



**Gower Heritage and Heritage
Foundation objections to the
development proposals on the listed
former Gower Street School, St
Georges. TWC/2021/0724**

The
Gower
HERITAGE &
ENTERPRISE
FOUNDATION

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Although there are a considerable number of issues on which to raise objections – the time allowed does not permit a thorough and proper discussion and consideration of the matters at hand. We are therefore objecting on 4 matters:

- Process and Misinformation
- Financial viability
- Community Benefit and Policy Alignment
- Damage to heritage

1. Process and Misinformation:

- Gower Heritage and Enterprise Foundation – referred to here as GHEF has been involved with the Gower since 2014, building on the initial work of the St Georges Community group. To minimise the importance of the Gower building and its amenity, heritage to the local community it is being referred to as “former youth club” when it is officially registered as the “former Gower Street School”
- The mitigation of the alterations to the building is based on the conservations officer’s observation that the building is substantially underused – this implies that there is no community interest in the building when the opposite is true. GHEF was excluded from the site in Sept 2019 by the council, presumably to create a 2-year gap of the required “lack of community use” of the building and grounds.
- The consultation process has been mired in secrecy with the tone being set at the beginning when Telford & Wrekin Council removed the community covenant from the building without consulting with or informing the public. Unavailability of various documents attached to the public planning documents have characterised this process namely -the amended statement of heritage significance (initially carried out by the eminent and professional heritage architects Aroll and Snell for GHEF) - the financial viability assessment
- ☐ The planning consultation process has been difficult to engage with from the start with numerous excuses about IT failures and the planning portal not working, unreturned phone calls, unavailability of documentation until the last minute or not at all– the list goes on.
- Right up until the 11th hour the information on the “rules” about who is allowed to speak at the meeting has been unavailable with the page /resource not found. The link has been unavailable on the council’s website until Tuesday 16th November morning when mysteriously it is now working.
- At the same time, we have been informed by email that no one from GHEF is allowed to speak and that a person unknown to us has been appointed by the council to speak and we must get in touch with them no contact details at the time of writing have yet been provided. This leaves a very short time for concerned parties to confer and prepare their case for a 3-minute presentation. This is designed to reduce the ability of those wishing to

make representations and is in our view blatant manipulation and undermining of the spirit of public participation in the planning process.

- It also fails to allow other planning concerns from residents to be heard such as parking, loss of visual amenity, loss of light, increased traffic as all objections must be heard as one within a 3-minute time slot. This makes a complete mockery of the process and people's concerns.
- We are also deeply concerned about the conflict of interest with NuPlace where its directors are senior managers at Telford & Wrekin Council with portfolios directly responsible for Housing, Housing Investment, and Planning. They are essentially marking their own homework.

2. Financial Viability

- Paragraph 8.3.5 of the planning report states that it is not financially viable to bring the northern wing and central section back into community use without housing development. There has never been a consideration within the Options appraisal of GHEF's proposals. There has been no comparison of the financial viability of the model for proposed community use with the current development proposals or how the Council could work with the community. Indeed, if the Borough and Parish councils worked together GHEF bringing the investment from the Parish precept raised for this purpose, there would be a viable model for community use and on-going maintenance.
- £650,000 from the Council's capital programme as gap-funding is also cited – is this the same £650,000 that was originally put forward for the programme but now allegedly spent or a new one? This is misleading.
- The planning committee is being asked to consider the development application based on incomplete financial information.

There are a considerable number of unidentified costs which mean that comparisons with other models of use are at best, meaningless and at worst, misleading.

These unidentified costs are:

- Ground works and site instability for the proposed housing development
- Costs of ecological requirements
- Reprovisioning of the play park to the Women's Institute – a £50,000 contribution to a new play park is not the same as reprovisioning the play park as is being widely announced by local politicians in St Georges.
- Road safety measures, land purchase, demolition of buildings at the new site, remedial ground works because of contamination (asbestos) and site stability remediation because of former mining. Purchase of new play park equipment and installation.
- Removal and disposal of current play park. This equipment was only allowed at the Gower because it was already in situ and cannot be reused. Offsetting of the previous investment into the play park by GHEF.
- Preservation of the Heritage features for future generations to access
- Equality Impact Assessment addressing suitability of housing and dwellings for people with disabilities.

3. Community Benefit and Policy Alignment

National Policy Planning Framework 2021 sets out 3 objectives to be considered

a) economic objective

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and

c) by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being;

The NPPF further states that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- We refute that there is a need for housing at the Gower site and in the building, a considerable number of sites are in development in Telford and the Housing proposed here is affordable housing to buy – there is a clear danger that this will be sold off to private investors either directly or indirectly resulting in expensive housing which does not meet the needs of local people and lead to a deterioration of the heritage asset of the Gower as a whole.
 - The NPPF2021 section 5 states that: “Provision of affordable housing should not be sought for residential developments that are not major developments” and Section 5/67 states that “Where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure. . .
 - . . . This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority”. We do not believe that this assessment has been made and that the housing needs of the St Georges neighbourhood has been adequately assessed in line with local demographics and economic circumstances
 - NPPF2021 references an environmental objective – that planning development and policy should “protect and enhance our natural, built and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
 - The business plan put forward by GHEF not only assessed community needs but is strategically aligned to the Council plan and other plans such as Tourism, Economic development and Children and Young People.

4. Community Wellbeing:

Section 8 /92 of the NPPF states, “Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

- i. promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres . . . and high-quality public space, which encourage the active and continual use of public areas; and
- ii. enable and support healthy lifestyles, especially where this would address identified local health and well-being needs . . . Planning policies should take into account and

- support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;
- iii. guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;"
 - We do not see any account taken of a local needs assessment of community wellbeing and the proposal for use of the Gower as a Wellbeing centre has been completely dismissed even though it was supported by local health organisations.
 - The availability of the proposed community facilities at the Gower are restrictive and unsustainable based on a hire and go arrangement within very limited hours. We believe that there will be a danger of this leading to further residential development in the building's North Wing and that the revenue projections for this model have not been adequately evidenced.

5. Damage to Heritage

The Gower is a building and place, much loved by the local community and the history of the past 7 years have shown this to be the case.

- While we agree with the statement from the council's conservation officer that the Gower building "is clearly in a poor state of repair and substantially underused, and proposals to secure a viable end use to enable its restoration and continued maintenance are required" we believe that this has been brought about by the Council's deliberate actions to exclude the community from the site in order to evidence this point- there is no need for this to be the case, if the council and parish councils would genuinely work together GHEF and the local community of interest.
- We do not agree with the report of the Council's conservation officer that "Some loss of features of significance to the special historic and architectural interest of the listed building are proposed in connection with the conversion of the south wing to residential use."

The conservation officer states that, "Considered in isolation, these alterations would fail to satisfy Local Plan Policy BE4ii requiring architectural features, both internal and external to be preserved intact.

However, in accordance with NPPF202 and Local Plan Policy BE4, this harm needs to be balanced against the clear public benefits of finding a new use for the building that can secure its restoration".

- We do not agree that the public benefit has been sufficiently evidenced to warrant the destruction of the unique architectural features of the Gower or that arrangements for the public to access the recording of those features give sufficient access to them. We refer the Conservation officer and the Planning committee to the original listing documents and to GHEF business plan and heritage documents.
- We do not agree that it is sufficiently demonstrated that the council's proposals are the 'optimum viable use', i.e., the viable solution which delivers the required heritage benefits with the least possible harm to the significance of the heritage asset as a whole.
- We ask the planning committee to meet with the GHEF trustees to hear their case and reach an outcome which meets the requirements of the Parish Council, local wellbeing and community needs as well as securing the longer-term viability of this wonderful heritage asset for everyone.
- We would also like to give notice to the planning committee of our intention to appeal to the planning inspectorate should these proposals be passed at the meeting.