



Acres Land & Planning Ltd
'Acres of space'

Hallam Land Management Ltd
Respondent No.
Matter 6 Environment

TELFORD & WREKIN LOCAL PLAN 2011-2031: CORE STRATEGY EXAMINATION MATTERS, ISSUES AND QUESTIONS.

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?

Paragraph 6.5.1 of the Submitted T & W Plan indicates that the NPPF places 'great weight' on the importance of landscape protection both at a National and Local level. It goes on to say that 'It requires Councils to protect and enhance valued landscapes'. Paragraph 6.5.2 goes on to include the Weald Moors as an example of Strategic Landscapes.

However, the NPPF **does not** 'place great weight' on all strategic landscape designations – many of which – like the Weald Moors are designated and defined by the Councils themselves. The actual quote from Para 115 of the NPPF is that '*Great Weight should be given to conserving landscape and scenic beauty in National Parks, the Broads, and AONB's which have the highest status of protection in relation to landscape and scenic beauty*'.

Paragraph 109 refers to 'valued landscapes' where the test is more modest and the restrictions are more balanced.

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

No. This is an important point. The Council has a tendency to impose its own environmental constraints and then use these as an impediment to change (for example through the Sustainability Appraisal process) which then prejudices the 'suitability' private sector sites.

It should be noted that the policy itself (NE7) is also very open ended in specifying that '*the Council will protect the Borough's Strategic Landscapes from development which would cause detrimental damage to the quality of the landscape*'. In practice this is interpreted as applying to buffer areas surrounding the Council's defined Strategic Landscape areas so that the policy constraint effectively becomes open-ended.

We are concerned that in the case of the Weald Moors, the Council has intentionally extended the boundary of the designation from the Consultation version to the Publication version, presumably to exert greater control. This is unacceptable and effectively gives the Council carte blanche to prevent otherwise suitable sites from coming forward.

Paradoxically, as we mention in relation to Matter 4, the Council has failed to even mention the Shrewsbury & Newport Canal which lies to the south of the Weald Moors and has a much greater significance to the live and heritage of Telford. The restoration of the canal supported by suitable and creative enabling development could bring considerable heritage, tourism, recreational and economic advantages to the area – as well as helping to deliver a visionary new community.

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.]

The Council's Green Network has become an essential characteristic of Telford and contributes greatly to its relaxed and low density atmosphere. But the designation of the boundaries of the Green Network have become the subject of much controversy and debate over the years. In many ways, the Green Network has taken on many of the characteristics of Green Belt. Some clearer criteria for the choice of boundaries might well be helpful.

6.4 Is the Local Plan's approach to the conservation of the built and historic 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)?

The NPPF indicates that 'Great weight' should be given to the conservation of historic assets, in accordance with the significance of the asset. In a town which prides itself of being the 'birthplace of industry' it is perhaps surprising that more emphasis is not given to the protection and promotion of its canal network, which lies at the heart of the heritage and history of Telford.

We have already indicated that a case should be made for promoting the preservation of the Shrewsbury and Newport Canal and protecting the line of the canal. The scope should be taken to encourage 'enabling development' to allow those objectives to be achieved.

John Acres