

Sir,

I am speaking as a representative of Newport Civic Society and as a resident of Newport for the past 25 years.

As an amenity society, we are very concerned about the environmental impact of the rapid development that Newport has experienced, and continues to experience and especially the desperate decline in green space from the loss of so many greenfield sites to housing.

We are objecting to the allocation of H13 because it would enable the deliberate removal of a valuable piece of publicly accessible green space from Newport, where the Council has identified a serious deficiency. In so doing, the Council would not only be failing to address this deficiency but by worsening it, Newport would be further disadvantaged compared to the rest of the Borough

Newport is short of open space in both quantity and quality, and what open space it has, does not score well in the assessments in the Local Needs Green Infrastructure Survey compared to the rest of Telford. In 2013, this document identified a need for amenity green space in Newport, and stated that the current provision meets less than 25% of the recommended quantity standards (Page 16), and goes on to warn that anticipated new developments will exacerbate existing needs, putting more pressure on existing sites and if additional provision is not made, quantity shortfall will become more severe.

But crucially, however, Newport has an undersupply of publicly accessible green spaces, a situation which has been acknowledged by the Council in the reports prepared over the past 5 years as evidence building for the Local Plan. We referred to this in our submission last year on the Publication Version.

Since 2013, as predicted, the situation has worsened considerably, to such a critical level that, with the Shropshire Homes development now underway on another greenfield site off Station Road, the **last** remaining piece of publicly accessible green space on the southern edge of the town is now the land at Station Road, owned by Telford and Wrekin Council and yet - allocated as H13.

The site is existing open space and designated OL6 in the extant Local Plan. It is a well-used and much valued area of accessible and natural green space with ecological, wildlife and local history interest and crossed by a network of footpaths including Hutchison Way, Telford and Wrekin's long distance public footpath. The area has been used by local people for many years for informal recreation, particularly walking, socialising and for access to nature. **Most importantly**, because of its network of footpaths linking to adjacent residential areas, to Millwood Mere, and to Church Aston, it is truly accessible to a large number of people in the locality without the need to cross a busy road.

The view of Inspector Christina Downes in 2012 that the Station Road site was “greatly valued as an informal recreational resource” was upheld by the Court of Appeal’s judgement on 2 April 2014, as referenced in our submission last year.

This site has been submitted as an existing green space to be protected in the evidence for inclusion in the Newport Neighbourhood Development Plan.

It is owned by the Council and they are well aware of its value to local people. Indeed, nearly 10 years ago, Telford and Wrekin promoted the amenity use of the site by supporting local efforts to improve the entrance to Hutchison Way and Shropshire Wildlife Trust provided the data for the Interpretation Board. They have identified this area as a locally scarce important habitat for wildlife including species on the Red List such as skylarks and an important feeding, shelter and breeding area for a variety of birds and small mammals.

In 2013, the Director of Shropshire Wildlife Trust, in evidence presented to the call-in inquiry for a superstore, proposed that Telford and Wrekin Council fulfil their biodiversity duty and designate the site as a Local Nature Reserve for which it was ideally suited as the Council was the landowner. This would also help to fill the gap in Local Nature Reserves in this part of the Borough.

However, we note, Sir, that recently, the Council has designated 3 more Local Nature Reserves elsewhere in Telford, bringing the total there to 6 since 2011.

The Council’s 2008 Open Space, Sports and Recreation Assessment identified this site, known as Site 80 Baddely Wells, which includes grassland and pond, a veteran oak, species rich hedgerows, scrub and woodland, as natural and semi-natural open space “in which Newport is deficient.” This is still the case and again, the Local Needs Green Infrastructure Survey, regarding the need for contact with, and access to nature, has identified Newport as not meeting the quantity standards for natural and semi-natural green space – yet another deficiency.

However, in 2015, in the Green Guarantee exercise, when the Council had the opportunity to protect the site by including it on the list of “locally important sites, owned by the Council not already protected”, they chose not to, despite it meeting all the criteria, and with all the evidence of Newport’s increasing loss of accessible and natural green space in their own Plan documents.

Moreover, in late 2014, within a few weeks of the withdrawal of the superstore application, and despite the Court of Appeal judgement on the OL6 status of the land, the Council had brought forward an application for housing on the site with the same developer.

Sir, it would appear that there has been a catalogue of inconsistencies regarding this site in the application of policies in the extant Local Plan and these are being perpetuated in the proposals and policies in the new one.

There is much more evidence of the site's importance as green space to local people, as presented many times to the Council over the last 5 years. With all this known to Telford and Wrekin of the site's value for amenity, recreation, biodiversity and local history, the promotion of the development of this site contradicts the stated aim to protect the Green Infrastructure and is completely contrary to their own policies for the Natural and Built Environment, in particular NE1, NE2, NE3 and NE6 and BE8. By proposing the reduction in publicly accessible green space in the south of Newport to virtually zero, the Council is not applying its policies consistently, evenly and fairly throughout the Borough.

Sir, we seek the release of the allocation for H13 and your recommendation, Sir, for the Council to find a means to protect the site in line with their policies.