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J6/47/1

**Submission on Behalf of Redrow Homes Midlands.**

**Telford and Wrekin Local Plan Examination**

**Matter 6**

**6.3 Is the Green Network identified in the Local Plan (policy NE6) 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.]***

1        Objection has been raised to NE6 on the basis that areas have become included as green network which do not need to be so protected and some of which are appropriate for housing development. The Newport Inset indicates that land south of Plough Lane is included as green network.

2        This land has been the subject of a recent planning application and current planning Appeal. There is in our opinion no justification for including this land within the green network area for the following reasons.

- This land is contained by the A 41 by pass to the east, there are no direct views across the land from the wider countryside.
- The parts of the area that have landscape value are retained in the proposed planning/ design layout which retains the essential features of the site, these being the mature oak trees and the peripheral trees and greenery.
- The site remains open in the southern part giving views from the Shropshire Union Canal over open land and the mature Oak tree and maintaining a greenfield view.
- There is currently public access along the northern and western edges of the proposed development but not within the site itself.

- This land is not operating as an area of separation between built up areas, a green gap will be retained in the circumstances where the housing development is constructed and in fact public access will be improved.
- The proposed masterplan layout includes for new links to be created from Plough Lane through to the Canal in the south as well as maintained the peripheral footpaths
- The land does not have any current recreational function as it does not enjoy any public access or provide any amenity function.
- The site has no special ecological value, but in any event the development of part of the site will retain green corridors for wildlife.
- There are no historical or geological features of importance
- There are already footpath linkages that link the area with the centre of Newport.

3 This green network designation is not based on any rationale and in our view is simply an allocation to resist the development of the site. The Planning Authority have acknowledged in previous versions of the Plan that this area should become an employment site and it is difficult to understand how they can have moved from this to a green network allocation in a short timeframe without any evidence to explain the changes.

4 It is considered that the main green linkage in Newport is along the route of the Shropshire Union Canal. The Canal route runs through the centre of town and out to the western fringe and there is already a dedicated walk way along this route allowing the link from east to west. There is no requirement to include additional land within that area .

5 It is unclear as to exactly what type of green network the plan is trying to deliver. The Framework does not include a reference to Green Network. The Framework indicates at para 76 that local green spaces should only be designated where they are capable of enduring beyond the end of the Plan Period. Quite clearly the areas of land both north and south of

Plough Lane are logical development sites being enclosed by the A 41 By Pass. In the circumstances where the subject land is not developed in this Plan period it is entirely logical that in the future additional land will be needed for development purposes and the land contained by the by pass remains the most logical from of extension to the built up area . on this basis alone the proposal is contrary to the provision of the NPPF at para 76 ;if this is what is intended.

6 There should be clarity regarding why it is necessary to retain the land south of Plough Lane as undeveloped land and why the Green Network is necessary over and above the existing or proposed situation. In terms of the proposed development there will additional dedicated open land available for public use adjacent to the Canal. This is considered to be a better situation then one where the land remains in agricultural use with no dedicated public access or amenity use.

JVH 28<sup>th</sup> October 2016.

