trust);
- c) £15,150.00 financial contribution towards traffic calming improvements in Ironbridge;
- d) £23,000.00 towards the installation of additional play equipment at Cherry Tree Hill Playground, and;
- e) S106 Monitoring Fee of £963.00

8.175 In determining the required planning obligations on this specific application the following three tests as set out in the CIL Regulations (2010), in particular Regulation 122, have been applied to ensure that the application is treated on its own merits:

- a) necessary to make the development acceptable in planning terms;
- b) directly related to the development;
- c) fairly and reasonably related in scale and kind to the development.

9. CONCLUSIONS

9.1 Overall, the LPA are content that the design has reached a point whereby Officers can recommend to the Planning Committee that the proposed development is appropriately designed for the site and would not detract from the Outstanding Universal Value of the World Heritage Site as a whole.

9.2 What is very evident is that at present the site provides nothing by way of bringing life to the historic narrative. The site is entirely private, and visitors to the Gorge would have no understanding of its importance in the Industrial Revolution or to Coalbrookdale, even in its most recent history as the AGA foundry; beyond its current appearance as a predominantly 20th century industrial site viewed from outside the site. This development provides an opportunity for investment into the site and its surrounding, to better integrate it into the wider setting of Coalbrookdale giving opportunities for public access, learning and collaborations with IGMT, whilst maintaining the broad essence of its visual character. This redevelopment should be seen as an opportunity to reduce the deterioration and risk to heritage assets that currently exists; create an active and sustainable development, rejuvenating and preserving heritage assets such as the Wingshop and Pattern Shop/Compressor House; making the site more accessible to the public; mitigating against the wider flood risks that affect the living community within the WHS from the site through to Dale End; enhancing the local area and an opportunity for a local developer to create a bespoke designed site which

takes account of the sites characteristics, constraints and importance to local, national and international heritage.

- 9.3 The applicant's design has been planned to purposefully draw visitors and residents to the heart of the site where its story can best be told. From here, the location can offer extensive views of both the lower valley and the upper slopes. Signage and perambulation will link points of interest together and the daylighting of the culvert will illustrate that it was the fast flowing water that first brought manufacturing here and also illustrate how the circa 10 metres of foundry waste in the near level valley floor testifies to its 340 years of foundry activities.
- 9.4 The SGCA Management Plan (2016) recognises the need to find alternative uses for redundant buildings; with the industrial buildings and Wingshop on the AGA site being specifically acknowledged. Furthermore, Para 5.6.1 of SGCAMP talks about the protection of views; acknowledging that many views within, across and around the Gorge are characterised by the unusual juxtaposition of industrial or urban, with heavily wooded slopes surrounding – the development seeks to retain this area of landscape significance through its design and the viewpoints in the HIA demonstrate this.
- 9.5 Whilst undoubtedly, the development of this site will result in a change to the landscape and WHS, significant efforts have been made (despite the viability issues) to go to great lengths to tell the sites narrative through the design and give something back to the local community.
- 9.6 Whilst the ICOMOS concerns are recognised and acknowledged, their comments give little recognition to site constraints, issues surrounding viability, nor the public benefits arising from the scheme such as the conversion and preservation of heritage assets, daylighting of the culvert and associated flood risk improvements in the wider area achieved by undertaking these works, enhancement and accessibility of the site and its historic narrative, and reuse of a heavily contaminated brownfield site. Officers consider that the applicants has demonstrated the best and most viable solution for the site and there are no further amendments that could be made which would overcome the remaining concerns raised by ICOMOS, whilst still achieving a viable proposal.
- 9.7 The IGWHS SPD (2023) advises that it is important to stop the accumulation of redundant buildings within the IGWHS to reduce the risk to the Outstanding Universal Value with a redundant building being a considerable risk of rapid deterioration through decay and vandalism, it is also a visible sign of neglect and decline. It goes on to say vacancy and the uncertainty of future uses threaten the OUV and this does not just relate to the buildings themselves but the significant of the IGWHS as a whole. The AGA site ceased operation in 2017 (with the Wingshop already being in a poor state of repair in IGMT

ownership before this time) with the site and its buildings rapidly decaying. It is imperative therefore that a future use is secured to avoid risk to the OUV of the WHS, as is supported by this SPD.

- 9.8 The level of harm identified to the WHS is considered to be less than substantial and paragraph 202 of the NPPF indicates that such instances of harm should be weighed against the public benefits of the proposal, taking into account the requirement that '*great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be)*'. As such, the minor negative impacts of the development on the WHS should be weighed against the benefits identified as part of the development, taking into account that the WHS is an asset of the highest value.
- 9.9 Officers have given due consideration to ICOMOS comments and the threat of the loss of the 'World Heritage Site' status, but this would not be an adequate material planning reason to warrant the refusal of the application; any refusal can only be justified if the harm was substantial. On balance, taking account of the site constraints, the identified (less than substantial harm) and the significant public benefits outlined in this report and briefly outlined in para 9.6 above, Officers consider that the proposal is compliant with relevant policies of the Telford & Wrekin Local Plan 2011-2031 and the relevant guidance contained within the NPPF.

10. DETAILED RECOMMENDATION

10.1 Based on the conclusions above, as there are no material grounds to warrant the refusal of the application, it is requested that Member advise whether they would have been minded to grant Delegated Authority to the Service Delivery Manager to **GRANT FULL PLANNING PERMISSION** (with the authority to finalise any matter including conditions, legal agreement terms, or any later variations) subject to:

A) The applicant/landowners entering into a Section 106 agreement with the Local Planning Authority (item i. subject to indexation from the date of committee), with terms to be agreed by the Development Management Service Delivery Manager, relating to:

- i. The provision of 20% discounted market dwellings (at 90% open market value, offered to key workers);
- ii. £10,000.00 financial contribution towards the future maintenance and management of Dale Coppice (to be paid to Severn Gorge Countryside Trust);
- iii. £15,150.00 financial contribution towards traffic calming improvements in Ironbridge, and;
- iv. £23,000.00 towards the installation of additional play equipment at Cherry Tree Hill Playground, and;
- vi. S106 Monitoring Fee of £963.00

B) The following conditions (with authority to finalise conditions and reasons for

approval to be delegated to Development Management Service Delivery Manager):-

Time Limit (Full)

Further details:

Materials
Window/Door sections
Rainwater goods etc
Highway Design
CEMP
LMP
Landscaping Design
Woodland Management Plan (Wellington Road/Dale Road)
Bat/bird boxes and hedgehog passes
Lighting Plan
Archaeology
Foul & Surface water detailed design
Exceedance flow routing plan
Watercourse design
Culvert abandonment plan
Flood Response Evacuation Management Plan
Contamination
Foundation Designs
Photographic Historic Record
Demolition Method Statement
Schedule of Works – Pattern Shop
Schedule of Works – Compressor House
Schedule of Works – Wingshop
Method Statement – Historic wall along Wellington Road
Scheme of Interpretation
Boundary treatments
Shed finishes
Design/location of EVC
Noise – ventilation details for south-facing facades
Retained wall along streetscene/former access and railings.
Details of AGA gates/entrance streetscape
BNG Monitoring strategy
Detail of inset/materials for highway to delineate tramway
Shed details
Wingshop bin storage

Specifying:

Approval of Noise Impact Assessment mitigation & glazing spec
Approval of Arboricultural Impact Assessment
Prior to occupation - Parking/loading/turning of vehicles
No burning/storage in tree RPA
Set FFL (as per EA guidance)
FFL for new structures (as per EA guidance)
Piling (as per EA guidance)

Approved Plans
Removal of permitted development
No further windows/openings without explicit consent

Informatives:

S106

STW

Highways License

Highways – S184

Coal Authority – Low Risk

Contaminated Land

Nesting Wild Birds

Lighting

Fire Authority

Street Name & Numbering

Cadent Gas

West Mercia Police

Piling

EA: Land Contamination