

Telford & Wrekin Local Plan – Inspector Matters, Issues & Questions (MIQs)

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This paper provides the Council's response to the Inspector's MIQs –

Matter 6 - Environment

6.1 Is the highest level of protection that national policy requires for Areas of Outstanding Natural Beauty adequately reflected in the Local Plan? Does policy NE7 make a sufficient distinction between the AONB and Strategic Landscapes?

6.1.1 Paragraph 6.5.1 of the Local Plan¹ recognises that Areas of Outstanding Natural Beauty (AONB) should be given the highest level of protection. This is consistent with paragraphs 115² and 116³ of the NPPF.

6.1.2 Policy NE1 of the Local Plan also states that “*Nationally and internationally protected sites and species will be afforded the highest level of protection*” which applies to the AONB.

6.1.3 Representation from Historic England related to lack of reference to the Shropshire Hills AONB, part of which lies within Telford & Wrekin. Minor Modification P39⁴ addresses this issue by proposing the following additional wording to paragraph 6.5.4:

The Wrekin Forest Strategic Landscape includes part of the Shropshire Hills Area of Outstanding Natural Beauty (AONB) a small part of which falls within the borough. Any proposals affecting the Shropshire Hills AONB will also be required to be consistent with the current AONB Management Plan and any subsequent update.’

6.1.4 The Council considers that this additional wording is reasonable and reference to the AONB Management Plan⁵ provides supplementary guidance in decision making relevant to the AONB as advised in the NPPG⁶.

6.1.5 The Council would also like to clarify the distinction between AONB and Strategic Landscapes, the boundaries of which are shown in Figure 1 below.

¹ Document A1

² Conserving landscape and scenic beauty in AONBs

³ Determining applications in AONBs

⁴ Document A5a

⁵ Document C3a

⁶ NPPG Paragraph: 004 (reference ID: 8-004-20140306)

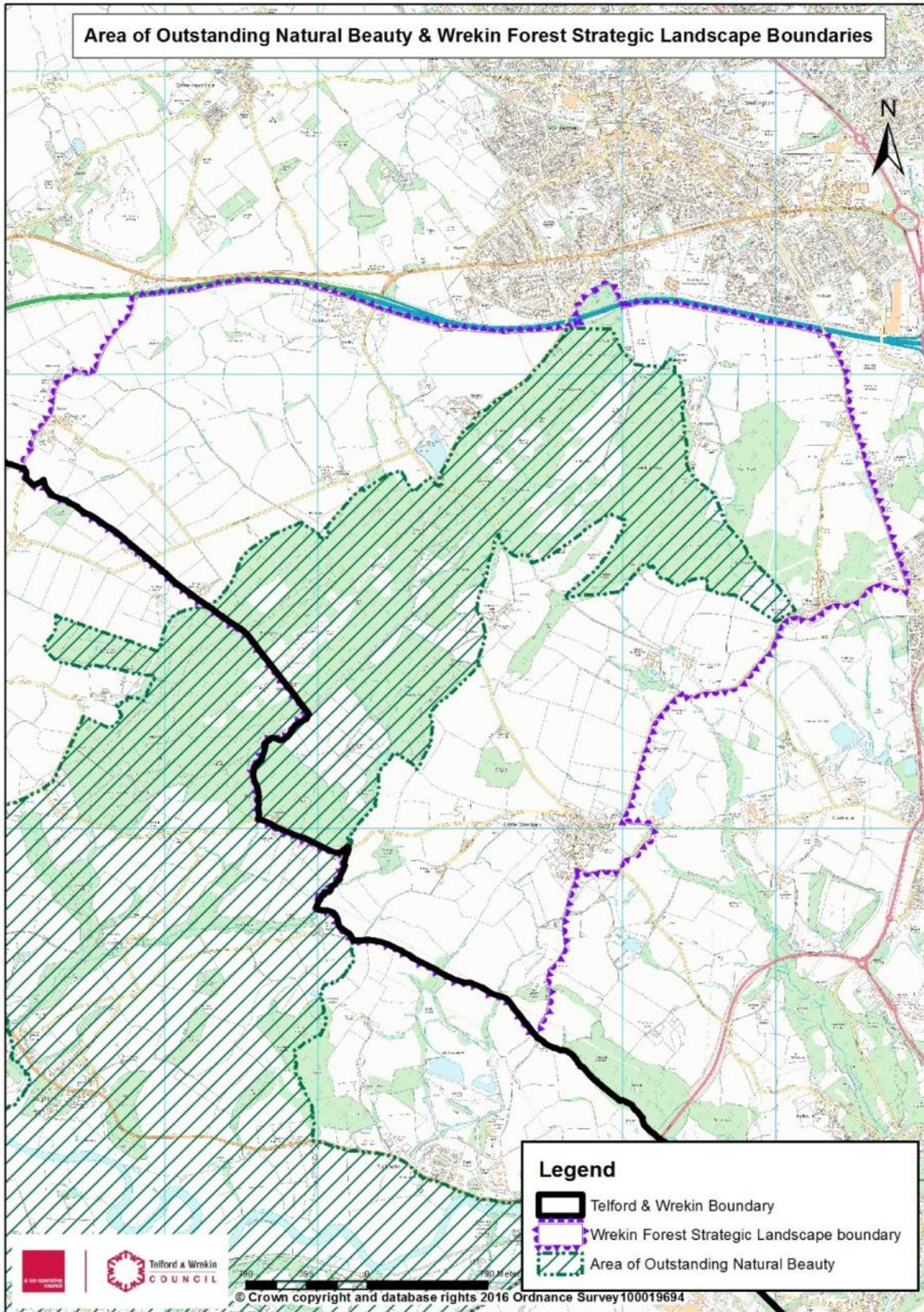


Figure 1: Wrekin Forest Strategic Landscape and Shropshire Hills Area of Outstanding Natural Beauty boundaries

6.1.6 The Shropshire Hills AONB was designated in 1958, and a small but significant part of it (the Wrekin) falls within the borough. The immediate setting of the Wrekin (some of which is outside the AONB boundary) also falls within the borough. The area comprising the Wrekin and its environs is known as the 'Wrekin Forest'. In order to avoid detriment to the natural beauty of the AONB through inappropriate development at its margins, it is desirable that the landscape setting of the AONB is reflected in borough planning policy, hence the designation of the Wrekin Forest Strategic Landscape.

6.2 Are the Local Plan's Strategic Landscapes sufficiently justified and consistent with national policy in the Framework?

6.2.1 Justification for the Strategic Landscape designation in national policy context

6.2.2 The NPPF makes a number of references to the protection of valued landscapes, specifically paragraph 109 '*The planning system should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes*'... and paragraph 156 '*Local planning authorities should set out...strategic policies to deliver...conservation and enhancement of the natural and historic environment, including landscape*'. The identification of valued landscapes is also referenced in other government documents, such as *An Approach to Landscape Character Assessment*⁷ which states that '*Landscape character assessment can be used to inform decision-making, including...identification of special/ designated area boundaries (p.11)*'. The Council therefore considers that the designation of Strategic Landscapes is justified and consistent with national planning policy. The Council also considers that the landscape character-based approach which has been taken in the identification of these Strategic Landscapes is robust and in line with recognised best practice.

6.2.3 Justification for the designation of the three specific Strategic Landscapes

6.2.4 The Council identified three landscapes of strategic or borough-wide significance following a review of its urban and rural areas.

6.2.5 There is clearly only one landscape in the urban area that merits protection – the Ironbridge Gorge. This is already protected by other Local Plan policies reflecting its World Heritage Site status (Policy BE3) and conservation area status (Policy BE5). Its future management will be set out in a World Heritage Management Plan and an SPD. Identifying the site as a Strategic Landscape in the Local Plan would serve no additional policy merit. Other urban

⁷ Natural England, (2004)

landscapes (for example, The Cockshutt and Telford Town Park) have localised function and are protected by other Local Plan policies (NE1 and NE3).

6.2.6 The rural parts of the borough can be categorised into three distinct areas using Natural England's landscape classifications. Firstly, the north western part of the rural area is within the wider Shropshire, Cheshire and Staffordshire Plain⁸ characterised as a flat landscape with strong field patterns and sparse woodland. It contains a diversity of sites of habitat value and rich archaeological heritage. Secondly, the south western part of the rural area of the borough is within the wider Shropshire Hills⁹ AONB. It has an upland and more rugged character compared with the rest of the rural area and is nationally recognised for its geology with the Wrekin a very prominent regional landmark. Thirdly, the rural area between Newport and Telford is identified within the Mid Severn Sandstone Plateau¹⁰. This is an extensive sandstone plateau punctuated by Lilleshall Mount, a prominent volcanic ridge and, arguably, the borough's second most significant natural landmark after the Wrekin.

6.2.7 The borough contains exceptionally fine examples of landscapes from within all of these distinct areas, and these were taken forward for consideration as potential Strategic Landscapes. These are the *Weald Moors* (previously an Area of Special Landscape Character¹¹); the *Wrekin Forest* (including part of the AONB¹²); and Lilleshall. On this basis, the Council commissioned research¹³ to assess whether they should be designated as Strategic Landscapes and, if so, the extent of their designation. Tables 1, 2 and 3 overleaf set out the merits of each of these landscapes being designated.

6.2.8 The Council has reviewed but rejected submissions that other Strategic Landscapes be designated (for example, one protecting Chetwynd Aston from coalescence with Newport) and representations asking for a similar control to be applied between Edgmond and Newport¹⁴. Such representations fail to appreciate that the policy is to protect landscape rather than to serve as a policy tool to restrict development.

6.2.9 The Wrekin Local Plan had previously designated landscapes subject to control as Areas of Special Landscape Character. The change of name in the

⁸ NCA Profile 61

⁹ NCA Profile 65

¹⁰ NCA Profile 66

¹¹ Policy OL2 of the Wrekin Local Plan

¹² Also covered by Policy OL2 of the Wrekin Local Plan

¹³ Document C3f

¹⁴ Although para 5.3.1.5 in Policy HO10 makes clear that the policy seeks to restrict coalescence as way of protecting the distinctiveness of each settlement.

Local Plan to strategic reflects the fact that the Council considers these to be of borough wide importance. It goes without saying that by their recognition as Strategic Landscapes they are still considered to be special.

6.2.10 Justification for the detailed Strategic Landscape boundaries

6.2.11 As explained above, the Strategic Landscapes were identified following detailed local level landscape character assessment, in line with national best practice guidance. Full details of the methodology and findings may be found in document C3f. The study identifies the landscape characteristics and associated special qualities of each of the Strategic Landscapes, and provides recommended boundaries for the Strategic Landscapes based on their landscape character. The special qualities of each of the Strategic Landscapes are set out in document C3f¹⁵

6.2.12 A small number of representations have been received regarding the detailed boundaries of the Strategic Landscapes, which are addressed in the following tables. It should be noted that representations have also been received supporting the identification of these Strategic Landscapes.

Table 1 The Weald Moors Strategic Landscape

Issue raised in representation	Council's Response
The village of Eyton upon the Weald Moors is not included within the Weald Moors Strategic Landscape	The historical significance of Eyton Upon the Weald Moors is acknowledged, including the presence of a number of Listed Buildings (including Eyton Hall) and the cultural connections with the Weald Moors which are implied in the name of the village. However, there is a transition between the Weald Moors landscape and the Estate Farmlands landscape which surrounds it, and the village of Eyton Upon the Weald Moors is located within this transition. It is necessary for the purposes of designation for the Strategic Landscape boundary to follow a clear line on the ground within the zone of transition, and it is considered that the old canal, with its line of mature trees, is a suitable boundary line which marks a sense of 'arrival' in the Weald Moors, and demarcates the low-lying and open Weald Moors landscape from the more densely settled and undulating Estate Farmlands which surround it.

¹⁵ Weald Moors- p.22, Lilleshall Village- p. 34, Wrekin Forest – p. 47

Issue raised in representation	Council's Response
The Weald Moors and Lilleshall should be merged into a single Strategic Landscape	The Weald Moors and Lilleshall are very different and distinctive landscapes. Between the two Strategic Landscapes is an area of transitional landscape, where the character gradually changes from one to the other. This transitional area does not have such a strong sense of place, or strongly exhibit the special qualities associated with either of the Strategic Landscapes. It has therefore not been designated as a Strategic Landscape.
The finger-like extension of former Special Landscape Area to the south of Newport has not been included in the Weald Moors Strategic Landscape	This area of flat land alongside the Strine Brook is surrounded by higher land to the north and south. It therefore exhibits more of an enclosed valley floor character than the expansive open landscapes associated with the Weald Moors. It has therefore not been included within the Weald Moors Strategic Landscape.

Table 2 Lilleshall Village Strategic Landscape

Issue raised in representation	Council's Response
The Strategic Landscape should begin at the urban edge and all the fields adjacent to Muxton Lane should be included in the Strategic Landscape	It is acknowledged that the fields adjoining Muxton Lane are attractive with historic landscape features, comprising small, irregular pastoral fields surrounded by mature hedgerows, and which are likely to have a relatively early date of enclosure. However, because of intervening vegetation, they do not have views of the Lilleshall monument on the horizon, and therefore lack the distinctive sense of place which is felt within the Lilleshall Village Strategic Landscape.
Concern that the designation of Lilleshall Village Strategic Landscape would prevent development of affordable housing within Lilleshall Village	The purpose of Strategic Landscape designation is not to preclude all development, but to protect them from development which would cause detrimental change to the quality of the landscape. If high quality and appropriate development can be achieved within the planning and management principles set out in document C3f, then the Strategic Landscape designation should not preclude the development

Table 3 Wrekin Forest Strategic Landscape

Issue raised in representation	Council's Response
<p>The Wrekin Forest Strategic Landscape boundary should follow the A4169/A5223 so it can abut the urban area and be consistent with the Draft Wrekin Forest Landscape Partnership boundary.</p>	<p>The Strategic Landscape designation and the Wrekin Forest Landscape Partnership boundary are different designations for different purposes. The Strategic Landscape designation is primarily a planning tool, designated on the basis of its landscape character, and intended to protect the area from development which would cause detrimental change. The Landscape Partnership is primarily concerned with implementation of the Wrekin Forest Plan (primarily a landscape management tool) and engagement with landowners and local communities. Its boundary therefore needs to come as close as possible to those communities.</p> <p>Given their different purposes, the Council does not consider it necessary for the boundaries of the Wrekin Forest Strategic Landscape and the Wrekin Forest Landscape Partnership to be contiguous.</p> <p>The area between the two (i.e. outside the Strategic Landscape boundary) is considered to be more closely related to Coalbrookdale than the Wrekin both visually (the south-easterly aspect directs views towards Coalbrookdale rather than west towards the Wrekin) and physically, as the tributary valleys flow into the Severn Gorge at Coalbrookdale. The area's landscape character and sense of place is therefore less strongly associated with the Wrekin.</p>

6.3 Is the Green Network identified in the Local Plan (policy NE6) and Strategic Landscapes (policy NE7), sufficiently justified and consistent with national policy in the Framework? Is it clear why specific areas have been included within or excluded from the Green Network?
[Inspector's note: the Council's comments on the specific changes to the Green Network that are sought by representors are requested.]

6.3.1 Is the Green Network identified in the Local Plan (policy NE6) sufficiently justified and consistent with national policy in the Framework?

6.3.2 The Green Network was first adopted in the *Telford Local Plan*¹⁶ and has been maintained in local policy since that time. The detailed history of the

¹⁶ The Plan which predates the Wrekin Local Plan

Green Network in Telford is set out in the Technical Paper: Green Network¹⁷. Green Network is the term which refers to the borough's collective network of green spaces and environmental features. Through recognition of the many benefits it can provide for people and for wildlife, and the vital and wide ranging functions these assets perform, networks of green infrastructure are now widely recognised as a critical ingredient in creating successful places where people want to live and work.

- 6.3.3 The NPPF does not recognise green network or green wedge concepts directly but in section 11 and paragraph 109 in particular the government acknowledges the '*wider benefits*' of ecosystem services and that '*coherent ecological networks*' are both more resilient to potential pressures and important tools for helping to reduce the decline in biodiversity. Moreover paragraphs 114 and 117 set out the strategic approach Local Plan policy should take including planning for networks of biodiversity and green infrastructure and ecological networks.
- 6.3.4 The submitted Green Network designation is a landscape scale designation focusing on functioning green infrastructure (GI). The designation recognises biodiversity, recreation and landscape GI functions which are inescapably integrated with wider GI and ecosystem services functions including flood alleviation, urban cooling and health and wellbeing benefits¹⁸. This approach to GI is in line with the NPPF (paragraphs 99 and 114) and also in line with guidance from the Landscape Institute¹⁹ and the TCPA and Wildlife Trusts²⁰. PPG states that '*GI can help to deliver a range of planning policies*²¹ and gives examples relating to good design, healthy communities and meeting the challenges of climate change. These link directly to the intention of the Green Network policy in the submitted Plan which promotes the maintenance of the high quality natural environment and the sense of place for which Telford & Wrekin is noted and appreciated by its residents and businesses.
- 6.3.5 The Council firmly believes that the designation of the Green Network is consistent with the NPPF and is positively prepared, justified and effective.
- 6.3.6 The Council recognises that the original Green Network concept developed in advance of the current concept of GI and recognition of that term in policy guidance. Nevertheless, the Council asserts that the legacy of the Green Network's design, implementation and subsequent protection is that Telford & Wrekin has a well-established, interconnected network of multifunctional green space providing GI functions.

¹⁷ Document B3c.

¹⁸ Local Plan paragraph 6.4.4 describes Green Network functions.

¹⁹ Green Infrastructure: An Integrated Approach to Land Use. (2013). Landscape Institute Position Statement.

²⁰ Planning for a Healthy Environment – Good Practice Guidance for Green Infrastructure and Biodiversity. (2012). Town & Country Planning Association and the Wildlife Trusts.

²¹ NPPG Paragraph 030 (Reference ID: 8-030-20160211).

- 6.3.7 The submitted Plan recognises the history and existing function of the original designation by proposing a modified Green Network designation and policy. It is recognised that, in some areas, the status or value of sites has changed leading to amendments (both removals and new inclusions) to the mapping²². The policy recognises that the value of the land is directly connected to its GI functions and that it may be possible, through innovative design and early engagement with Green Network and GI functions, to allow appropriate high quality development within the network while still protecting the strategic designation. This will not be possible in all cases since different areas of network provide different GI functions and some of those functions are more location fixed and/or sensitive than others.
- 6.3.8 The Green Network, through the meaningful review²³ which has been carried out, meets the NPPF requirement for local plans to plan for biodiversity in a strategic way and to identify and map components of networks for biodiversity and GI (paragraph 114). The Green Network covers a wider range of GI functions (recreation, landscape etc) than just those for biodiversity, but also recognises land forming core areas, corridors or stepping stones for biodiversity²⁴.
- 6.3.9 The Council recognises the original Green Network concept emerged from the unique way in which Telford was planned as a New Town. The Council notes that NPPG states that local authorities should work *'to develop and deliver a strategic approach to protecting and improving the natural environment based on local priorities and evidence.'*²⁵ While it is recognised that Newport as a Market Town is different from Telford as a New Town undeveloped land in Newport provides wide ranging GI functions consistent with both NPPF and with the proposed Green Network policy approach. The Council therefore concludes the extension of the Green Network concept to Newport is both justified and sound.

6.3.10 Is it clear why specific areas have been included within or excluded from the Green Network?

- 6.3.11 The review of the Green Network was carried out by Telford & Wrekin Council specialist officers using data from GI studies,²⁶ the Shropshire Ecological Data Network and information on designated sites, public open space, public rights of way and aerial photography. Detailed habitat and species data generated through the planning system was also utilised where available.

²² Document B3c.

²³ Document B3b.

²⁴ NPPF Paragraph 117.

²⁵ NPPG paragraph 008 (Reference ID: 8-008-20140306).

²⁶ Document C3c and Document C3d.

6.3.12 Gathering all of the assessment information into a form which could be released to the public and meaningfully interrogated went beyond the preparation of the plan but the Green Network which is displayed on the interactive Policies Map does, when an area of the GN is 'clicked' upon, show which of the six Green Network functions the site was assessed as providing. This interactive tool has been available since the plan was submitted and those who made representations seeking the full assessment have been informed of its availability.

6.3.13 [Inspector's note: the Council's comments on the specific changes to the Green Network that are sought by representors are requested.]

6.3.14 The Council received a number of representations relating to the Green Network. Supportive representations are not discussed further. The representations which object to the Green Network or seek specific site changes to the mapping are summarised, along with the Council's approach to those sites in the table in document G13. Document G13 is intended to assist the Inspector in understanding the Council's response to the Green Network representations and the changes to the Green Network which are proposed as Minor Modifications²⁷.

6.4 Is the Local Plan's approach to the conservation of the built environment consistent with national policy in the Framework, particularly in terms of the relationship between the significance of a heritage asset and the weight that should be given to the asset's conservation (paragraph 132 of the Framework)?

6.4.1 The Council's approach to planning for the built and historic environment is set out in its Technical Paper²⁸. The Council has taken careful account of Historic England's advice and introduced a number of modifications across the whole of the Local Plan²⁹. Historic England has raised no objection to the Council's approach.

6.4.2 The Council rejects the assertion that Policies BE4 to BE6 are not consistent with the NPPF. Policies BE4 and BE5 largely reflect and interpret the statutory obligation that a decision maker is placed under when considering development affecting a listed building or a conservation area.

6.4.3 Historic England supports the promotion of local lists³⁰. As buildings on the local list do not enjoy statutory protection, the policy tests for Policy BE6 are lower. The requirement in criterion (i) to secure development of equal or better

²⁷ Document A5a.

²⁸ Document B5a

²⁹ Document A5a

³⁰ <https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7>

quality is also consistent with other policies (e.g., BE1 and BE2) and the thrust of the NPPF³¹ where it covers good design.

³¹ Eg. Paragraph 7 seeks to enhance the built environment as an integral part of its understanding of sustainable development. This is elaborated on in paragraphs 56 to 68 and paragraphs 132 to 134.