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## EXAMINATION OF THE TELFORD & WREKIN LOCAL PLAN 2011-2031

### MATTER 6 - ENVIRONMENT

#### Question 6.1

**Does policy NE7 make sufficient distinction between AONB and Strategic Landscapes?**

AONB's should be accorded the highest level of protection and in this respect should be differentiated from a Strategic Landscape such as Weald Moors which may warrant protection, but at a slightly lower level with more in-built flexibility to allow for appropriate development.

#### Question 6.2

**Are the Strategic Landscapes sufficiently justified and consistent with national policy in the Framework?**

The 'Wrekin Forest' and the 'Weald Moors' represent unique and rather special landscapes, but the same cannot be said of the one at Lilleshall. Here the landscape is not special or out of the ordinary. Instead it appears to have been formulated as a policy response to restrict development within what is termed a 'gap' between Muxton, Telford and Lilleshall. It therefore appears to me to suffer what might be termed an identity crisis.

The Strategic Landscape designation seeks to avoid development which would cause detrimental change to the quality of the landscape. It should be noted, however, that the *Telford & Wrekin Strategic Landscapes Study (December 2015)*, upon which Policy NE 7 is predicated and which forms part of the evidence base for the forthcoming Examination states that it will be important to: *"Resist large scale residential development (i.e. 10 units or greater) within the Strategic Landscape, and ensure that any development in the vicinity is not detrimental to the special qualities of the area and its views."* (first bullet point on page 36) (emphasis added)

The explanatory text makes reference to the Strategic Landscapes Study, which does not preclude development as a matter of principle as might a Green Belt, but neither the policy nor the text makes any explicit reference the qualification referred to above and this should be rectified.

**Question 6.3 Is the Green Network (Policy NE6) sufficiently justified?**

I wish to rely upon the comments submitted in my duly made objection to the Publication Plan, save to emphasise that I do not quibble with the policy, but I maintain that the specific designations have not been the subject of a thorough review as required by the NPPF. There has been a desk-top review of a very old data base and I very much doubt whether the boundaries are accurate and in all instances, properly reflect the criteria referred to in the NPPF (paras 76-77)