

**G13 - Telford & Wrekin Local Plan: Summary of Green Network  
Representations (Regulation 19) Table and the Council's Proposed Approach  
October 2016**

**Evidence Document submitted by Telford & Wrekin Council post Submission**

Telford & Wrekin Council wishes to submit this document to examination, with reference to the council's response to Matter Q6.3 of the Inspector's Matters, Issues and Questions (MIQs) and the representations made relating to Policy NE6.

21 October 2016

## Green Network Representations (Reg19) and the Council's proposed approach

Supporting table to the Council's answer to Inspectors Matters, Issues & Questions on the Green Network Q6.3

Rep. reference	Representor Name/ Group	Issue of representation	Council's proposed approach to the representation
PUB 145	Newport & District Civic Society	Promotes sites for inclusion under the Council's 'Green Guarantee'.	The 'Green Guarantee' is a land management commitment by the Council and is outside of the scope of the Local Plan though it is mentioned in the text of the Natural Environment chapter.
PUB 96	Newport in Bloom	Requests that a site is considered for inclusion under the Council's 'Green Guarantee'.	
PUB 310	Old Park Residents Association	Makes comments relating to the Council's 'Green Guarantee.'	
PUB 144	Newport & District Civic Society	Requests that a site is considered for inclusion under the Council's 'Green Guarantee.'	
PUB 145	Newport & District Civic Society	Requests that two sites be included in the Council's 'Green Guarantee'.	
PUB 37	A. Williams	Requests that The Crest, Old Park be excluded from the Green Network.	The Green Network in this area has been amended as a proposed Minor Modification (Ref P59) <sup>1</sup> in line with the representation.

<sup>1</sup> Document A5a.

Rep. reference	Representor Name/ Group	Issue of representation	Council's proposed approach to the representation
PUB 321	S. Bruneau	Requests inclusion of the woodland at allocation H16 within the Green Network.	<p>The woodland identified is within the allocated site H16. Development of the allocation would need to have regard to policy NE2 – Trees, Hedgerows and Woodlands which would protect the identified features.</p> <p>No change to the Green Network proposed by the Council.</p>
PUB 313	Old Park Residents Association	Requests inclusion of the woodland north and west and within allocation H16 within the Green Network designation	<p>The woodland identified is within the allocated site H16. Development of the allocation would need to have regard to policy NE2 – Trees, Hedgerows and Woodlands which would protect the identified features.</p> <p>No change to the Green Network proposed by the Council.</p>
PUB 149	Newport & District Civic Society	Requests protection of H13 from development as open space or a nature reserve.	<p>While in the past the site (H13) was publically accessible it currently is fenced and let for grazing though the Right of Way remains present and usable on the ground. While it is acknowledged that the site has some wildlife value for common and widespread species the site is not considered to have 'significant wildlife interest' and did not meet the criteria to be declared as a Local Wildlife Site when presented to the Local Sites Partnership in 2015.</p> <p>The representation says the site is proposed in the Neighbourhood Plan as Open Space and a Local Nature Reserve. There is no 'made' neighbourhood plan for Newport. The site has not been proposed to Telford &amp; Wrekin Council as a Local Nature Reserve - the Council is the only organisation who can declare a Local Nature Reserve in Telford &amp; Wrekin.</p> <p>The Council does not propose a change to the Green Network as a result of this representation.</p>

Rep. reference	Representor Name/ Group	Issue of representation	Council's proposed approach to the representation
PUB 253	Kembertons (M. Fowler)	References NPPF paragraphs 76 & 77 – Local Green Space. Asks for the justification of the Green Network against the functions. Seeks to remove land north of Hodgebower from the Green Network.	<p>The Green Network is not intended to be a Local Green Space designation and is NPPF paragraphs 76 &amp; 77 are not considered relevant. The justification of each parcel of Green Network land was made available on the interactive Policies Map at the time of Submission and a direct link has been provided to Kembertons. The land in question was Green Network in the Wrekin Local Plan and remains Green Network in the submitted Plan – no change in status is proposed.</p> <p>The Council does not propose to amend the Green Network in this area.</p>
PUB 255	Kembertons	Asks for justification of functions of Green Network and individual plots of land. Asks whether NPPF paragraphs 165 and 166 have been applied. Particularly queries inclusion of a site north of Hodgebower in Ironbridge.	<p>Each individual plot has been assessed against the six functions of the Green Network. The Green Network justification is based on an up to date assessment and has been subject to Sustainability Assessment. The justification of each parcel of Green Network land was made available on the interactive Policies Map at the time of Submission and a direct link has been provided to Kembertons. The land in question was Green Network in the Wrekin Local Plan and remains proposed Green Network in the submitted Plan – no change in status is proposed.</p> <p>The land is part of a Green Network parcel which has significant visual amenity, provides separation of built up areas, has ecological value since it is directly adjacent to a Local Wildlife Site and proposed Local Nature Reserve and acts as a buffer of semi-natural habitat to that designated site. There are known reptile, amphibian and bird populations in the local area. NPPF 165 &amp; 166 relate to the use of up to date evidence. The assessment of the Green Network used the best, up to date evidence available to the Council including recent species surveys of nearby sites.</p> <p>The Council does not propose a change to the Green Network in this area.</p>

Rep. reference	Representor Name/ Group	Issue of representation	Council's proposed approach to the representation
PUB 286	Kembertons (M. Powell)	References NPPF paragraphs 76 & 77 – Local Green Space. Asks for the justification of the Green Network against the functions. Seeks to remove land north of Hodgebower from the Green Network.	<p>The Green Network is not intended to be a Local Green Space designation and is NPPF paragraphs 76 &amp; 77 are not considered relevant. The justification of each parcel of Green Network land was made available on the interactive Policies Map at the time of Submission and a direct link has been provided to Kembertons. The land in question was Green Network in the Wrekin Local Plan and remains proposed Green Network in the submitted Plan – no change in status is proposed.</p> <p>The Council does not propose to amend the Green Network in this area.</p>
PUB 17	P. Clapp	Supports the Green Network designation around Plough Lane in Newport and asks for it to be extended behind Beechfields Way. Asks for this site to be listed as a wildlife site or nature reserve.	<p>The small parcel of land behind Beechfields Way has previously had the benefit of outline planning permission and is, therefore, not included within the Green Network. The designation of the land as either a local wildlife site would require that the land be proposed to Shropshire Wildlife Trust and meet the assessment criteria and in order to create a Local Nature Reserve the land would need to be owned by the Council which it is not. A habitat survey of the site in 2014 does not indicate that it would meet the criteria for Local Wildlife Site status.</p> <p>The Council does not propose to amend the Green Network in this area.</p>
PUB 18	P. Clapp	Seeks the extension of the Green Network behind Beechfields Way.	<p>The small parcel of land behind Beechfields Way has previously had the benefit of outline planning permission.</p> <p>The Council does not propose to amend the Green Network in this area.</p>

Rep. reference	Representor Name/ Group	Issue of representation	Council's proposed approach to the representation
PUB 35	D. Roberts	Seeks the removal of land in representors ownership from the Green Network and states that is has been transferred from 'green fields to green network'.	<p>The site in question was Wrekin Local Plan Green Network and is proposed to remain Green Network. There is no proposed change in status of the land as a result of the new plan.</p> <p>The Council does not propose any change to the Green Network in this area.</p>
PUB 90	Fradley Estates	Seeks the allocation of SHLAA 19 for housing. States that the site fails on all six Green Network functions and is not justified and should be removed from Green Network.	<p>The site is valued green space and is partially covered in flood zones making a viable scheme difficult. Therefore the site is not considered worthy of an allocation by the Council.</p> <p>The assessment of the Green Network shows that the site, as part of a wider Green Network parcel, provides significant visual amenity and separation of built up areas. It also provides ecological value through being part of functioning corridors and stepping stones for wildlife.</p> <p>The inclusion of the site within the Green Network is justified and the Council does not propose a change.</p>
PUB 140	Apley Preservation Society	Seeks the inclusion of land at Peregrine Way, Apley within the Green Network.	<p>The land in question has the benefit of outline planning permission and has a current reserved matters application lodged with the Council and pending consideration. Parts of the site, notably the tree avenue, hedgerows and woodland edge are included in the Green Network proposed in the submission Plan to protect Green Infrastructure functions.</p> <p>The Council does not propose to further amend the Green Network in this area.</p>

Rep. reference	Representor Name/ Group	Issue of representation	Council's proposed approach to the representation
PUB 263	Balfours (Litchfield Diocese)	Requests the removal of SHLAA 24 from the Green Network. Seeks to understand the reason for inclusion.	<p>The site was Wrekin Local Plan Green Network and the review of the Green Network indicated no reason to change its status. The site provides separation of build up areas and provides a stepping stone for wildlife with semi-natural vegetation present and has recreational value. Justification of each parcel of Green Network land was made available on the interactive Policies Map at the time of Submission.</p> <p>The inclusion of the site in the Green Network is sound and the Council proposes no change.</p>
PUB 361	Shropshire Wildlife Trust	Supports policy NE6 but would welcome Green Network designation within allocated sites H13 and H10. Green Network does not go as far in Newport as SWT would like.	<p>Green infrastructure features within allocated sites will be protected under the biodiversity (NE1) and tree (NE2) policies and also through the Strategic Application Workshop and pre-application processes within Telford &amp; Wrekin Council.</p> <p>Land within Newport has been included in the Green Network where it meets the six functions of the Green Network within the Local Plan. It is intended to be a strategic designation and does not cover all the incidental green spaces which were recognised through PPG17 and which might be better protected under the Council's 'Green Guarantee' land management commitment or under the Local Green Space designation through neighbourhood planning.</p> <p>The Council does not propose to amend the Green Network in this area.</p>
PUB 385	Harris Lamb Chartered Surveyors	Asks that the Green Network designation be removed from the clients land which has planning permission (Castle Farm Way)	<p>None of the land at this location is proposed as Green Network within the submission version of the Plan.</p> <p>The Council does not propose to amend the Green Network in this area.</p>

Rep. reference	Representor Name/ Group	Issue of representation	Council's proposed approach to the representation
PUB 431	JVH Planning Consultants (Redrow Homes)	Objects to Green Network designation at Kestrel Close and Plough Lane in Newport.	<p>Land in Newport has been included in the Green Network where it meets at least one of the six functions of the Green Network. The land at Kestrel Close and Plough Lane, as part of a wider parcel of Green Network land, has been assessed as providing significant visual amenity and separation of built up areas, the site is valuable for wildlife including a number of Section 41 species and habitats of principal importance for nature conservation and also forms a buffer to the designated site at Newport Canal Site of Special Scientific Interest (SSSI). The site forms part of a Greenspace linkage.</p> <p>The Council concludes that the inclusion of the site within the Green Network is justified and in line with NPPF, that the Green Network policy should apply and that any proposed development in this area should respond both in scale and design to the Green Network functions provided by the land. No change is proposed by the Council.</p>
PUB 539	Hallam Land Management	Objects to the principle of the Green Network. Requests the justification. States that extensions to the Green Network are new layers of protection on open countryside. Suggests that the allocation of a site at Wappenshall could include areas of Green Network around the site.	<p>The Council has concluded that the Green Network is in line with NPPF and other relevant guidance as set out in the answer to Issue 6.3 above. The Council clarifies that it does not intend to allocate the site at Wappenshall. The justification of each parcel of Green Network land was made available on the interactive Policies Map at the time of Submission. The Green Network is an urban designation and does not cover open countryside or any land outside of the settlement boundaries of Telford &amp; Newport.</p> <p>The Council does not intend any changes to the Green Network designation or policy in response to this representation.</p>

Rep. reference	Representor Name/ Group	Issue of representation	Council's proposed approach to the representation
PUB 552	Hallam Land Management	Requests the justification. States that extension to the Green Network are new layers of protection on open countryside. Objects to the principle of the Green Network as not in line with NPPF and too permissive and open ended.	<p>The Council concludes that the Green Network is in line with NPPF and other relevant guidance as set out in the answer to Inspectors Matter 6.3. The justification of each parcel of Green Network land was made available on the interactive Policies Map at the time of Submission. The Green Network is an urban designation and does not cover open countryside or any land outside of the settlement boundaries of Telford &amp; Newport.</p> <p>The Council does not intend any changes to the Green Network designation or policy in response to this representation.</p>
PUB 561	Seabridge Developments Ltd	Requests the justification. States that extension to the Green Network are new layers of protection on open countryside. Objects to the principle of the Green Network as not in line with NPPF and too permissive and open ended.	<p>The Council concludes that the Green Network is in line with NPPF and other relevant guidance as set out in the answer to Issue 6.3 above. The justification of each parcel of Green Network land was made available on the interactive Policies Map at the time of Submission. The Green Network is an urban designation and does not cover open countryside or any land outside of the settlement boundaries of Telford &amp; Newport.</p> <p>The Council does not intend any changes to the Green Network designation or policy in response to this representation.</p>

Rep. reference	Representor Name/ Group	Issue of representation	Council's proposed approach to the representation
PUB 587	Advance Land & Planning Ltd	Network is not compatible with NPPF Paragraph 76 & 77 and that the concept is unsound.	<p>The Council clarifies that the Green Network is not intended to be a Local Green Space designation and that NPPF paragraphs 76 &amp; 77 are not considered relevant. The justification of each parcel of Green Network land was made available on the interactive Policies Map at the time of Submission. Furthermore the policy NE6 asks development within the designation to react to and maintain the functions of Green Network land and is not an unreasonable constraint on development.</p> <p>The Council does not intend any changes to the Green Network designation or policy in response to this representation.</p>