

Our Ref: 41/15

Your Ref: Representor Ref: 144

11 February 2017

**Ms T Kelly**  
**Programme Officer**  
**c/o Development Management**  
**Telford & Wrekin Council**  
**Wellington Civic Offices**  
**Telford**  
**TF2 2FH**

Dear Ms Kelly

**TELFORD AND WREKIN LOCAL PLAN EXAMINATION**  
**POLICY NE6 – GREEN NETWORK**  
**SUBMISSION ON BEHALF OF MRS M FOWLER – LAND AT HODGBOWER**

I would be grateful if you would pass on to the Inspector Mr Fowler's appreciation for allowing this written submission in place of the presentation at the oral session on Day 6 of the Examination.

Mrs Fowler's concern about the Green Network and the manner in which her land at Hodgebower has been designated and is likely to be controlled by Policy NE6, follows on from the discussion of Green Network issues on 9 February 2017.

It became clear at that session that the Green Network as presented in the Telford and Wrekin Local Plan had essentially been "carried forward" (now with alterations) from the Wrekin Local Plan. However, the functions of the land so designated and expressed in para 6.4.4 of the Telford and Wrekin Local Plan have changed somewhat from the aims of the Green Network expressed in para 8.2.12 of the Wrekin Local Plan.

If the aims and functions of the Green Network have changed, then a fresh assessment of the land to be included should have been carried out, against the new criteria. It also became clear that whatever re-assessment had taken place had been undertaken in relation to "parcels of land" (para. 6.9 of the Green Network Technical Paper) rather than the individual plots that make up the various parcels.

This is clear from the interactive Policies map available on the Council's web site, that the land in Mrs Fowler's ownership - shown edged red on the attached map - has been assessed as being part of a much larger parcel of land, and not in its own right. That larger land parcel is also shown on the attached plan – edged blue.

The Council's assessment of this larger parcel shows that they have concluded, in relation to the six functions of the Local Plan set out in para 6.4.4 of the Plan and para. 6.7 of the Technical Paper, that the site,

- Has significance in terms of Visual Amenity.
- Assists in the separation of Built up Areas.
- Acts as Public Open Space thus meeting needs for recreation.
- Has Ecological Value because of water bodies and woodland.
- Is a Local Geological Site, and has unique Geological or Archaeological features.

There was no assessment in relation to providing linkages for footpaths, cycleways etc.

These assessments may or may not be true of the majority of the land forming the land parcel that includes Mrs Fowler's land, but they are not true of the land in Mrs Fowler's ownership. Such assessments in relation to her land would, more accurately conclude that:

- No one can see into the site other than the dwellings fronting Hodgebower and back onto her land. It has, then, no visual significance.
- There are no buildings to the north of Mrs Fowler's site, and indeed there is a proposed nature reserve immediately to the north, so clearly it cannot assist in the separation of built up areas.
- There is no private or public access to the site other than for Mrs Fowler. It cannot be said, then, to have any recreational significance whatsoever.
- The Council has indicated that reptiles and amphibians are known to exist in the vicinity, but there is no evidence of them existing on Mrs Fowler's land. There is no woodland. It cannot, then, be said to be of any ecological significance.
- There is no evidence of any geological or archaeological significance (let alone 'unique' features) on the site and it has no direct link to the Industrial Revolution. It is not shown on the Council's interactive map as containing a Local Geological Site. It cannot be claimed, then, that the site has geological or archaeological significance.
- There are no footpaths, cycleways, bridleways or public rights of way crossing Mrs Fowler's land, and ecological corridors can easily be safeguarded without sterilising significant areas of land. The site does not, then, be regarded as being of significance for its 'linkage' characteristics.

In short, Mrs Fowler's land does not serve any of the Green Network functions expressed in Para 6.4.4, and no evidence has been presented by the Council to demonstrate that it does. The 'parcel' of land that Mrs Fowler's land has been assessed alongside is, in fact, a very diverse area, with designated and proposed areas for nature reserves, wildlife sites, woodland, while other areas within the parcel do not have any such designations. Clearly the parcel has not been assessed with reference to its constituent parts.

Nevertheless, housing site H5 sits in the middle north of the parcel, in clear view from the adjacent highway. That, however, whilst having been included within the Green Network in the Wrekin Local Plan and being of similar nature and contiguous to the main body of the rest of the parcel is now excluded from Green Network. The nature of land now within housing site H5 has not changed, but the Council, which appears to own that site, now wants it for housing.

Similar considerations should apply to private land. Mrs Fowler's site does not perform Green Network functions and, if developed for housing, would only support a single dwellinghouse (because of access issues) which would in any event replace a permission granted for a single dwellinghouse on an adjacent site.

Mrs Fowler's land is unlikely to be unique as far as the assessments of parcels of land are concerned. It is noted, for instance, that land on the opposite side of Beech Road (opposite Site H5), which was included as Green Network in the Wrekin Local Plan, is also not included in the Green Network in the new Local Plan (indeed some has already been developed) though it appears to have the same characteristics as surrounding land that is retained in the Green Network in the new Local Plan.

The Green Network covers a considerable area of land within the Telford Urban Area, and is a significant feature in the new Local Plan. If the Green Network designation has been applied throughout the town on the same basis as the parcel that includes Mrs Fowler's land with little accurate assessment of individual plots of land, then the Local Plan cannot be regarded as being sound. Where there is no specific justification for including individual plots of land within the Green Network they should be excluded from the designation and the serious restrictions that it imposes.

Yours sincerely

**CLIVE ROBERTS**

