

Consultation Response – Wappenshall Consortium – Developer

Question 1: Which part of the Local Plan does this comment relate to?

Vision and Strategic Priorities

Question 2: Do you consider that this part of the plan is:

Sound

Legally compliant

Compliant with Duty to Co-operate

Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, or is unsound, or fails to comply with the duty to co-operate. Please be as precise as possible.

The Wappenshall Consortium control the proposed Land North of A442 Wheat Leasows Sustainable Community (SC3).

The Consortium support the Vision and Strategic Priorities of the TWLPR Publication Version.

The Consortium consider that the Vision and Strategic Priorities of the TWLPR are positively prepared, justified, effective and consistent with national policy, and therefore meet the tests of soundness in line with Paragraph 36 of the Framework.

Development of SC3 will help deliver the Vision; in particular in relation to focusing development in the most sustainable locations with good access to services, facilities and job opportunities; contributing to the health and wellbeing of residents through the provision of infrastructure and greenspaces; providing a mix of homes to meet the changing needs of the population; supporting inward investment to create jobs through new development; and adapting to climate change through the provision of well-connected sustainable transport, energy efficient homes and the location and design of developments.

The development of SC3 will also contribute positively to the Strategic Local Plan Priorities as demonstrated in the table below:

TWLPR Strategic Priority	Positive Contribution Made to Priority by Development at SC3
Tackling climate change and achieving carbon neutrality.	Development of SC3 will respond to meeting the challenge of climate change through an approach to sustainability which will be flexible, fit for the future, and align with the Council’s aspirations and actions. It will be a Zero Carbon Ready place built to Future Homes Standards, once implemented, delivering EV charging points and low carbon heating. Sustainability measures will ensure that development is resilient to the future impacts of climate change. Investment will be made in sustainable travel networks to support active lifestyles and reduce car use.
Protection and enhancement of the green, natural and historic environment.	The Masterplan for SC3 will protect the existing green, natural and historic environment, and provide betterment where possible. This includes space for woodland planting reflecting the ‘Forest Community’; the provision of new recreational routes, connecting with existing routes on the northern edge of Telford and links to off-site attractions (such as Wappenshall Wharf); and heritage

Maximising inward investment and employment opportunities.	<p>interpretation to bring the history of the locality to life. SC3 will also deliver at least 10% Biodiversity Net Gain.</p> <p>SC3 will provide around 68ha of employment land, which can deliver a range of employment uses and buildings, stimulating inward investment and creating a significant number of job opportunities. The Consortium are experienced in delivering high quality employment developments in Telford that meet demand.</p>
Securing better homes for all.	<p>SC3 will deliver around 3,100 homes, making a sizeable contribution to meeting the Council's overall housing requirement, including a range of types and tenures including much needed affordable housing and homes suitable for first-time buyers. The Consortium include experienced housebuilders capable of delivering homes at volume and to a high standard.</p>
Delivering regeneration, renewal and stronger communities.	<p>SC3 will deliver a range of new community facilities which will benefit new and existing residents alike and support community cohesion. The Consortium are committed to making land available for schools, health facilities, and local services, including a new secondary school for the wider area, and will work with the Council and the local community to bring forward the facilities and secure their long term stewardship. The Consortium will use its experience in delivering new communities elsewhere in the country to achieve this priority.</p>
Improving health, wellbeing and tackling health inequalities.	<p>SC3 will be an inclusive place that meets the needs of a broad range of future residents, workers and visitors. The proposals align with the principles of a sustainable neighbourhood and consider services, transport and inclusivity to deliver safer, healthier places for people to live. This approach will reinforce a strong sense of identity and provide a positive environment to live and work. The Consortium will use its experience in delivering new communities elsewhere in the country to achieve this priority.</p>

Question 4: Please set out what modification(s) you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness.

1. Notwithstanding the overall support for the Vision and Strategic Priorities, the Consortium consider the phrase 'Forest Community' should be defined within the Glossary of the TWLPR in order to provide clarity as to what it means. Without this addition, the Consortium object to the absence of such a definition. The Council consulted on a

definition at the Issues and Options stage, and this should be carried forward into the Glossary so as to provide more certainty for Applicants responding to the Plan.

Question 5: If your representation is seeking a modification, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Question 6: If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

Wappenshall Consortium is seeking to participate in the hearing sessions support and build upon their response to the plan raised in these representations.

Question 1: Which part of the Local Plan does this comment relate to?

Telford, Paragraph 4.3 – Support

Question 2: Do you consider that this part of the plan is:

Legally compliant

Sound

Compliant with Duty to Co-operate

Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, or is unsound, or fails to comply with the duty to co-operate. Please be as precise as possible.

1. The Consortium consider the Strategy of the TWLPR is positively prepared, justified, effective and consistent with national policy, and therefore meets the tests of soundness in line with Paragraph 36 of the Framework.
2. The Wappenshall Consortium support the majority of future growth being delivered in or on the edge of Telford through sustainable urban extensions to the existing urban area. As the most sustainable location within the Borough, growth here is consistent with Paragraph 110 of the Framework in limiting the need to travel and offering a genuine choice of modes of travel.
3. The Consortium control SC3 Land North of A442 Wheat Leasows and bring with them years of experience and knowledge in successfully collaborating to promote and deliver major mixed use urban extensions across the country. In terms of track record locally, Homes England have successfully delivered Lawley SUE and Lightmoor. Further, Bellway are an experienced national housebuilder, and Hallam Land an experienced national land promoter. The Consortium have reviewed all the technical information submitted in respect of SC3 and are confident the allocation is developable in line with the aspirations of the Council in the TWLPR.

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Yes, I wish to participate in hearing session(s)

Question 6: If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

Wappenshall Consortium wish to participate in the hearing sessions support and build upon their response to the plan raised in these representations.

Question 1: Which part of the Local Plan does this comment relate to?

Policy CC1: Sustainable Construction and Carbon Reduction – Object

Question 2: Do you consider that this part of the plan is:

none

Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, or is unsound, or fails to comply with the duty to co-operate. Please be as precise as possible.

1. The Consortium object to Policy CC1 1., 2. and 3. as they are not justified, not effective, not consistent with national policy, and therefore not sound.
2. The requirement at criterion 1. for all development to demonstrate how it provides for energy needs by using on-site or local renewable energy sources is contrary to Paragraph 16 d) of the Framework which requires policies to be clearly written and unambiguous so it is evident how a decision maker should react to development proposals. It reads as if all energy needs arising from the development must be met on site or using local renewable energy sources. Further, it contradicts the wording of CC2 1.
3. If that is correct, it cannot be effective or deliverable as expecting developments to meet their energy needs on site is unrealistic and overly onerous, with no evidence provided as to the implications for on-site capacity and viability. Further, requiring energy needs to be met using local renewable energy sources is again unrealistic as energy will be supplied from the grid which will draw on a range of energy sources. The wording should be reviewed and amended.
4. The requirement at criterion 2. d. to select materials with high thermal mass, low embodied carbon and durability is onerous and goes beyond national policy in Paragraph 164 b) of the Framework in not reflecting national technical standards.
5. The requirement at criterion 3. of Policy CC1 for all major developments to aim to achieve net zero carbon emissions is onerous and contrary to Paragraph 16 d) of the Framework which requires policies to be clearly written and unambiguous so it is evident how a decision maker should react to development proposals. Local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards as set out in Paragraph 164 b) of the Framework.

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1. Policy CC1 1. should be amended to remove the requirement to provide for energy needs on-site or local renewable energy sources. Criterion 2. d. should be amended to be more flexible as to the types of materials used for construction. Criterion 3. should be amended to reflect national policy as set out in Paragraph 164 a) of the Framework.

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Question 1: Which part of the Local Plan does this comment relate to?

Policy CC2: Renewable Energy in Developments – Object

Question 2: Do you consider that this part of of the plan is:

none

Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, or is unsound, or fails to comply with the duty to co-operate. Please be as precise as possible.

1. The Consortium object to Policy CC2 as it is not justified, effective, or consistent with national policy, and therefore not sound.

2. The requirement at CC2 1. for all new development to incorporate renewable energy production and storage onsite unless existing local renewable energy sources are available and achievable to provide power to the site will not be achievable or desirable on all sites.

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3. Delivery of renewable energy production and storage onsite of any significant scale to meet the needs of the site will cause conflict with delivery of other land uses, in particular on allocated sites such as SC3 where they are being delivered to meet the development needs of the Borough.

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4. Further, the practicalities of seeking to secure a local renewable energy source which is available and achievable to provide power to the site, where renewable energy production and onsite storage isn't being provided, is likely to impinge on delivery of development and viability. The wording of the policy should be reviewed and amended.

5. The requirement at CC2 4. that major development must demonstrate it has selected the most sustainable heating and cooling system is ambiguous and potentially overly onerous, with no evidence provided as to the effects on site capacity or viability. Further, the hierarchy at CC2 5. and 6. does not allow for consideration of feasibility and viability as required by Paragraph 166 of the Framework.

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1. Policy CC2 1. should be amended to start “**Where feasible, viable and appropriate having regard to the development requirements on the site**, all new development will incorporate renewable energy production and storage onsite.”, with the wording “unless existing local [...] provide power to the site” removed.

2. Policy CC2 4., 5. and 6. should be reworded to make it clear that decentralised energy supply will only be required where it is feasible and viable.

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Question 6: If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

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Question 1: Which part of the Local Plan does this comment relate to?

Policy CC5: Flood Risk Management and Sustainable Drainage Systems – Object

Question 2: Do you consider that this part of of the plan is:

none

Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, or is unsound, or fails to comply with the duty to co-operate. Please be as precise as possible.

1. The Consortium object to Policy CC5 1. b. as it is not justified and therefore not sound.
2. Criterion b. of Policy CC5 1. seeks to require that development does not prejudice land that is required for flood management where identified by the Council, both now and in the future. It is unclear how a development proposal can not prejudice land that may be required in the future for flood management, if not identified at the time a planning application is determined.

Question 4: Please set out what modification(s) you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness.

1. The Consortium request that “now or in the future” is removed from Criterion b. of Policy CC5 1.

Question 6: If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

Wappenshall Consortium wish to participate in the hearing sessions support and build upon their response to the plan raised in these representations.

Question 1: Which part of the Local Plan does this comment relate to?

Policy DD2: Housing Development Design – Object

Question 2: Do you consider that this part of the plan is:

none

Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, or is unsound, or fails to comply with the duty to co-operate. Please be as precise as possible.

1. The Consortium object to Policy DD2 on the grounds that Part 2 of the Policy does not provide sufficient clarity in what is expected to be set out in a Design Code / Brief to support housing development proposals.
2. The Consortium consider that Part 2 of Policy DD2 should include a list of criteria, detailing the specific aspects of design expected to be covered in a Design Code / Brief, proportionate to the scale of development.
3. The Consortium also note that Policy HO2 refers to a Development Brief and not a Design Code / Brief. The Local Plan should ensure consistency throughout to ensure appropriate compliance.

Question 4: Please set out what modification(s) you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness.

1. Part 2 of Policy DD2 should be amended to refer to Development Briefs and include a list of criteria, detailing the specific aspects of design expected to be covered in a Design Code / Brief, proportionate to the scale of development. This should contain objectives, site information covering opportunities and constraints, relevant policies, a framework masterplan and explanatory text that provides guidance as to the intended land uses, access arrangements, layout, density, building heights, and infrastructure delivery.

Question 5: If your representation is seeking a modification, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Question 6: If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

Wappenshall Consortium wish to participate in the hearing sessions support and build upon their response to the plan raised in these representations.

Question 1: Which part of the Local Plan does this comment relate to?

Policy EC5: Hierarchy of Centres – Object

Question 2: Do you consider that this part of the plan is:

none

Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, or is unsound, or fails to comply with the duty to co-operate. Please be as precise as possible.

1. The Consortium note that reference is made in Policy EC5 to Appendix C. This is an error; the reference should be to Appendix E.

Question 4: Please set out what modification(s) you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness.

1. The reference in Policy EC5 should be amended to accurately reference Appendix E and not Appendix C.

Question 5: If your representation is seeking a modification, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Question 6: If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

Wappenshall Consortium wish to participate in the hearing sessions support and build upon their response to the plan raised in these representations.

Question 1: Which part of the Local Plan does this comment relate to?

Policy HO1: Housing Allocations – Object

Question 2: Do you consider that this part of of the plan is:

none

Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, or is unsound, or fails to comply with the duty to co-operate. Please be as precise as possible.

1. The Consortium object to the boundary of SC3 as illustrated on the Policies Map and referenced within Policy HO1 as it includes two residential properties that are not necessary or available.
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2. The Consortium also note that reference is made in Policy HO1 to Appendix C. This is an error; the reference should be to Appendix A.
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3. Furthermore, the Consortium consider that criterion i. of Part 2 of Policy HO1 is unnecessary. Planning applications for major housing developments will need to appropriately take account of the relevant Policies set out in the TWLPR, however it may not be possible to be wholly complaint with all Policies particularly where there are conflicts, and this would be reflected in the planning balance exercise undertaken by the decision-taker.

Question 4: Please set out what modification(s) you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness.

1. The Policies Map should be amended to exclude the two residential properties in the south-west, located north of the A442 at approx. 364963, 313659 (Easting, Northing). In addition, the reference in Policy HO1 should be amended to accurately reference Appendix A and not Appendix C. Furthermore, criterion i. of Part 2 of Policy HO1 should be deleted.

Question 5: If your representation is seeking a modification, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Question 6: If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

Wappenshall Consortium wish to participate in the hearing sessions support and build upon their response to the plan raised in these representations.

Question 1: Which part of the Local Plan does this comment relate to?

Policy HO10: Stalled Development Sites – Object

Question 2: Do you consider that this part of of the plan is:

none

Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, or is unsound, or fails to comply with the duty to co-operate. Please be as precise as possible.

1. The Consortium object to Policy HO10 on the grounds it is not justified and therefore not sound.
2. Policy HO10 is unduly onerous. Paragraph 9.91 of the supporting text for Policy HO10 refers to a site being considered as stalled where planning permission has been granted but no works have been undertaken on site after 12 months. This does not reflect the reality of development of strategic sites in particular, whereby there is a risk of delay through the planning process due to the need to discharge planning conditions in advance of commencement and secure necessary technical consents from other bodies, such as the local highway authority. The processes to enable commencement on site are not wholly within the control of any developer.
3. Whilst the Council's intentions of speeding up delivery of sites once they have been consented are supported by the Consortium, it is considered that the provisions set out in Policy HO10 are not justified and could lead to unnecessary outcomes, if the Council's Compulsory Purchase Order powers sought to be enforced through no fault of the developer.

Question 4: Please set out what modification(s) you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness.

1. Policy HO10 should be revised to allow for more flexibility where planning permission has been granted for a major site where lead-in times to commencement of development are likely to be longer than 12 months.

Question 5: If your representation is seeking a modification, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Question 6: If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

Wappenshall Consortium wish to participate in the hearing sessions support and build upon their response to the plan raised in these representations.

Question 1: Which part of the Local Plan does this comment relate to?

Policy HO11: Self-Build and Custom-Build – Object

Question 2: Do you consider that this part of of the plan is:

none

Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, or is unsound, or fails to comply with the duty to co-operate. Please be as precise as possible.

1. The Consortium object to Policy HO11 2. on the grounds it is not consistent with national planning policy and therefore not sound.
2. Paragraph 32 of the Framework requires policies to be underpinned by relevant and up-to-date evidence that focusses tightly on supporting and justifying the policies concerned.
3. There is no evidence to require at least 5% of the housing as self-build or custom housebuilding serviced plots. This would equate to over 150 plots on SC3 alone, and when replicated across other allocations, would lead to a significant supply of plots far in excess of any evidence of need.

Question 4: Please set out what modification(s) you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness.

Policy HO11 2. should be amended to state that developments over 100 dwellings should provide self-build or custom housebuilding plots having regard to the evidence of need in the area of the Site at the time of determination of the application.

Question 5: If your representation is seeking a modification, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Question 6: If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

Wappenshall Consortium wish to participate in the hearing sessions support and build upon their response to the plan raised in these representations.

Question 1: Which part of the Local Plan does this comment relate to?

SC3 Land North of A442 Wheat Leasows – Object

Question 2: Do you consider that this part of of the plan is:

none

Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, or is unsound, or fails to comply with the duty to co-operate. Please be as precise as possible.

1. The Consortium supports the identification of SC3 as an allocation for a sustainable community and consider it to be justified, effective, and consistent with national planning policy, and therefore sound. However, the Consortium objects to the detailed wording of SC3.
2. Paragraph 77 of the Framework outlines that large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.
3. SC3 is assessed as the best performing Sustainable Urban Extension in the TWLPR, and the Site is considered to be consistent with Paragraph 77 of the Framework as follows:
 - adjacent to the urban edge of Telford, and bordered by development on three sides (east, west, and south) including the Hortonwood Strategic Employment Area (identified by Draft Policy EC1);
 - well located and accessible to the existing residential and commercial areas of Telford via the A442 and existing pedestrian/cycle routes, and capable of including a genuine choice of transport modes;
 - free of significant environmental constraints and not covered by any designations that would preclude its development;
 - available and owned or controlled by a Consortium which includes Homes England, national housebuilders (Bellway Homes), national land promoters (Hallam Land), and publicly owned land which forms part of the Telford Land Deal;
 - attractive to the market from an employment and residential perspective;
 - able to deliver biodiversity net gain and other environmental benefits;
 - able to better connect and reveal the area's history associated with nearby heritage assets;
 - able in part at least to potentially jointly (alongside TWC and Severn Trent) address existing flooding issues arising from the Northern Interceptor;
 - of sufficient scale to accommodate a mix of homes, jobs, open space, and retail and community facilities (including a secondary school) to ensure a sustainable community and a high level of internalised trip rates;
 - capable of achieving a well-designed, sustainable and beautiful place, with its own identity; and
 - is deliverable and has the benefit of multiple potential access points enabling more opportunities for housebuilders and commercial developers to deliver development more quickly.
4. The allocation of SC3 is supported by the Integrated Impact Assessment (Sustainability Appraisal). Paragraph 7.3.3 outlines that the SUE would deliver major positive economic impacts adjacent to existing employment development, and good positive opportunities to enhance biodiversity, with limited negative impacts. As set out in Paragraph 33 of the Framework, significant adverse impacts identified in a Sustainability Appraisal (SA) should be avoided, and if unavoidable then appropriate mitigation measures should be pursued. The loss of Grade 2 agricultural land is unavoidable but compensated for due

to the excellent sustainable credentials of the Site due to its location and connectivity, and will be mitigated through substantial improvements to biodiversity and habitats.

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5. The Consortium have demonstrated through the submission of a suite of evidence base documents and previous representations that the Site is developable in accordance with the definition within the Framework.

 6. The submitted Vision Document and Emerging Masterplan include provision for two mixed-use local centres, mobility hubs, formal and informal public open spaces, ecological enhancements connecting with the existing green networks, secondary school, and two primary schools with nursery provision, as per the vision for the Site in Policy HO2. These demonstrate that the Site can deliver the necessary development requirements as identified within the draft allocation.

 7. The delivery of 2,190 dwellings within this Plan period is consistent with Paragraph 77 and contributes towards a Plan that is sound. Footnote 38 of Paragraph 78 of the Framework supports the Council's allocation of around 910 of the homes beyond the end of the Plan period. The Consortium have provided evidence to demonstrate that the Site can deliver a consistent supply of homes and jobs across the Plan period to help meet the needs of the Borough, in accordance with Paragraph 78 of the Framework.

 8. The Wappenshall Consortium are willing to support the Council as it prepares for the examination of the submission version of the Plan and prepare Statements of Common Ground as necessary to cover any objections raised during this consultation.

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 9. Notwithstanding the Consortium's general support for the allocation of SC3, it has objections to the Policy wording which require clarification. Paragraph 16 d) of the Framework requires policies to be clearly written and unambiguous so it is evident how a decision maker should react to development proposals.

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 10. Furthermore, the Consortium would welcome further dialogue with the Council and Severn Trent Water with regard to the Northern Interceptor Channel referenced in the policy. Whilst the development of SC3 can enable the strategic drainage asset through the Site to be retained and not be adversely affected by development, the responsibility and maintenance sits with Severn Trent Water.

 11. In addition, it is considered necessary that wording

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1. The Consortium recommend that draft SC3 Policy is redrafted, as below:

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SC3 Land North of A442 Wheat Leasows

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The land is to the immediate north of the built-up area of Telford. The land sits adjacent to predominantly commercial developments to the east, and residential development to the south and west of Queensway (A442). To the north, and north-east lie the settlements of Horton, Preston upon the Weald Moors, Wappenshall Junction, and Eyton upon the Weald Moors.

Site Area: approx. 274.1ha (gross)

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Vision for the site

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~~The Site Land within the strategic allocation at Land North of A442 Wheat Leasows~~ will be developed to deliver a new sustainable community of approximately 3,100 dwellings with 2,190 of those to be delivered in the Plan period. The Site will also provide approximately 68ha of employment land (gross) which includes 22ha of an existing employment allocation, E28 at Shawbirch. ~~The employment land will be phased throughout the plan period.~~

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The dwellings ~~will must~~ provide a range of multi-generational living accommodation that includes accommodation for the elderly, supported and specialist provision and accessible housing that meets the identified needs in the ~~B~~orough.

At the heart of the community, the site will provide two mixed local centres comprising a range of shops and services to include **potentially** community, leisure and recreation facilities. ~~The delivery of these should be agreed with the Local Planning Authority~~

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The site will provide an active and sustainable travel network, ~~leading a~~ **including** mobility hubs ~~provided~~ within the local centres. ~~These~~ hubs should ~~provide~~ **enable delivery of** a number of facilities such as enhanced bus services, EV car charging, car hire parking, **and parcel box lockers.** ~~as well as walking and cycling facilities.~~

A network of formal and informal public open and recreation spaces **to extend the Borough's existing green network** will be provided. ~~in line with the Council's Playing Pitch and Outdoor Recreation Strategy and the Play Strategy.~~

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~~The site must also provide extensions to the boroughs existing green network.~~

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~~The sustainable community must provide **Provision of** two primary schools, both comprising of two form entry and nursery provision will further meet the needs of the development. The delivery of the primary schools should be delivered to an agreed plan with the Local Planning Authority in line with projected housing delivery rates.~~

Land ~~for to deliver~~ a Secondary School will also be provided on site to serve the needs of this and the other allocated sustainable communities (SC1 and SC2), with an appropriate mechanism in place within a Section 106 Agreement to compensate for provision of land and build cost ~~over~~.

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Delivery

A ~~D~~development ~~B~~rief will be required to coordinate uses across the site, that is based on effective community engagement and reflect local aspirations, **in accordance with Policy DD2**. ~~The brief shall consider the environmental, social, design, and economic objectives as they seek to create a new community. This will allow for the all elements of the proposal to be considered comprehensively in order to promote an integrated development as far as is practical.~~ The **Development B**rief shall be agreed by the Local Planning Authority prior to **the determination of any planning application for the site**. ~~consideration of any detailed matters.~~ The Development Brief shall contain objectives, site information covering opportunities and constraints, relevant policies, a framework masterplan and explanatory text that provides guidance as to the intended land uses, access arrangements, layout, density, building heights, and infrastructure delivery.

~~The site must provide the following details to allow for an efficient and comprehensive delivery of the site: Delivery of highway and transport infrastructure to an agreed phasing plan to allow for highways adoption as soon as possible. Delivery of on-site and off-site utilities infrastructure to a phasing plan approved by all utility undertakers. The proposal needs to: incorporate~~

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- **Consider and reflect as necessary the** recommendations from the Level 2 Strategic Flood Risk Assessment outcomes for this site.
 - ~~Maintenance~~**Retain** the functionality of the Northern Interceptor Channel as a strategic drainage asset.
 - Provide a comprehensive Green Infrastructure strategy ~~incorporating the Council's vision for a forest community~~ including:
 - Structural landscaping and public open space
 - Extension of Green Network Connection to the Silkin Way and Apley Woods
 - Footpath and cycleway connections into and around the site
 - Identified areas of existing woodland and new planting

This Policy needs to be read alongside all relevant other policies within the Local Plan.

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2. In addition, SC1 and SC2 should be revised to include reference to contributions towards land and build costs associated with the delivery of the Secondary School, to appropriately reflect the expectations set out in that regard in SC3.

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Yes, I wish to participate in hearing session(s)

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2. Paragraph 77 of the Framework outlines that large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.
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3. SC3 is assessed as the best performing Sustainable Urban Extension in the TWLPR, and the Site is considered to be consistent with Paragraph 77 of the Framework as follows:
 - adjacent to the urban edge of Telford, and bordered by development on three sides (east, west, and south) including the Hortonwood Strategic Employment Area (identified by Draft Policy EC1);
 - well located and accessible to the existing residential and commercial areas of Telford via the A442 and existing pedestrian/cycle routes, and capable of including a genuine choice of transport modes;

- free of significant environmental constraints and not covered by any designations that would preclude its development;
- available and owned or controlled by a Consortium which includes Homes England, national housebuilders (Bellway Homes), national land promoters (Hallam Land), and publicly owned land which forms part of the Telford Land Deal;
- attractive to the market from an employment and residential perspective;
- able to deliver biodiversity net gain and other environmental benefits;
- able to better connect and reveal the area's history associated with nearby heritage assets;
- able in part at least to potentially jointly (alongside TWC and Severn Trent) address existing flooding issues arising from the Northern Interceptor;
- of sufficient scale to accommodate a mix of homes, jobs, open space, and retail and community facilities (including a secondary school) to ensure a sustainable community and a high level of internalised trip rates;
- capable of achieving a well-designed, sustainable and beautiful place, with its own identity; and
- is deliverable and has the benefit of multiple potential access points enabling more opportunities for housebuilders and commercial developers to deliver development more quickly.

-

4. The allocation of SC3 is supported by the Integrated Impact Assessment (Sustainability Appraisal). Paragraph 7.3.3 outlines that the SUE would deliver major positive economic impacts adjacent to existing employment development, and good positive opportunities to enhance biodiversity, with limited negative impacts. As set out in Paragraph 33 of the Framework, significant adverse impacts identified in a Sustainability Appraisal (SA) should be avoided, and if unavoidable then appropriate mitigation measures should be pursued. The loss of Grade 2 agricultural land is unavoidable but compensated for due to the excellent sustainable credentials of the Site due to its location and connectivity, and will be mitigated through substantial improvements to biodiversity and habitats.

-

5. The Consortium have demonstrated through the submission of a suite of evidence base documents and previous representations that the Site is developable in accordance with the definition within the Framework.

6. The submitted Vision Document and Emerging Masterplan include provision for two mixed-use local centres, mobility hubs, formal and informal public open spaces, ecological enhancements connecting with the existing green networks, secondary school, and two primary schools with nursery provision, as per the vision for the Site in Policy HO2. These demonstrate that the Site can deliver the necessary development requirements as identified within the draft allocation.

7. The delivery of 2,190 dwellings within this Plan period is consistent with Paragraph 77 and contributes towards a Plan that is sound. Footnote 38 of Paragraph 78 of the Framework supports the Council's allocation of around 910 of the homes beyond the end of the Plan period. The Consortium have provided evidence to demonstrate that the Site can deliver a consistent supply of homes and jobs across the Plan period to help meet the needs of the Borough, in accordance with Paragraph 78 of the Framework.

8. The Wappenshall Consortium are willing to support the Council as it prepares for the examination of the submission version of the Plan and prepare Statements of Common Ground as necessary to cover any objections raised during this consultation.

-

9. Notwithstanding the Consortium's general support for the allocation of SC3, it has objections to the Policy wording which require clarification. Paragraph 16 d) of the Framework requires policies to be clearly written and unambiguous so it is evident how a decision maker should react to development proposals.

-

10. Furthermore, the Consortium would welcome further dialogue with the Council and Severn Trent Water with regard to the Northern Interceptor Channel referenced in the policy. Whilst the development of SC3 can enable the strategic drainage asset through the Site to be retained and not be adversely affected by development, the responsibility and maintenance sits with Severn Trent Water.

11. In addition, it is considered necessary that wording

Question 4: Please set out what modification(s) you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness.

1. The Consortium recommend that draft SC3 Policy is redrafted, as below:

-

SC3 Land North of A442 Wheat Leasows

-

The land is to the immediate north of the built-up area of Telford. The land sits adjacent to predominantly commercial developments to the east, and residential development to the south and west of Queensway (A442). To the north, and north-east lie the settlements of Horton, Preston upon the Weald Moors, Wappenshall Junction, and Eyton upon the Weald Moors.

Site Area: approx. 274.1ha (gross)

-

Vision for the site

-

The Site Land within the strategic allocation at Land North of A442 Wheat Leasows will be developed to deliver a new sustainable community of approximately 3,100 dwellings with 2,190

of those to be delivered in the Plan period. The Site will also provide approximately 68ha of employment land (gross) which includes 22ha of an existing employment allocation, E28 at Shawbirch. ~~The employment land will be phased throughout the plan period.~~

-

The dwellings ~~will~~**must** provide a range of multi-generational living accommodation that includes accommodation for the elderly, supported and specialist provision and accessible housing that meets the identified needs in the ~~B~~**borough**.

At the heart of the community, the site will provide two mixed local centres comprising a range of shops and services to include **potentially** community, leisure and recreation facilities. ~~The delivery of these should be agreed with the Local Planning Authority~~

-

The site will provide an active and sustainable travel network, ~~leading to~~ **including** mobility hubs ~~provided~~ within the local centres. ~~These~~ hubs should ~~provide~~ **enable delivery of** a number of facilities such as enhanced bus services, EV car charging, car hire parking, **and parcel box lockers**. ~~as well as walking and cycling facilities.~~

A network of formal and informal public open and recreation spaces **to extend the Borough's existing green network** will be provided. ~~in line with the Council's Playing Pitch and Outdoor Recreation Strategy and the Play Strategy.~~

-

~~The site must also provide extensions to the boroughs existing green network.~~

-

~~The sustainable community must provide~~ **Provision of** two primary schools, both comprising of two form entry and nursery provision will further meet the needs of the development. ~~The delivery of the primary schools should be delivered to an agreed plan with the Local Planning Authority in line with projected housing delivery rates.~~

Land ~~for to deliver~~ a Secondary School will also be provided on site to serve the needs of this and the other allocated sustainable communities (SC1 and SC2), with an appropriate mechanism in place within a Section 106 Agreement to compensate for provision of land and build cost ~~over~~.

-

Delivery

A ~~D~~**development B**rief will be required to coordinate uses across the site, that is based on effective community engagement and reflect local aspirations, **in accordance with Policy**

~~DD2. The brief shall consider the environmental, social, design, and economic objectives as they seek to create a new community. This will allow for the all elements of the proposal to be considered comprehensively in order to promote an integrated development as far as is practical. The Development Brief shall be agreed by the Local Planning Authority prior to the determination of any planning application for the site. consideration of any detailed matters. The Development Brief shall contain objectives, site information covering opportunities and constraints, relevant policies, a framework masterplan and explanatory text that provides guidance as to the intended land uses, access arrangements, layout, density, building heights, and infrastructure delivery.~~

~~The site must provide the following details to allow for an efficient and comprehensive delivery of the site: Delivery of highway and transport infrastructure to an agreed phasing plan to allow for highways adoption as soon as possible. Delivery of on-site and off-site utilities infrastructure to a phasing plan approved by all utility undertakers. The proposal needs to: incorporate~~

-

- **Consider and reflect as necessary the** recommendations from the Level 2 Strategic Flood Risk Assessment outcomes for this site.
- ~~Maintenance~~**Retain** the functionality of the Northern Interceptor Channel as a strategic drainage asset.
- Provide a comprehensive Green Infrastructure strategy ~~incorporating the Council's vision for a forest community~~ including:
 - Structural landscaping and public open space
 - Extension of Green Network Connection to the Silkin Way and Apley Woods
 - Footpath and cycleway connections into and around the site
 - Identified areas of existing woodland and new planting

This ~~P~~policy needs to be read alongside all relevant other policies within the ~~L~~local ~~P~~plan.

-

2. In addition, SC1 and SC2 should be revised to include reference to contributions towards land and build costs associated with the delivery of the Secondary School, to appropriately reflect the expectations set out in that regard in SC3.

Question 5: If your representation is seeking a modification, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Question 6: If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

Wappenshall Consortium wish to participate in the hearing sessions support and build upon their response to the plan raised in these representations.

Question 1: Which part of the Local Plan does this comment relate to?

Policy HO3: Housing Mix and Quality – Object

Question 2: Do you consider that this part of of the plan is:

none

Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, or is unsound, or fails to comply with the duty to co-operate. Please be as precise as possible.

1. The Consortium object to Policy HO5 1. b. and k. on the grounds it is not consistent with national planning policy and therefore not sound'
2. Paragraph 16 d) of the Framework requires policies to be clearly written and unambiguous so it is evident how a decision maker should react to development proposals.
3. The policy is unclear as it states that development is to plan positively for a range of housing types, tenures and sizes including b. Look after children, which is not defined. In addition, the inclusion of k. Gypsies and travellers is unnecessary given it is covered by Policy HO8, with it not being clear how provision should be accounted for.

Question 4: Please set out what modification(s) you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness.

1. Policy HO3 1. should be amended to provide clarity on, or delete, criterion b., and delete criterion k.

Question 5: If your representation is seeking a modification, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Question 6: If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

Wappenshall Consortium wish to participate in the hearing sessions support and build upon their response to the plan raised in these representations.

Question 1: Which part of the Local Plan does this comment relate to?

Policy HO4: Affordable Housing Requirements - Object

Question 2: Do you consider that this part of of the plan is:

none

Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, or is unsound, or fails to comply with the duty to co-operate. Please be as precise as possible.

1. The Consortium object to Policy HO4 1. a. on the grounds it is not justified and therefore not sound.
2. The Consortium understand that Part 1. a. of Policy which applies to the Telford built-up area includes the Sustainable Communities allocations listed in Policy HO2, including SC3, however this would benefit from confirmation in the wording set out in Policy HO4.

3. In any case, the minimum 25% affordable housing requirement set out in Policy HO4 1. a. is not supported by the Council's own viability evidence. The Regulation 19 Viability Note (December 2024) is clear at Paragraph 5.32 that the 2023 Whole Plan Viability Assessment recommends 20% affordable housing in and adjacent to Telford, but that a 25% requirement is instead being pursued by the Council.
4. Whilst Part 4 of Policy HO4 allows for the policy requirements not to be met if justified through a viability assessment, the starting point being higher than what has been demonstrated by the Council's evidence base to be viable is inappropriate and will inevitably lead to planning applications having to seek to deliver a lower requirement than set out in the Policy. This is unhelpful not only for Applicants but also for Members and the general public who may misconceive that the development proposal is seeking to underdeliver on affordable housing compared with the Policy requirement, when in reality that requirement is not viably achievable.
5. As set out in response to Policy S7, the Consortium have some concerns with the assumptions set out in the Viability Assessment which require further consideration.

Question 4: Please set out what modification(s) you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness.

1. Policy HO4 1. a. should be amended to include reference to the Sustainable Communities allocations, and the affordable housing requirement should be reduced to appropriately reflect the Council's viability evidence.

Question 5: If your representation is seeking a modification, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Question 6: If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

Wappenshall Consortium wish to participate in the hearing sessions support and build upon their response to the plan raised in these representations.

Question 1: Which part of the Local Plan does this comment relate to?

Policy HO5: Affordable Housing Delivery – Object

Question 2: Do you consider that this part of of the plan is:

none

Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, or is unsound, or fails to comply with the duty to co-operate. Please be as precise as possible.

1. The Consortium object to Policy HO5 1. a. on the grounds it is not consistent with national planning policy and therefore not sound.

2. Paragraph 16 d) of the Framework requires policies to be clearly written and unambiguous so it is evident how a decision maker should react to development proposals.
3. The policy is unclear as it states that affordable housing mix and tenures should be determined by the local housing needs evidence but then that it should prioritise affordable housing for rent.

Question 4: Please set out what modification(s) you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness.

1. Policy HO5 1. a. should be amended to delete sentence that states “The tenure split should prioritise affordable housing for rent”.

Question 5: If your representation is seeking a modification, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Question 6: If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

Wappenshall Consortium wish to participate in the hearing sessions support and build upon their response to the plan raised in these representations.

Question 1: Which part of the Local Plan does this comment relate to?

Policy ML1: Mineral Safeguarding – Object

Question 2: Do you consider that this part of the plan is:

none

Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, or is unsound, or fails to comply with the duty to co-operate. Please be as precise as possible.

1. The Consortium object to Policy ML1 on the grounds that Part 1 of the Policy is too restrictive for allocated sites, including SC3, which are impacted by the Mineral Safeguarded Area. As drafted, Policy ML1 is unduly onerous and would require demonstration that the overriding need for the development outweighs the need to safeguard the mineral resource on sites allocated and relied upon by the Council to deliver the growth requirements set out in the Local Plan. Clearly the overriding need for the development will be established through the Local Plan.

Question 4: Please set out what modification(s) you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness.

1. Part 1 of Policy ML1 should be amended to reflect the fact that allocated sites, including SC3, are within the Mineral Safeguarded Area and that development of these sites would represent an exception to the restrictions set out.

Question 5: If your representation is seeking a modification, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Question 6: If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

Wappenshall Consortium wish to participate in the hearing sessions support and build upon their response to the plan raised in these representations.

Question 1: Which part of the Local Plan does this comment relate to?

Policy NE3: Biodiversity Net Gain – Object

Question 2: Do you consider that this part of of the plan is:

none

Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, or is unsound, or fails to comply with the duty to co-operate. Please be as precise as possible.

1. The Consortium object to Policy NE3 1. on the grounds it is not consistent with national planning policy and therefore not sound.
2. Paragraph 16 d) of the Framework requires policies to be clearly written and unambiguous so it is evident how a decision maker should react to development proposals.
3. The policy is unclear as to how the aspiration for 20% subject to viability will be applied. If the requirement of at least 10% is met, then the policy is complied with and no further information should be necessary for the Applicant to provide. If the policy is seeking to require 20% then evidence needs to be provided with the TWLPR to demonstrate it is deliverable. Reference is made in Paragraph 7.16 to the Council seeking 20% with viability evidence to be produced to justify 20%, and so the Plan is unclear.

Question 4: Please set out what modification(s) you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness.

1. Policy NE3 1. should be amended to remove the reference to 'an aspiration for 20% subject to viability', with the legally required minimum 10% gain established.

Question 5: If your representation is seeking a modification, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Question 6: If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

Wappenshall Consortium wish to participate in the hearing sessions support and build upon their response to the plan raised in these representations.

Question 1: Which part of the Local Plan does this comment relate to?

Policy NE4: Development Greening Factor – Object

Question 2: Do you consider that this part of of the plan is:

none

Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, or is unsound, or fails to comply with the duty to co-operate. Please be as precise as possible.

1. The Consortium object to Policy NE4 on the grounds it is not consistent with national planning policy and therefore not sound.
2. Paragraph 16 d) of the Framework requires policies to be clearly written and unambiguous so it is evident how a decision maker should react to development proposals.
3. The policy seeks to require development proposals to achieve a Greening Factor, but neither the policy or related supporting text providing clarity how the Greening Factor is calculated and thus what is expected of development proposals.

Question 4: Please set out what modification(s) you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness.

1. Policy NE4 should be revised to embed clarity on how the Greening Factor is calculated.

Question 5: If your representation is seeking a modification, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Question 6: If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

Wappenshall Consortium wish to participate in the hearing sessions support and build upon their response to the plan raised in these representations.

Question 1: Which part of the Local Plan does this comment relate to?

Policy ST1: Sustainable Travel – Object

Question 2: Do you consider that this part of of the plan is:

none

Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, or is unsound, or fails to comply with the duty to co-operate. Please be as precise as possible.

1. The Consortium object to Policy ST1 on the grounds that Part 2 of the Policy does not provide sufficient clarity on what would constitute a development served by a rail and bus station, and thus when development would be expected to contribute towards relevant enhancements.

Question 4: Please set out what modification(s) you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness.

1. Part 2 of Policy ST1 should be deleted.

Question 5: If your representation is seeking a modification, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Question 6: If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

Wappenshall Consortium wish to participate in the hearing sessions support and build upon their response to the plan raised in these representations.

Question 1: Which part of the Local Plan does this comment relate to?

Policy Strategic S7: Developer Contributions and Infrastructure Delivery – Object

Question 2: Do you consider that this part of of the plan is:

none

Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, or is unsound, or fails to comply with the duty to co-operate. Please be as precise as possible.

1. The Consortium object to Policy S7 1. as it is not consistent with national policy and therefore not sound.
2. Paragraph 16 d) of the Framework requires policies to be clearly written and unambiguous so it is evident how a decision maker should react to development proposals.
3. Paragraph 58 of the Framework sets out the tests to be met for developer contributions to be acceptable, and it would be helpful for the wording to be set out in full in the policy.
4. Criterion c. of S7 1. requires contributions to on-going revenue such as the management and maintenance of services and facilities. Whilst contributions towards the management and maintenance of areas of open space or SUDS would be reasonable and expected, contributions to the ongoing management/maintenance costs of buildings, highways, or other infrastructure would not be expected to be funded by the development. The wording of the policy needs to be amended and clarified.
5. Further, Policy S7 1. makes no reference to contributions being collected towards the cost of land offsite to deliver infrastructure necessary to make development acceptable in planning terms. If land needs to be acquired in order to provide infrastructure, such as land for schools, it is reasonable for a contribution to be sought towards the cost of the land.
6. The Consortium are concerned as to the practicalities of implementing Policy S7 4. and how this will be applied on developments that may come forward over a long time period,

such as the SUEs, and how any monies clawed back will be used by the Council upon completion of the development. Further clarity is needed.

7. The Consortium also have some concerns with the assumptions set out in the Viability Assessment supporting the emerging TWLPR and how it reflects against the infrastructure requirements set out in the Infrastructure Delivery Plan, notably the assumed £15,000 per plot costs of strategic infrastructure and mitigation for the proposed Sustainable Communities. This requires further consideration.

Question 4: Please set out what modification(s) you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness.

1. Policy S7 should be amended to include the relevant tests for developer contributions, criterion c. of S7 1. be amended to make clear this only relates to the provision of public open space and SUDS, a new criterion to be added to S7 1. that covers the cost of land required to enable the delivery of infrastructure necessary to make development acceptable, and greater clarification as to how S7 4. will be applied in practice be added to the supporting text to the Policy.

Question 5: If your representation is seeking a modification, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Question 6: If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

Wappenshall Consortium wish to participate in the hearing sessions support and build upon their response to the plan raised in these representations.



A Vision for a New Community

Land at Wappenshall

April 2025

Introduction

Purpose of this document

The purpose of this Vision Document is to demonstrate why the land at Wappenshall (North of Wheat Leasows) represents a unique opportunity to deliver a sustainable urban extension (SUE) of Telford that offers a mix of new jobs, homes, and community facilities in an environment that can use its landscape and history to create a real sense of place.

The document has been prepared to support the promotion of the land through the review of the Telford and Wrekin Local Plan, and assist Officers and Members in assessing the potential of the land as a SUE.

The Promoters

Land at Wappenshall is unique in being promoted by a Consortium that includes Homes England, national housebuilder Bellway Homes, and national land promoter Hallam Land. The Consortium team bring with them years of experience and knowledge in successfully collaborating to promote and deliver major mixed use urban extensions across the country. In terms of track record locally, Homes England have successfully delivered Lawley SUE and Lightmoor.

Since the start of this process, they and the other promoters and landowners have come together and commissioned a joint evidence base for the land, and agreed a single Masterplan and phasing plan. It is this Masterplan that is jointly put forward to the Council in this document.



PART OF HENRY BOOT



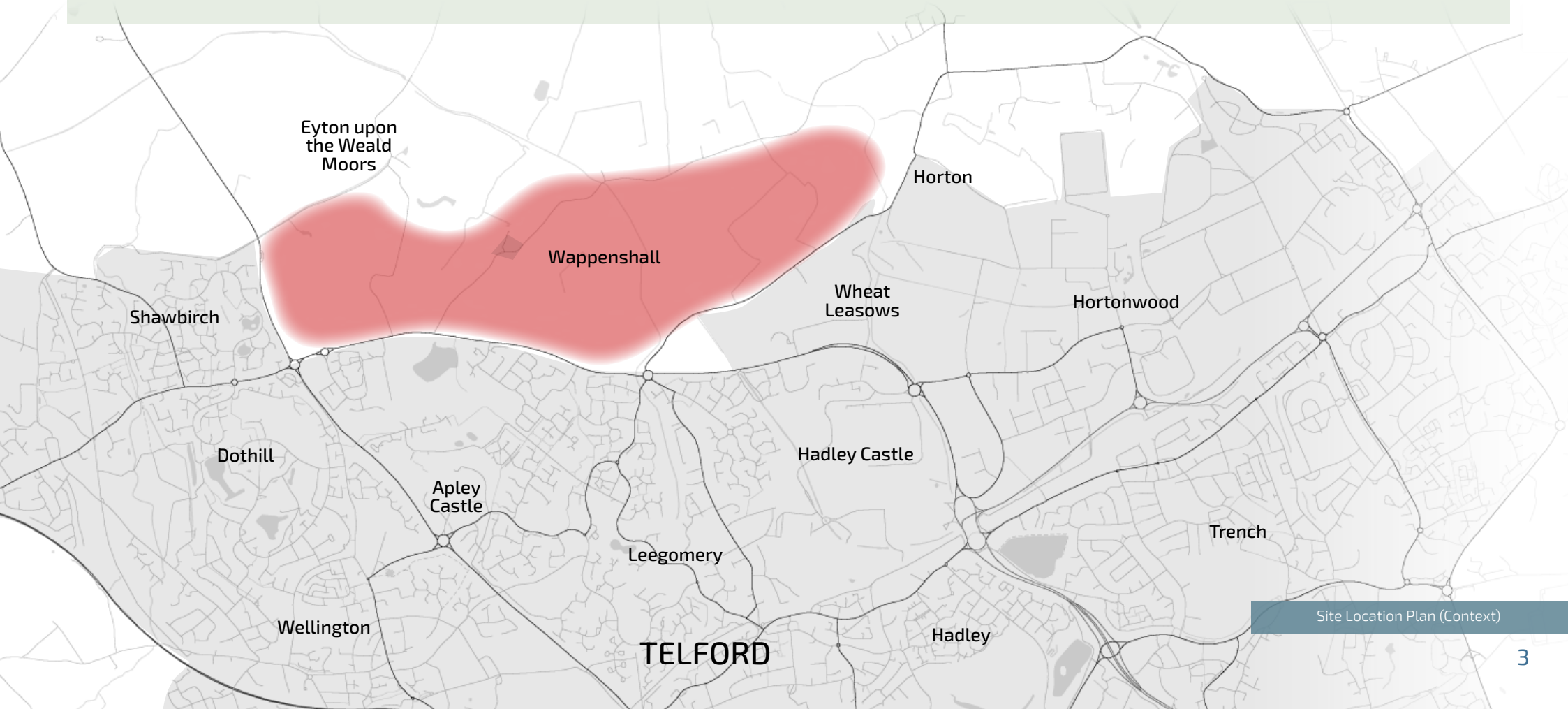
J.H. Sankey & Sons
David Udale Ltd
Sydney Farms Ltd
Samuel Wood

The Land

The land consists of approximately 274ha of agricultural land to the immediate north of the built-up area of Telford. The land sits within an arc of built or committed development adjacent to the urban area, with commercial and residential areas to the west and east, and residential development to the south of the Queensway (A442) set amidst trees and notable areas of woodland land.

To the north, and north-east lie the settlements of Horton, Preston upon the Weald Moors, Wappenshall Junction, and Eyton upon the Weald Moors, with open countryside beyond. The land is relatively flat, and characterised by a series of large intensively-farmed fields with field boundaries marked by hedgerows and scattered trees.

A notable feature within the land is the Hurley Brook also referred to as the Northern Interceptor, and forms part of the drainage infrastructure of Telford.



Vision



Our vision is to create a series of connected, woodland communities that together form a great place to live and work.

We will achieve this by creating a sense of place and identity using the existing natural features of the land and drawing upon its unique heritage. Telford is well known as the 'birthplace of industry' and the canal system at Wappenshall played an important role in delivering its growth and prosperity. We want to celebrate that rich history within this development.

The neighbourhoods will sit within a network of trees and woodland and will seamlessly connect to the existing built-up area and include facilities and features that make it a place to visit. The identity and rural character of nearby villages will be retained through careful masterplanning and open spaces.

The Site will help support the transition to a low carbon future through delivery of a range of measures which will enhance the sustainability of the development, ensuring it is resilient to the future impacts of climate change and reducing carbon emissions.

Active and low-carbon travel will be at the heart of the design, and safe routes for recreation will encourage healthy lifestyles and space for social interaction.

Buildings will be beautiful, efficient and sustainable. Community spirit and togetherness will be developed through quality public spaces and buildings, and community support work. The legacy will be a strong, thriving and inclusive community which reveals the area's unique history.



An illustration of a village scene. A large, leafy green tree stands in the center. To its right is a house with a brown roof and a chimney. To its left is another house with a red roof. In the foreground, a person wearing a blue cap and an orange shirt is riding a bicycle on a path. The background shows rolling green hills under a blue sky.

Opportunity

1. Site Connectivity - The Site can positively integrate with the existing edge of Telford via a range of connections, pedestrian and cycle routes, established recreational spaces and green corridors delivering a woodland character.

2. Revealing the History - Development can sensitively restore the lost setting of overlooked heritage assets around the Site, connecting them in a logical way. New linkages will reveal the history of this part of Telford and make it more accessible to local people.

3. Biodiversity Net Gain (BNG) - A successful masterplan can be delivered that does not impact sensitive landscape and habitat areas. At least 10% BNG can be delivered with potential to deliver further gains on-site.

4. Drainage, Landscape and Climate Resilience - The drainage strategy for the Site will be carefully woven with heritage, landscape and ecological requirements to create a range of multi-functional and beautiful water networks that help to bring the history of the area to life whilst contributing to flood mitigation and a 'Blue Recovery'.

5. A Healthy, Safe and Sustainable Place - The emerging development framework can deliver the foundations for a healthy, safe and sustainable place to live, work and visit.

6. Meeting the Challenge of Climate Change - Embracing the challenges faced from a strategic level down to a detailed level in order to deliver a resilient, successful and enduring mixed-use development.

7. Commitment to Delivery - Development is supported by an experienced consortium of land owners and developers, committed to a partnership approach and joint working.

8. Delivery and Phasing - An organic pattern of phased growth is proposed from the southern edge, utilising all primary access points in a flexible and adaptable way.

Site Connectivity

A Logical and Sustainable Location

The northern edge of Telford and Leegomery is an ideal location for new development. The Site can be accessed from a range of highway locations and offers excellent opportunities to integrate with the existing road and active travel network. In addition, it can provide notable improvements to sustainable transport in the local area - particularly bus routing, frequency and overall viability.
















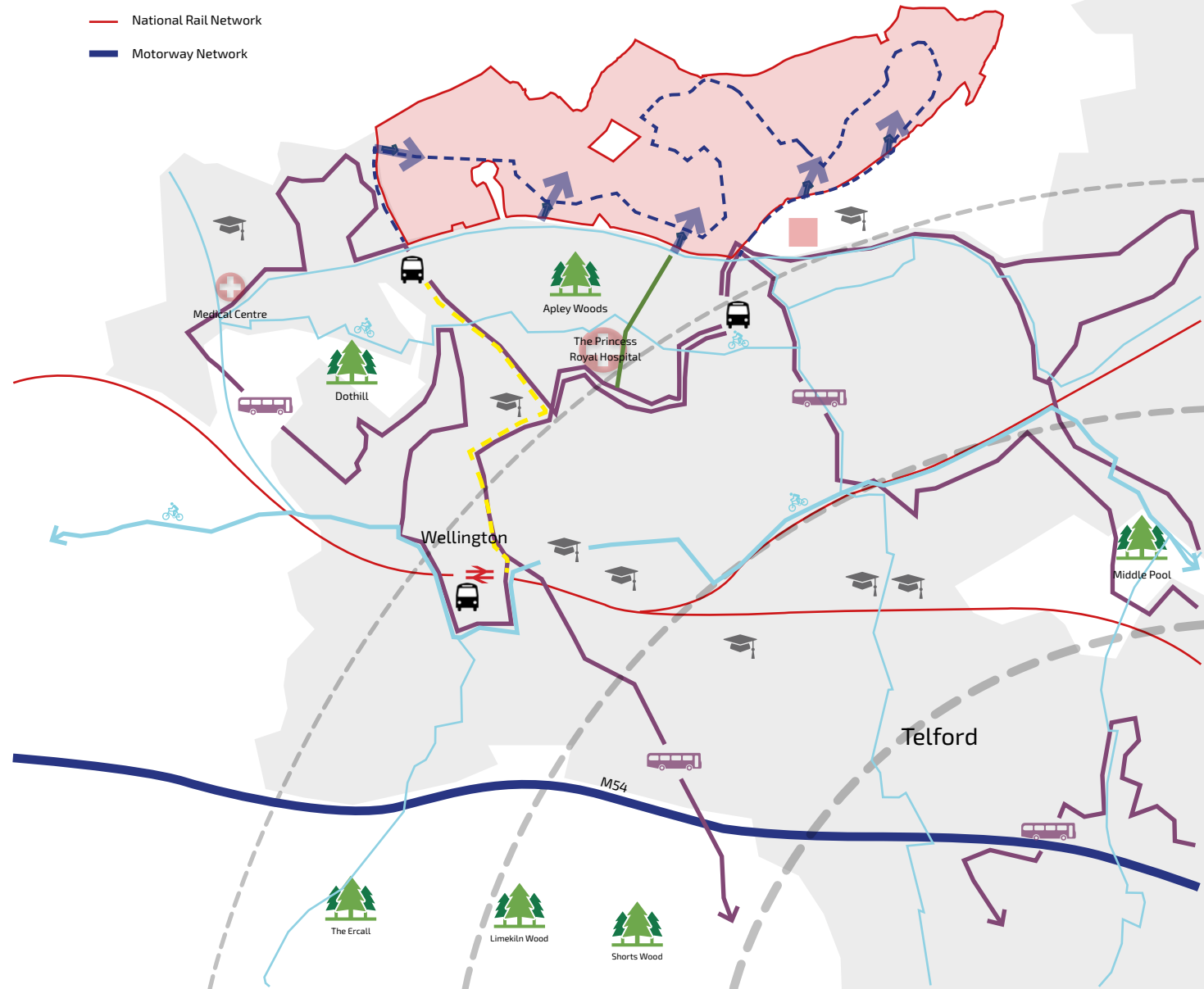
Complementary land uses fringe the Site to the south, west and south-east. These include established residential and commercial areas, and areas under construction or committed.



Direct and convenient pedestrian and cycle routes connect the Site with these areas, including the continuous corridor along the Queensway (A442) to the southern boundary of the Site and other traffic free routes heading south. Development has the potential to deliver new active travel routes that extend and improve local connectivity.

Site Links

-  The Site
-  Site Access
-  Local Bus Routes
-  Proposed Bus Route
-  Existing Cycle Routes
-  Existing Bridleway
-  National Rail Network
-  Motorway Network
-  Educational Establishment
-  Local Bus Stop
-  Train Station
-  Health/Medical Facility
-  Local Nature Reserve



Sustainable Mobility and Local Connectivity

Analysis of Census data suggests that the desire line for future residents is likely to be towards the centre of Telford together with Wellington and various local employment centres. It highlights some sustainable commuting and home-working trends that a large-scale, mixed-use development could help to strengthen by delivering new facilities to the area and improving access to nearby employment centres such as Hortonwood, Hadley Castle, Shawbirch and Donnington. It is an aspiration that the day-to-day needs of new and existing residents and workers will be conveniently met on-site or locally.

The Site doesn't just offer connections between homes and places of work. An extensive network of new green corridors will link proposed greenspaces, facilities and amenities within the Site and connect to a range of off site destinations. These linear wooded corridors, which characterise much of Telford, can extend into the Site in a logical and well-considered manner.

Apley Woods is a Local Nature Reserve (LNR) to the south of the Site. The Consortium have been actively engaging with the Friends of Apley Woods to consider how potential impacts on the LNR can be best managed. The masterplan proposes significant areas of open, accessible greenspace to its northern edge and improved connections through the Site between Wappenshall Wharf and the northern edge of Telford. It is hoped that this approach will prevent a notable increase in footfall on the LNR or other off-site destinations and will instead draw people into the scheme for recreation and play.

These new and extended green corridors will provide new linkages northwards, converging on emerging visitor facilities at the historically significant Wappenshall Wharf and linking other recreational areas that would come forward with development. New vehicular connections through the Site could allow sections of Wappenshall Lane to be downgraded for pedestrians and cyclists, whilst still retaining access for existing residents and farm vehicles.

38.5% of all journeys to work are less than 5km* and could be made on foot or by bicycle.



60.6% of working people in the locality travel less than 10km to work*, which suggests a significant proportion of the workforce will remain within **Telford**.



High Levels of existing local residents work mainly at or from home*



*a review of the latest Census data identifies the travel patterns of residents who currently reside in and around the Wappenshall Middle Super Output Area (MSOA).

Site Connectivity

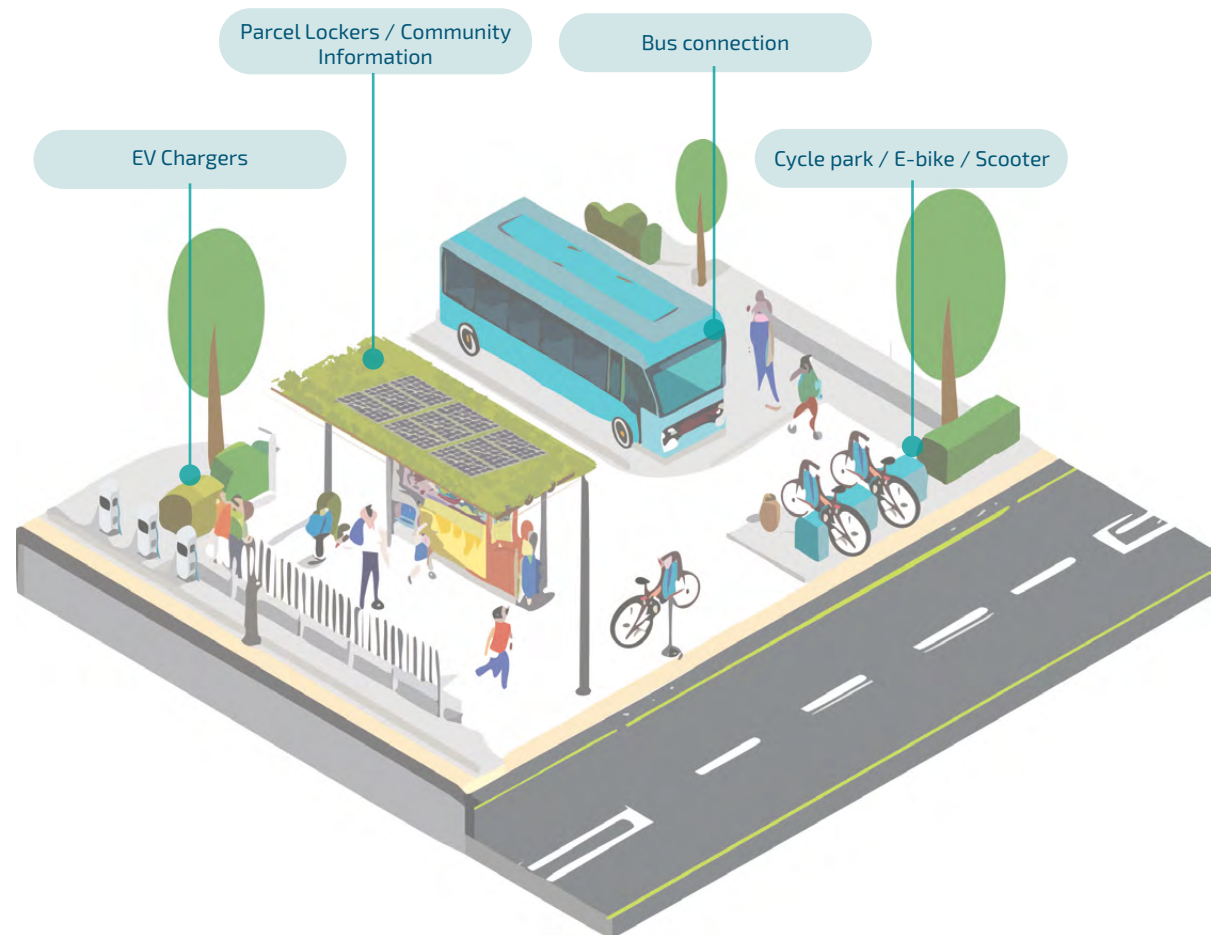
On-Site Accessibility

The development will feature a network of footways and cycleways that connect residents to community facilities, schools, shops, and employment areas. These routes will offer convenient access to various parts of the site, encouraging walking and cycling.






Key locations, such as local centers, will host Mobility Hubs where residents and visitors can change modes of transport, such as switching from walking to cycling or taking a bus. The hubs may also offer electric car, bike, or scooter rentals, as well as amenities like cafés, lockers, and cycle repair services.

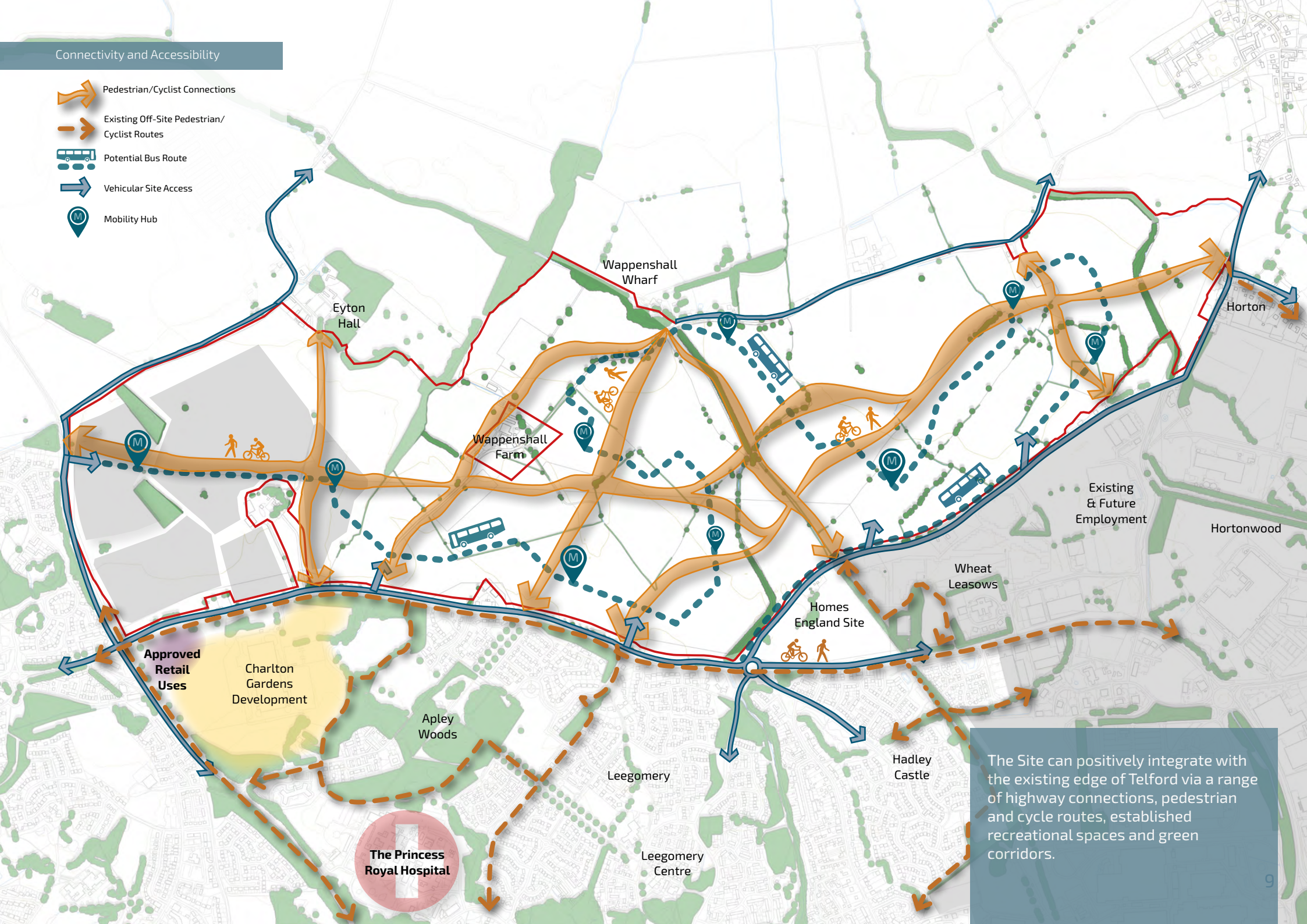
Proposed bus stops will feature cycle parking, shelters, seating, and real-time information. A frequent and conveniently routed bus service will pass through the site, entering from the A442, with a bus-only gate between residential and employment areas to prevent through-traffic. The bus route will also serve Wappenshall Wharf and avoid crossing the Brook, continuing on to Wheat Leasowes and rejoining the A442.

The network of footways and cycleways will provide direct access to Mobility Hubs, bus stops, and local facilities, promoting walking and cycling as alternatives to driving. Additional routes will be designed for recreation and will connect to play areas and Wappenshall Wharf.



Connectivity and Accessibility

-  Pedestrian/Cyclist Connections
-  Existing Off-Site Pedestrian/Cyclist Routes
-  Potential Bus Route
-  Vehicular Site Access
-  Mobility Hub



The Site can positively integrate with the existing edge of Telford via a range of highway connections, pedestrian and cycle routes, established recreational spaces and green corridors.

Revealing the History

Sense of Place

Design is important at a National and Local level and the attributes within the Site and its immediate context lend it strongly to delivery of a high-quality and distinctive place.

In particular it is the history of the Site and the immediate area that can be revealed and enhanced through development. A unique attribute is that development can sensitively link historic buildings and features that played a notable part in the industrial development of the region. The proposals can reinterpret lost features and act as a linking element and catalyst for wider restoration that combine to capture the spirit of the past.



Direct, family-friendly links between Telford and Wappenshall Wharf

Wappenshall Wharf and Waterways

The restoration of Wappenshall Wharf offers an exciting opportunity to preserve its heritage while introducing modern attractions and community spaces. As a Grade II listed site, its historical significance is central to the project. The restoration of the Shrewsbury and Newport Canals could improve accessibility and enhance green infrastructure, connecting the Wharf with Telford through new green corridors.

Reviving the abandoned Shrewsbury Canal Trench Branch and lost sections of Hurley Brook as part of the drainage strategy could create an engaging history walk with interpretive features, blending historical elements with ecological and community development.

Eyton Hall

Eyton Hall, a Grade II listed building, sits to the north-west of the Site, partly enclosed by woodland and tree belts. Historic OS maps reveal a former Deer Park landscape to the south of the Hall, with intricate field boundaries, woodland, and tree avenues, much of which has been lost to large-scale arable and pasture fields.

The proposed development aims to deliver a sensitive landscape design around the Hall, including a robust planted buffer and open grassland with feature trees, recreating the character of the former Deer Park. The project will also restore a lost field boundary and may reinstate the tree avenue leading south to The Queensway.



New Heritage Interpretation for the Shrewsbury and Newport Canals with History Walks

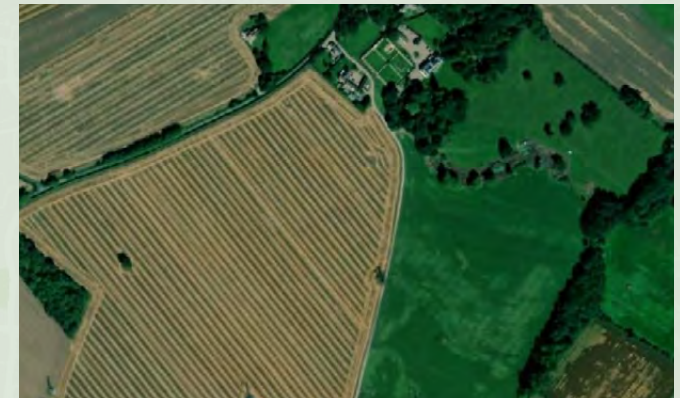
Wider Considerations

The masterplan will deliver landscape buffers to Wappenshall Farm and associated buildings. By potentially downgrading a section of Wappenshall Lane as it passes the farm and other residences, the masterplan can preserve the quiet nature of this route.

A prominent avenue of trees from Apley Castle Woods currently terminates at The Queensway. This avenue can be extended through the Site, linking key community facilities and leading directly to the Wharf as part of a wider network of recreational routes.






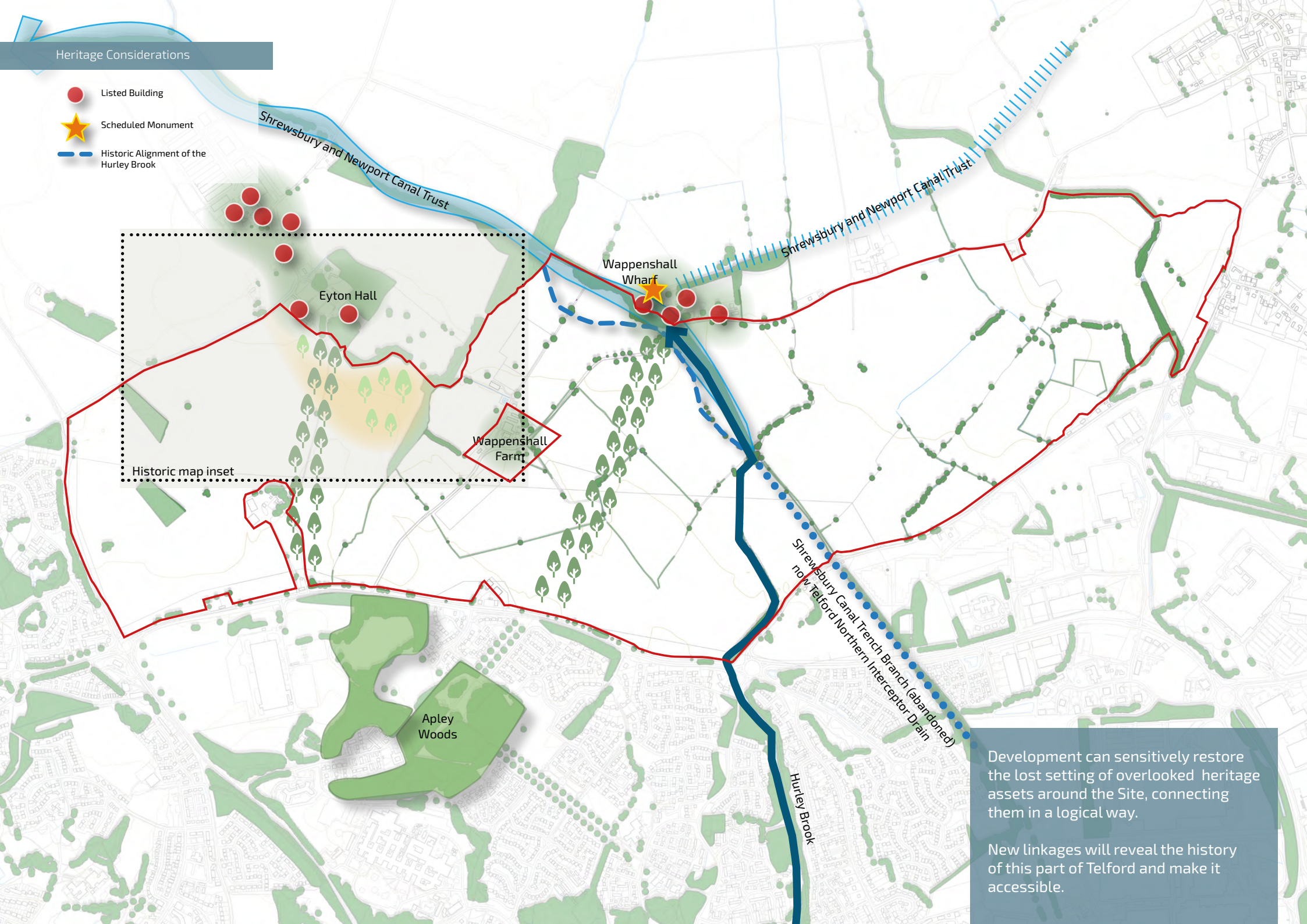
1892-1914 25 Inch OS Mapping showing Deer Park and Tree Avenue



Present day aerial photograph of Eyton Hall

Heritage Considerations

-  Listed Building
-  Scheduled Monument
-  Historic Alignment of the Hurley Brook



Development can sensitively restore the lost setting of overlooked heritage assets around the Site, connecting them in a logical way.

New linkages will reveal the history of this part of Telford and make it accessible.

Biodiversity Net Gain (BNG)

Developing Naturally

The Site is currently dominated by arable land and species poor grassland which are common and widespread habitats supporting limited botanical diversity. It is the arable and species poor areas where built development is primarily focused.

Historically, the Site featured a more notable degree of tree cover and water had a more significant presence. The Site lends itself to these and related habitats and development will aim to target local Biodiversity Action Plan species and habitats where possible.

Existing woodland, trees, hedgerows and ponds will be retained and enhanced where ever possible and incorporated within the green infrastructure of the development. This sensitive approach will deliver a degree of maturity to the landscape setting of new development across development phases.

New areas of species-rich grassland, native scrub, woodland will expand and connect existing habitats. In addition, new areas of wetland and waterbodies will be delivered as part of the drainage strategy, further reinforcing the strong water theme that is derived from the history of the Site and that sits at the heart of the proposals.

Buffer planting will be implemented within and close to the northern and western parts of the Site and will extend and reconnect existing woodland blocks and provide enhanced diversity.

Ecological Enhancements

The green infrastructure of the Site will incorporate a mosaic of under-represented or absent local habitats. Due to the scale of the proposals, new development can deliver significant swathes of land dedicated to ecological enhancement. This land will experience minimal human disturbance (on account of its location and use of fencing and interpretation).

Significant enhancements within the Site will deliver notable improvements to the locality and contribute strongly to the Site's ability to achieve BNG. Early net gain work suggests at least 10% gain can be achieved on-site, with potential to deliver further gains on-site if required.

In addition to the requirements for BNG, a range of measures for local fauna will also be included within the scheme. The Site currently provides suitable habitat for roosting bats and nesting birds in the form of mature trees, woodland and hedgerows however the scheme will look to provide further opportunities in the form of bat and bird boxes throughout. Amphibians, reptiles and invertebrates will be benefited through the inclusion of waterbodies and wetland features incorporating native species-rich planting, as well as features such as log piles and hibernacula in strategic locations (e.g. woodland edges and long grassland margins). Buffering and enhancement of the on-site watercourses will aim to increase the Site's suitability for species such as water vole.



**High-level
Biodiversity Net Gain
Assessment
identifies that we can
achieve at least
10% Gain
on-site**



A successful masterplan can be delivered that does not impact sensitive landscape and habitat areas. At least 10% BNG can be delivered with potential to deliver further gains on-site.

Drainage, Landscape and Climate Resilience

Drainage

Two watercourses pass through the Site, the Hurley Brook and the Crow Brook. In addition to these, the Telford Interceptor Drain follows the alignment of a partially absent section of the Trench Branch of the Shrewsbury Canal. It combines with a section of the Hurley Brook that was partially diverted by the Telford Development Corporation. Development presents a notable opportunity to reinstate the alignment and spirit of lost watercourses and canal features as part of a multi-functional drainage network.

The topography of the Site generally falls in a northerly direction and given the presence of watercourses and the topography surrounding them there are areas of land that fall within Flood Zone 2 and 3.

The majority of the Site lies within Flood Zone 1 and taking a sequential approach, development can be arranged in a logical manner that fully considers flood risk.

To further mitigate flood risk, a broad range of options have been identified in supporting technical work. These include reprofiling ground levels to deliver a multi-staged channel to deal with worst case flood events, allowing water infiltration across the Site, providing permanently wet or wetland type features that could also provide compensatory floodplain storage and delivering a chain of drainage interventions, including swales, that convey water from the heart of development areas through to multi-functional storage areas.

Resilient Landscape

The Site will benefit from an extensive provision of green infrastructure. Approximately 48% (133ha) of the Site will comprise green spaces and corridors that will also include planted swales, ponds and strategic attenuation areas that are sensitively and subtly incorporated into the landscape.

Extensive and well-planned drainage areas will be designed to support a range of appropriate habitats from wet scrub and woodland to marshy grasslands - all managed and maintained for wildlife to flourish. These areas will provide opportunities for interpretation and learning all inter-connected by a network of designated paths, trails and spaces that will be pleasant places for a range of recreational uses.

The inclusion of surface drainage features and areas of water through out the development will help to deliver a resilient and functional landscape structure that is better equipped to deal with climate changes in the future.

A Blue Recovery

The Wildfowl & Wetlands Trust recently published proposals to restore and create 100,000ha of wetlands in the UK. There are many benefits of wetlands, including:

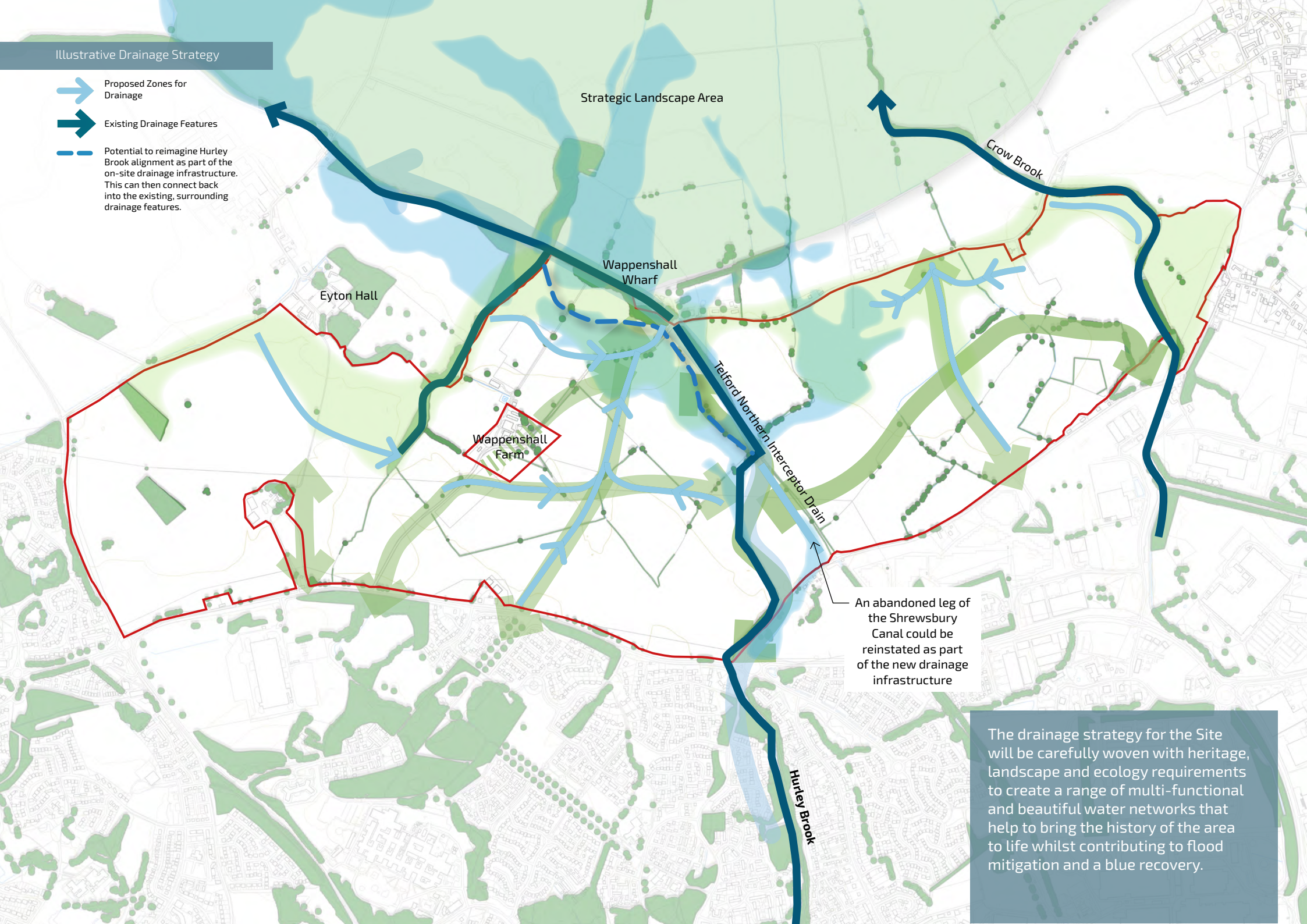
- Wetlands for carbon storage
- Wetlands for urban wellbeing
- Wetlands for flood protection
- Wetlands for water quality

The scheme proposes wetlands, ponds and areas of ephemeral water for the benefit of people, nature and the environment. Proposals can contribute positively to the Trust's aims and also local flooding considerations.



Illustrative Drainage Strategy

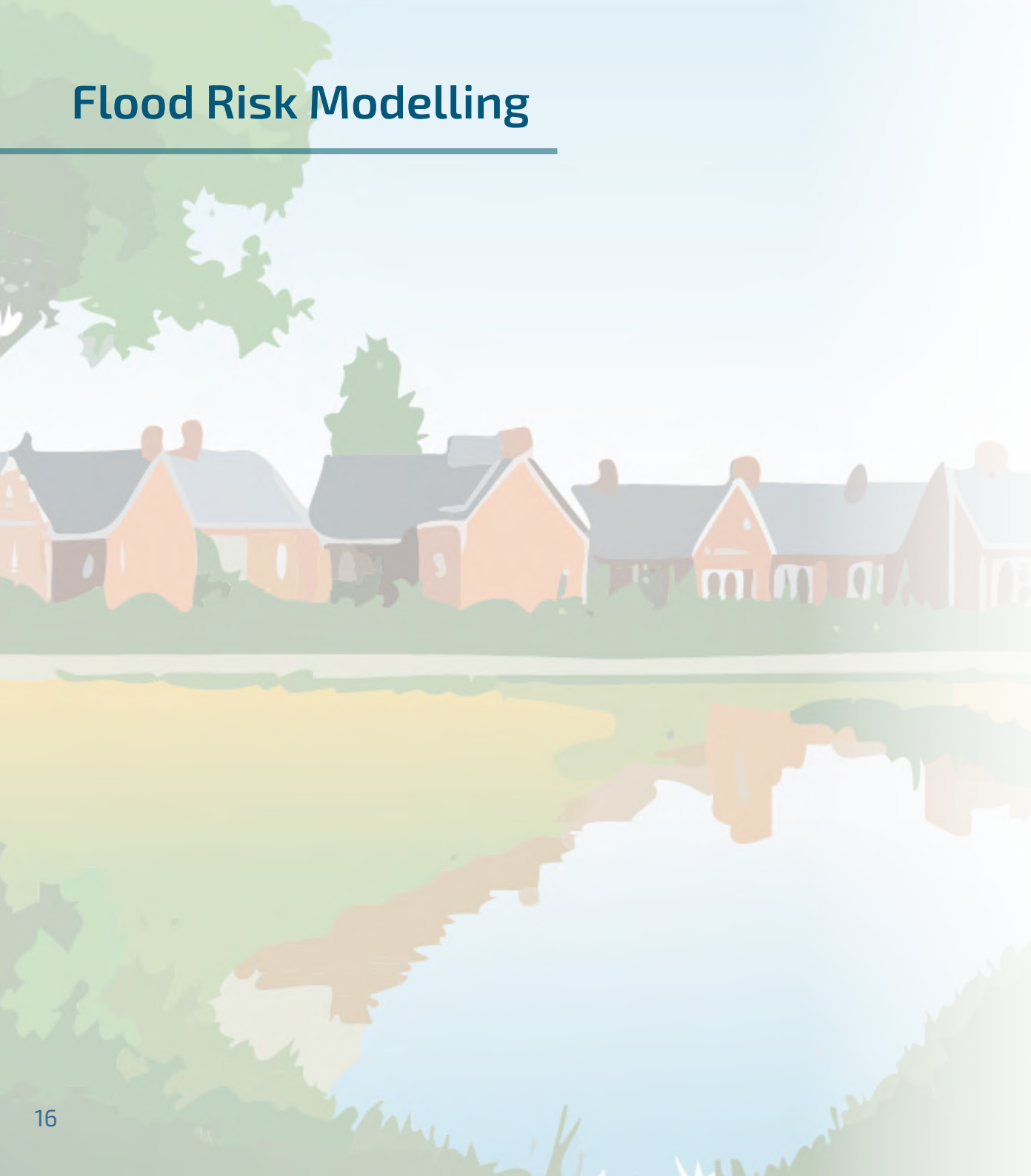
- Proposed Zones for Drainage
- Existing Drainage Features
- Potential to reimagine Hurley Brook alignment as part of the on-site drainage infrastructure. This can then connect back into the existing, surrounding drainage features.



An abandoned leg of the Shrewsbury Canal could be reinstated as part of the new drainage infrastructure

The drainage strategy for the Site will be carefully woven with heritage, landscape and ecology requirements to create a range of multi-functional and beautiful water networks that help to bring the history of the area to life whilst contributing to flood mitigation and a blue recovery.

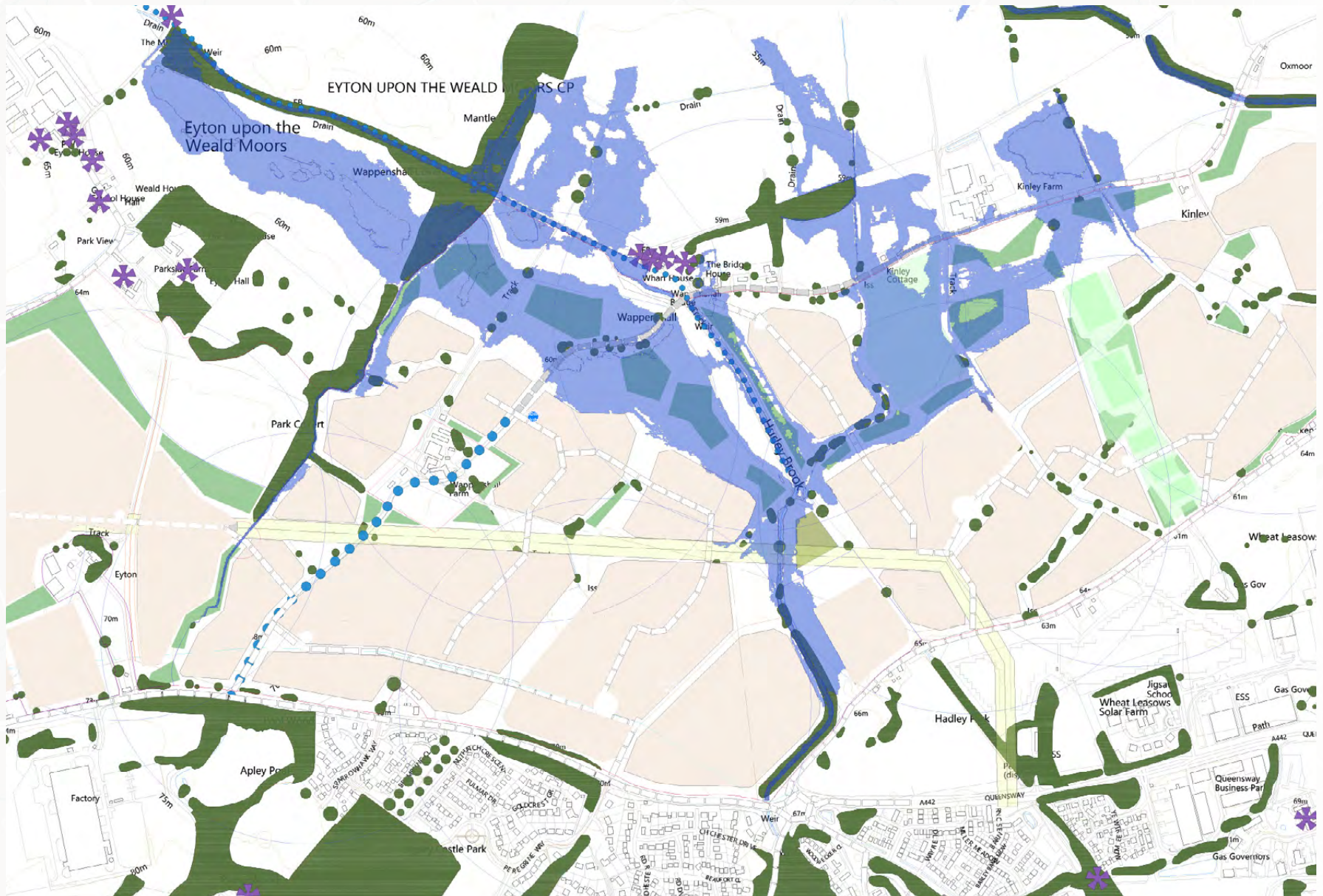
Flood Risk Modelling



Modelling work has been undertaken to confirm the extent of flood zones identified by the Environment Agency (EA) Flood Map for Planning more precisely. An initial model has been prepared using Lidar data with some assumptions made regarding hydraulic structures and other structures that may be in watercourses. At the time of writing, the watercourses are subject to a detailed topographic survey. Once information is received, a more detailed model will be created to assess the Site's flood risk, inform Site design, and demonstrate a sequential approach to development.

The preliminary 2D model results, undertaken by Brookbanks and shown on the figure to the right, identify the most likely flood extent and offers the most up-to-date results. The baseline model is considered to be more accurate than the EA flood map for planning. The model displays the 1 in 100 year fluvial flood event plus 44% allowance for climate change and show that the fluvial flood extents are primarily located to the south of Hurley Brook. The Brook also appears to burst and overtop its northern bank with flood water from this point flowing in a general northeast direction across the Site.

Where possible built development is located within Flood Zone 1 and is therefore a preferable location for residential development when considered in the context of the NPPF. Where it is not possible, development has been raised 300mm above existing ground levels and above the Hurley Brook flood levels. As the flood model is refined moving forward, opportunities will be explored to provide a betterment to the current situation and in turn reduce and better manage the existing flood risk.



Brookbanks preliminary 2D flood model results overlaid across a masterplan extract

A Healthy, Safe and Sustainable Place

A Healthy and Sociable Place

The development will be an inclusive place that meets the needs of a broad range of future residents and workers. The proposals align with the principles of a sustainable neighbourhood and consider services, transport and inclusivity to deliver safer, healthier places for people to live. This approach will reinforce a strong sense of identity and provide a positive environment to live and work.

A key principle in the development of Telford was the creation of a settlement in the landscape, whereby the settlement was dominated by green networks of amenity space, trees and woodland planting. These green linkages are evident along the southern edge of the Site and this overarching development principle remains as relevant today as it has ever been.

The creation of strong, multi-functional green networks provides resilience against climate change; contributes to Biodiversity Net Gain; places green open space close to the homes of all future residents and workers; and delivers a raft of other benefits as set out in this document. The indicative diagram overleaf also demonstrates how green networks can be designed to create a series of pleasant and distinct sub-communities that offer differing character with the common theme that they are defined by a strong landscape structure.

The sub-communities have green space and community facilities at their heart, helping to ensure cohesion across the masterplan.

A Sustainable Place

A significant number of jobs will be created on site within easy-commuting distance of planned and existing homes. Employment growth will be zoned close to existing and planned areas and strong, traffic-free links will encourage active travel options and a reduced reliance on cars. An extension to existing bus routes will serve the development and Wappenshall Wharf, which currently is inaccessible via public transport.

The Site sits at the threshold between town and country and access to open space sits at the heart of the proposals. Allotments, sports pitches and community areas provide the space and seeds for community involvement and engagement. Outdoor recreation, gardening and opportunities to grow food are all integral to the proposals.

New homes will be delivered across a range of tenures and sizes, supporting those in affordable housing need, first-time buyer homes through to larger family homes and the potential for care/ extra care provision. At the heart of new communities will sit neighbourhood centres satisfying day-to-day convenience and retail needs. The centres will sit adjacent to the two primary schools and secondary school sites that are proposed and located conveniently for all residents to access via green corridors or bus connections.



Illustrative Concept

-  Primary / Secondary School
-  Community Facilities and Focal Point
-  Sports Pitches
-  Allotments
-  Facilities, amenities and green space help to form the Centre and Heart of new Communities
-  Bus Route and Mobility Hubs



The emerging masterplan can deliver the foundations for a healthy, safe and sustainable place to live, work and visit. The development principles directly respond to the exciting opportunities and considerations explored in this document.

What We Propose

Emerging Masterplan



Around 3,000 to 3,200 New Homes constructed to **Future Homes Standards** including much needed affordable, first-time buyer and Care/ Extra Care



Connected Transport Strategy prioritising sustainable travel



39ha net (68.3ha Gross)
Employment land providing on-site job opportunities and attracting inward investment



At least 10% Biodiversity Net Gain delivered on-site
Around 133 ha (48% of the Site area) dedicated to BNG and Green Infrastructure



New recreational routes, links to wider off-site attractions and heritage interpretation to bring the history of the locality to life



Motivated and focused consortium of promoters/landowners with a track record of delivering high quality developments



New Community Facilities including Secondary and Primary Schools, Shops, Retail, Neighbourhood, Community and Events Space, Allotments and Sports Pitches















Sustainable Drainage Strategy to mitigate flooding and deliver a range of wider benefits









Key

 Site Boundary 274.1ha

Development

	Residential Uses [c.3,000 to 3,200 dwellings @ 35dph to 38dph net]	85.1ha
	Employment Uses	39.0ha (68.3ha Gross)
	Neighbourhood Centre and Community Uses	1.6ha
	Primary and Secondary Schools [2no. 2FE Primary schools with Nursery] [1no. 8FE Secondary schools]	15.3ha 2.4ha each 10.5ha
	Potential Vehicular Access Locations	
	Highway Routes Adjoining the Site	
	Mobility Hubs along Bus Route	
	Internal Connectivity (potential bus route serving development)	
	Bus Gate and Emergency Access Only	
	Public Right of Way	
	Existing Off-Site Surfaced Connectivity Routes	
	Pedestrian/ Cycle Routes through the Site	

Green Infrastructure c.133ha (48% of site area)

	Existing Vegetation
	Proposed Structural Vegetation
	Avenue Tree Planting
	Drainage and Wetland Zones
	Drainage Proposals Capture Spirit of Lost Canal and Watercourse
	Sports Pitches with Parking & Changing Facilities
	Play Areas
	Potential Location for Community Allotments

Notes:

1. Connectivity route through Homes England land to be considered.

The illustrative masterplan overlaid shows how the Site could be masterplanned to create a high-quality environment for people to live and work based around a number of different character areas.



Meeting the Challenge of Climate Change

Sustainable Design

Telford and Wrekin Council declared a Climate Emergency in 2019. Through engagement and collaboration with residents, businesses, public sector organisations and partners the Council's aspiration is to create a carbon neutral borough by 2030.

In 2020 the Council published an Action Plan to establish actions necessary to becoming carbon neutral by 2030. Work to deliver on the action plan is well underway, but in order for this target to be achievable, the Council is seeking that everyone across the borough comes together to work towards this common goal.

Development at Wappenshall will adopt a sustainability strategy that is flexible, fit for the future and aligns with the Council's aspirations and actions. It will be a Zero Carbon Ready place built to Future Homes Standards, delivering EV charging points and low carbon heating. Energy positive technology will allow buildings to produce more energy than they consume. Sustainability measures will ensure that development is resilient to the future impacts of climate change.





Flood Risk and Surface Water Drainage

The proposed developable areas are located in Flood Zone 1 and the development will include an extensive and attractive sustainable drainage system to manage surface water on Site.



Reducing the Risk of Overheating

Homes will be designed to take into account rising temperatures as a result of climate change. The masterplan has space to mitigate the risk of overheating through its layout, green infrastructure, building orientation and design.



Sustainable Transport

The development is in a sustainable location and can connect positively with existing pedestrian and cycling links whilst also offering notable public transport improvements to the locality. The provision of EV charging points will help support low carbon forms of personal transport.



Improving Site Biodiversity

Development will include the retention and enhancements of key habitats delivering a Biodiversity Net Gain on-site along with a robust and diverse green infrastructure network that contains and defines development parcels.



Energy Positive Opportunities

Low carbon heating combined with energy positive technologies may allow the scheme to produce more energy than it consumes. Consideration will be given to the potential for dedicated on-site solar energy production.



Low Carbon Infrastructure

To further reduce carbon emissions, where possible the development will incorporate low carbon infrastructure such as highly efficient street lighting and solar powered shelters and signage.



Water Efficiency

Water efficiency measures such as low flow toilets, shower heads and efficient appliances will contribute to achieving low water consumption rates. Rain water butts will provide opportunity to capture and store surface water run off to use in gardens during drier months.



Sustainable Materials

New homes will specify the use of sustainable materials and where possible will make use of sustainable timber and recycled materials with low embodied carbon.



Climate Resilient design

Buildings and infrastructure will be designed and constructed to take into account longer term impacts of climate change. Tree planting and the presence of new water bodies will help to reduce Summer temperatures.



Reducing Energy Use, Carbon Emissions and Carbon Sequestering

The proposed development will include homes designed in accordance with future iterations of the Building Regulations and Future Homes Standard.

Opportunities for generous tree planting throughout the masterplan would support the Council's Forest Community objective and, along with carefully managed grasslands, would help to sequester carbon on-site



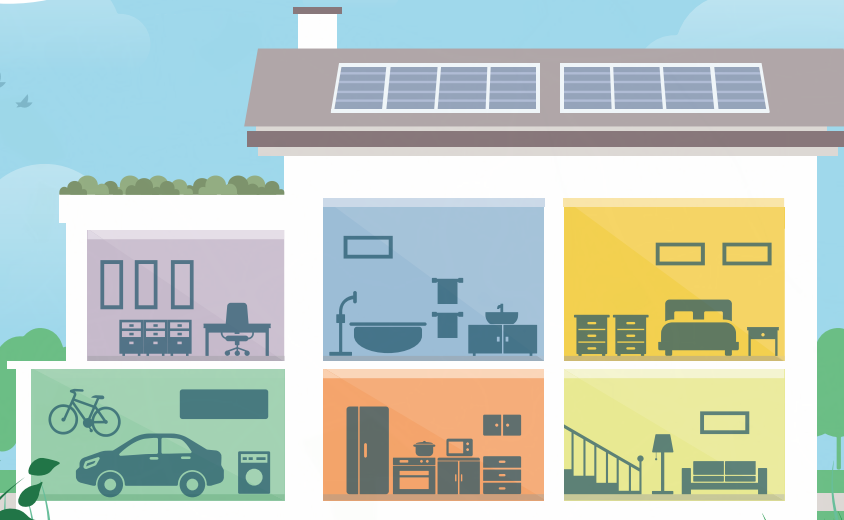
Reducing Emissions During Construction Phases

Buildings will be built using sustainable materials and practices. To reduce construction stage emissions the detailed design of buildings will focus on materials with reduced embodied carbon.



Community Growing Space

Development will include community growing spaces including allotments of varying plot sizes, smaller communal gardens and orchards with fruiting trees and shrubs.



Our Commitment to Delivery

Partnership Working and Engagement

The Consortium have the necessary credentials and a clear set of actions in place that will ensure the realisation of the vision for Land at Wappenshall.

The Consortium are committed to a partnership approach to joint working and have considerable experience and success in delivery of new development. The Consortium have been holding regular meetings and have jointly commissioned a range of technical surveys and reports that inform this Vision.

The Consortium are keen to maximise the social value of the proposals and will be developing a Community and Stakeholder Engagement Strategy as the scheme progress to ensure local people can influence the development as it comes to fruition.

Long Term Stewardship

The Consortium are aware that careful and responsible management of the Site will be important to new and existing residents and are committed to developing a long term Stewardship Strategy aligned with the Council's aspirations.

Homes England

One of the strategic landowners forming part of the Wappenshall Consortium is Homes England, who also control the planned employment land directly to the west of the Site.

Homes England is the Government's housing and regeneration agency, playing a key role in supporting the delivery of quality housing and placemaking, helping to create jobs and drive local economic growth.

Homes England believe affordable, quality homes in well designed places are key to improving people's lives. By working with over 5,000 organisations, Homes England can increase the supply and quality homes and create thriving places that drive regeneration and support local economic growth.

Homes England are uniquely positioned to help with any aspect of the housing process and overcome barriers no one else can. This has contributed to helping deliver over 152,000 new homes and unlocking land that's capable of delivering over 380,000 new homes across the country.

Land at Wappenshall can contribute to Homes England's Strategic Objectives and Key Performance Indicators (KPI), specifically: KPI 2 & 3 which seek to create vibrant and successful places by creating employment floorspace and creating jobs.



Homes England Strategic Plan Objectives (2023-2028)

Hallam Land

Hallam Land is the strategic land and planning promotion arm of Henry Boot PLC, an established construction company with a national presence and a long and varied history. Operating from our Sheffield home since 1886, we pride ourselves on reputation and delivering what we've set out to do.

Hallam carries this ethos since incorporating within the Group portfolio of companies in 1990 and has delivered a range of strategic projects comprising residential, commercial, retail, mixed use and motorway services. Our historic and current projects range from small town extensions to new communities such as Cranbrook, Exeter (3,500 dwellings) and strategic urban extensions such as Lubbesthorpe, Leicester (4,250 dwellings), and Eastern Green, Coventry (2,400 dwellings). Such complex, multi-ownership projects require careful nurturing and community liaison which we are able to provide from our local teams in our regional offices located in Sheffield, Northampton, Glasgow, Bristol, London, and Leeds.

Since formation, Hallam have been responsible for delivering 52,000 new dwellings with a further 92,000 potential plots in the pipeline. This has been achieved through cooperating positively across all stakeholders, strong technical acumen and an eye to delivering strong commercial returns. Today, Hallam currently controls over 18,000 acres in England, Scotland and Wales, and this figure continues to grow year on year. We are looking to continuing growing our portfolio continuing this ethos and maintaining our legacy.

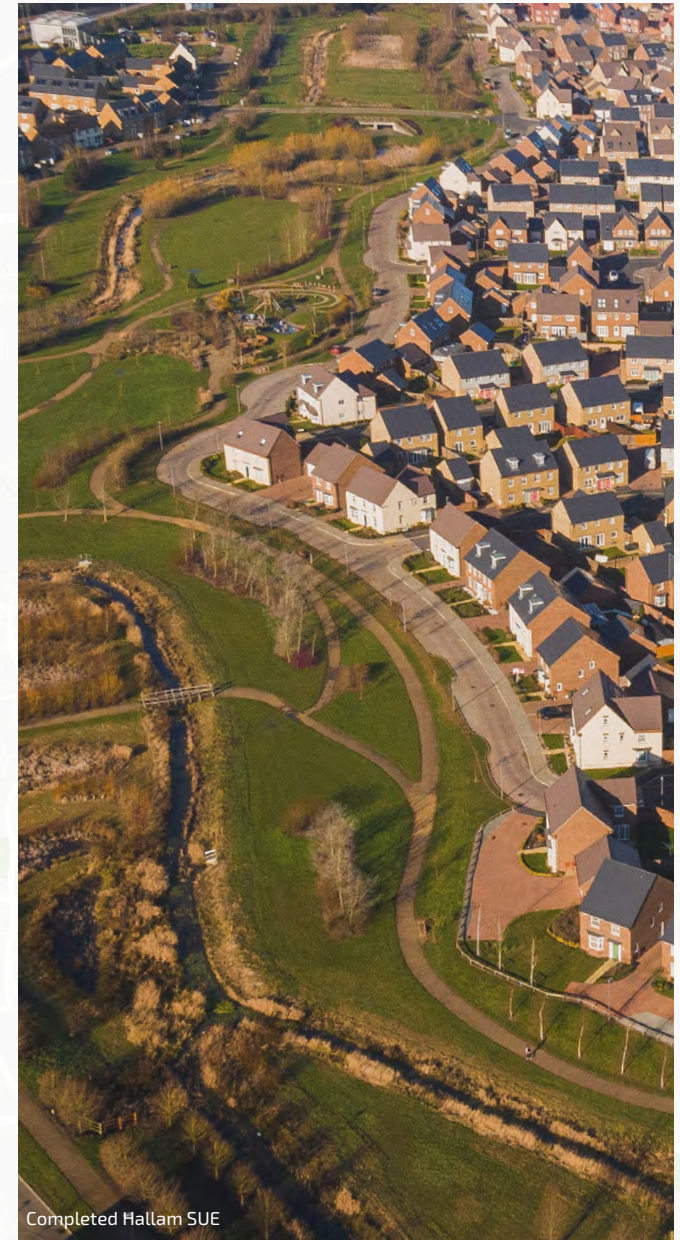
Bellway Homes

Bellway Homes began as a small family business in 1946 with a passion for building exceptional quality homes in carefully selected locations, inspired by the needs of real families. Bellway Homes have now grown into a FTSE 250 company and one of the UK's leading home builders delivering over 11,000 homes across the country last year.

The designs of Bellway's homes and construction techniques blend tradition with innovation, creating well-built homes with modern living standards. With a reputation for high quality developments in prime locations, Bellway Homes strive to create sustainable new developments that leave a positive legacy for residents and wider society. The homes are designed with more than seven decades of experience and craftsmanship, featuring exterior finishes that reflect the character of the locality.

Bellway Homes have achieved 5-star builder status in the national Home Builders Federation awards for seven years running. This is voted on independently by customers, reflecting commitment to delivering exceptional quality as standard.

Bellway Homes have been involved in several schemes locally and have experience in bringing forward SUEs, including Langley SUE in Birmingham where Bellway Homes are involved in delivery alongside Homes England and other developers.



Completed Hallam SUE



Land at Wappenshall

A Vision for a New Community

April 2025

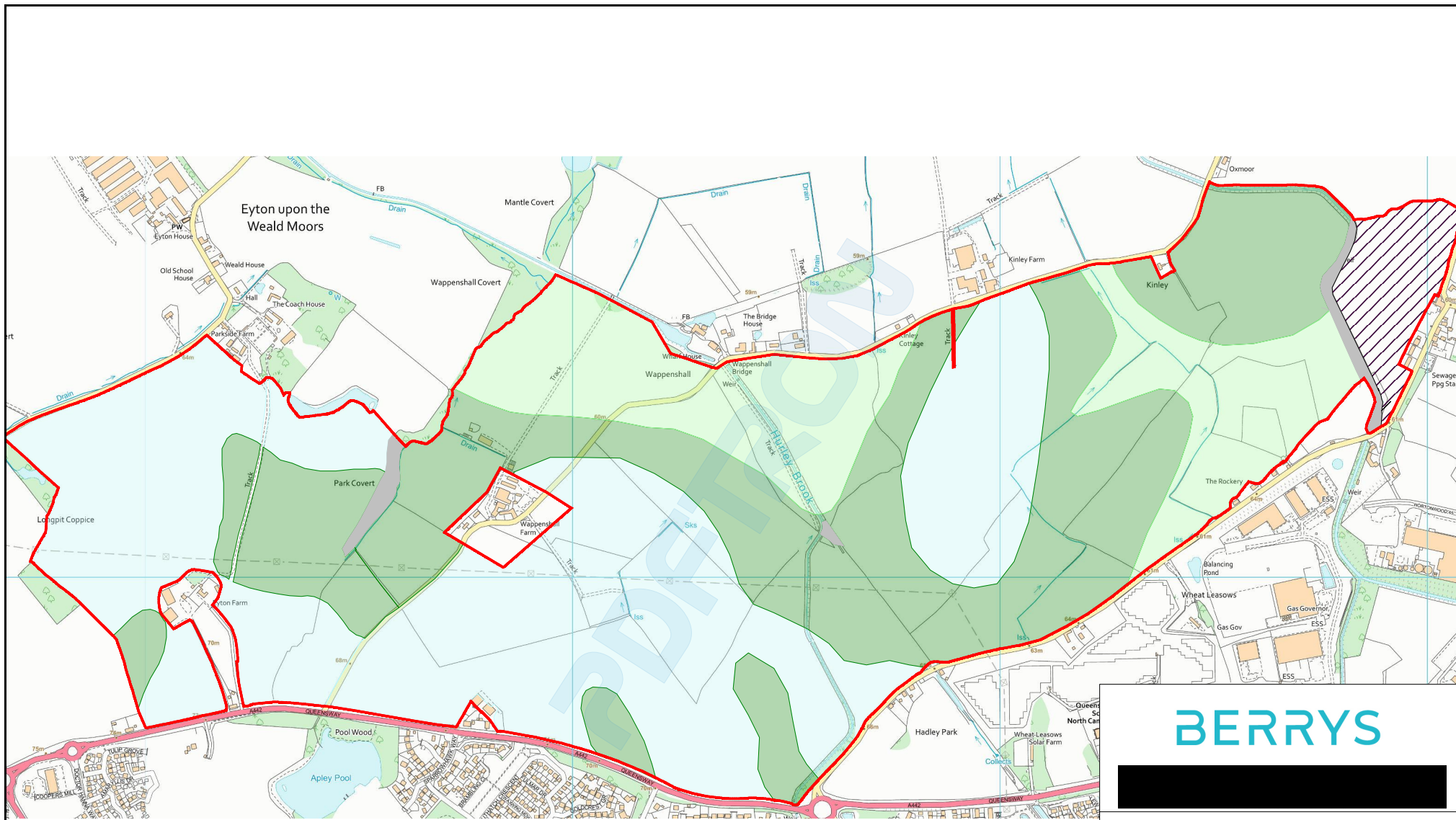
FPCR | environment
& design

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Aerial imagery © 2024 Microsoft.

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	Grade 2 (106.98ha) - 43%		Sub grade 3a (90.18ha) - 36%
	Sub grade 3b (43.61ha) - 17%		Other (2.38ha) - 1%
	Not surveyed (8.21ha) - 3%		

BERRYS



**Land at Wappenshall
Agricultural Land Classification**

SCALE :
1 : 12750 @ A4

DATE :
09/10/2024

MAP FILENAME :
Wappenshall ALC Plan.mpd



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Appendix A – Biodiversity Net Gain Assessment Summary

The Consortium

Wappenshall, Telford

September 2024

Introduction

FPCR Environment and Design Ltd. were commissioned by The Consortium to undertake a Biodiversity Net Gain (BNG) Assessment of an area of land located to the north of Telford (referred to herein as 'the site').

The site comprised arable fields, along with eight grassland fields, small areas of woodland and scrub, two ponds and watercourses. Fields are bound and divided by native hedgerows and trees, with several scattered individual trees within the fields.

The site will be promoted through Telford and Wrekin Council's Local Plan Review as a new Sustainable Urban Extension to Telford. Proposals include residential development of around 3,160 dwellings, employment uses, neighbourhood centres, educational facilities and other community facilities. Large areas of the site are proposed as green infrastructure, including land dedicated to ensuring 10% BNG is comfortably achievable.

This BNG Assessment Summary has been prepared to inform the above site promotion and to demonstrate the principals of how Net Gain could be achieved on-site. A Preliminary Ecological Appraisal (PEA) has also been produced, of which this report forms Appendix A.

Proposals for the site are provided by the Framework Masterplan (11521-FPCR-ZZ-XX-DR-L-0002 P10).

This Technical Note is broadly based on the Chartered Institute of Ecology and Environmental Management (CIEEM) guidance¹. The scope and objectives of this report are to:

- Summarise the results of the baseline survey undertaken on the site and to present the results of habitat condition assessment surveys following the Defra Biodiversity Metric 4.0 Technical Guidance.
- Provide an overview of the proposed habitats following completion of the scheme.
- Present the results of the Defra Biodiversity Metric 4.0 assessment completed for the proposals.
- Assess the feasibility of the proposals to achieve a net gain in biodiversity through the Defra Biodiversity metric 4.0.
- Provide recommendations for the proposals to maximise their biodiversity potential.

¹ CIEEM (2021) Biodiversity Net Gain Report and Audit Templates Chartered institute of Ecology and Environmental Management, Winchester, UK.

Biodiversity Net Gain Legislative and Policy Context

The Environment Act 2021

In England, biodiversity net gain is now required under statutory frameworks introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). Under this framework, every grant of planning permission will be deemed to have been granted subject to a general biodiversity gain condition. This will require an objective for developments to deliver at least 10% increase in biodiversity value relative to the pre-development biodiversity value of all onsite habitats.

This is a pre-commencement condition requiring the provision of a Biodiversity Gain Plan to be submitted and approved before works can be commenced, but after planning permission has been granted.

In principle, the grant of planning permission is not within the scope of BNG, however it is important to consider as part of the consenting body's decision-making process how a scheme will be able to demonstrate BNG after permission is granted. Therefore, this biodiversity net gain report presents the results of a Biodiversity Net Gain assessment that has been completed in order to demonstrate how the proposals will be compliant with the requirements of the Environment Act.

Biodiversity Net Gain Hierarchy

The statutory framework allows for the 10% biodiversity gain to be delivered through on-site biodiversity gains, registered offsite biodiversity gains or statutory credits. However, as set out in Articles 37A and 37D of the Town and Country Planning (Development Management Procedure)(England) Order 2015, development must consider the biodiversity net gain hierarchy when designing scheme proposals. This sets out hierarchy of actions as follows:

- First, for all medium, high, and very high distinctiveness habitats, the avoidance of any adverse effects;
- Where these cannot be avoided, mitigating any adverse effects on medium, high and very high distinctiveness habitats;
- Then, for all onsite habitats (including low distinctiveness), adverse effects should be compensated by in accordance with the following hierarchy:
 - a) Prioritising the enhancement of existing habitats; then
 - b) Creation of onsite habitats;
 - c) Allocation of registered offsite unit gains; then
 - d) Purchase of biodiversity credits.

Proposals must demonstrate how the biodiversity hierarchy has been applied to or provide the reasons for any deviation. The biodiversity net gain hierarchy is distinct from the mitigation hierarchy set out in paragraph 186(a) of the National Planning Policy Framework (2023)(NPPF).

Exemptions

There are several circumstances where a site will be exempt from biodiversity net gain including:

- Development impacting habitat of an area below a 'de minimis' threshold of 25m², or 5m for linear habitats.
- Householder applications (as defined within article 2(1) of the Town and Country Planning (Development Management Procedure)(England) Order 2015).
- Self-build and custom-build applications (no more than 9 dwellings, site no larger than 0.5ha and consists exclusively of self-build/custom dwellings).
- Biodiversity gain site (where habitats are being enhanced for wildlife only).
- Previously developed land with a baseline score of zero (exempted via the metric).

National Planning Policy Framework (2023)

The NPPF (2023) in particular seeks to ensure that the planning system contributes to and enhances the natural and local environment, and protects and enhances biodiversity by:

"180.d) minimising impacts on and providing net gains for biodiversity including by establishing coherent ecological networks that are more resilient to current and future pressures;

185.b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protected and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."

Telford & Wrekin Local Plan 2011 - 2031

Policy NE1 of the Telford & Wrekin Local Plan sets out the requirement for development to achieve 'no net biodiversity loss,' the policy encourages enhancements where they can be provided. According to the Biodiversity Net Gain Position Statement April 2022, the 'Council expects developers to demonstrate that their development meets the 'no net biodiversity loss' test; and by way of best practice using the Defra Biodiversity Metric. The Council is currently drafting its timetable and associated guidance to deliver the mandatory net gain requirement before November 2023 as set out in the Environment Act.'

Brief Methodology

An Extended Phase I Habitat² survey and Condition Assessment³ survey were completed on 23rd and 31st May 2023, and a survey of additional compartments was conducted on 26th July 2024 by suitably skilled ecologists from FPCR, all details of which are included within the PEA.

The site was mapped and then digitised using the Biodiversity Metric 4.0 QGIS Template. In accordance with the 4.0 Metric User Guide⁴, habitats were classified under UK Habitat Classification⁵ in order to be input into the metric. The proposals for the site were then uploaded into the QGIS template, and the proposed habitats mapped and digitised to generate areas for each of the habitats proposed for creation. As the proposals are only broadly outlined at this stage, professional judgement has been used to select some of the habitats and proposed conditions.

² JNCC (2010). Handbook for Phase 1 habitat survey – a technique for environmental audit. Peterborough: JNCC

³ Natural England Joint Publication JP039 March 2023 The Biodiversity Metric 4.0 – Technical Annex 1: Condition Assessment Sheets and Methodology

⁴ Natural England Joint Publication JP039 March 2023 The Biodiversity Metric 4.0 User Guide

⁵ Butcher, B., Carey, P., Edmonds, R., Norton, L. and Treweek, J. (2020). UK Habitat Classification – Habitat Definitions V1.1 at <http://ukhab.org>

The DEFRA Biodiversity 4.0 Calculation Tool was used to complete the BNG calculations in accordance with the Biodiversity Metric 4.0 – User Guide.

Results

Existing Habitats

Figures 1, 1a, 1b, 2, 2a and 2b show the distribution of habitats along with their condition and distinctiveness scores. Habitat types outlined below follow definitions set out by UK Habitat Classification (UKHab). The PEA uses Phase I Habitat terminology, and so for clarity, Table 1 overleaf contains both category names for each habitat.

The site was dominated by arable land cultivated with cereal crops, which is a habitat of low distinctiveness that does not have a condition assessment assigned in the Metric. Field margins were generally species-poor rough grassland with tall ruderal herbs indicative of high soil nutrient levels.

Two fields of other neutral grassland were present within the site. These contained over 9 characteristic species per m² with a mixture of grasses, a limited diversity of flowering herbs and a low cover of perennial rye-grass *Lolium perenne*. As the grasslands were found to fail Criterion A of the condition assessment, they were classified as poor condition.

Three arable headlands were also classified as other neutral grassland owing to their size and diversity of the swards. As above, these areas of grassland were found to fail Criterion A and were classified as poor condition.

Six fields of modified grassland were present within the site. All fields were dominated by perennial rye-grass with a small number of additional grass and herb species. All swards were very species poor containing less than 6 species per m², and as such failed Criterion A and were classified as poor condition.

Six areas of woodland within the site have been classified as other woodland; broadleaved owing to the composition of woodland canopies, comprising sycamore *Acer pseudoplatanus*, poplar *Populus sp.*, and cherry *Prunus sp.*. Park Covert, which was not surveyed during the Phase I habitat survey has been classified as lowland mixed deciduous woodland.

Additional habitats within the site included small areas of dense scrub (both mixed and single species) and small areas of tall ruderal herb characterised by stands of limited species diversity. These were all considered to be of poor condition.

Mature trees within field boundaries were all classified as good condition owing to their size, location and presence of ecological niches. At present all trees have been classified as large or medium mature trees in good condition and are all being retained. Three trees considered likely to be veteran were also recorded. Further survey work to determine their status is recommended (such as through an Arboricultural Survey) and where trees are classified as veteran, they would need to be recorded as 'irreplaceable habitat' within future versions of the Metric, if applicable.

Linear Habitats

Linear habitats on-site included hedgerows, lines of trees, watercourses and ditches.

Hedgerows of different distinctiveness were present and were classified as either; native hedgerows, species-rich native hedgerows, native hedgerows associated with bank or ditch, or native hedgerow with trees associated with bank or ditch. Hedgerows were generally in good or moderate condition. Lines of trees were in moderate condition, failing a maximum of 2 condition assessment criteria.

Two watercourses and two sections of wet ditch were present within the site. A River Condition Assessment to determine impacts to the on-site watercourses has not been undertaken at this stage as all watercourses are to be retained and appropriately buffered, and the only proposed crossings (footpath and cycleways) are proposed in locations which currently have concrete farm track crossings. As such, it is considered likely that impacts will be minimal, and crossings can be designed to be sympathetic to each watercourse.

Two wet ditches were present within the site. These were present as boundary features of arable fields and not associated with hedgerows. Ditches were assessed as moderate condition.

The biodiversity units for each habitat on the site have been calculated and are presented in Table 1.

Table 1: Existing On-site Habitats

Phase 1 Habitat	Defra 4.0 Habitat	Distinctiveness	Condition Assessment	Biodiversity Units
Unit Habitats				
Cereal crops	Arable	Low	N/A	486.81
Poor semi-improved	Other Neutral Grassland	Medium	Poor (fails Criterion A)	23.48
Improved grassland	Modified grassland	Low	Poor (fails Criterion A)	36.65
Broadleaved semi-natural woodland	Other woodland; broadleaved	Medium	Moderate	28.6
	Lowland mixed deciduous woodland	High	Assumed moderate	10.87
Dense / continuous scrub	Mixed scrub	Medium	Poor	0.14
Dense / continuous scrub	Willow scrub	Medium	Poor	0.35
Ephemeral / short perennial vegetation	Ruderal / ephemeral	Low	Poor	1.54
Mature trees within fields	Rural tree	Medium	Good	8.14
Hardstanding	Developed land; sealed surface	Very Low	N/A	0.00
Pond	Non-priority pond	Medium	Moderate	0.15
			Poor	0.46
Total				597.44
Linear Habitats – Hedgerows and Lines of trees				
Hedgerow	Native hedgerow with trees – associated with bank or ditch	High	Good	2.16
	Species rich native hedgerow – associated with bank or ditch	High	Good	17.21
	Native hedgerow – associated with bank or ditch	Medium	Various – Good, Moderate and Poor	27.30
	Native hedgerow with trees	Medium	Various – Good and Moderate	4.54

Phase 1 Habitat	Defra 4.0 Habitat	Distinctiveness	Condition Assessment	Biodiversity Units
	Species rich native hedgerow	Medium	Various – Good and Moderate	10.70
	Native hedgerow	Low	Various – Good, Moderate and Poor	60.23
Line of trees	Line of trees	Low	Moderate	4.21
Total				126.35
Linear Habitats – Ditches				
Wet ditch	Ditches	Medium	Moderate	5.01
Other rivers and streams	Stream	High	Moderate and Poor	22.79
<i>Please note there may be minor discrepancies (rounding errors) between the columns and the totals, however, the numbers duplicate those presented within the matrix calculator.</i>				

Design Proposals

The extent of habitat retention is shown in Figure 3, 3a and 3b. Given the nature of the site and works required to facilitate the development, it has been assumed that all arable land will be lost along with some of the modified grassland, the other neutral grassland, the small areas of scrub and ruderal vegetation. The majority of habitats to be lost are of low distinctiveness.

Based on the Framework Masterplan, most hedgerows are due to be retained. At present the plan assumes that 15.46km will be retained and 2.09km will be lost.

Working to the above principals, it has also been assumed that that 3.236km of wet ditch and other rivers and streams can be retained and 0.184km of wet ditch will be lost.

Habitat proposals are shown in Figures 4, 4a and 4b, 5, 5a and 5b. Green infrastructure proposals include the creation of wildflower (other neutral) grassland, amenity (modified) grassland, woodland (other broadleaved), mixed scrub, sustainable drainage systems, introduced shrubs and mature tree planting.

Table 2 below presents these habitats along with their proposed target conditions and the biodiversity units they achieve.

Table 2: Biodiversity Units: Proposed Unit Habitats

Broad Habitat	Defra 4.0 Habitat	Area (ha)	Condition	Biodiversity Units
Unit Habitats				
Wildflower grassland	Other neutral grassland	50.0446	Moderate	335.03
Amenity grassland	Modified grassland	11.1483	Good	52.13
Amenity grassland	Modified grassland	9.4092	Moderate	32.64
Amenity grassland	Modified grassland	19.5966	Poor	37.82
Woodland	Other woodland, broadleaved	11.77	Moderate	55.18
Native shrubs	Mixed scrub	5.7249	Moderate	38.33
Drainage and wetland zones	Sustainable drainage systems	6.5759	Moderate	15.84
Trees	Urban and rural trees	1.4617	Moderate	4.47
Gardens	Vegetated garden	25.6415	N/A	49.49
Allotments	Allotments	3.0092	Moderate	11.62
Total				632.53

Please note there may be minor discrepancies (rounding errors) between the columns and the totals, however, the numbers duplicate those presented within the matrix calculator.

Linear Habitats

Post-intervention, it has been assumed that the extensive areas of green infrastructure included within the scheme can deliver 1km of species-rich native hedgerow which are associated with a bank or a ditch and 2.5km of species-rich native hedgerow, both in moderate condition.

It has also been assumed that the site can deliver 0.65km of wet ditch in moderate condition.

As discussed above, the amount of hedgerow and wet ditch loss has been assumed on a worst-case scenario basis in which all hedgerows and wet ditches currently shown within development plots have been lost. Should lengths of hedgerow and wet ditches within these plots be retained at the detailed design stage, then the amount of compensation required would reduce.

Habitat Enhancement

In addition to the above, it has also been proposed that some existing habitats on-site could be enhanced, either through management practices to improve their condition, or through habitat modification. Table 3 below shows these proposals and the habitat units delivered from the proposed enhancements.

Table 3: Biodiversity Units: Habitat Enhancements

Baseline Habitat	Proposed habitat	Condition change	Distinctiveness change	Habitat Units delivered
Lowland mixed deciduous woodland	Lowland mixed deciduous woodland	Moderate to good	None (good to good)	11.75
Total				11.75

Biodiversity Net Gain Calculations

Habitats

The development site delivers a baseline of 597.44 habitat units with arable land as the primary habitat contributor.

Post intervention the site will deliver 680.42 habitat units under the current proposals. This represents a net gain of 82.98 habitat units which equates to a 13.89% net gain.

Hedgerows and Ditches

At present, it has been assumed that 15.46km of hedgerows within the site boundary can be retained, equating to 112.41 hedgerow units.

Post-intervention, providing the scheme can include 1km of species-rich native hedgerow which are associated with a bank or a ditch and 2.5km of species-rich native hedgerow (both in moderate condition), the current proposals can deliver 139.18 hedgerow units which equates to a 10.16% gain.

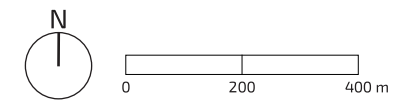
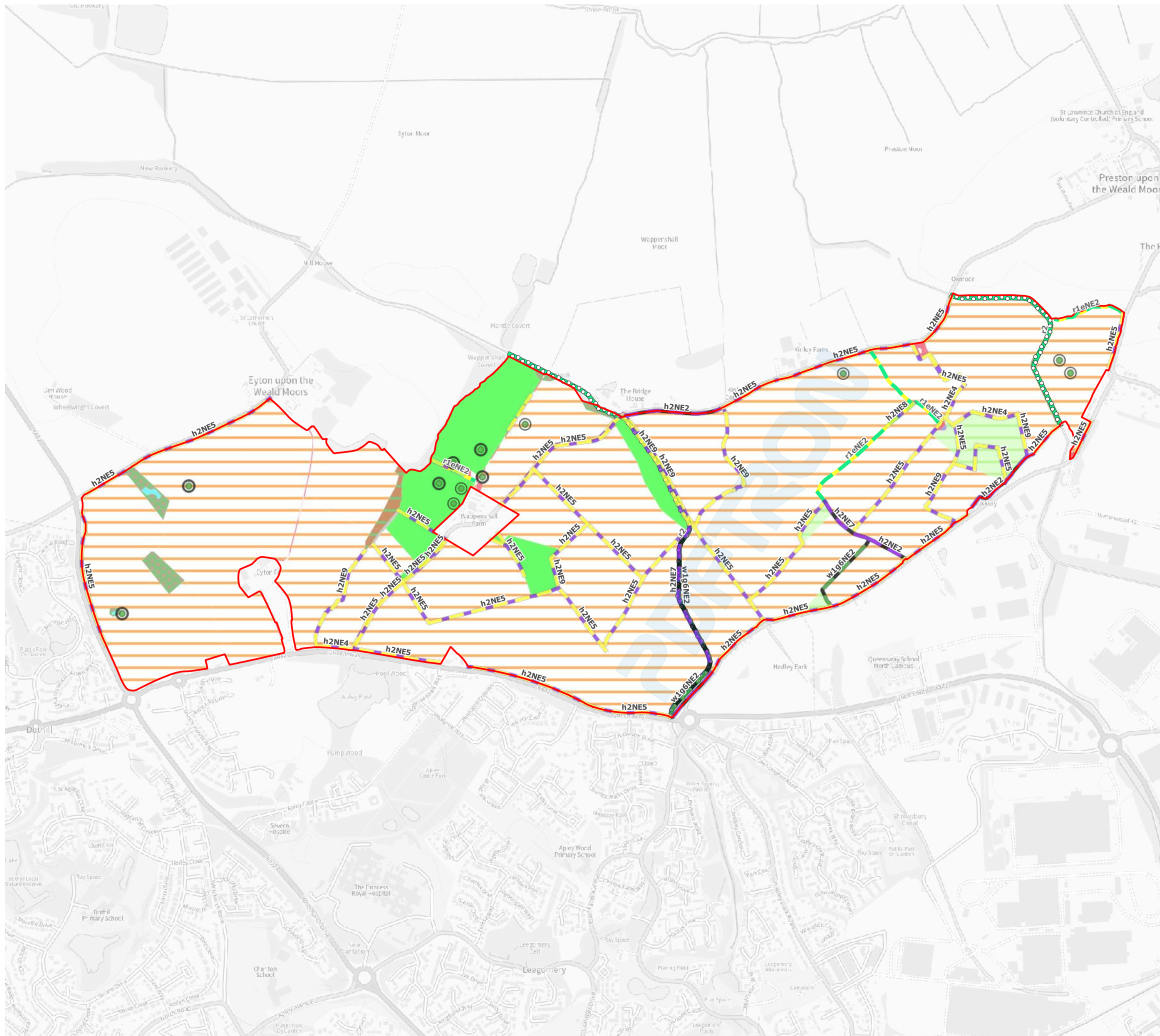
In addition, providing the current proposals can deliver 0.65km of wet ditch in moderate condition, there will be a gain of 3.05 watercourse units which equates to a gain of 10.97%.

As discussed above, the amount of hedgerow and wet ditch loss has been assumed and should additional hedgerow and wet ditch lengths be retained at the detailed design stage, then the amount of hedgerow compensation and wet ditch would reduce.

Discussion and Recommendations

The current assessment has demonstrated that biodiversity net gain can be achieved on-site, subject to the required lengths of hedgerow and wet ditch being created and any future works proposed to the watercourses being minimal and sympathetically designed.

The extensive areas of green infrastructure included within the scheme allow for significant areas of habitat creation as well as enhancement of existing habitats. The current assessment assumes that large swathes of wildflower grassland could be created on-site, which could be managed specifically for nature conservation and cut in the style of a traditional hay meadow (with one or two cuts only per year). Where these are to be multifunctional (providing biodiversity value as well as informal public open space), it is considered that mown paths could be created for informal recreation through longer grassland swards. In addition, it has been assumed that some of the existing grassland pasture could be enhanced (such as through reseeding or overseeding) to increase the biodiversity value of the swards, and these could be managed as per the proposed wildflower grasslands. Proposals also include the creation of areas of woodland and scrub, and the inclusion of drainage basins. To increase the biodiversity net gain score further, additional native scrub planting could be included to create a mosaic of grassland and scrub habitats which would be of benefit to wildlife. Additional increases in units could also be achieved through the creation of ponds managed specifically for wildlife.



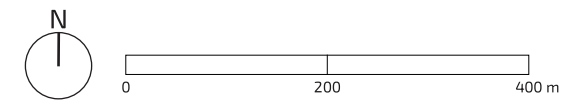
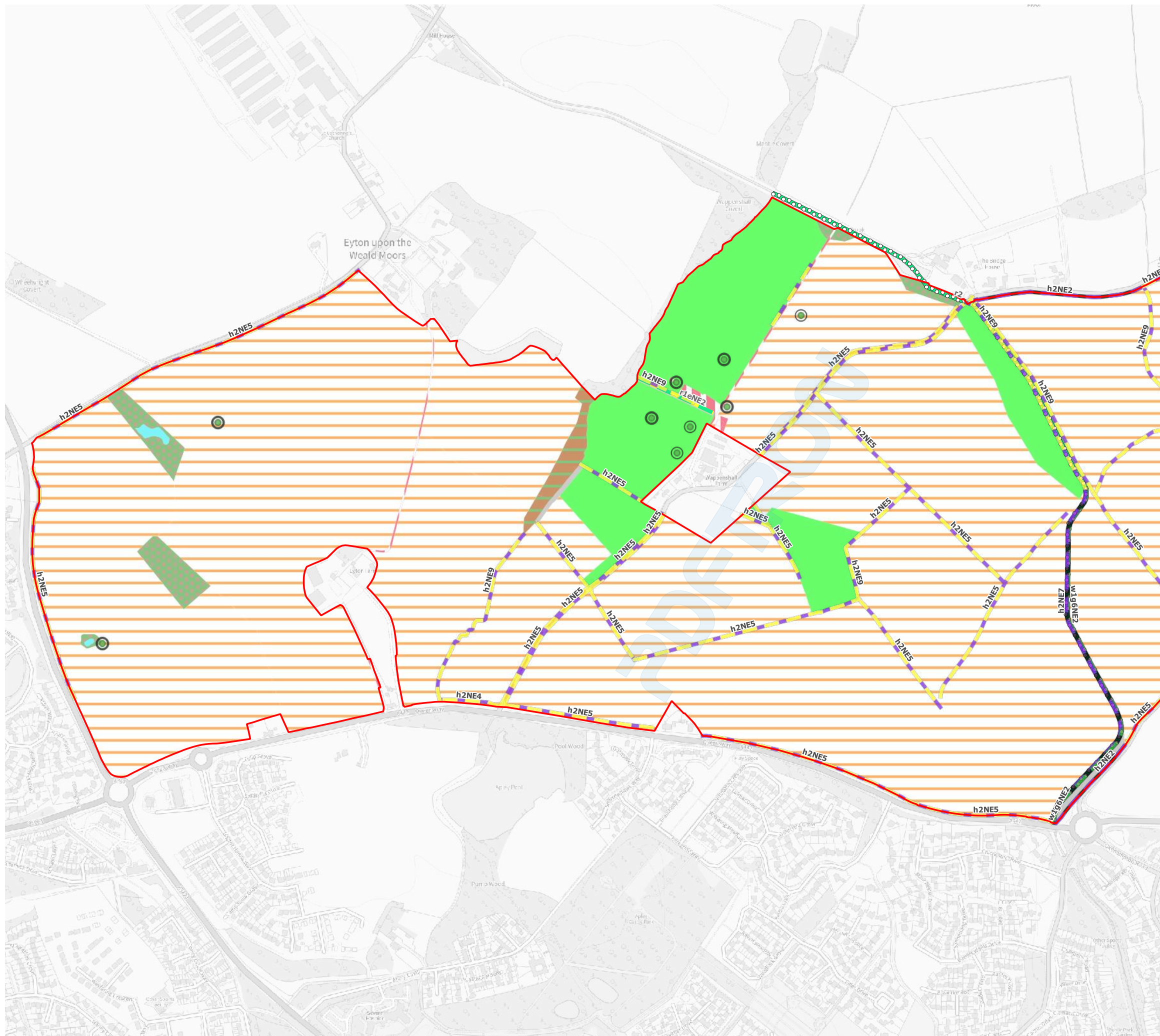
- Site Boundary
- Baseline Habitats**
- Cereal crops
- Developed land; sealed surface
- Lowland mixed deciduous woodland
- Mixed scrub
- Modified grassland
- Other neutral grassland
- Other woodland; broadleaved
- Ponds (non-priority habitat)
- Ruderal/Ephemeral
- Vegetated garden
- Willow scrub
- Baseline Hedgerows**
- Line of trees (w1g6NE2)
- Native hedgerow (h2NE5)
- Native hedgerow - Associated with bank or ditch (h2NE9)
- Native hedgerow with trees (h2NE4)
- Native hedgerow with trees - Associated with bank or ditch (h2NE8)
- Species-rich native hedgerow (h2NE2)
- Species-rich native hedgerow - Associated with bank or ditch (h2NE7)
- Baseline Trees**
- Large Rural Tree
- Medium Rural Tree
- Baseline Linear Watercourses**
- Ditches
- Other rivers and streams

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Telford**

title **BASELINE HABITAT PLAN - OVERVIEW** scale
1:13,000 @ A3

number **FIGURE 1** rev
-



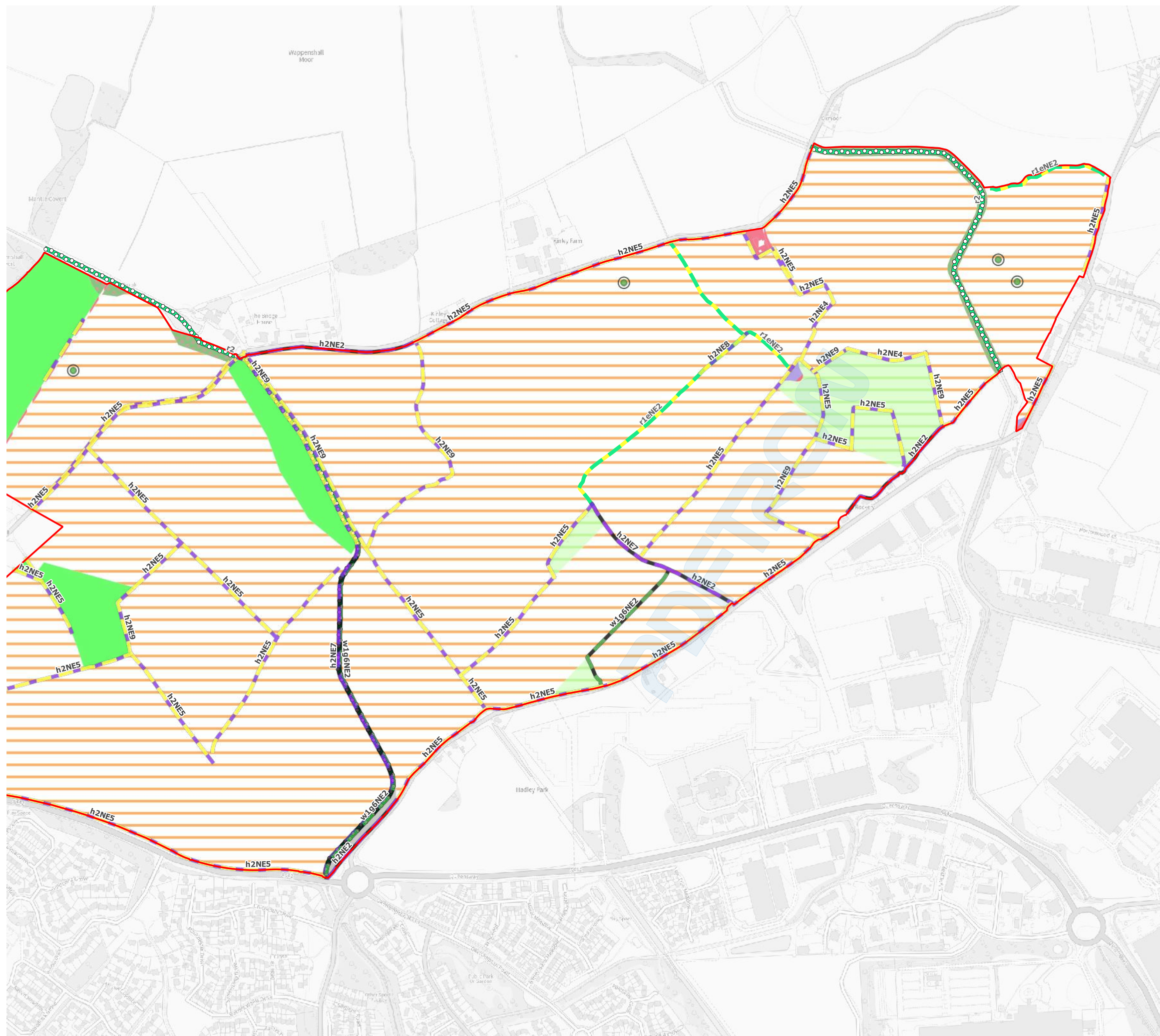
- Site Boundary
- Baseline Habitats**
- Cereal crops
- Developed land; sealed surface
- Lowland mixed deciduous woodland
- Modified grassland
- Other woodland; broadleaved
- Ponds (non-priority habitat)
- Ruderal/Ephemeral
- Baseline Hedgerows**
- Line of trees (w1g6NE2)
- Native hedgerow (h2NE5)
- Native hedgerow - Associated with bank or ditch (h2NE9)
- Native hedgerow with trees (h2NE4)
- Species-rich native hedgerow (h2NE2)
- Species-rich native hedgerow - Associated with bank or ditch (h2NE7)
- Baseline Trees**
- Large Rural Tree
- Medium Rural Tree
- Baseline Linear Watercourses**
- Ditches
- Other rivers and streams

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client **The Consortium**
 project **Wappenshall, Telford**

title **BASELINE HABITAT PLAN - WEST** scale 1:7,500 @ A3

number **FIGURE 1a** rev -



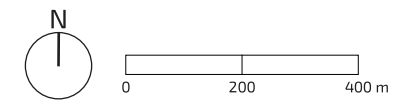
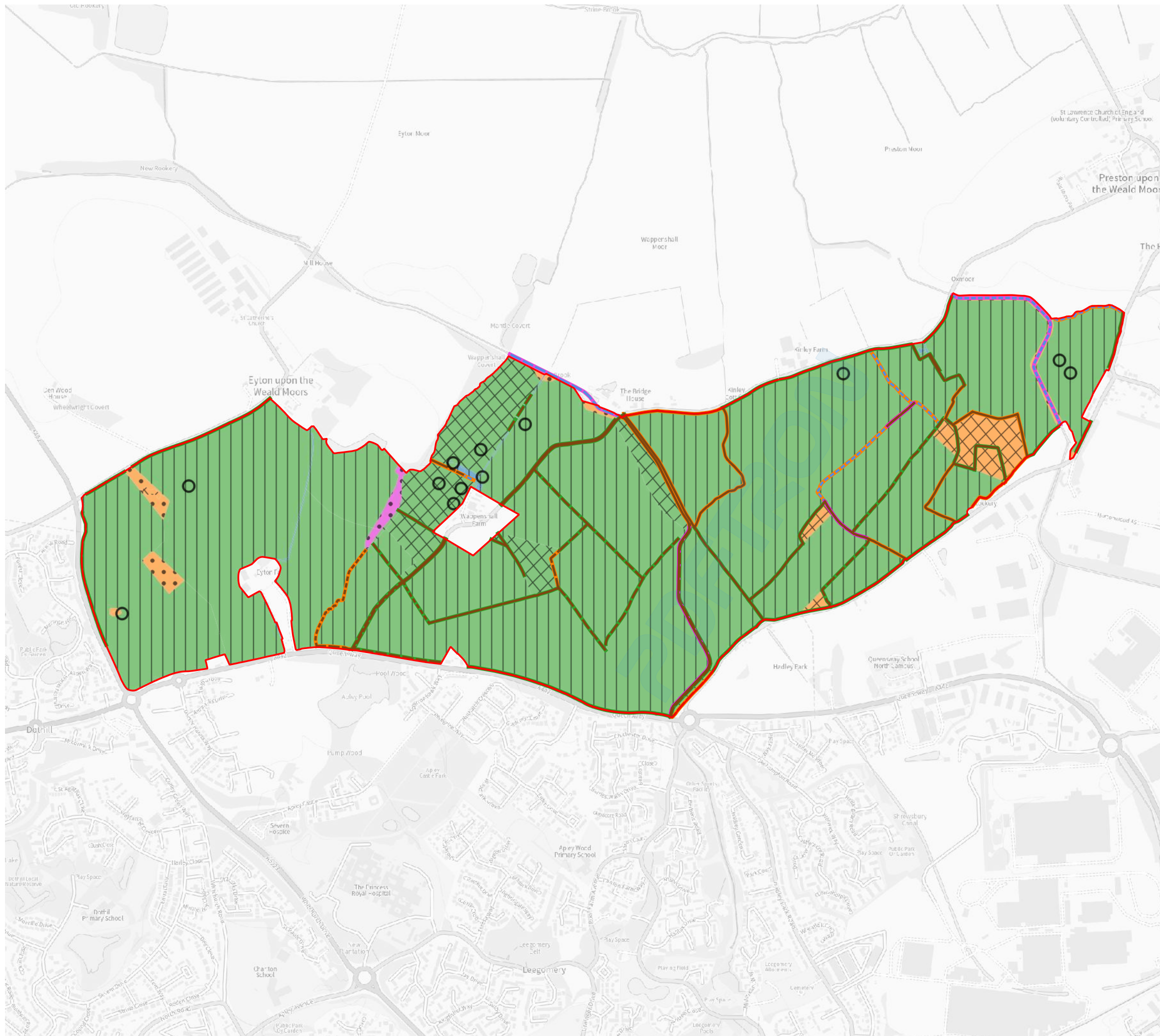
- Site Boundary
- Baseline Habitats**
- Cereal crops
- Developed land; sealed surface
- Mixed scrub
- Modified grassland
- Other neutral grassland
- Other woodland; broadleaved
- Ruderal/Ephemeral
- Vegetated garden
- Willow scrub
- Baseline Hedgerows**
- Line of trees (w1g6NE2)
- Native hedgerow (h2NE5)
- Native hedgerow - Associated with bank or ditch (h2NE9)
- Native hedgerow with trees (h2NE4)
- Native hedgerow with trees - Associated with bank or ditch (h2NE8)
- Species-rich native hedgerow (h2NE2)
- Species-rich native hedgerow - Associated with bank or ditch (h2NE7)
- Baseline Trees**
- Medium Rural Tree
- Baseline Linear Watercourses**
- Ditches
- Other rivers and streams

date 26/09/24 drwn/chkd LG / CH

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 project **Wappenshall, Telford**

title **BASELINE HABITAT PLAN - EAST** scale 1:7,500 @ A3

number **FIGURE 1b** rev -



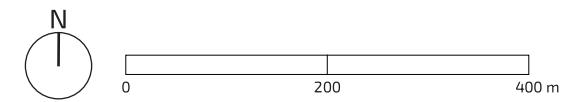
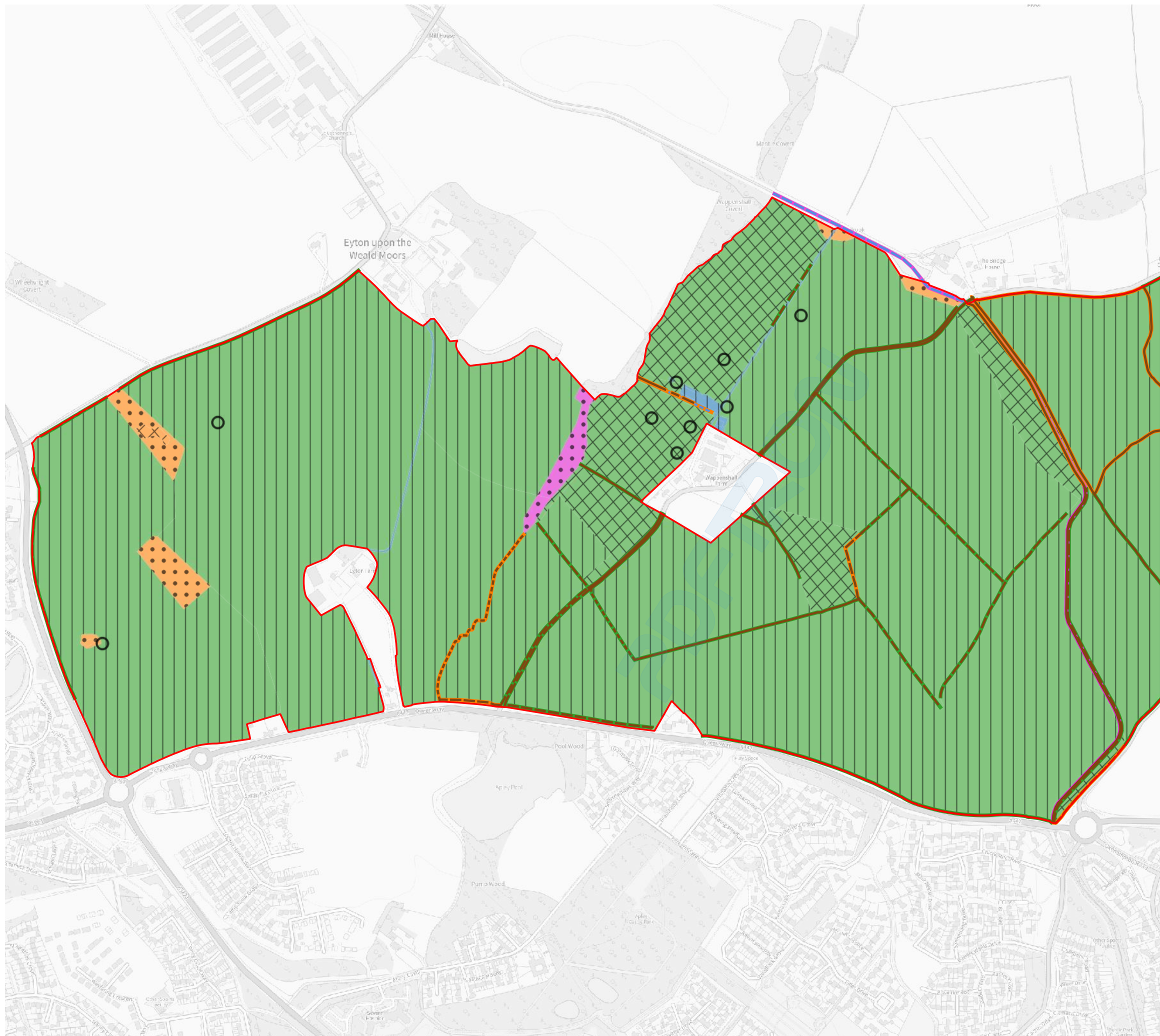
- Site Boundary
- Baseline Habitat Condition**
- Moderate
- Poor
- N/A - Other
- Condition Assessment N/A
- Baseline Habitat Distinctiveness**
- High
- Medium
- Low
- V.Low
- Baseline Hedgerow Condition**
- Good
- Moderate
- Poor
- Baseline Hedgerow Distinctiveness**
- High
- Medium
- Low
- Baseline Tree Condition**
- Good
- Baseline Linear Watercourse Condition**
- Moderate
- Poor
- Baseline Linear Watercourse Distinctiveness**
- High
- Medium

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title **BASELINE HABITAT CONDITION & DISTINCTIVENESS - OVERVIEW** scale 1:13,000 @ A3

number **FIGURE 2** rev -



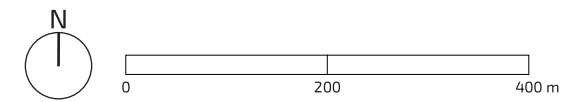
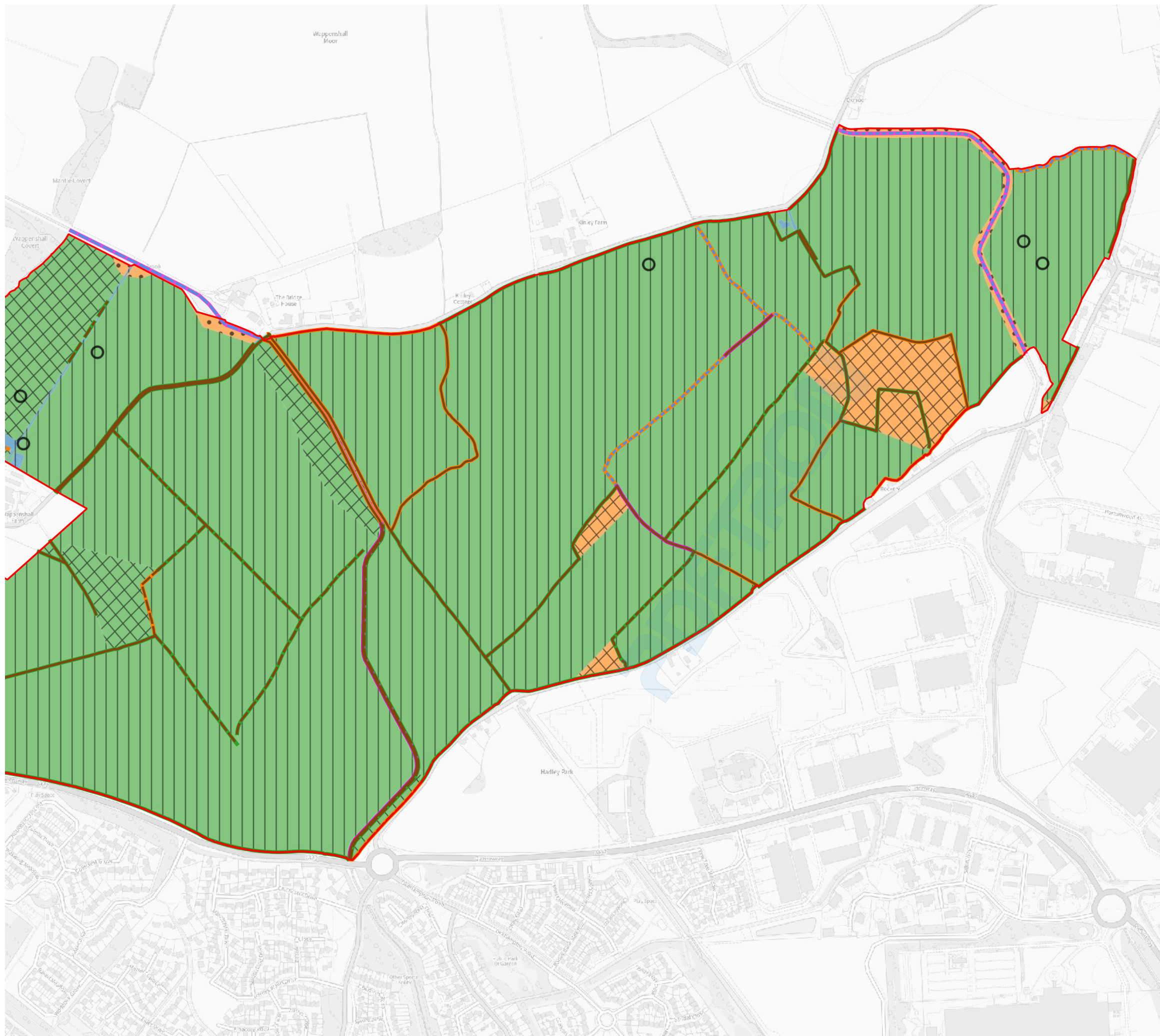
- Site Boundary
- Baseline Habitat Condition**
- Moderate
- Poor
- N/A - Other
- Condition Assessment N/A
- Baseline Habitat Distinctiveness**
- High
- Medium
- Low
- V.Low
- Baseline Hedgerow Condition**
- Good
- Moderate
- Poor
- Baseline Hedgerow Distinctiveness**
- High
- Medium
- Low
- Baseline Tree tree Condition**
- Good
- Baseline Linear Watercourse Condition**
- Moderate
- Poor
- Baseline Linear Watercourse Distinctiveness**
- High
- Medium

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title **BASELINE HABITAT CONDITION & DISTINCTIVENESS - WEST** scale 1:7,500 @ A3

number **FIGURE 2a** rev -

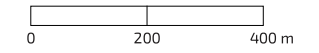
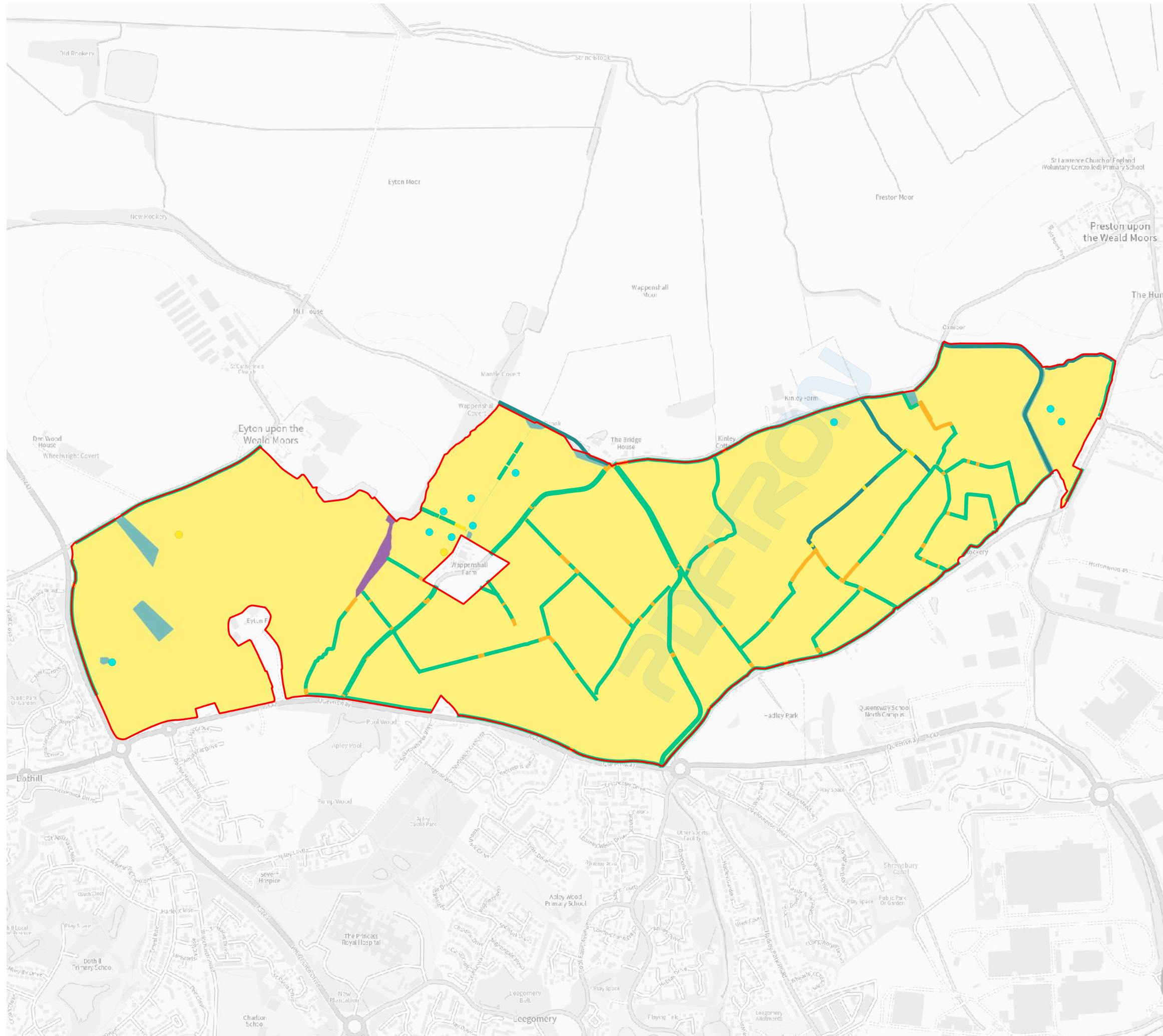


- Site Boundary
- Baseline Habitat Condition**
- Moderate
- Poor
- N/A - Other
- Condition Assessment N/A
- Baseline Habitat Distinctiveness**
- Medium
- Low
- V.Low
- Baseline Hedgerow Condition**
- Good
- Moderate
- Baseline Hedgerow Distinctiveness**
- High
- Medium
- Low
- Baseline Tree tree Condition**
- Good
- Baseline Linear Watercourse Condition**
- Moderate
- Poor
- Baseline Linear Watercourse Distinctiveness**
- High
- Medium

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title **BASELINE HABITAT CONDITION & DISTINCTIVENESS - EAST** scale 1:7,500 @ A3
 number **FIGURE 2b** rev -



- Site Boundary
- Habitat Retention**
- Habitat Enhanced
- Habitat Retained
- Habitat Lost
- Hedgerow Retention**
- Hedgerow Retained
- Hedgerow Lost
- Tree Retention**
- Tree Retained
- Tree Lost
- Watercourse Retention**
- Retained
- Lost

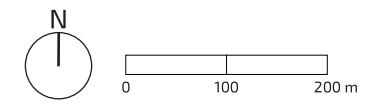
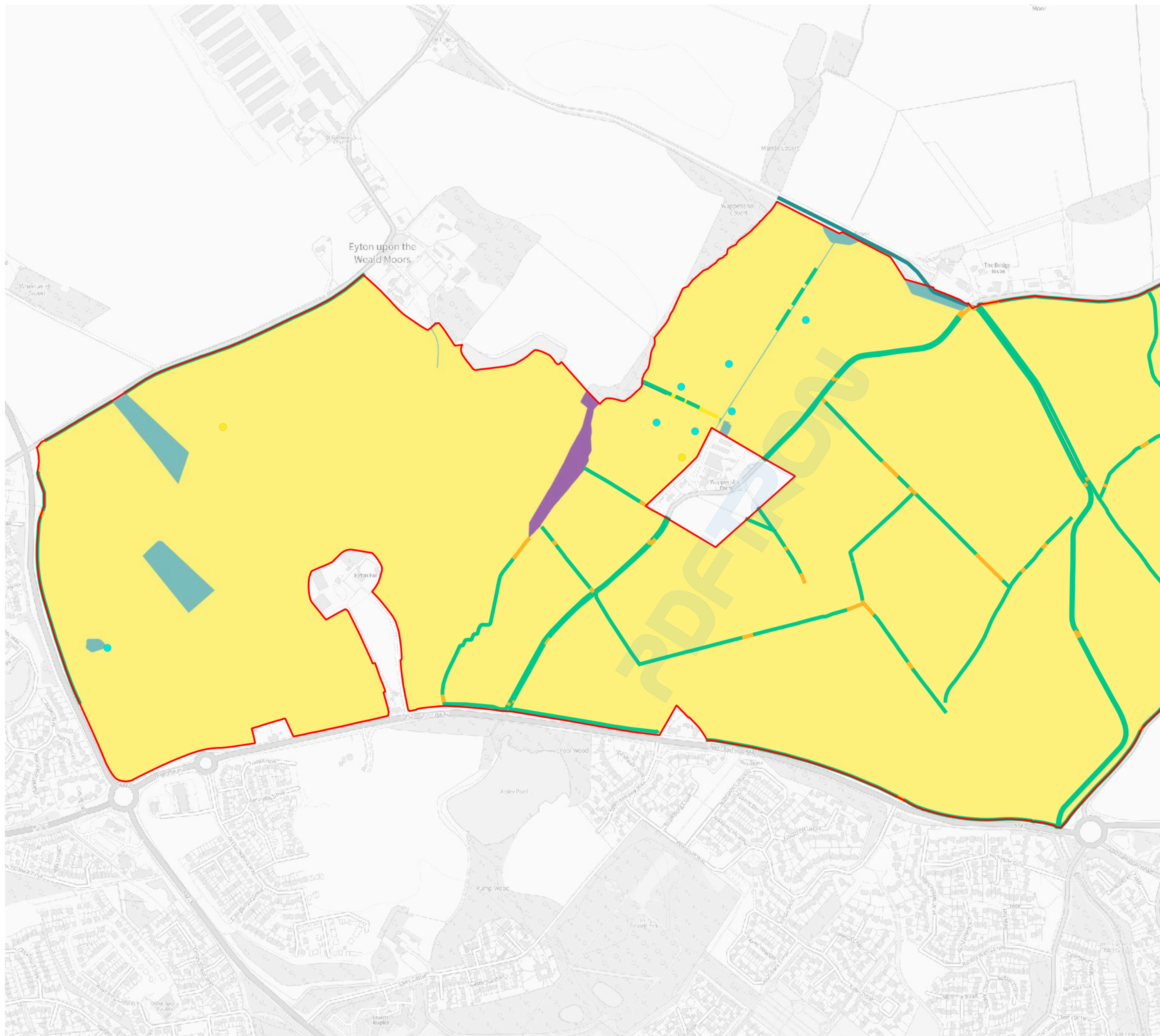
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title **HABITAT RETENTION - OVERVIEW** scale 1:13,000 @ A3

number **FIGURE 3** rev -





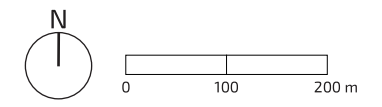
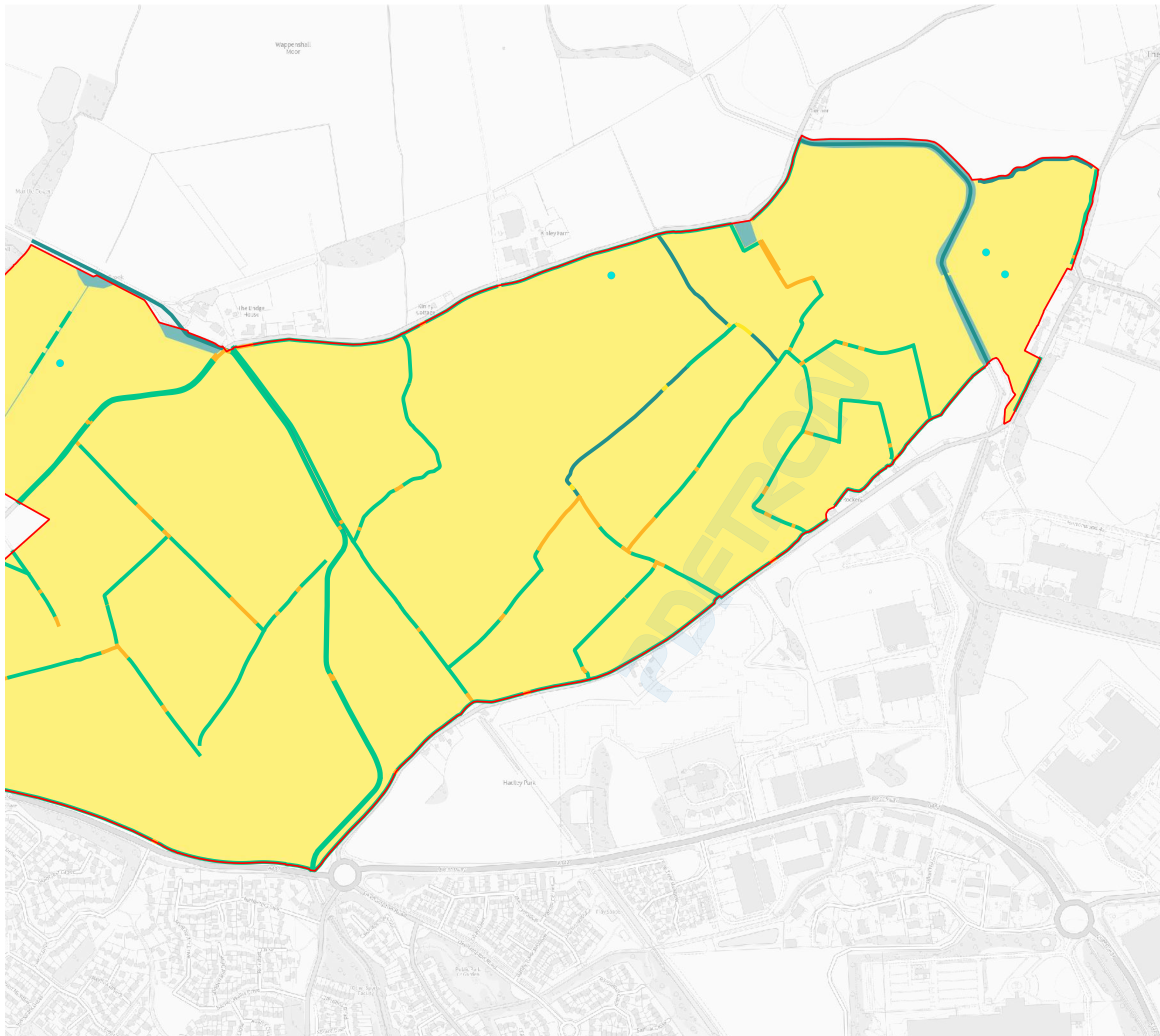
- Site Boundary
- Habitat Retention**
- Habitat Enhanced
- Habitat Retained
- Habitat Lost
- Hedgerow Retention**
- Hedgerow Retained
- Hedgerow Lost
- Tree Retention**
- Tree Retained
- Tree Lost
- Watercourse Retention**
- Retained
- Lost

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title **HABITAT RETENTION - WEST** scale 1:7,500 @ A3

number **FIGURE 3a** rev -



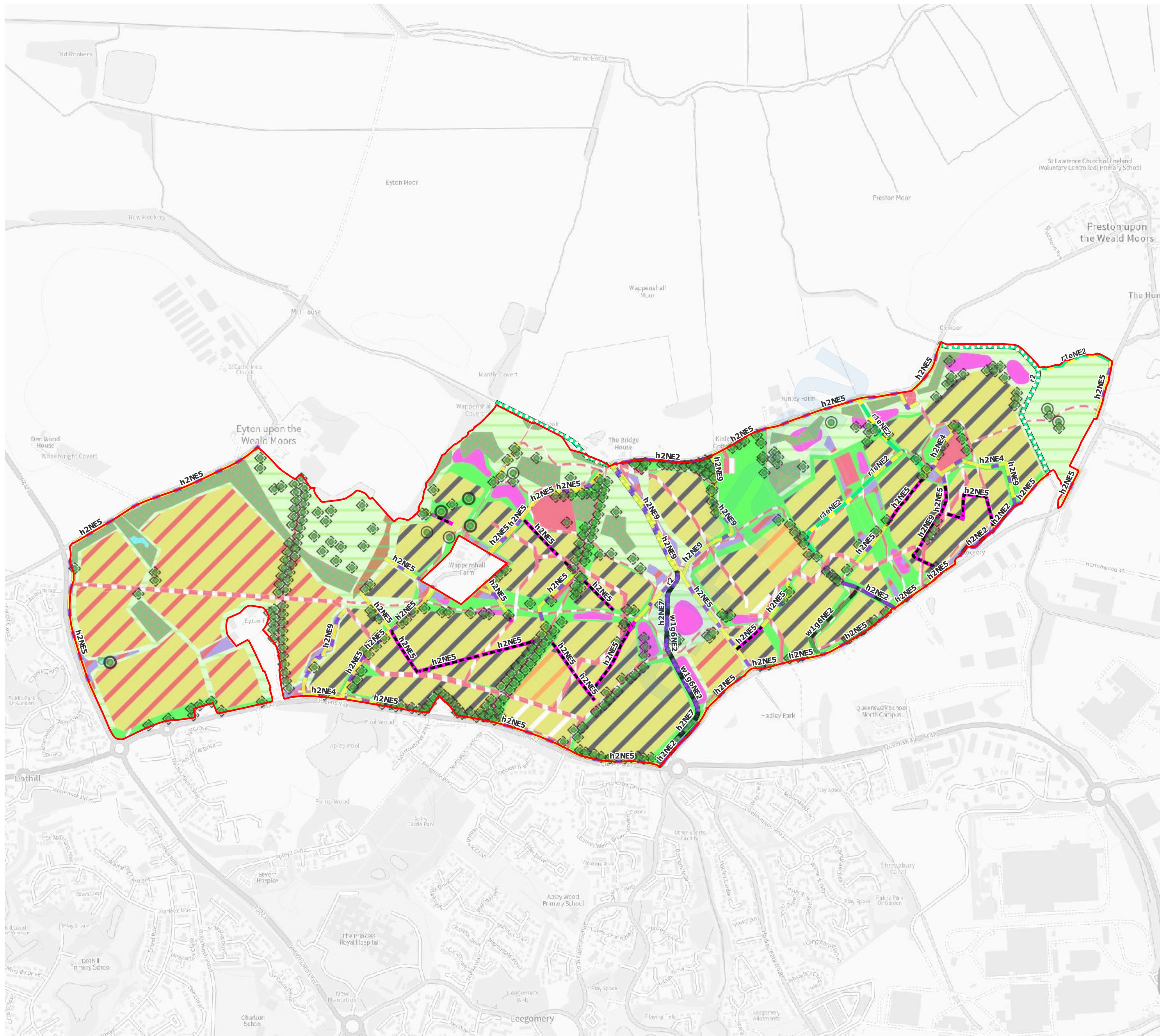
- Site Boundary
- Habitat Retention**
- Habitat Retained
- Habitat Lost
- Hedgerow Retention**
- Hedgerow Retained
- Hedgerow Lost
- Tree Retention**
- Tree Retained
- Watercourse Retention**
- Retained
- Lost

date 26/09/24 drwn/chkd
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 project **Wappenshall, Telford**

title **HABITAT RETENTION - EAST** scale
1:7,500 @ A3

number **FIGURE 3b** rev
-



- Site Boundary
- Proposed Habitats**
- Allotments
- Developed land; sealed surface
- Lowland mixed deciduous woodland
- Mixed scrub
- Modified grassland
- Other neutral grassland
- Other woodland; broadleaved
- Ponds (non-priority habitat)
- Sustainable drainage system
- Vegetated garden
- Commercial
- Residential
- Retail
- School
- Proposed Hedgerows**
- Line of trees
- Native hedgerow
- Native hedgerow - associated with bank or ditch
- Native hedgerow with trees
- Native hedgerow with trees - associated with bank or ditch
- Species-rich native hedgerow
- Species-rich native hedgerow - associated with bank or ditch
- Hedgerow within Development Parcel (75:25 Retained:Lost)
- Proposed Trees**
- Large Rural Tree (Retained)
- Medium Rural Tree (Retained)
- Small Urban Tree
- Proposed Watercourse**
- Ditches
- Other rivers and streams

date 26/09/24 drwn/chkd
LG / CH

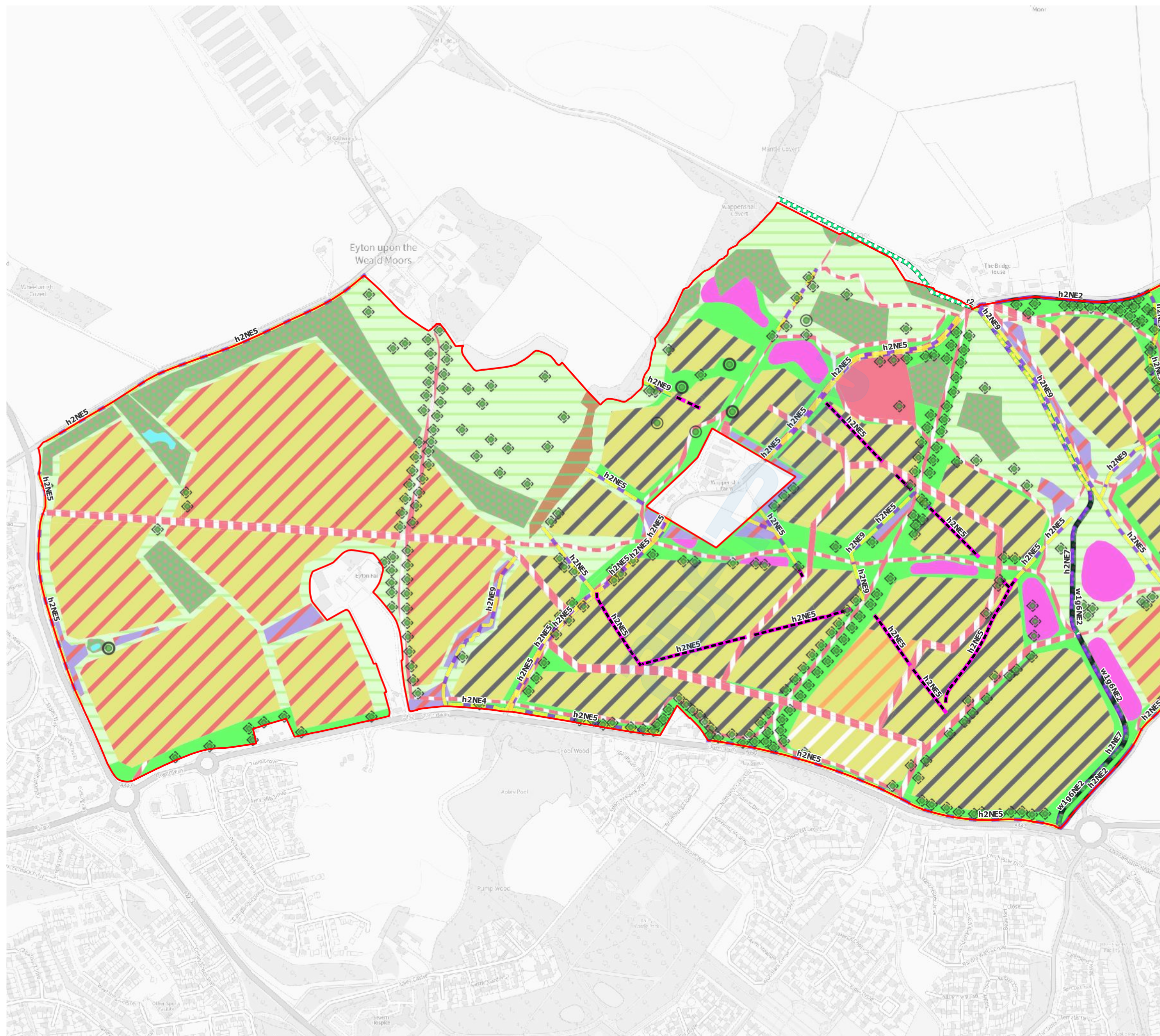
client
The Consortium
project
**Wappenshall,
Telford**

title **PROPOSED HABITAT PLAN -** scale
1:13,000 @ A3
OVERVIEW
number rev

FIGURE 4 -

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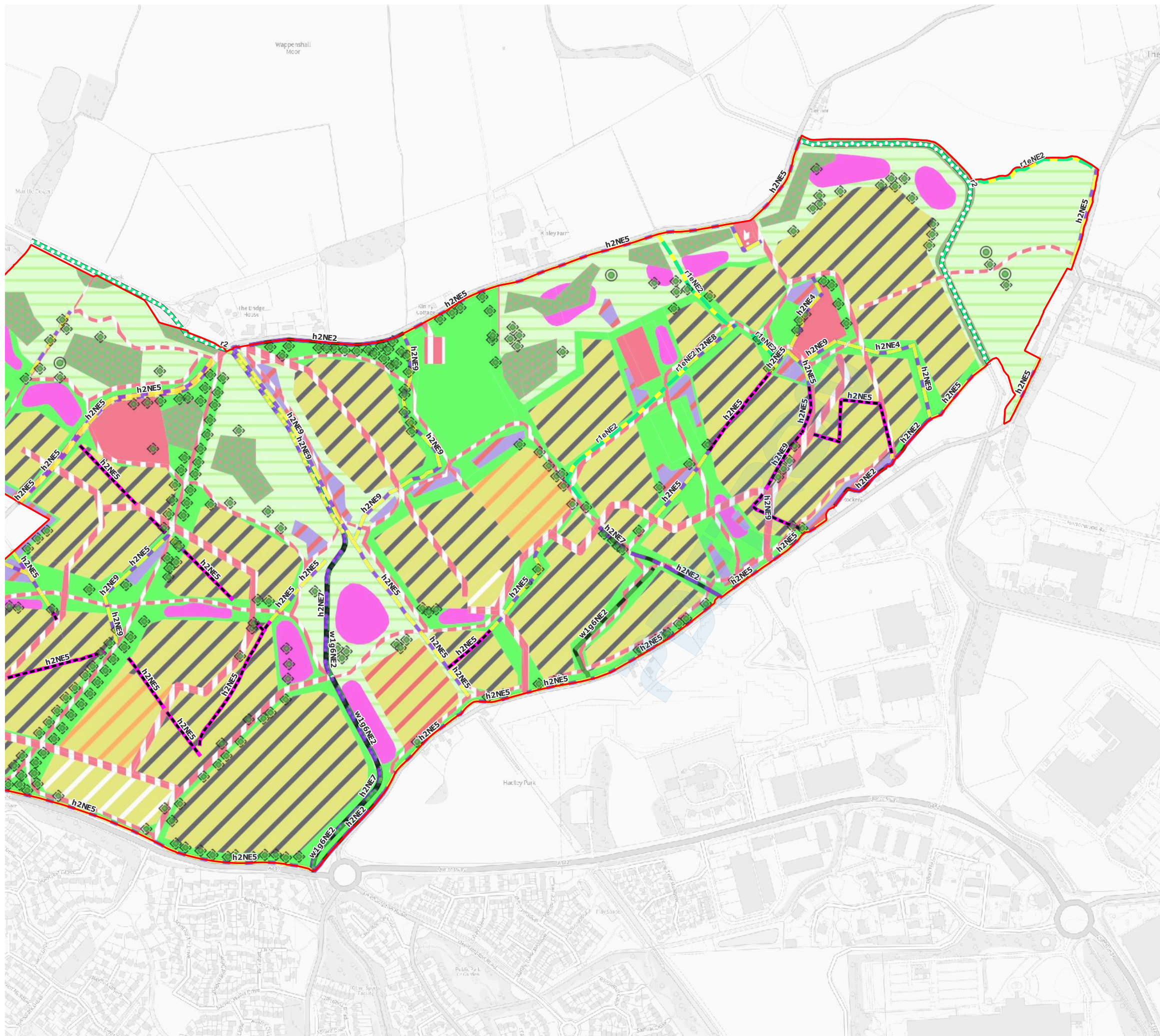
- Site Boundary
- Proposed Habitats**
- Allotments
- Developed land; sealed surface
- Lowland mixed deciduous woodland
- Mixed scrub
- Modified grassland
- Other neutral grassland
- Other woodland; broadleaved
- Ponds (non-priority habitat)
- Sustainable drainage system
- Commercial
- Residential
- Retail
- School
- Proposed Hedgerows**
- Line of trees
- Native hedgerow
- Native hedgerow - associated with bank or ditch
- Native hedgerow with trees
- Species-rich native hedgerow
- Species-rich native hedgerow - associated with bank or ditch
- Hedgerow within Development Parcel (75:25 Retained:Lost)
- Proposed Trees**
- Large Rural Tree (Retained)
- Medium Rural Tree (Retained)
- Small Urban Tree
- Proposed Watercourse**
- Ditches
- Other rivers and streams

date 26/09/24 drwn/chkd
LG / CH

client
The Consortium
project
**Wappenshall,
Telford**

title **PROPOSED HABITAT PLAN - WEST** scale
1:7,500 @ A3

number **FIGURE 4a** rev
-



N

0 100 200m

- Site Boundary
- Proposed Habitats
 - Allotments
 - Developed land; sealed surface
 - Mixed scrub
 - Modified grassland
 - Other neutral grassland
 - Other woodland; broadleaved
 - Sustainable drainage system
 - Vegetated garden
 - Commercial
 - Residential
 - Retail
 - School
- Proposed Hedgerows
 - Line of trees
 - Native hedgerow
 - Native hedgerow - associated with bank or ditch
 - Native hedgerow with trees
 - Native hedgerow with trees - associated with bank or ditch
 - Species-rich native hedgerow
 - Species-rich native hedgerow - associated with bank or ditch
 - Hedgerow within Development Parcel (75:25 Retained:Lost)
- Proposed Trees
 - Medium Rural Tree (Retained)
 - Small Urban Tree
- Watercourse Proposed EDIT ME
 - Ditches
 - Other rivers and streams

date 26/09/24 drwn/chkd LG / CH

client
The Consortium
 project
Wappenshall, Telford

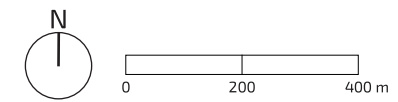
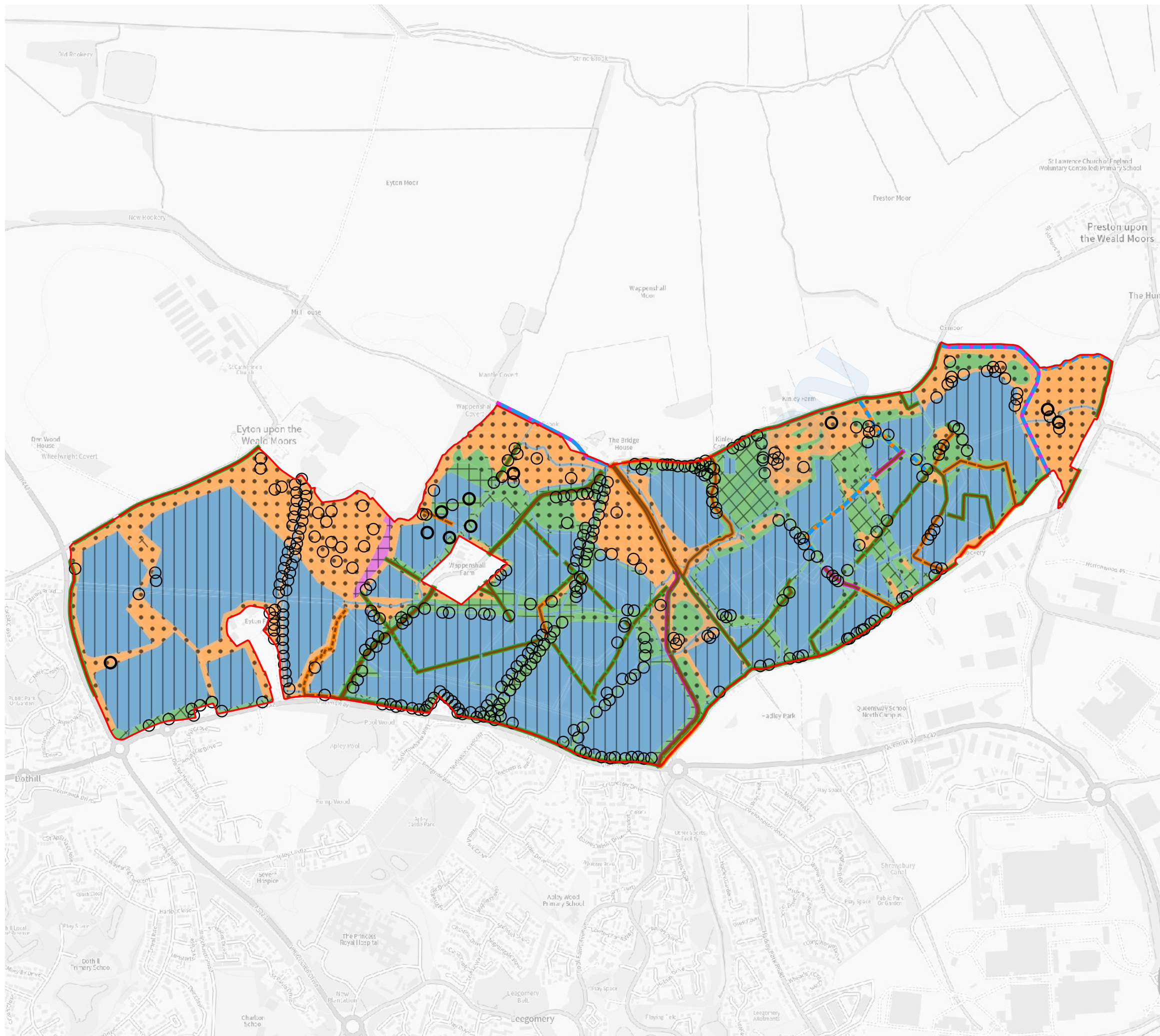
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PROPOSED HABITAT PLAN - EAST
 number

scale
 1:7,500 @ A3

rev
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FIGURE 4b

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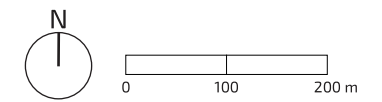
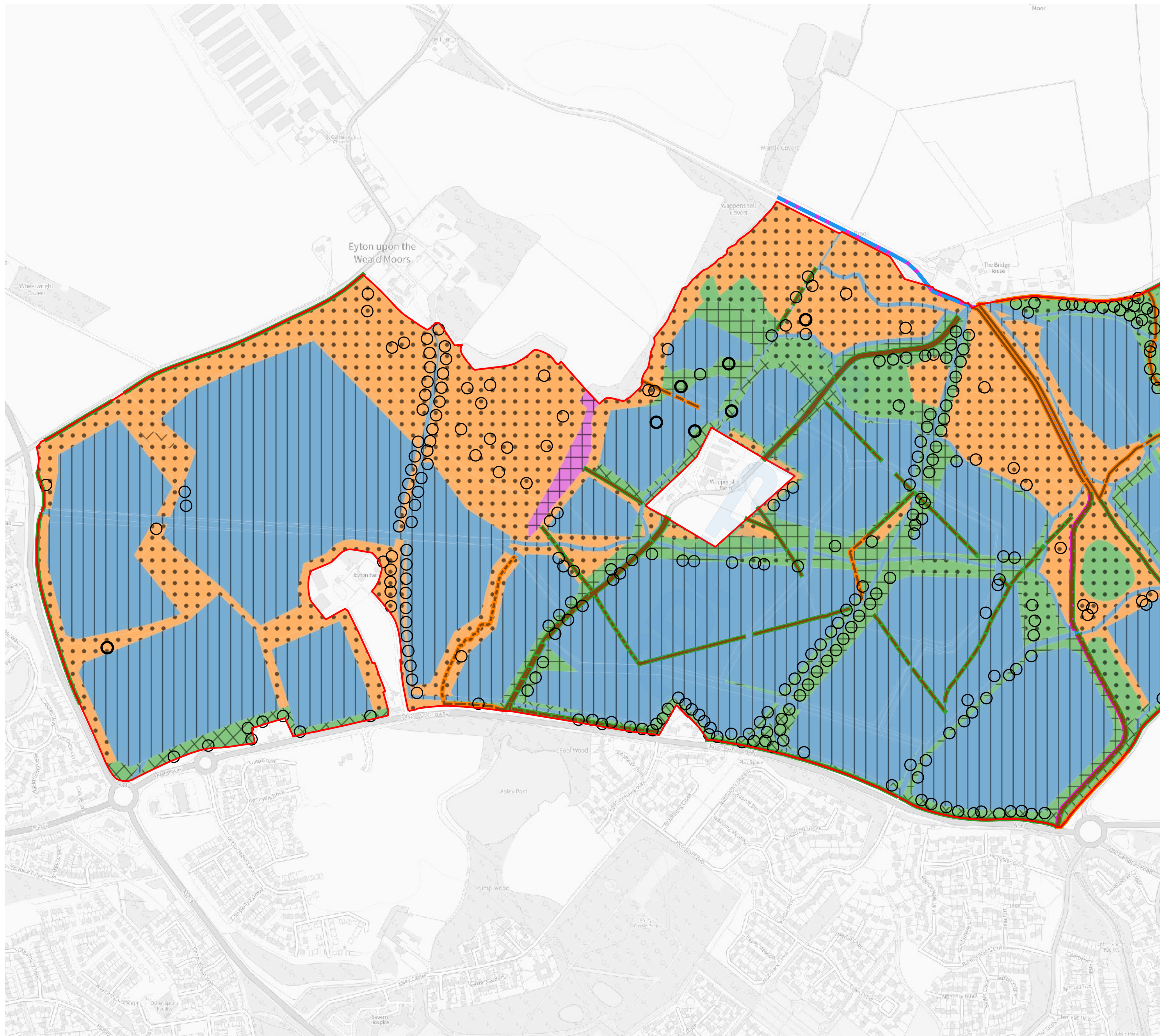
- Site Boundary
- Proposed Habitat Condition**
- Good
- Moderate
- Poor
- N/A - Other
- Condition Assessment N/A
- Proposed Habitat Distinctiveness**
- High
- Medium
- Low
- V.Low
- Proposed Hedgerow Condition**
- Good
- Moderate
- Poor
- Proposed Hedgerow Distinctiveness**
- High
- Medium
- Low
- Proposed Tree Condition**
- Moderate
- Good
- Proposed Watercourse Condition**
- Moderate
- Poor
- Proposed Watercourse Distinctiveness**
- High
- Medium

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 project **Wappenshall, Telford**

title **PROPOSED HABITAT CONDITION & DISTINCTIVENESS - OVERVIEW** scale 1:13,000 @ A3

number **FIGURE 5** rev -

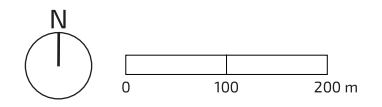
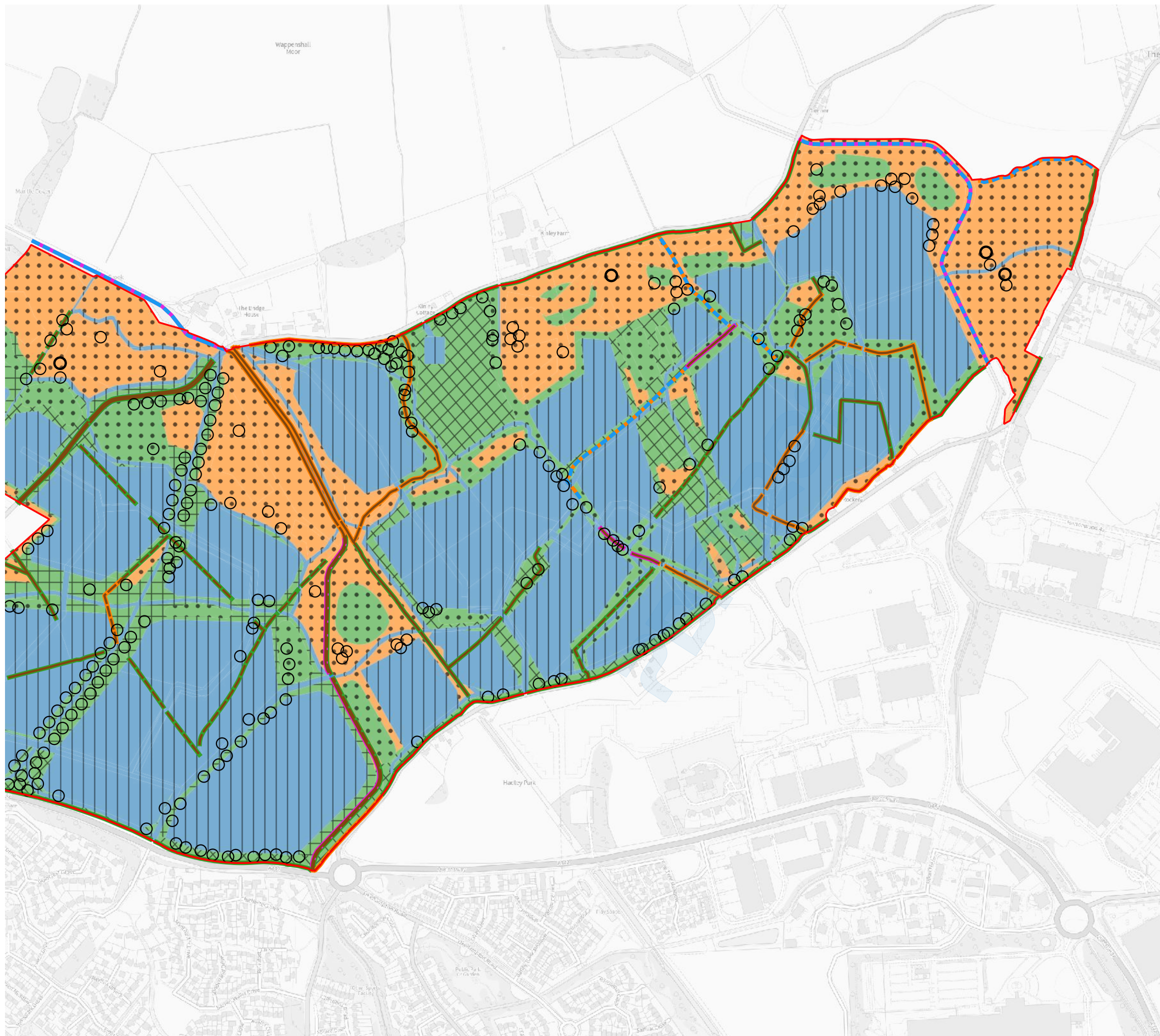


- Site Boundary
- Proposed Habitat Condition
 - Good
 - Moderate
 - Poor
 - N/A - Other
 - Condition Assessment N/A
- Proposed Habitat Distinctiveness
 - High
 - Medium
 - Low
 - V.Low
- Proposed Hedgerow Condition
 - Good
 - Moderate
 - Poor
- Proposed Hedgerow Distinctiveness
 - High
 - Medium
 - Low
- Proposed Tree Condition
 - Moderate
 - Good
- Proposed Watercourse Condition
 - Moderate
 - Poor
- Proposed Watercourse Distinctiveness
 - High
 - Medium

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 project **Wappenshall, Telford**

title **PROPOSED HABITAT CONDITION & DISTINCTIVENESS - WEST** scale 1:7,500 @ A3
 number **FIGURE 5a** rev -



- Site Boundary
- Proposed Habitat Condition
 - Good
 - Moderate
 - Poor
 - N/A - Other
 - Condition Assessment N/A
- Proposed Habitat Distinctiveness
 - Medium
 - Low
 - V.Low
- Proposed Hedgerow Condition
 - Good
 - Moderate
- Proposed Hedgerow Distinctiveness
 - High
 - Medium
 - Low
- Proposed Tree Condition
 - Moderate
 - Good
- Proposed Watercourse Condition
 - Moderate
 - Poor
- Proposed Watercourse Distinctiveness
 - High
 - Medium

date 26/09/24 drwn/chkd LG / CH

client **The Consortium**
 project **Wappenshall, Telford**

title **PROPOSED HABITAT CONDITION & DISTINCTIVENESS - EAST** scale 1:7,500 @ A3
 number **FIGURE 5b** rev -

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10563 Wappenshall, Telford

Technical Note 10 Rv2: Flood Risk and Modelling Review

30th September 2024

Document Status

Revision	Issue Status	Prepared / Date	Checked / Date	Approved / Date
0	Draft	J. Banks 30.08.24	S. Haggett 30.08.24	R. Boyle 30.08.24
1	Draft	K. Miller 17.09.24	S. Haggett 17.09.24	R. Boyle 17.09.24
2	Draft	K. Miller 30.09.24	R. Boyle 30.09.24	R. Boyle 30.09.24

1 Introduction

- 1.1** This Technical Note (TN) has been prepared on behalf of the Wappenshall Consortium to provide a review of flood risk and drainage at Wappenshall, Telford.
- 1.2** The findings of this note are provided to support the promotion of the site through the Local Plan process which is being led by Telford and Wrekin Council.
- 1.3** This TN summarises the findings of the study and specifically addresses the following issues in the context of the current legislative regime:
 - Assessment of Flood Risk
 - Indicative modelling results
 - Flood Mitigation Opportunities
 - Storm Drainage
 - Foul Drainage
- 1.4** This assessment has been undertaken in consultation with the relevant authorities, and with reference to data, documents and guidance published by the Environment Agency (EA), the Lead Local Flood Authority (LLFA) (Telford and Wrekin Council), the Local Planning Authority (LPA) (Telford and Wrekin Council), the Water Authority (Severn Trent Water), Strine Internal Drainage Board (IDB), and River's and Canal Trust. At the time of writing this Technical Note correspondence has only been received from the EA and IDB.
- 1.5** This findings of this note will support the promotion of this Site through the Local Plan process, being led by Telford and Wrekin Council.

2 Site Context

Site Location

- 2.1 The proposed development Site (hereafter referred to as “the Site”) is located in Wappenshall to the north of Telford. The Site is wholly within the boundary of Telford and Wrekin Council and is outside of the currently defined ‘Built up Area’. The closest postcode for the Site is TF6 6ES, Telford. The approximate centre of the Site is located at 365253E, 314099N or SJ 65253 14099.
- 2.2 The proposed development draft masterplan is provided in **Appendix A**, with the Site bound to the south by the A442 (Queensway), to the southeast and east by Moor Head Road, and to the north and west by agricultural fields.

Current Land Use

- 2.3 According to aerial photography, the Site has historically existed as agricultural fields and not been subject to any significant built development.

Development Proposals

- 2.4 The proposed development at the Site will aim to deliver circa 3,160 dwellings, comprising of mixed type and tenure, along with employment areas, neighbourhood centre, and community uses, 2no. 2FE primary schools and comprehensive green infrastructure, including dedicated areas for Biodiversity Net Gain (BNG). This is illustrated in the indicative masterplan attached in **Appendix A**.

Existing Drainage Network

- 2.5 A Site visit was undertaken on 10th July 2024 to confirm the existing drainage network across the Site.
- 2.6 There are two main watercourses; the Hurley Brook which flows north through the approximate centre of the Site and Crow Brook that flows in a generally northerly direction through the eastern section of the Site.
- 2.7 In addition to the above watercourses, a network of drainage ditches operates along the field boundaries connecting the Site to the two watercourses. Although these drainage features exist, they have not been illustrated on **Figure 2-2**. There appears to be a flow path within the Brookbanks preliminary model, this has been referenced within **Figure 2-2** and given Ordinary Watercourse number 1.
- 2.8 Running through the north of the Site towards Wappenshall Junction is a historic section of the Shrewsbury & Newport Canal. Although this stretch of canal was closed in 1944, it remains a valued piece of local heritage that has the opportunity to be restored as part of the development.
- 2.9 In 1975, Telford Development Corporation as agents of the Severn Trent Water Authority, constructed the Northern Interceptor Drain (NID), from Britton Lock to the River Tern via Wappenshall Junction to relieve the flood risk on Telford and the Wealds Moors.

- 2.10 The NID took over the historic section of Shropshire Union Canal, through Telford before connecting into the Hurley Brook approximately 400m into the Site. At this location the Hurley Brook has been enlarged in order to accommodate the additional flows from the NID.
- 2.11 The drainage features identified are illustrated on **Figure 2-2**, unless stated otherwise.

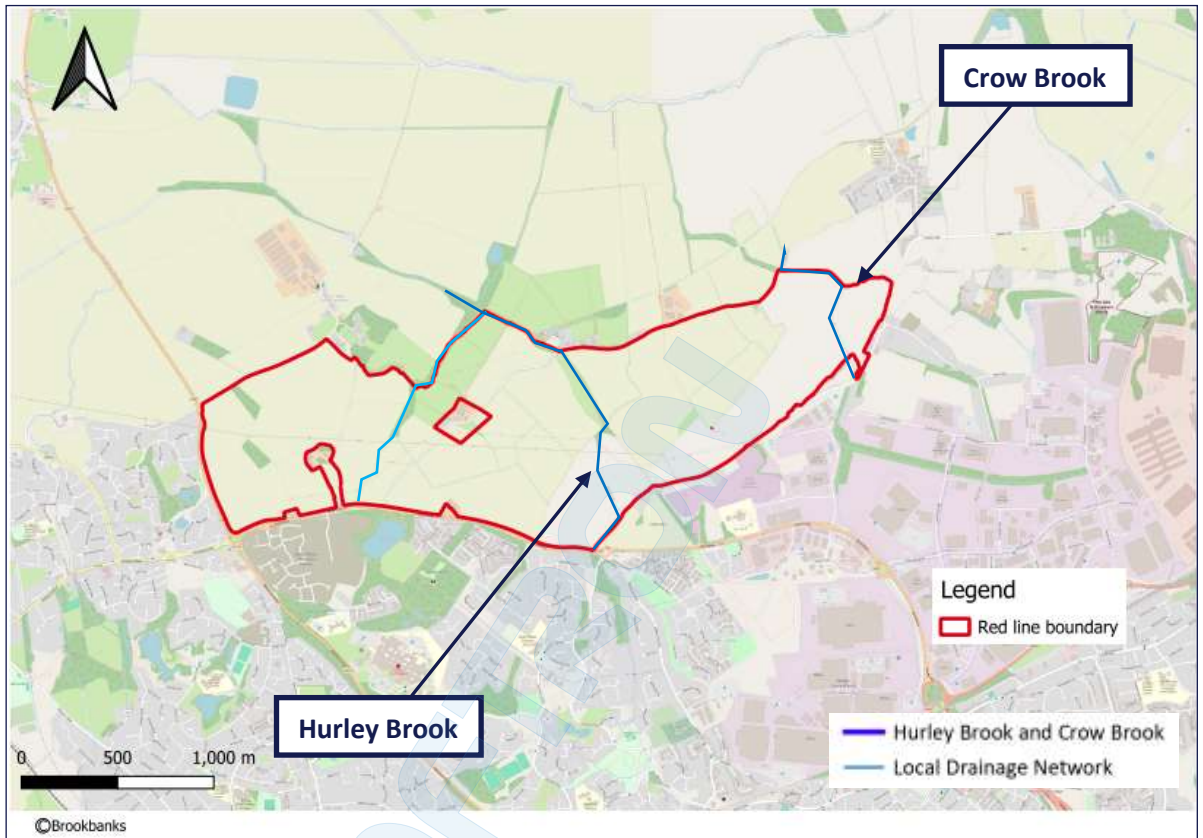


Figure 2-1: Existing Drainage Network

3 Policy Overview

National Policy

- 3.1 Chapter 14 of the **National Planning Policy Framework** (2023), reviews how new development should plan around flood risk and future climate change. Paragraph 167 states that:

“All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property.”

- 3.2 The **National Planning Practice Guidance** (2022) categorises flood zones in three principal levels of risk, as outlined in **Table 3-1**.

Flood Zone	Annual Probability of Flooding
Zone 1: Low probability	< 0.1 %
Zone 2: Medium probability	0.1 – 1.0 %
Zone 3a / 3b: High probability	> 1.0 %

Table 3-1: NPPG Flood Risk Parameters

Local Plan

3.3 Telford and Wrekin Council adopted their Local Plan in January 2018 and will be applied until 2031. The following policies, quoting only relevant aspects, relate directly to surface water flood risk and drainage.

Policy ER 10: Water conservation and efficiency

The Council will encourage major development to incorporate design features, commensurate with the scale and type of development, that will support recycling / re-use of water to help offset demand for potable water supplies.

Policy ER 11: Sewerage systems and water quality

The capacity and resilience of local sewerage infrastructure is critical to the sustainability of new development. In order to avoid adverse impacts of additional demand on the existing foul sewerage network, the Council requires development to demonstrate:

- i. That sewerage and surface water will drain separately;*
- iv. That development follow the hierarchy (order of preference for foul drainage connection) as set out in the National Planning Policy Guidance. The Council requires non mains drainage proposals to assess the potential impacts upon water quality to ensure no detrimental impact on the water environment; and*
- v. That any drainage system is designed and constructed so surface water discharged does not adversely impact the water quality of receiving water bodies, covered by the Water Framework Directive, both during construction and when operational. Proposals resulting in unacceptable risk to the quality of a water body will not be supported.*

Policy ER 12: Flood Risk Management

Effective on-Site management of surface water can improve water quality, water conservation, the replenishment of ground water supplies and reduce instances of flooding. The Council will require, where applicable, development to:

- i. Ensure development proposals are located in accordance with the Sequential Test and Exception Test (where appropriate) and also have regard to both the Strategic Flood Risk Assessment update and Local Flood Risk Management Strategy (LFRM) where appropriate;*
- ii. Provide detailed schemes for on-Site management of surface water run off which are designed to the greenfield/previously developed land run off rates as set out in the current 'Local Flood Risk Management Plan; iii. Demonstrate that all new development, where flooding has been identified, reduce flood risk through the inclusion of appropriate flood storage compensation measures and seeks opportunities for flood risk reduction measures to enhance the local flood risk regime;*

- iii. *Ensure that all Sustainable Drainage Systems serving residential developments are designed to provide an additional modelling allowance dependent on the housing density to cater for future development;*
- iv. *Demonstrate that where Sustainable Drainage systems have been provided that there is a management and maintenance plan in place for the lifetime of the development which shall include arrangements, including financial, for adoption by any public authority or statutory undertaker;*
- v. *Include appropriate Sustainable Drainage Systems to manage surface water appropriate to the hydrological setting of the Site. Development should not result in an increase in runoff and should aim to achieve a reduction in the existing runoff rate and volumes, where possible;*
- vi. *Ensure that development is designed to be safe taking into account the lifetime of the development, and the need to adapt to climate change by setting appropriate floor levels, providing safe pedestrian and vehicular access, where appropriate, implementing a flood evacuation management plans;*
- vii. *Demonstrate no loss of open watercourse with culverts being opened up where possible to improve drainage and flood flows. Proposals involving the creation of new culverts (unless essential to the provision of access) will not be permitted; and*
- viii. *Demonstrate proposals should help to conserve and enhance watercourses and riverside habitats, where necessary through management and mitigation measures for the improvement and/or enhancement of water quality and habitat of the aquatic environment.*
- ix. *Refer to Table 1 and 2 of the Government's Climate Change Allowances guidance and contact the Environment Agency for any detailed river catchment climate change data.*

Other Local Policies

- 3.4** Halcrow Group Limited have produced Strategic Flood Risk Assessments (SFRA) on behalf of Telford and Wrekin Council. Telford and Wrekin Council SFRA Level 1 (2007) and SFRA Level 2 (2008).
- 3.5** The SFRA level 1 states that *“This report provides general guidance and an overview of assumptions, uncertainties, approach, tasks undertaken and understanding of flood risk within the Borough. It provides the information required for the application of the Sequential Test of PPS 25. The LPA should apply the Sequential Test to demonstrate that there are no reasonably available Sites in areas with less risk of flooding that would be appropriate to the type of development or land use proposed,”* (Halcrow Group Ltd, 2007).
- 3.6** The SFRA Level 2 *Comprises two-dimensional (2D) hydraulic modelling of 6 watercourses in the Borough including ... Hurley Brook... Crow Brook... to produce refines Flood Zone information for Flood Zones 2 (1 in 100 year), 3a (1 in 100 year) 3a plus climate change (1 in 100 +20%) and 3b (1 in 20 year).*
- 3.7** The study refines and builds upon the work undertaken during the Level 1 SFRA which identified that the resolution of existing Flood Zone data through the Borough is relatively coarse. This study therefore focuses on existing flood hazard and improving the Flood Zone information in order to better inform the Sequential Test and Site selection process, which the Council will undertake as part of its Local Development Framework (LDF).
- 3.8** Relevant policies for the management of flood risk and appropriate development in these areas are then put forward. The Environment Agency has been consulted throughout the study to ensure that the approach is robust and meets best practice (Halcrow Group Ltd, 2008).

3.9 A Local Flood Risk Management Strategy for Telford and Wrekin Council has been produced and will be reviewed as part of planning application process.

4 Baseline Conditions

Site Topography

- 4.1 At the time of writing this Technical Note a site specific topographic survey has not been conducted. A topographic survey is being undertaken week commencing 02/09/2024.
- 4.2 A review of the topography has been undertaken using available LiDAR data. This shows that the Site is characterised by moderate gradients which fall in a general north direction. Available data shows levels fall from a high point of circa 72mAOD along the southern boundary of the Site within the vicinity of the A442, to a low point of circa 57mAOD along the northern boundary (**Figure 4-1**). Other local variations in Site levels do occur and it should be noted that the western section of the Site is shown to fall to the northwest and away from the general trend of the rest of the Site. The east of the Site also falls to the northwest and also away from the general trend of the Site.

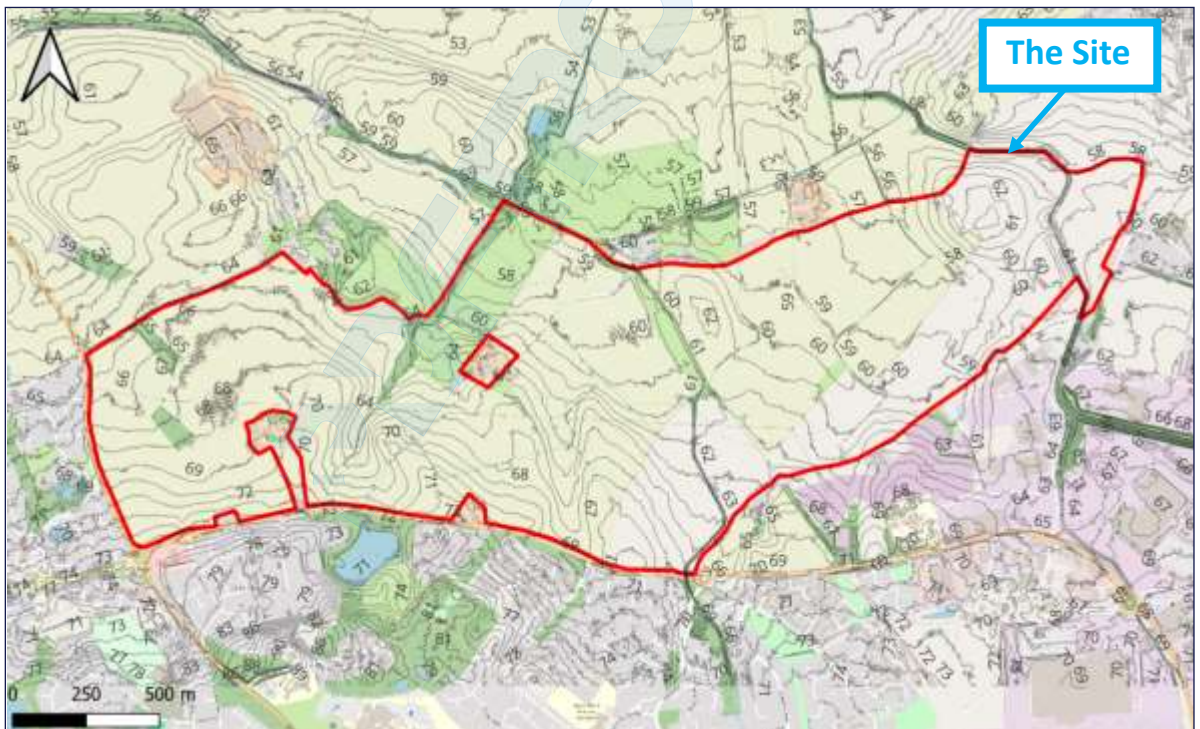


Figure 4-1: 1m Site Contours

Geology and Hydrogeology

- 4.3 With reference to the British Geological Survey map, the majority of the Site is shown to be underlain by sandstone bedrock geology belonging to the Bridgnorth Sandstone Formation, with an area of mudstone, siltstone and sandstone belong to the Halesowen Formation in the centre of the Site (**Figure 4-2**).

4.4 There are superficial deposits of Glaciofluvial Deposits, Devensian – (sand and gravel) and Glaciolacustrine Deposits, Devensian (clay and silt) across the Site (**Figure 4-3**).

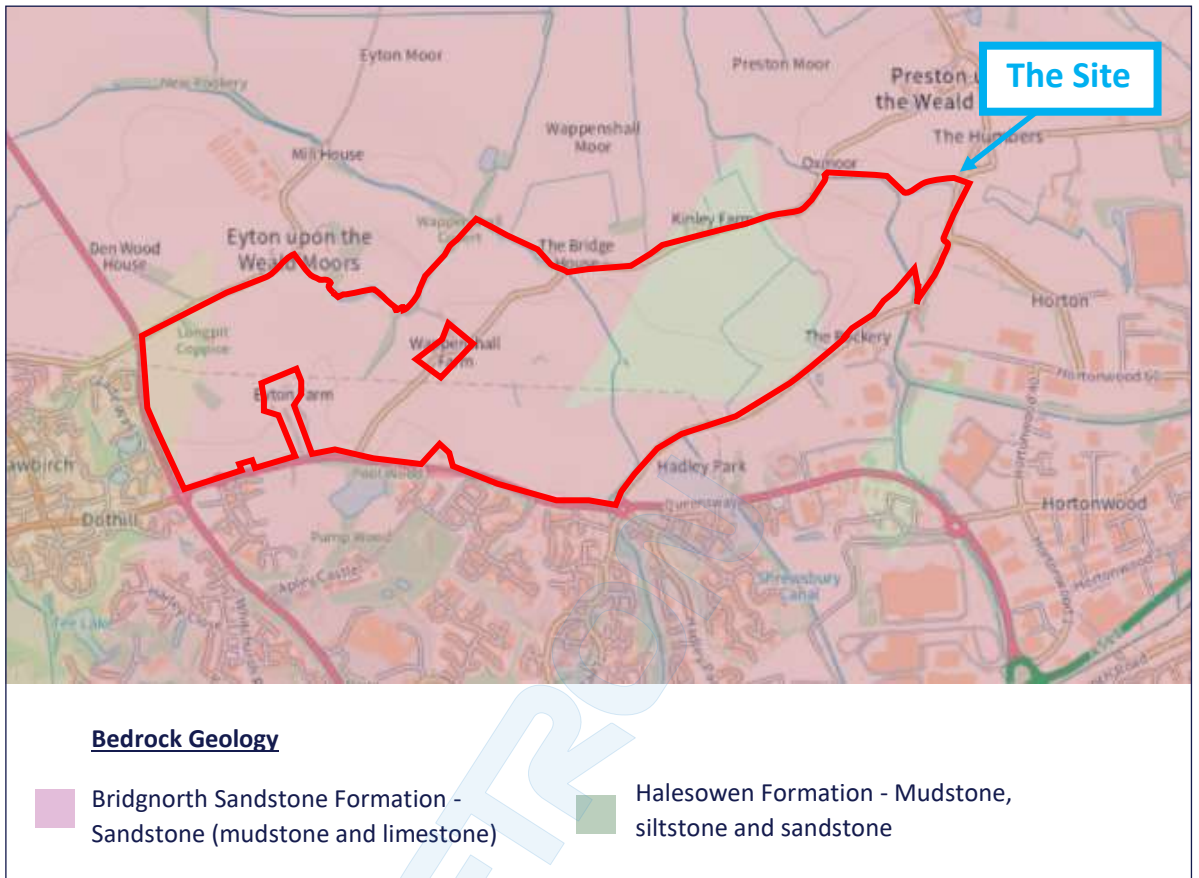


Figure 4-2: Bedrock Geology

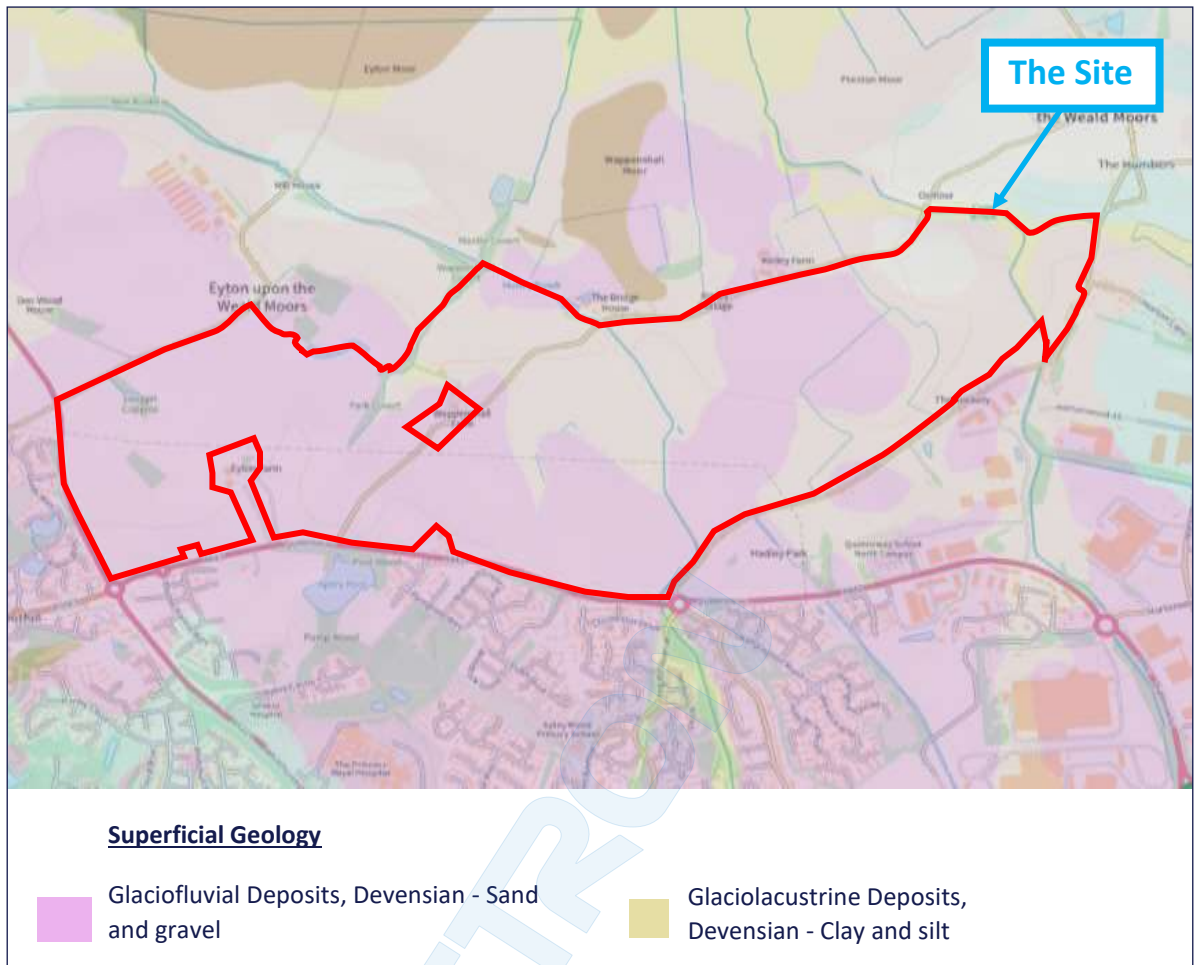


Figure 4-3: Superficial Deposits

- 4.5 The underlying bedrock geology forms a principal and a secondary A aquifer across the whole Site and the superficial deposits form a secondary A aquifer.
- 4.6 The underlying aquifers means that the Site is situated within an unproductive too low to medium-high risk in terms of groundwater vulnerability.

5 Assessment of Flood Risk

- 5.1 Having completed a Site hydrological desk study, the possible flooding mechanisms at the Site are identified and presented in **Table 5-1**.
- 5.2 Where potential risks are identified in **Table 5-1**, detailed assessments have been completed. Further background is also outlined below.

Mechanisms	Potential	Comment
Coastal & Tidal	N	No tidal watercourses lie within an influencing distance of the proposed development owing to location and elevation.
Fluvial	Y	Land adjacent to the Hurley Brook is shown as being at an increased risk and located within Flood Zones 2 and 3. Land adjacent to Crow Brook is shown as being at an increased risk and located within Flood Zones 2 and 3.
Overland Flow (Pluvial)	Y	There is low to high risk from overland flow within the low-lying areas within the Site. These are closely aligned with the fluvial outlines
Groundwater	N	The SFRA does not identify any risk of groundwater flooding nor does the underlying geology indicate any significant risk
Sewers	N	The SFRA does not identify any risk of sewer flooding.
Reservoirs, Canals etc	Y	EA mapping shows the Site to be affected by artificial flooding in the event of a breach/failure of the upstream reservoirs.

Table 5-1: Flood Mechanisms

Coastal Flooding

- 5.3** The Site lies approximately 90km away from the nearest tidal watercourse and the coast, and a minimum of 57m above sea level. As such the risk from this source is considered as being negligible.

Fluvial Flooding

- 5.4** The EA map illustrated as **Figure 5-1**, shows that the majority of the Site lies within Flood Zone 1; land having a less than a 1 in 1,000 year annual probability of river flooding. Therefore, the majority of the Site has a low risk of river flooding.
- 5.5** Flood Zones 2 and 3 are associated with the river corridors of Hurley Brook which flows in a northerly direction through the centre of the Site as well as Crow Brook, also flowing in a northerly direction, which is located in the east of the Site and along the north eastern corner of the Site.
- 5.6** Flood Zone 2 is assessed as land having between a 1 in 100 year annual probability of river flooding and 1 in 1,000 year annual probability of river flooding. Whereas as Flood Zone 3 is land assessed as having a 1 in 100 year or greater annual probability of river flooding.
- 5.7** Historically the Hurley Brook was partially diverted by the Telford Development Corporation to accommodate the aforementioned Telford Northern Storm Interceptor. The route of the drainage channel runs through the development land largely along the alignment of the old Trench arm of the Shrewsbury and Newport Canal system. A new filter drain was installed along the old route of the Hurley Brook to drain flood waters and respect the historic channel route.

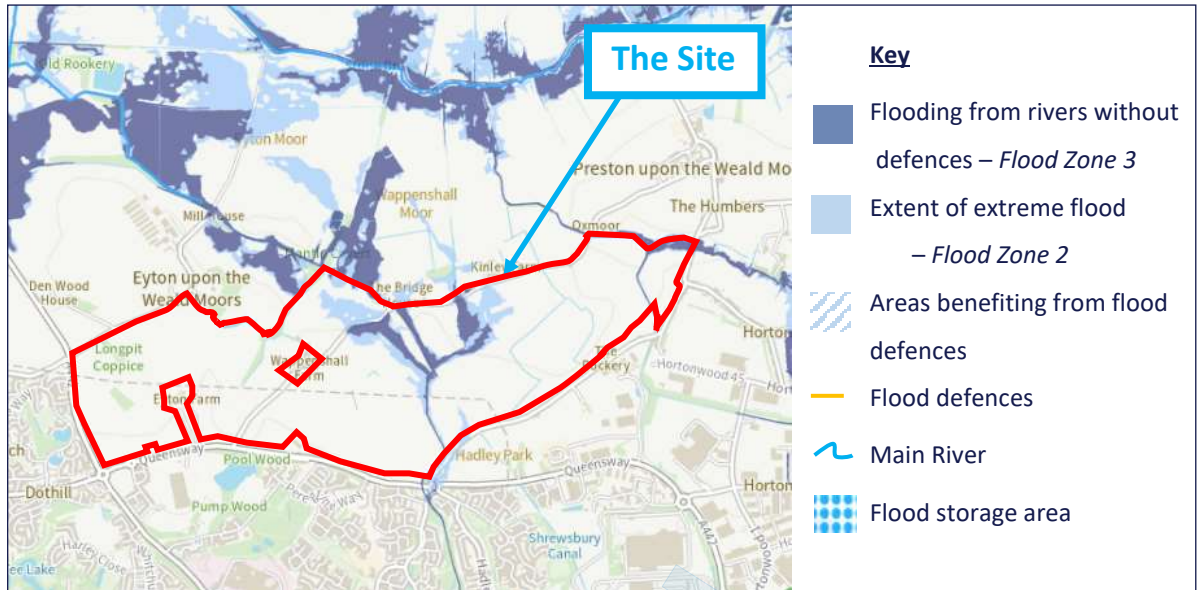


Figure 5-1: EA Flood Zone Plan showing 1 in 100 & 1 in 1,000 year floodplains (Gov.Uk website)

- 5.8 As part of this assessment a Product 4 data request has been made to the Environment Agency and they have confirmed that the currently flood zone mapping is based on JFLOW data. This is known as coarse mapping on a strategic scale with the EA themselves providing a disclaimer that states it is not suitable for Site specific assessments.
- 5.9 Brookbanks has therefore conducted preliminary modelling to enhance the JFLOW model results received from the Environment Agency and improve flood zoning, accurately determining the flood extents and zones within the Site boundary.

Brookbanks Modelling

- 5.10 This section will compare the current EA flood map for planning to the results from the Brookbanks model for the baseline flood risk and later compare the results from the baseline flood risk to the future developed Site flood risk.
- 5.11 Due to some outstanding Site-specific topographic details, certain assumptions have been made within the model. The current preliminary model has been developed using the best available data and information at the time; however, these assumptions will change between the 1D-2D linked model, which will affect the results. The preliminary baseline model produced is limited to 2D extent and does not take into consideration hydraulic structures and other structures that may be in the watercourse. Once all necessary information is received, a more detailed model will be created to assess the Site’s flood risk, inform Site design, and demonstrate a sequential approach to development. Therefore, the preliminary 2D model undertaken by Brookbanks serves as the most likely flood extent and the most up-to-date results, founding the basis for informing Site design. The model does not consider structures within the channel and until a detailed model is produced, the preliminary baseline model is illustrative.

5.12 Figure 5-2 shows the results from the Brookbanks preliminary fluvial modelling of the Site. The model displays the 1 in 100 year fluvial flood event plus 44% allowance for climate change. The model shows that the fluvial flood extents are located to the south of Hurley Brook. Flood extents on the Site are likely to have flood depths between 0-50mm within the south of the Site and within the centre of the Site have flood depths between 100-600mm deep. There are areas of flood depths up to 1,200mm located near the northern boundary of the Site where Hurley Brook exists the Site.

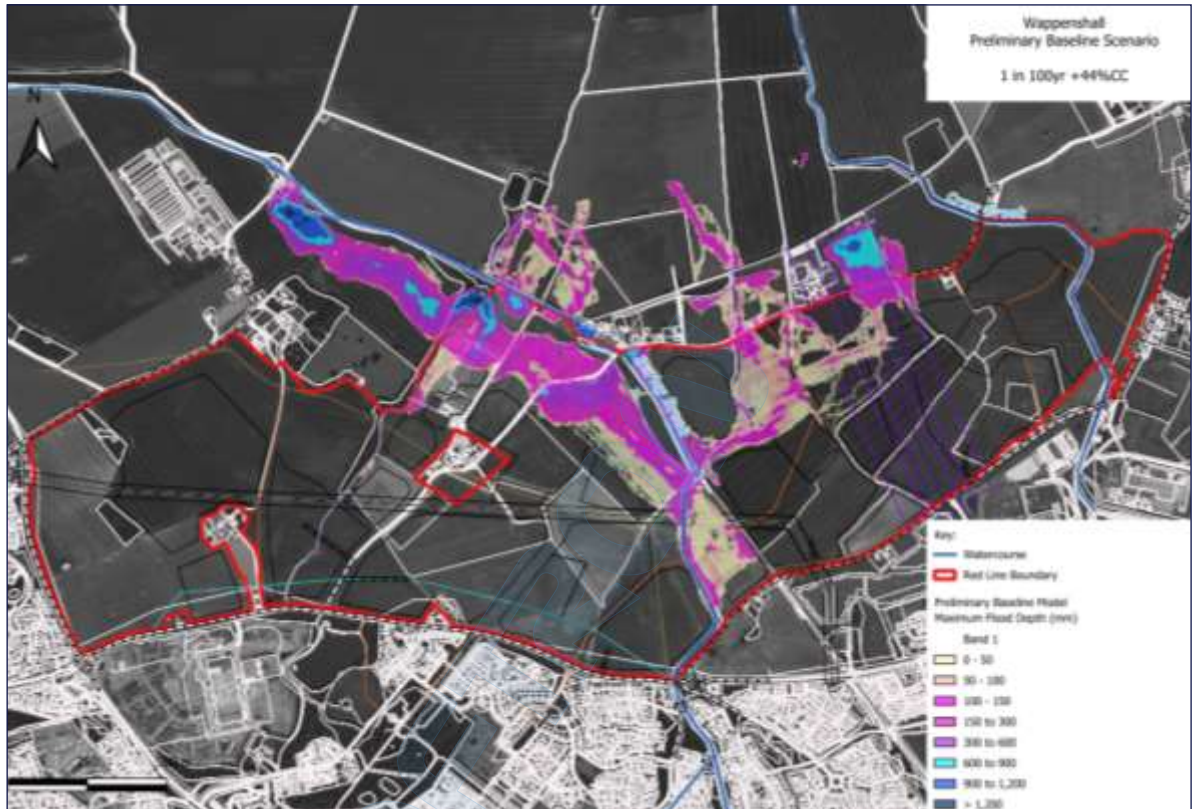


Figure 5-2: Brookbanks Preliminary Baseline 1 in 100 year flood + 44% climate Change Scenario

- 5.13** Within the centre of the Site, the Hurley Brook appears to burst and overtop its northern bank. Flood water from this point flows in a general northeast direction across the Site and experiences flood depths between 0-150mm.
- 5.14** There is an ordinary watercourse that originates from Queensway (A442) within the vicinity of the junction for Wrekin Concrete products. This ordinary watercourse flows in a northeasterly direction through the Site (as seen in **Figure 2-2** Ordinary Watercourse number 1) and forms a section of the northern boundary of the Site before discharging into Hurley Brook.
- 5.15** As this is a preliminary model, the Crow Brook that flows through the east of the Site has not been assessed within the model. The model is subject to change based on receiving Site-specific topographic information. This model should be used for illustrative purposes to aid Site design and development until a more detailed model is created.
- 5.16** The current preliminary model has been developed using the best available data and information at the time; however, these assumptions will change between the 1D-2D linked model, which will affect the results. This preliminary model used a high-resolution Digital Terrain Model (DTM) to approximate flood routes and in some cases identified flow routes that the EA flood map for planning overlooked.

- 5.17 **Figure 5-3** compares the EA flood map for planning Flood Zone 2 (Flood Zone 2 land assessed as having between a 1 in 100 year and 1 in 1,000 year annual probability of river flooding), against Brookbanks baseline 1 in 100 year flood event plus 44% climate change allowance.
- 5.18 The green hashed area shows the EA flood map for planning Flood Zone 2. The blue hashed area shows the Brookbanks 1 in 100 year flood plus 44% climate change allowance flood event.

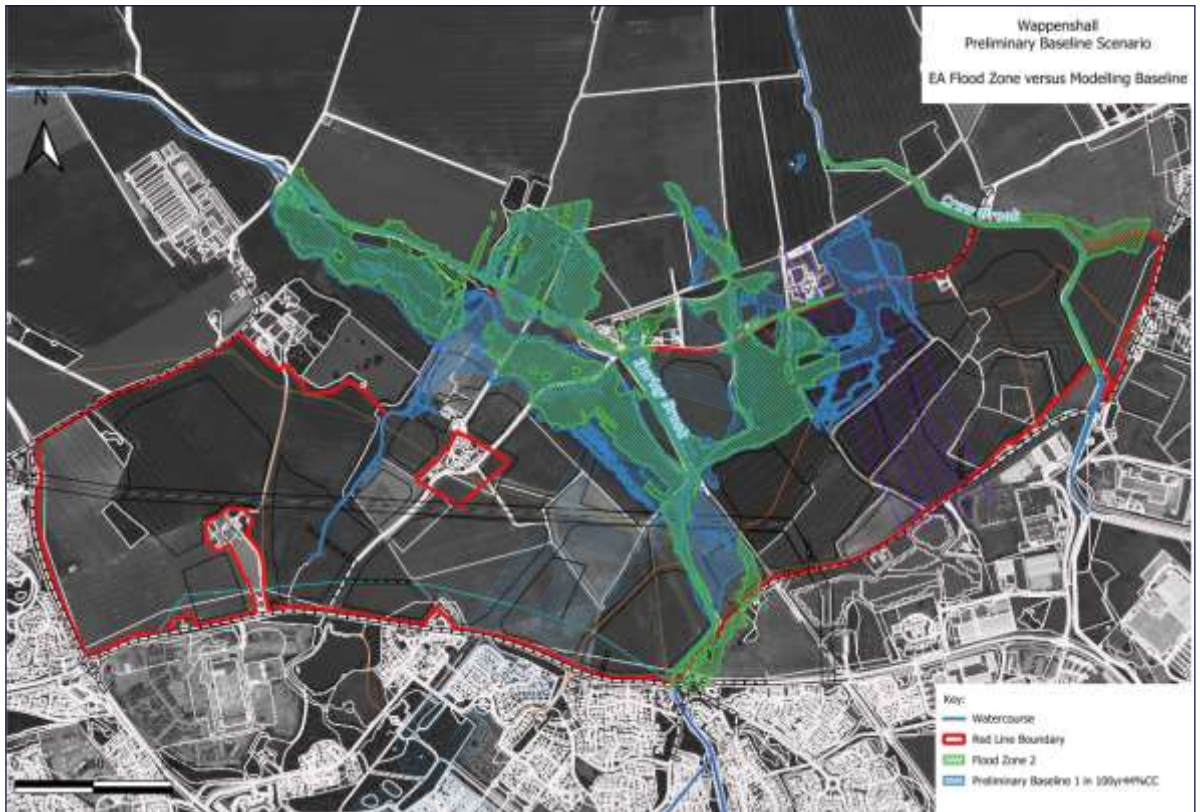


Figure 5-3: EA Flood Map for Planning vs Brookbanks Baseline 1 in 100 year flood + 44% climate Change Scenario

- 5.19 **Figure 5-3** shows that both models differ. Within the south of the Site where Hurley Brook enters the Site, the EA model shows flood flows burst their bank; however, the preliminary baseline model shows that the flood event is constrained within the channel. Further north the preliminary baseline model shows larger flood extents than the EA model does.
- 5.20 Near the centre of the Site, both models show that flood flows exceed the northern bank capacity and flow north across the Site although the Brookbanks preliminary model shows that flood flows proceed further across the Site in a northeasterly direction than the EA model shows.
- 5.21 Towards the north of the Site both the EA model and Brookbanks preliminary model show similar flood extents other than the EA model did not identify the Ordinary Watercourse originating from Queensway (A442) that flows in a northeast direction and discharges into Hurley Brook. The Ordinary Watercourse contributes to the flood extents near the northern boundary of the Site that otherwise has not been identified within the EA flood map for planning. This is likely due to the preliminary 2D model using a higher resolution DTM, which modelled the Ordinary Watercourse converging with Hurley Brook. In contrast, the EA's model did not include this convergence. This will be reviewed once site topographic information is received, and a detail model undertaken.

5.22 In summary of fluvial flood risk the Brookbanks preliminary modelling identifies the majority of the Site to be located within Flood Zone 1 and therefore very low flood risk. However, there are areas of Flood Zones 2 and 3 associated with Hurley Brook through the centre of the Site.

Historic Flooding

5.23 The EA have kept fluvial flood extent records since 1946, any events previous to that are not likely to have been recorded. In accordance with **Figure 5-4** the Site has not experienced any fluvial flooding in the past 77 years.

5.24 No record has been made of other sources of flooding either within the EA data or within the local authority Strategic Flood Risk Assessment.



Figure 5-4: EA Historic Fluvial Flood Mapping

Overland Flow

5.25 Overflow flow mechanisms result from the inability of unpaved ground to infiltrate rainfall or due to inadequacies of drainage systems in paved areas to accommodate flow directed to gullies, drainage downpipes or similar. In minor cases, local ponding may occur. In more extreme events, flows accumulate and may be conveyed across land following the topography.

5.26 The mapping on **Figure 5-5** illustrates areas of low to high risk from surface water flooding. The majority of the Site is shown to have a very low risk of surface water flooding. However, there is a central strip of medium to high flood risk located around the Hurley Brook.

5.27 The flooding extents shown on **Figure 5-5**, correspond to the location of the fluvial flood zones shown in **Figure 5-1**, which suggest that the risk of overland flow relates primarily to the topography of the Site.



Figure 5-5: EA Long Term Flood Risk Maps – Flood risk from Surface Water (Gov.Uk website)

Groundwater

5.28 Telford and Wrekin Councils Level 1 SFRA does not show any record of groundwater flooding on the proposed Site. However, SFRA assessments focus their assessments on entire districts and boroughs rather than individual Sites and it is recommended that groundwater monitoring across the Site is undertaken in the winter months at the outline planning stage, so any appropriate mitigation can be incorporated into the design proposals.

5.29 Due to the predominant Sandstone geology across the Site, it is considered that whilst seasonally fluctuations may occur it is not considered that groundwater emergence would occur. Equally the existing watercourses would be in hydraulic connectivity with the groundwater levels and therefore the flood mapping provided can be considered as being indicative of the worst case groundwater events. On this, if anything conservative,

assessment, the risk posed from groundwater would only be increased in areas of low lying land adjacent to the Hurley Brook. The remainder, and majority, of the Site is concluded as being at 'low' risk from this source.

Sewerage Systems

- 5.30 Severn Trent Water sewer records have been obtained and shows that there is a 600mm foul sewer running across the middle of the Site in a north to south direction adjacent to Hurley Brook and a second foul sewer flowing adjacent to the A442. There are also two combined sewers: one crossing diagonally through the centre of the Site (1500mm/1650mm) and the second 600mm sewer flowing off the central sewer south towards the A442.
- 5.31 Finally, there are three potable water mains crossing the Site. A 450mm main crossing through the southern part of the Site from and back to the A442 crossing the track to the existing farm buildings, a 4 inch main flowing in southerly direction within the west of the Site and third 100mm main flowing adjacent to Wappenshall Lane.
- 5.32 Telford and Wrekin Councils Level 1 SFRA does not show any record of sewer flooding on the proposed Site.

Artificial Water Bodies - Reservoirs & Canals

- 5.33 The EA Long Term Flood Risk Service provides extent mapping for flooding from reservoirs both when river levels are normal and when there is also flooding from rivers. Mapping identifies the Site lies within the maximum extent of flooding in the event of a catastrophic failure two upstream reservoirs. Given the monitoring and maintenance requirements for such reservoirs under the Reservoirs Act 1975 in England, which requires reservoir owners to regularly inspect and maintain the reservoirs, the risk of such an occurrence is considered to be very low and would be considered a 'residual' risk.
- 5.34 The reservoir flood risk is illustrated in **Figure 5-6**.



Figure 5-6: EA Long Term Flood Risk Maps – Flood risk from Reservoirs (Gov.Uk webSite)

Flooding Constraints

5.35 A combined flood risk map of the Site is provided in **Figure 5-7**.

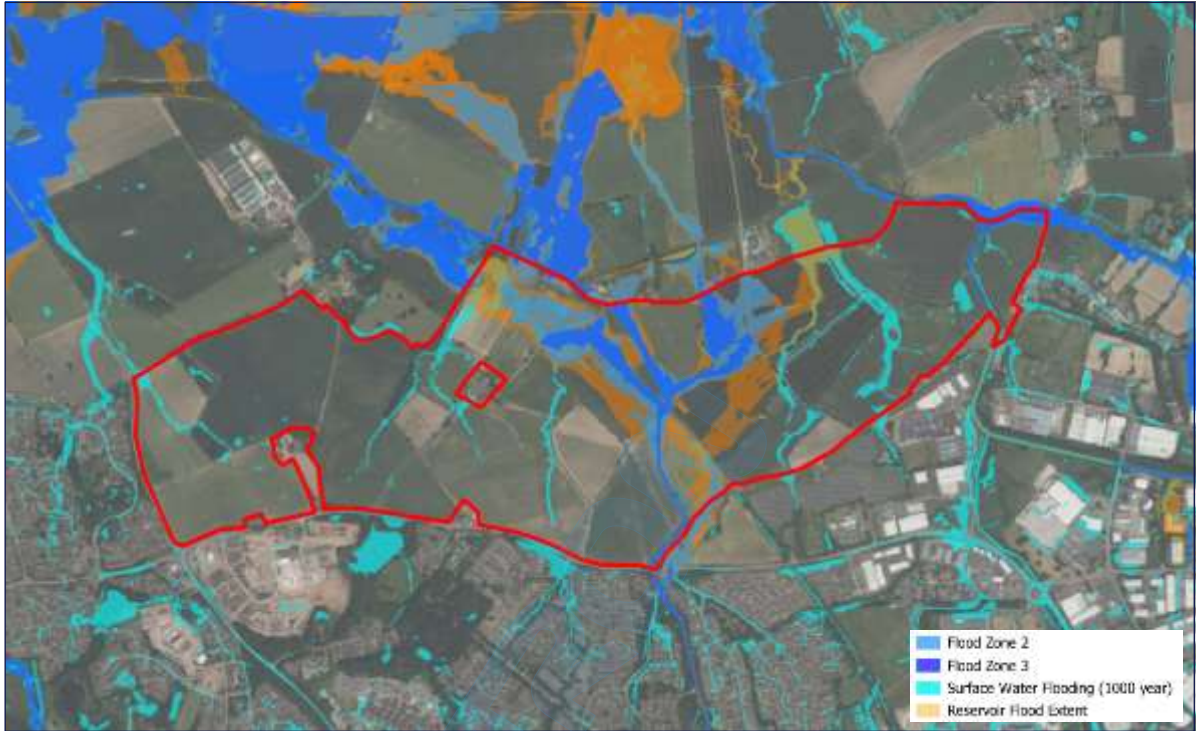


Figure 5-7: EA Identified Flood Risk

5.36 A consultation response was received from the Strine IDB on the 27th August 2024, the emails have been included as **Appendix B**. The IDB state that *“the section south of Wappenshall caused major flooding issues last winter. Water poured across farmland from the area circled in yellow below, blocking the road and flowing on into IDB drainage assets.”* A screenshot of the diagram prepared by the IDB is reproduced as **Figure 5-8**.

5.37 The point at which the IDB locates their historic flooding within **Figure 5-8** corresponds to the point at which flood flows exceed their bank full discharge shown both within the EA model and Brookbanks preliminary modelling.



Figure 5-8: Strine IDB correspondence diagram

5.38 Halcrow Group Ltd have produced two SFRA, Level 1 was completed in 2007, and Level 2 completed in 2008. According to the SFRA level 1 the LLFA do not hold any historic flood records for the Site. The Level 2 SFRA explains that Halcrow Group have modelled Hurley Brook and Crow Brook. The LLFA have been contacted in regard to receiving the model results for Hurley Brook and Crow Brook although a response has not been received at the time of writing this Technical Note.

5.39 The Site is divided into separate Sites within the Level 2 SFRA, the Site is split into parcels numbered 611, 609, 361 (**Figure 5-9**). It is recommended that that areas affected by the Hurley Brook are left as open space.

Site 361 is affected by FZ 3b, 3a and 2 mainly at the central and northern parts of the Site. The Hurley Brook itself runs through the centre of the Site effectively splitting the Site into two halves. On the right bank over 50% of the Site is affected by all Flood Zones with very little difference in the extent of flooding. Parts of the Site appear to be cut off by flooding entirely in particular to the southeastern part of the Site. It is recommended that the right bank part of the Site is not developed. It is also recommended that parts of the Site on the left bank of Hurley Brook affected by FZ are kept as open space again. Parts of the Site located within FZ1 are acceptable for development provided alternative Sites fully in FZ1 are not available, subject to detailed FRA.

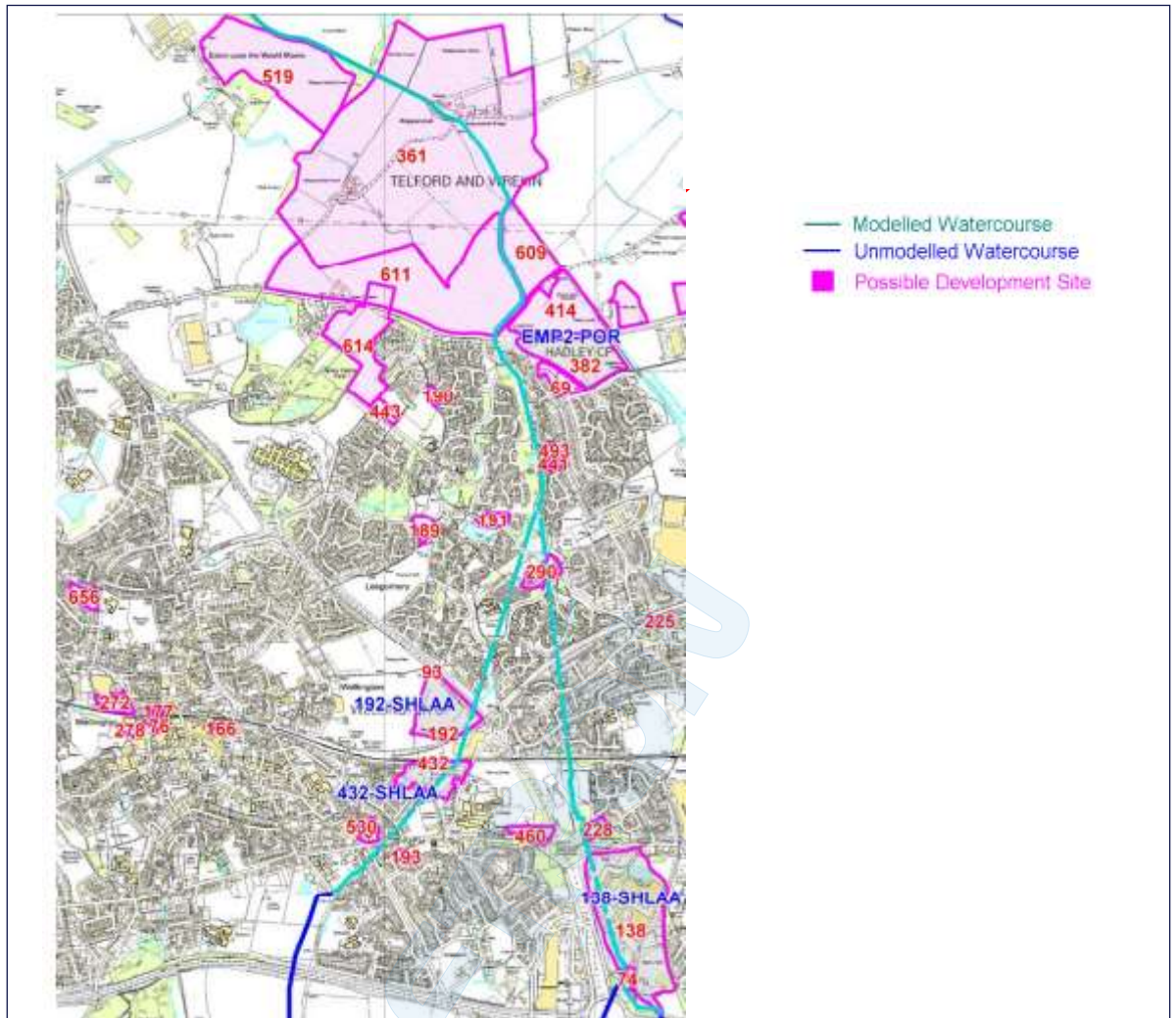


Figure 5-9: Halcrow Group Ltd Telford and Wrekin SFRA Level 2

5.40 At the time of writing this Technical Note, correspondence and Hurley Brook and Crow Brook modelling has not been received from the LLFA.

6 Flood Mitigation Opportunities

Fluvial Flood Risk

- 6.1 Through discussions the EA have confirmed that there is currently no detail modelling available for either the Hurley or Crow Brook with the outlines being taken from JFLOW modelling. Therefore, Brookbanks has conducted a preliminary baseline model for the 1 in 100 year plus 44% climate change scenario.
- 6.2 In accordance with the sequential test, where possible development has strategically been located outside areas at flood risk and therefore demonstrates a sequential approach to design.
- 6.3 When development cannot be located outside of the Flood Zone, the planned urban area is proposed to be elevated. Brookbanks has conducted an additional model to simulate the proposed development, raising the designated areas by 300mm, this has been reproduced as **Figure 6-1**.

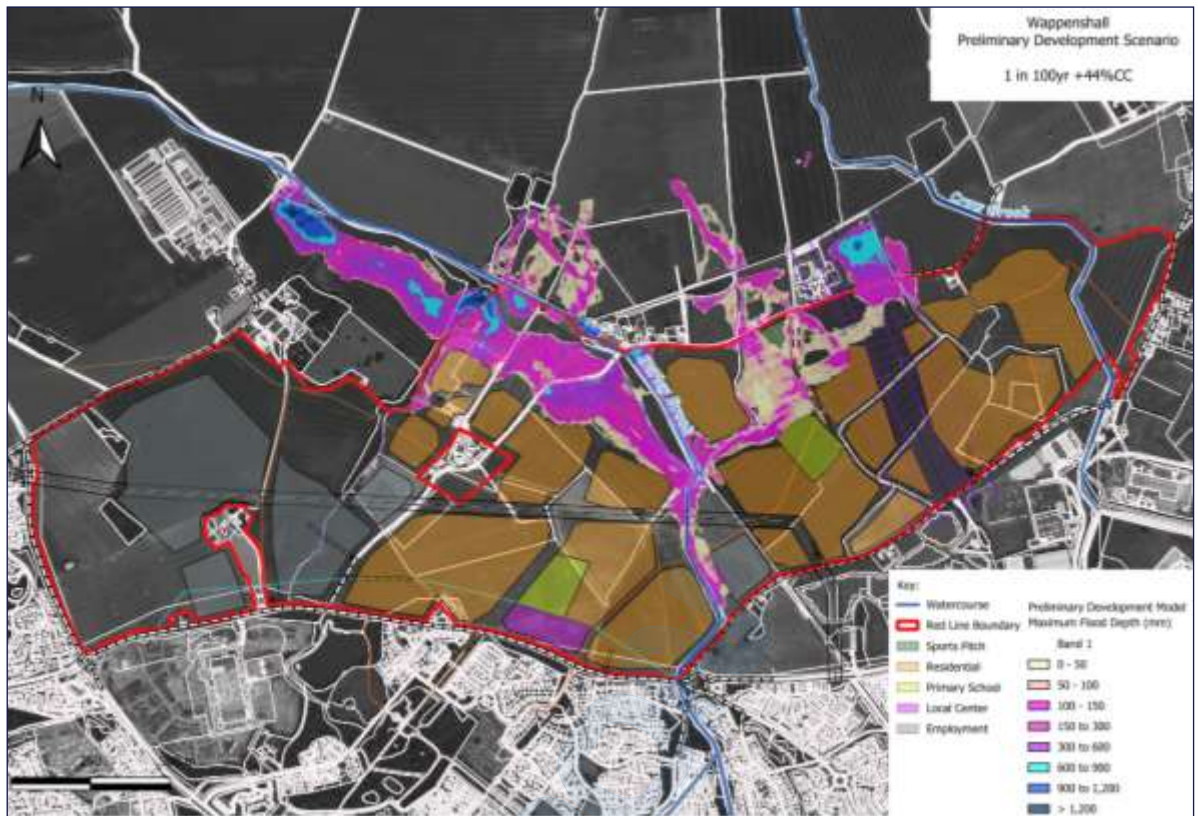


Figure 6-1: Brookbanks 1 in 100 year plus 44% climate change allowance development elevated 300mm

- 6.4 The model demonstrates that through raising the urban areas by 300mm elevates them above the 1 in 100 year plus 44% climate change flood event.
- 6.5 In raising development 300mm, constricts the flood extents in comparison to the baseline model. Therefore, it is essential for the proposed development to incorporate flood compensation areas to not increase flood risk elsewhere.
- 6.6 A detailed model will be constructed once outstanding information is received.
- 6.7 A number of 'in principle' opportunities have been identified that could aid in reducing/managing the existing flood risk through the Site and, where possible, provide a wider sustainable benefit. The in principle options are as follows:
 - Reprofile ground levels within the Site to provide a blue corridor through the Site with a multi-staged channel to provide capacity for flows in all required fluvial events (up to and including 1 in 1000 year event) but also to take the worst case volume in the event of a breach of the upstream reservoirs.
 - Creation of funnel type areas on the southern boundary in order to intercept any potential flows in the event of a failure of the upstream reservoirs. This would aid not only in providing additional volume but would also direct any off site flows into the proposed blue corridor and away from proposed properties.
 - Investigate options of river restoration along the Hurley Brook, opening up any culverts, no longer required in order to provide a natural route through the lowest sections of the Site. Currently it is proposed that this would be in addition to the Interceptor and a standalone feature. However, there would be potential benefits (with respect to functionality, management, and land take to combined both the proposed naturalised channel and interceptor but this would require ongoing discussions with Severn Trent and therefore the proposals would be for separate systems at the point of writing.

- Enhance both the ecological and landscape opportunities above and beyond those through any river restoration, by providing permanently wet or wetland type features that could also provide compensatory floodplain storage.
 - Consider opportunities to provide a drainage connection to the wharf in order to use as an exceedance flow route / additional channel.
 - Formalises of a series of low flow channels within the wider Site to convey flows more efficiently; and,
 - Provide a robust maintenance schedule of the Brook to ensure the risk of flooding caused by blockage is improved within Telford.
- 6.8** All of the above are to demonstrate a variety of options are available that could aid in managing / reducing flood risk within the Site. At this stage they are in principle and subject to further discussions with Environment Agency and Lead Local Flood Authority and detailed calculations.

7 Conclusions

- 7.1** The objective of the study is to demonstrate the development proposals for the Site are acceptable from a flooding risk perspective. The study also aims to compare the EA flood map for planning against the Brookbanks preliminary baseline model for the 1 in 100 year flood including a 44% allowance for climate change.
- 7.2** The Brookbanks preliminary baseline model is considered to be more accurate than the EA flood map for planning. The baseline preliminary model has been developed using the best available data and information at the time; however, these assumptions will change between the 1D-2D linked model due to omitted Site specific topographic information, which will affect the results. Once all necessary information is received, a more detailed model will be created to assess the Site's flood risk, inform Site design, and demonstrate a sequential approach to development.
- 7.3** Assessment of fluvial flood risk shows that the proposed built development where possible is located within Flood Zone 1 and hence be a preferable location for residential development when considered in the context of the NPPF. Where it is not possible development has been raised 300mm above existing ground levels and above the Hurley Brook flood levels.
- 7.4** Assessment of other potential flooding mechanisms shows the land to have a low probability of flooding from overland flow and sewer flooding and a medium risk from groundwater flooding.
- 7.5** Therefore, the Site is fully able to comply with the NPPF and NPPG together with associated local and national policy guidance. However, opportunities are available to provide a betterment to the current situation which would aid in reducing / better manage the existing flood risk and these in principle options have been outlined above.

8 Disclaimer

- 8.1** The conclusions and recommendations contained herein are limited to those given the general availability of background information and the planned usage of the Site.
- 8.2** Third party information has been used in the preparation of this report, which Brookbanks, by necessity assumes is correct at the time of writing. While all reasonable checks have been made on data sources and the accuracy of data, Brookbanks accepts no liability for same.

8.3 The benefits of this report are provided solely to the consortium for the proposed development Land at Wappenshall, Telford only.

8.4 Brookbanks Consulting Limited excludes third party rights for the information contained in the report.

Sources of Information

8.5 The following bodies have been consulted while completing the study:

- | | |
|------------------------------|--|
| • Seven Trent Water | - Storm & foul water drainage |
| • Environment Agency | - Flood risk and storm drainage |
| • Telford and Wrekin Council | - Flood risk, drainage and associated policy |
| • Shropshire Council | - Flood risk, drainage and associated policy |
| • Mastermap Data | - Ordnance Survey |
| • Published Geology | - British Geological Survey |

ABETRON

Appendix A – Flood Risk Mapping overlaid with Indicative Masterplan

ABETRON

Appendix B – Strine IDB Consultation Response

ABETRON

Jacob Banks

From: Kate Mayne [REDACTED]
Sent: 27 August 2024 14:08
To: Jacob Banks; flood@telford.gov.uk
Cc: Alejandro Marcotegui
Subject: Re: Strine Internal Drainage Board (IDB) Request for flood information

Hi Jacob,

My apologies for the delay coming back to you on this.

The North Interceptor Channel is as shown in blue on the map below. It incorporates the Hurley Brook and some of the old canal.



The asset is in the ownership of Severn Trent Water but has not been managed for a long time. As a result it is overgrown and in a state of serious disrepair, with severely compromised conveyance.

The section south of Whappenshall caused major flooding issues last winter. Water poured across farmland from the area circled in yellow below, blocking the road and flowing on into IDB drainage assets. As a drainage authority our most significant challenge comes from urban water entering the rural drainage system. Our assets become quickly overwhelmed and split out onto high grade farmland.



We do not have any modelling for the NIC.
Thanks & best,
Kate

From: Jacob Banks [REDACTED]
Sent: 12 August 2024 14:37
To: [REDACTED] flood@telford.gov.uk <flood@telford.gov.uk>
Cc: Alejandro Marcotegui [REDACTED]
Subject: Strine Internal Drainage Board (IDB) Request for flood information

Good Afternoon,

Please can I request flood related information regarding the red line boundary as seen below. The word 'site' here on in refers to the redline boundary.



The approximate centre of the site is located at national grid reference: 366688E, 314194N or SJ 66688 14194
The closest address to the site is: Wappenshall Junction, 1 Wappenshall, Telford TF6 6DE.

Please can I receive any historic flood events within the site and within the vicinity of the site.
Strategic Flood Risk Assessments, Preliminary Flood Risk Assessments, Surface Water Management Plan and any information regarding SuDS.

Hurley Brook crosses the site in the middle and Crow Brook is the boundary at the east. Also there are plenty of drainage ditches crossing the site.

Most important is at the south the Old Shropshire Union Canal (also know as Interceptor Drain green line in the drawing) apparently works as flood relief and that goes straight to Hurley Brook. (I have also contacted Canal and Rivers Trust).
Please may I receive any information you have on any of the watercourses including any modelling that may have been undertaken.

What are your easement distance requirements from proposed development to top of bank Ordinary Watercourses (OW).

If you have any questions, please contact me.

Kind Regards



Jacob Banks
Graduate Hydrological Consultant



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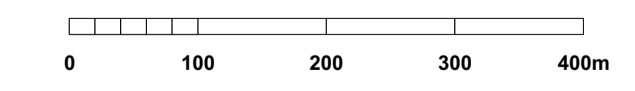
Key

	Site Boundary	274.1ha
Development		
	Residential Uses [c.3,000 to 3,200 dwellings @ 35dph to 38dph net]	85.1ha
	EMP	39.0ha (68.3ha Gross)
	LC	1.6ha
	PS/SS [2no. 2FE Primary schools with Nursery] [1no. 2FE Secondary schools]	15.3ha 2.4ha each 10.5ha
	Potential Vehicular Access Locations	
	Highway Routes Adjoining the Site	
	Mobility Hubs along Bus Route	
	Internal Connectivity (potential bus route serving development)	
	Bus Gate and Emergency Access Only	
	Public Right of Way	
	Existing Off-Site Surfaced Connectivity Routes	
	Pedestrian/ Cycle Routes through the Site	

Green Infrastructure c.133ha (48% of site area)

	Existing Vegetation
	Proposed Structural Vegetation
	Avenue Tree Planting
	Drainage and Wetland Zones
	Drainage Proposals Capture Spirit of Lost Canal and Watercourse
	Sports Pitches with Parking & Changing Facilities
	Play Areas
	Potential Location for Community Allotments

Notes:
1. Connectivity route through Homes England land to be considered.



Promoters/Landowners: Hallam Land, Bellway Homes Limited, Homes England, J.H Sankey & Sons, David Udale Ltd, Sydney Farms Ltd, Samuel Wood

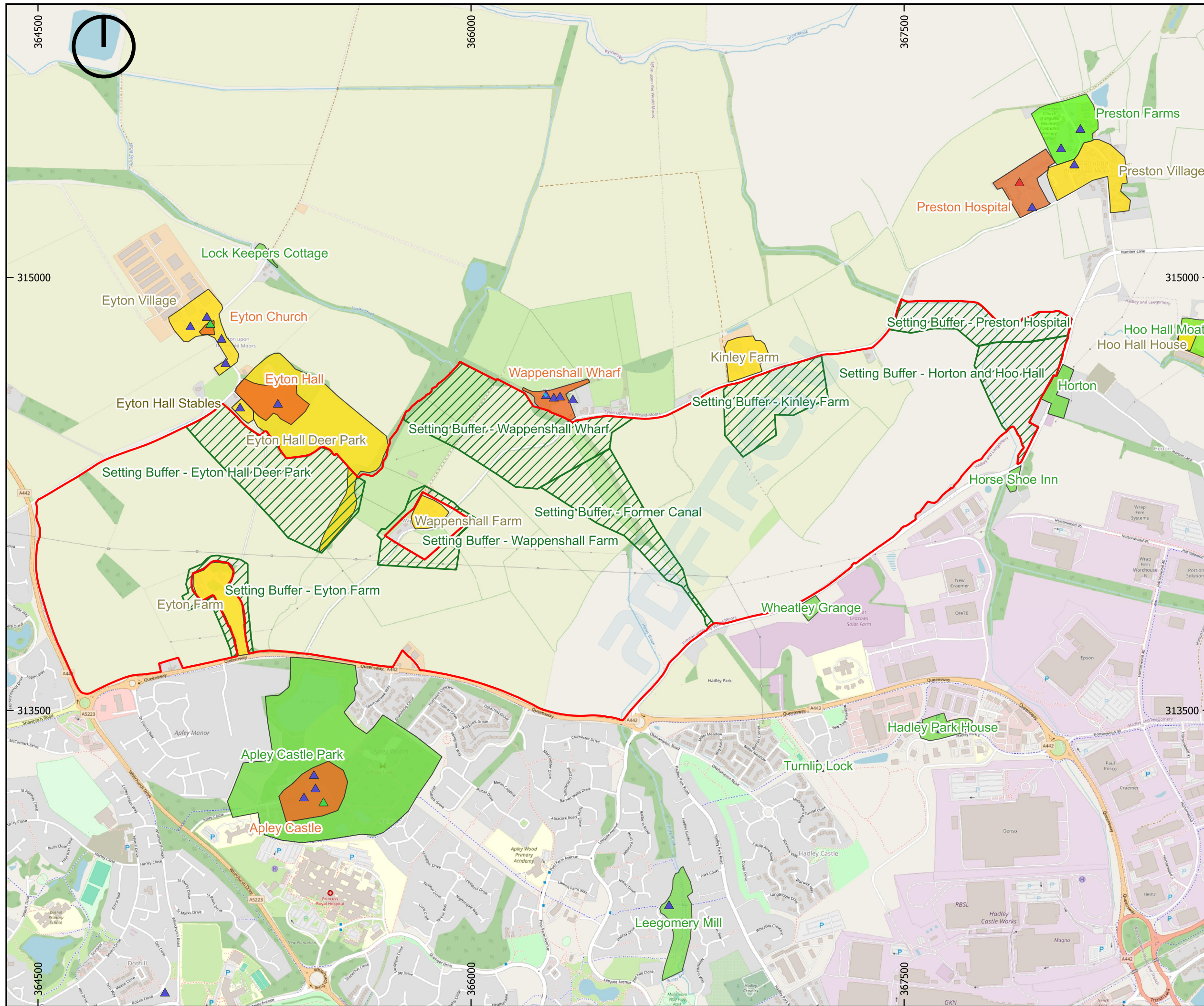
This drawing is the property of FPCR Environment and Design Ltd and is issued on the condition it is not reproduced, retained or disclosed to any unauthorised person, either wholly or in part without written consent of FPCR Environment and Design Ltd.

	drwn/chkd	scale	date	client
	TIK / SGL	NTS @ A1	18/02/2025	Wappenshall Consortium
	number		status rev	project
	11521-FPCR-ZZ-XX-DR-L-0002		S3 P13	Wappenshall, Telford

client
Wappenshall Consortium

project
Wappenshall, Telford

title
FRAMEWORK MASTERPLAN



KEY

NHLE
 Scheduled Monument

Listed Building

- I
- II*
- II

Areas of Sensitivity

- High Sensitivity Assets
- Medium Sensitivity Assets
- Low Sensitivity Assets

Heritage Mitigation

- Masterplan response

150 0 150 300 450 m

BERRYS

CLIENT	Wappenshall Consortium	
PROJECT	Wappenshall, Telford	
DRAWING	Heritage Impact Plan	
STATUS	FINAL	
SCALE @A3	1:12,500	DATE September 2024
DRAWN BY	LF	CHECKED BY RJ
DRG No.	SA51457-001a	

10563 Wappenshall, Telford

Technical Note 09: Access & Accessibility Review

24th September 2024

Document Status

Rev	Issue Status	Prepared / Date	Checked / Date	Approved / Date
0	INFORMATION	M.A'Lee 28.08.2024	B.Morgan 29.08.2024	M.A'Lee 30.08.2024
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2	FINAL	M.A'Lee 19.09.2024	M.A'Lee 19.09.2024	M.A'Lee 24.09.2024
3	FINAL	A.McGill 30.09.2024	M.A'Lee 30.09.2024	M.A'Lee 30.09.2024

1 Introduction

- 1.1 This Technical Note has been prepared on behalf of the Wappenshall Consortium to provide a review of the potential access arrangements to serve the proposed site and the opportunities to travel by modes other than the private car.
- 1.2 The findings of this note are provided to support the promotion of the site through the Local Plan process which is being led by Telford and Wrekin Council.

2 Development Context

Site Location

- 2.1 The proposed development site (hereafter referred to as "the Site") is in Wappenshall which is situated to the north of Telford. The Site is wholly within the boundary of Telford and Wrekin Council and is outside of the currently defined 'Built up Area'.
- 2.2 The indicative location of the Site is illustrated in **Figure 2-1** below, with the Site bound to the south by the A442 (Queensway), to the southeast and east by Wheat Leasowes, to the north by Wappenshall Lane and agricultural fields and to the west by the A442.

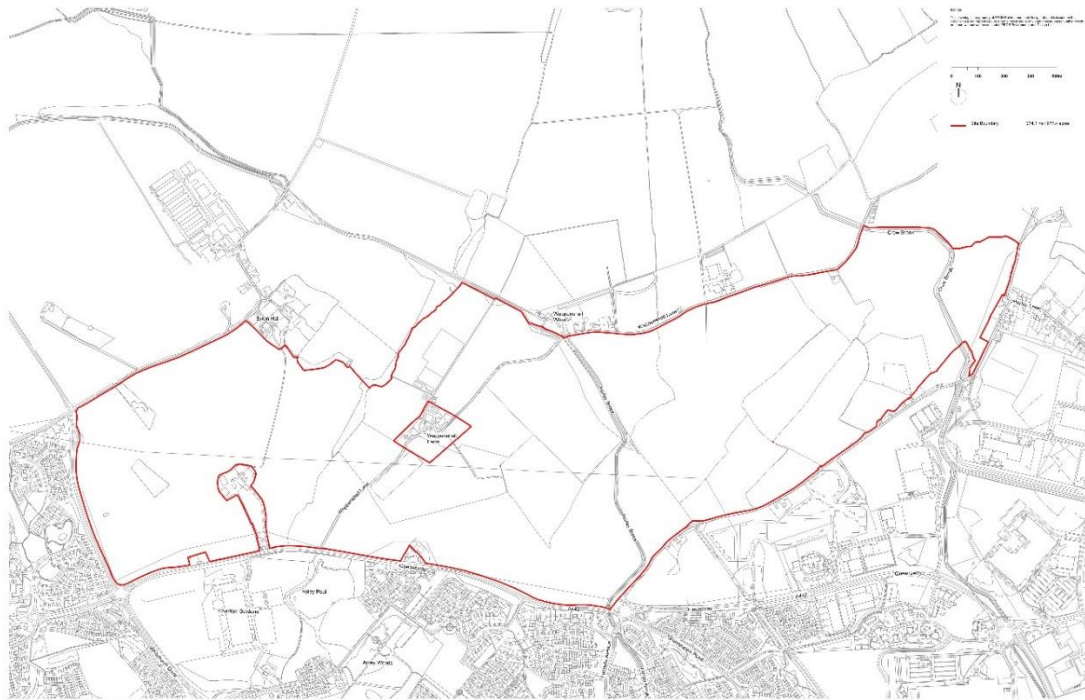


Figure 2--1: Site Location Plan

Development & Access Proposals

- 2.3 The proposal is to develop circa 3,160 dwellings, 2No. Primary Schools and new community facilities including shops, retail, neighbourhood community, allotments etc. The proposal also includes for Circa 44 hectares of employment use which will be primarily located to the western side of the development area.
- 2.4 The site is constrained by the Hurley Brook that continues along a north-south alignment through the centre of the site. Due to the historical value of the Brook the proposal will exclude any new vehicular routes across the Brook, therefore the development areas are split and require independent access points.
- 2.5 The proposal therefore is to provide vehicular access as follows:
 - 2No. accesses off Queensway to the south of the site
 - 2No. accesses off the lane north of Wheat Leasows
 - 1 No. access off A442 to the west of the site.
- 2.6 A more detailed review of these access proposals and their location is provided below.
- 2.7 The layout and design of the access arrangements shown are initial options and will need to be reviewed in more detail as part of a planning submission. The extent of Public Highway is assumed to extend up to the site boundary, although this will be checked as part of further Transport Assessment work required as part of a planning submission.

Queensway

- 2.8 Queensway (A442) is a single carriageway between the B5063/ A442 Shawbirch Roundabout to the west of the site and the Trench Road/ A442 roundabout junction to the southeast of the site, south of this junction Queensway is a dual carriageway.
- 2.9 Along the site’s frontage, Queensway is a single carriageway subject to a 50mph speed limit. The road is street lit and has a segregated footway/cycleway along the southern side of the road and a wide verge along the northern side.

Southwestern Access

- 2.10 A new access is proposed at the junction of Wappenshall Lane which currently forms a priority junction arrangement with Queensway and continues through the site to Wappenshall Wharf.
- 2.11 The proposal is to upgrade the existing arrangement to provide a three-arm signalised junction as illustrated in **Figure 2-2** below and included in **Appendix A**.

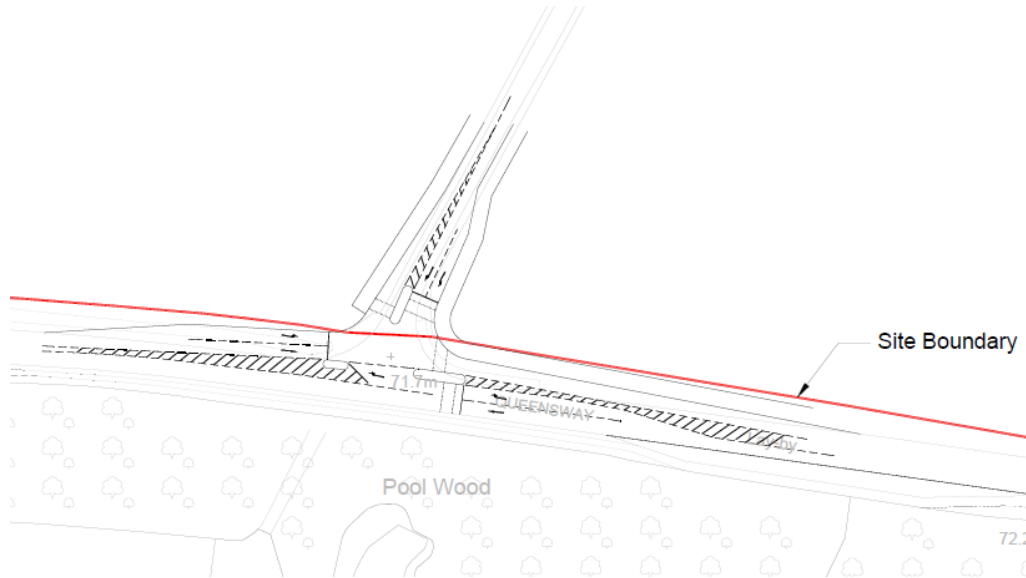


Figure 2--2: Wappenshall Lane/ Queensway junction

- 2.12 This arrangement proposes right and left turn lanes for traffic entering the development from Queensway and a two-lane exit from Wappenshall Lane. The layout also includes for the provision of controlled crossing facilities on the Site access arm and Queensway (eastern arm).

Southeastern Access

- 2.13 The second access from Queensway is proposed approximately 790m to the east of Wappenshall Lane at the junction with Peregrine Way. This is an existing 3 arm signalised junction arrangement, and the proposal is to include for a fourth arm that will continue into the site as illustrated in **Figure 2-3** and included in **Appendix B**

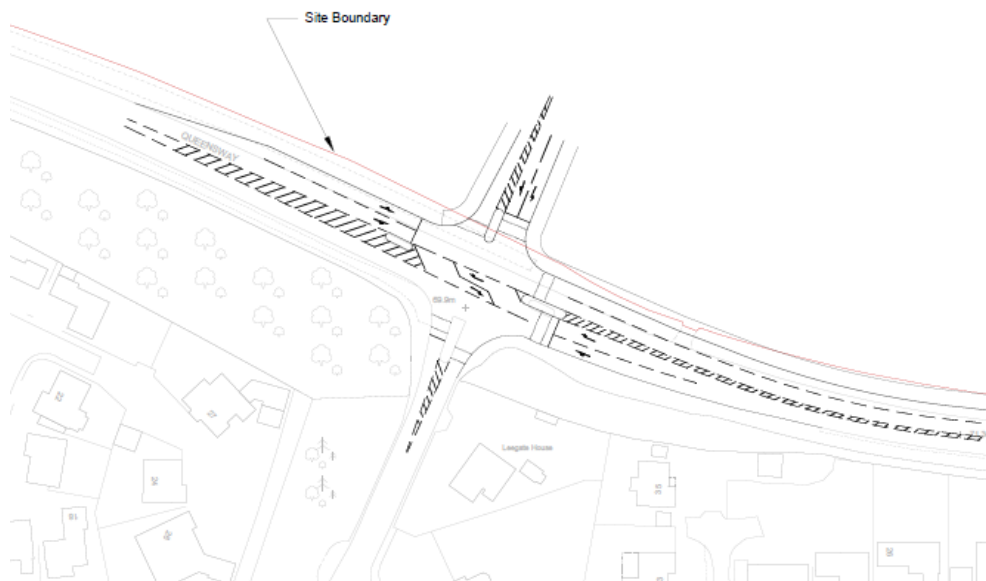


Figure 2--3: Peregrine Way/ Queensway junction

- 2.14** As part of this arrangement, the opportunity also exists to provide a short section of dualling up to the Leegomery Roundabout.
- 2.15** The existing arrangement includes a staggered crossing on Peregrine Way, the proposed arrangement would also include a staggered crossing on Queensway (east) and the Site access arm.

Wheat Leasowes

- 2.16** Wheat Leasowes is a rural lane to the east of the site that continues from the Leegomery roundabout to join Humber Lane to the northeast. This road is approximately 5m in width bound by verges and hedgerows along most of its length and is unlit. The speed limit along the section of road that passes the site is 40mph.
- 2.17** This lane provides access to the eastern parcel of the site and therefore access from this lane is proposed in the form of two simple priority junction arrangements. One will be located approximately 130m northeast of No.4 Wheat Leasowes (**Figure 2-4**) and the other approximately 305m northeast of Wheatley Grange (**Figure 2-5**), both drawings are included in **Appendix C**.

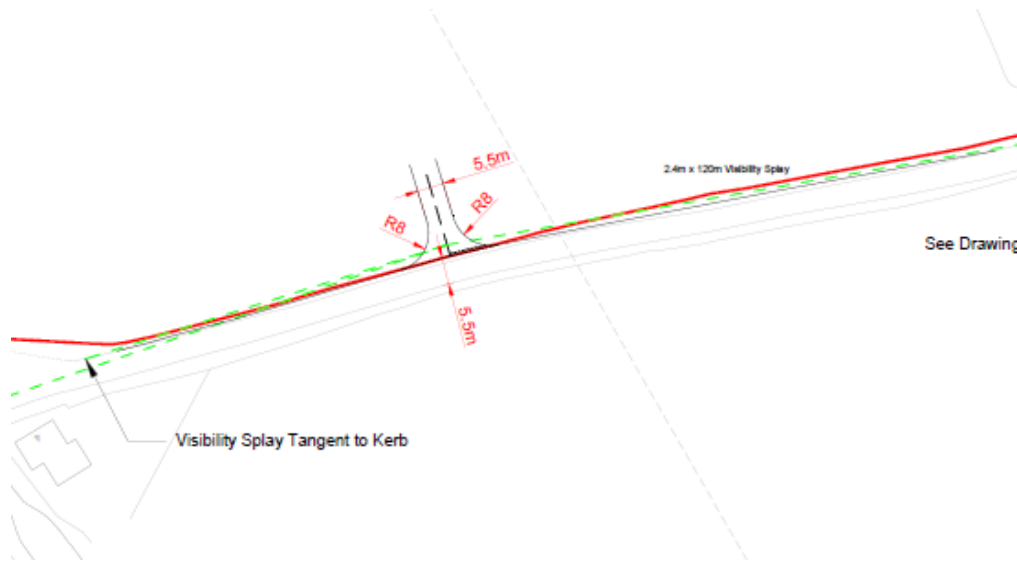


Figure 2--4: Wheat Leasowes Southwest access



Figure 2--5: Wheat Leasowes Northeast access

2.18 Both access arrangements will include minor road widening to 5.5m to ensure suitable width is provided for vehicles turning in and out of the site. The proposed arrangements show that visibility splays of 2.4m x 120m are achievable complying to the standards for a 40mph speed limit. Pedestrian access is not proposed via these access points as there is no footway provision along Wheat Leasowes. Details of the sites accessibility by non-car modes is provided in **Section 3** below.

A442

- 2.19** To the west of the site, the proposal is to develop circa 44 hectares of employment use. The A442 that bounds the site to the west is a single carriageway road. This road is subject to a 40mph speed limit at its junction with Queensway/ B5063 (Shawbirch Roundabout) changing to the national speed limit approximately 150m north of the Shawbirch Roundabout.
- 2.20** The section of road that passes the site includes a footway along the eastern side of the road, a grass verge on the western side and street lighting. At the northwestern edge of the site, there is an existing layby that forms a horseshoe arrangement off the A442.
- 2.21** Subject to detailed analysis, the proposal is to provide a priority junction arrangement with a ghost island right turn lane which will be approximately 130m south of the existing layby. This arrangement has been designed to the Design Manual for Roads and Bridges standards for a 60mph speed limit and is shown in **Figure 2-6** below and included in **Appendix D**.
- 2.22** The proposal will also include a 2m wide footway alongside the access road which will connect with the existing footway along the A442 which is currently approximately 1m wide due to overgrown vegetation, the opportunity exists to widen this footway to 2m between the site and the Shawbirch roundabout. Alternative access points for non-vehicular modes to the employment area are advised in **Section 3** below.

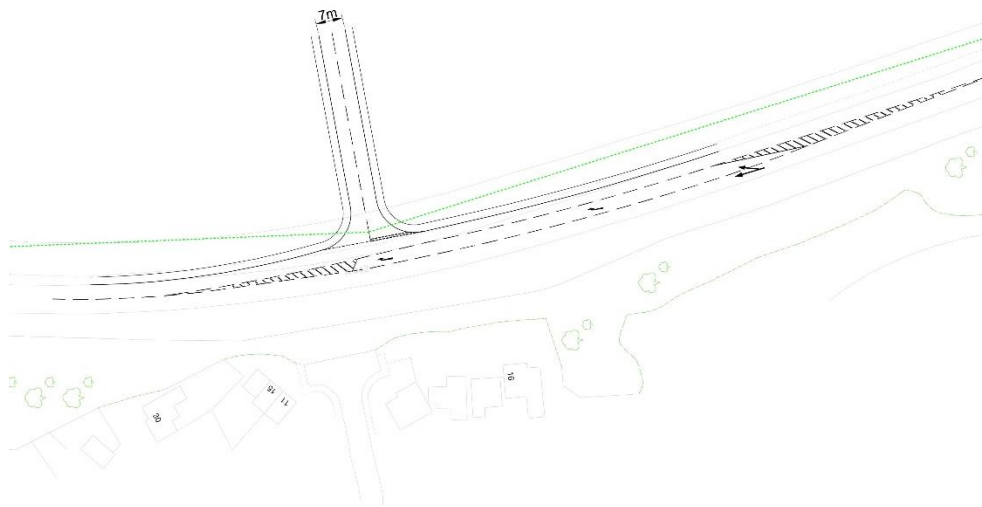


Figure 2-6: A442 Employment access

3 Accessibility by non-Car Modes

- 3.1 To create a sustainable development, the priority is to ensure that the site can be accessed by all, in particular Walking, Wheeling, Cycling and by Public Transport. This section provides the opportunities available in developing an accessible site and how the site will connect with the wider network.

Walking, Wheeling & Cycling

- 3.2 Access to the site for walking and wheeling will be provided at various locations, in addition to the proposed vehicular accesses proposed on A442 and Queensway. The provision for wheeling is to ensure that the footway widths are suitable to be able to accommodate a wheelchair user and a pedestrian so that they can pass side by side which is a minimum of 2m. In addition, the design will ensure that there is a suitable level of dropped kerb locations with tactile paving to enable easier crossing of the roads. The minimum footway width will be 2m in accordance with DfT’s Inclusive Mobility guidance together with appropriate levels of street lighting.
- 3.3 The site will connect with the existing wider footway network and where required improvements will be provided on routes to key facilities outside of the site, in line with Active Travel England’s Matrix. Controlled crossing facilities will be provided on Queensway to provide a safe route for pedestrians and cyclists to use.
- 3.4 In terms of cycling, the site benefits from being adjacent to existing cycle routes which continue along the A442 and therefore providing the opportunity to connect into the Site. **Figure 3-1** below identifies the existing cycle routes within the local area and the existing bus services that pass close to the site, a copy of this plan is also included in **Appendix E**.

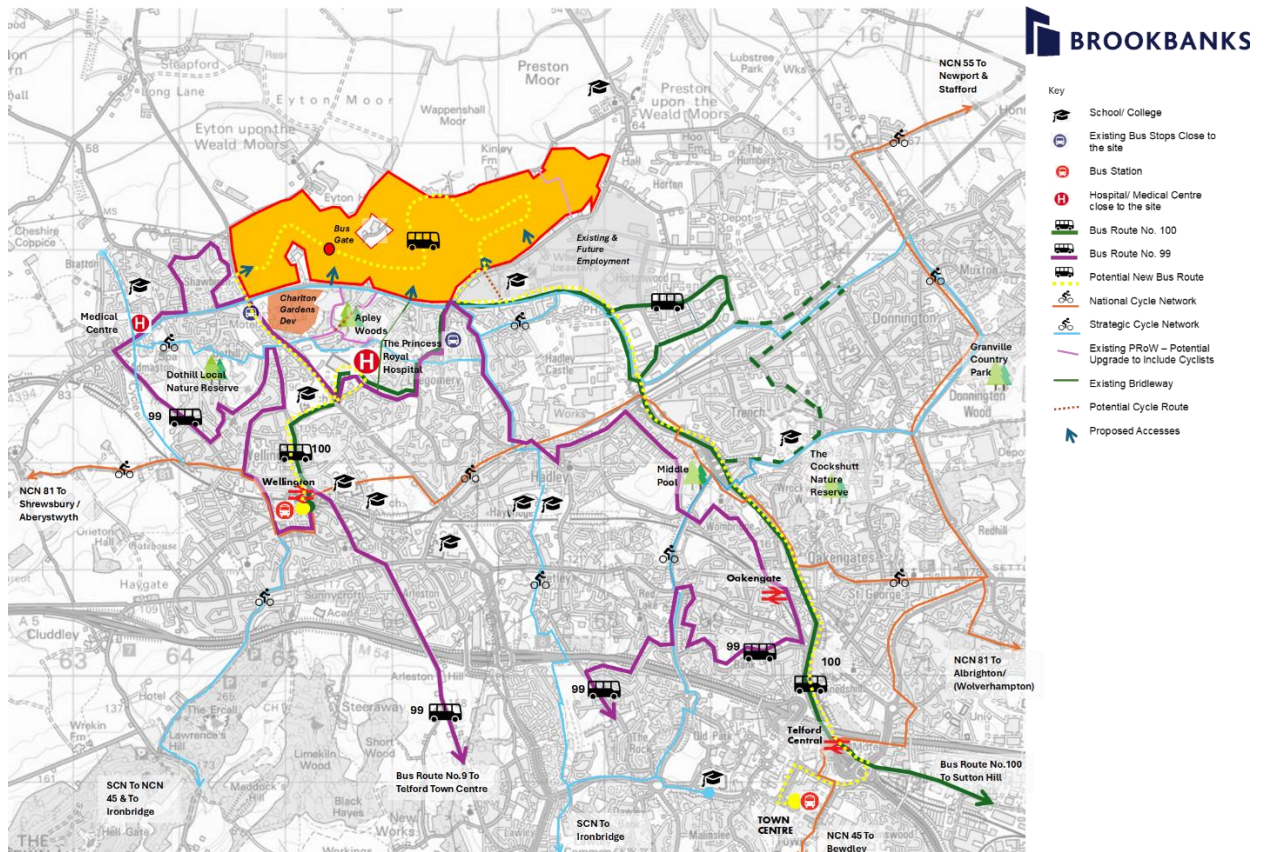


Figure 3-1: Wider Accessibility Plan

3.5 The above plan shows that the opportunity exists to connect with the existing facilities that are local to the site including:

- the Princess Royal Hospital (approx. a 11min cycle ride),
- Wellington Railway and Bus Station (approx. 14min Cycle ride),
- Wrekin College (approx. 15min cycle ride)
- existing employment areas off Hortonwood east of the site (approx. 14min cycle ride)

3.6 Cycle times are taken from the centre of the site. The opportunity also exists to upgrade some local Public Right of Way routes to permit the use of cycles.

3.7 On Wheat Leasowes the proposal will be to provide a separate footway/cycleway route that will access the site south of the southwestern access. This will link with the existing ProW route that continues past Queensway North school and onto the existing cycle route that continues along the A442.

3.8 For access into the proposed employment area to the west of the site, a connection is proposed from the Shawbirch Roundabout which will facilitate both walking and cycling routes (see **Figure 3-2**).

Public Transport

3.9 The nearest bus stops to the site are situated on Whitchurch Drive (Route 99) which are approximately a 20min walk/ 6min cycle from the centre of the site or alternatively Routes 99 & 100 are accessible from Leegate Avenue which is approximately a 28min walk or 7min cycle from the centre of the site. Route 4 stops in a loop at Leegomery Centre 800m from the edge of the site. Route 4 is a frequent (every 12 mins) route that connects the site to Telford Town Centre.

3.10 To ensure the site is accessible by public transport a frequent, conveniently routed bus service would be provided which may be a new service or a diversion of an existing service. A potential route for this bus is shown in **Figure 3-1** and would include stops at key facilities such as The Princess Royal Hospital, Wellington

Train and Bus Station, Telford Central Station and the Town Centre.

On Site Accessibility

- 3.11 Within the development site, there will be a network of footway and cycleways that will provide residents with various routes around the site connecting with the proposed facilities that will be provided including community facilities, schools, shops etc., as well as providing direct links to the proposed employment areas.
- 3.12 The development proposal will also include Mobility Hubs which will be located at key locations such as the local centres. The Mobility Hubs will provide residents or visitors with the opportunity to change mode in continuing their journey, this could be from foot to cycle to bus or hire an electric car or hire an electric cycle/scooter. A Mobility Hub will also be a meeting place that could include a café, lockers, cycle repair centres, parking etc., being located within the Local Centre the opportunity exists to combine uses.
- 3.13 In addition to the Mobility Hubs, **Figure 3-2** below shows smaller Hubs around the site, these are proposed bus stops which would include cycle parking facilities as well as bus shelters, seating and real-time information. These stops would be within 400m of residents and employment areas, making walking to and from these stops as convenient as possible. A copy of the plan provided in **Figure 3-2** is also included in **Appendix F**.

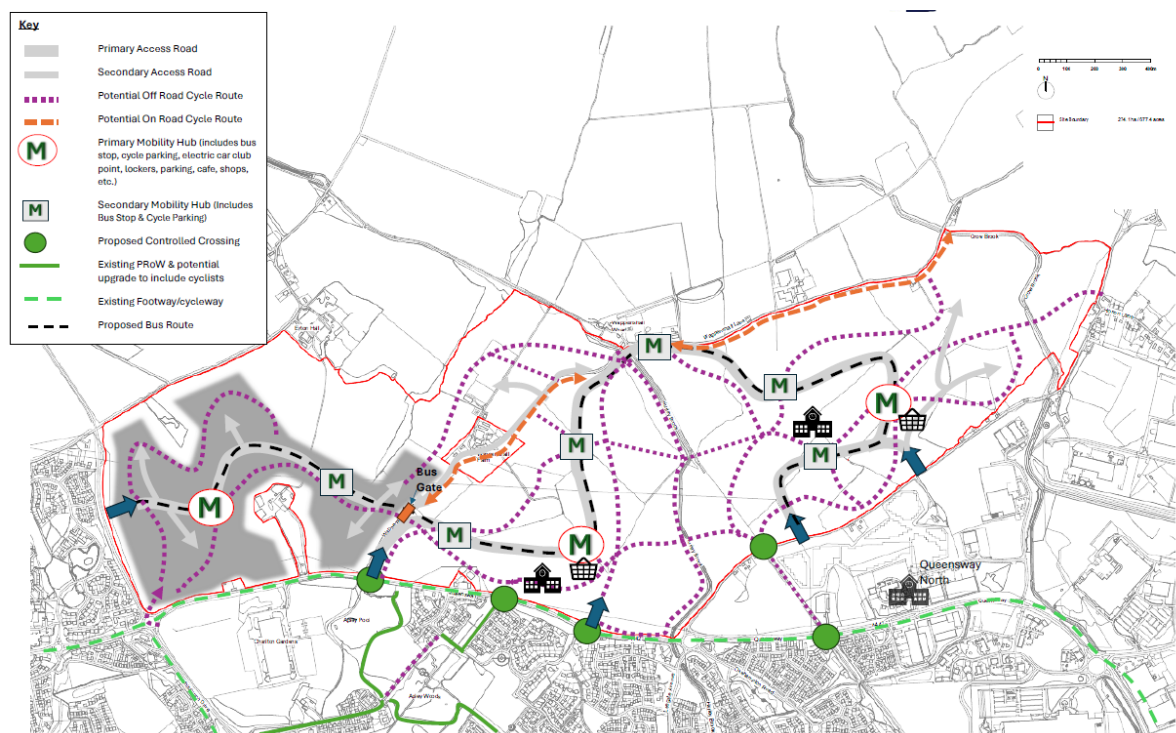


Figure 3-2: Site Accessibility Plan

- 3.14 The proposed bus route through the site will be a high frequency service and is proposed to access the site to/from the A442 access west of the site continuing through the new employment area and then into the residential area. The proposal is to include a bus gate between the residential and employment areas to allow access by buses only, reducing the possibility of any potential rat-running through the site.
- 3.15 The bus route will continue through the site, accessing Wappenshall Wharf just to the north before serving the eastern side of the site. The reason for this, as advised earlier in this note, is that the proposal does not include for any vehicular routes across the Brook. The bus route would continue onto Wheat Leasowes and then re-join the A442.
- 3.16 The network of footways and cycleways will provide direct routes to the Mobility Hubs, bus stops and local facilities and will aim to be more attractive and convenient to use than the private car.
- 3.17 The development will also include other routes for walking and cycling that will be for recreational purposes

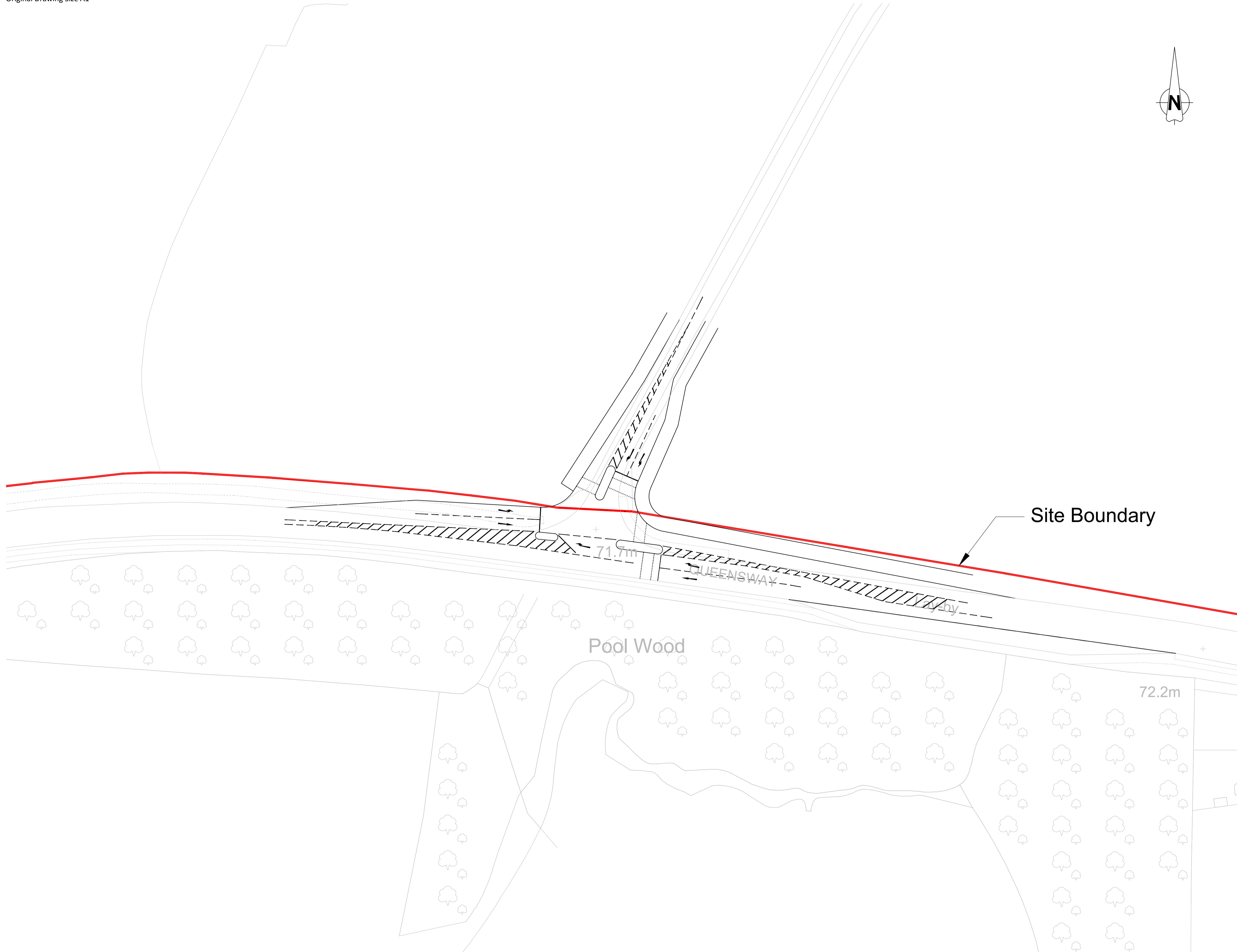
and link with play/ fitness areas as well as linking with Wappenshall Wharf.

- 3.18** Route Finder signs will be provided throughout the site to make navigation easy for all.

4 Summary

- 4.1** This Technical Note has been prepared to demonstrate how the site can be accessed by vehicular traffic and the type of junction arrangements that could be provided. The type of arrangements will be subject to more detailed analysis.
- 4.2** This note also demonstrates how the site would be able to connect with existing facilities that are available within the surrounding area by non-car modes through the provision of various access points for walking and cycling as well as providing controlled crossing facilities to enable safe crossing points.
- 4.3** Within the development site, the opportunity exists to provide a strategic network of footways and cycleways that will link with the key facilities on the site as well as the new Mobility Hubs. The proposal will also include a high frequency bus service that will enable residents and employees to be able to travel to/from the site by bus with stops being located within easy walking distance.
- 4.4** The site is considered to be well situated and able to create opportunities to facilitate non-car travel for both new and existing residents meeting the Government’s Key objectives in providing sustainable development sites.

| Appendix A – Queensway Southwestern Access



Construction Design and Management (CDM)
Key Residual Risks
 Contractors entering the site should gain permission from the relevant land owners and/or principle contractor working on site at the time of entry. Contractors shall be responsible for carrying out their own risk assessments and for liaising with the relevant services companies and authorities. Listed below are Site Specific key risks associated with the project.
 1) Overhead and underground services
 2) Street Lighting Cables
 3) Working adjacent to water courses and flood plain
 4) Soft ground conditions
 5) Working adjacent to live highways and railway line
 6) Unchartered services
 7) Existing buildings with potential asbestos hazards

- NOTES:**
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 2. All dimensions are in metres unless otherwise stated.
 3. Brookbanks Consulting Ltd has prepared this drawing for the sole use of the client. The drawing may not be relied upon by any other party without the express agreement of the client and Brookbanks Consulting Ltd. Where any data supplied by the client or from other sources has been used, it has been assumed that the information is correct. No responsibility can be accepted by Brookbanks Consulting Ltd for inaccuracies in the data supplied by any other party. The drawing has been produced based on the assumption that all relevant information has been supplied by those bodies from whom it was requested.
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First Issue BM MA 14.08.24



Hallam Land Management

Land at Wappenshall
Telford

A442 - Wappenshall Lane
Access

Draft		Aug 2024
BM	MA	14.08.2024
1:500	10563-SK-004	-
0 10 20 30 40 50 METRES		

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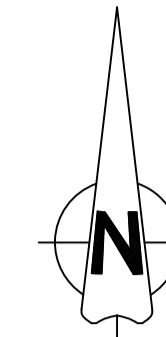
| Appendix B – Queensway Southeastern Access

Construction Design and Management (CDM)

Key Residual Risks

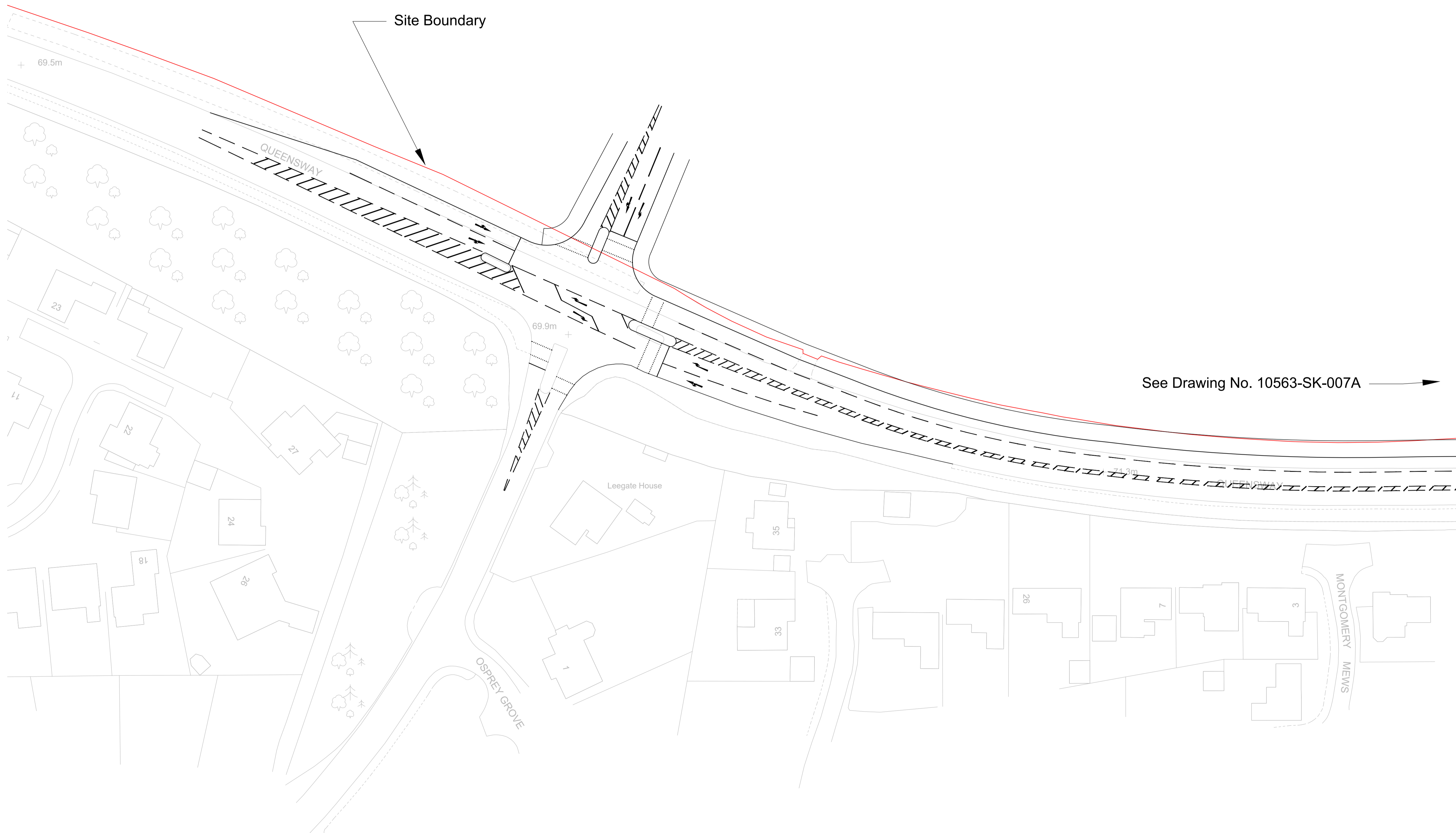
Contractors entering the site should gain permission from the relevant land owners and/or principle contractor working on site at the time of entry. Contractors shall be responsible for carrying out their own risk assessments and for liaising with the relevant services companies and authorities. Listed below are Site Specific key risks associated with the project.

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- 6) Unchartered services
- 7) Existing buildings with potential asbestos hazards



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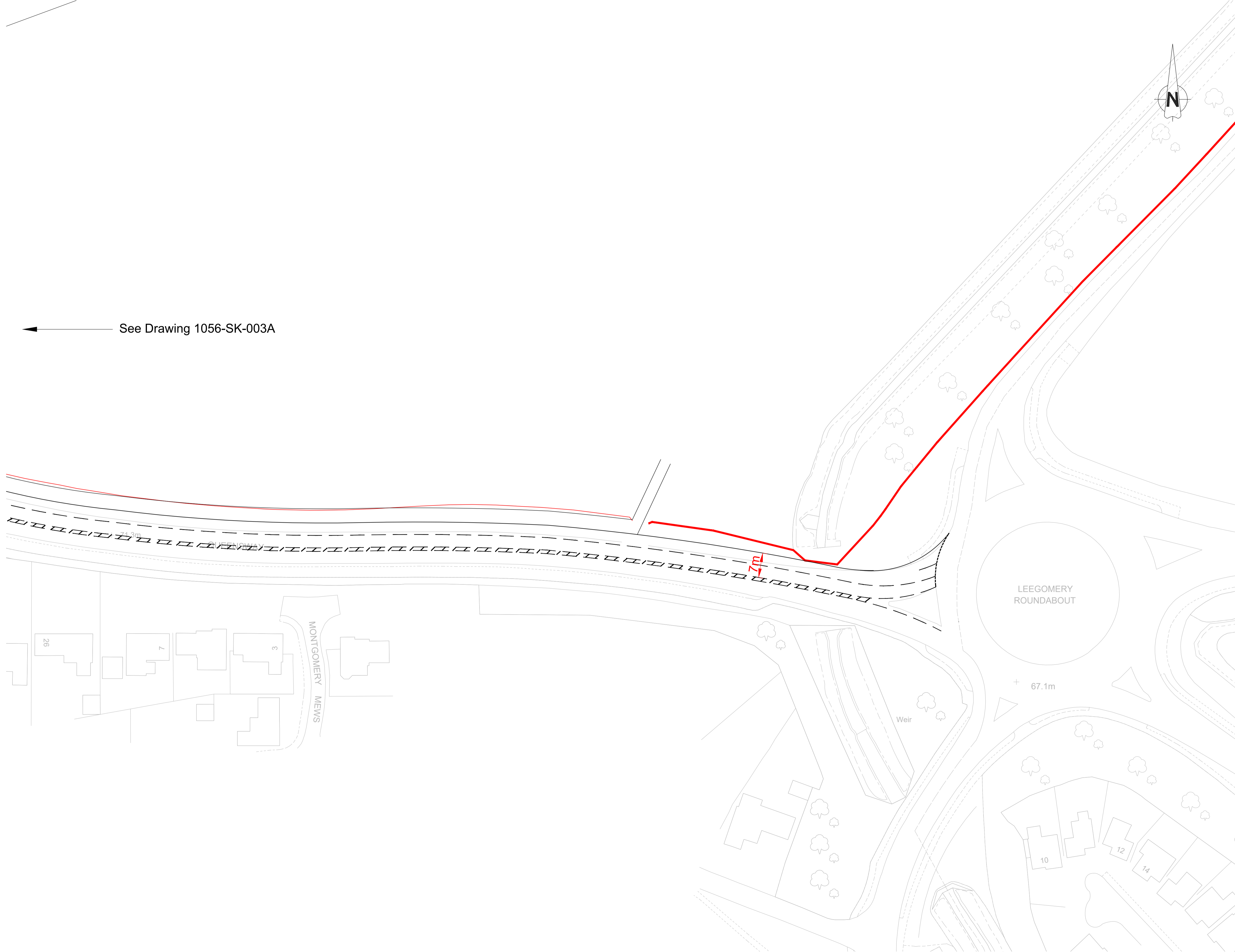
Hallam Land Management

Land at Wappenshall
Telford

Proposed Site Access with
Perigrine Way / Queensway

Draft		Aug 2024
BM	MA	14.08.2024
1:250	10563-SK-003	A
0 10 20 30 40 50 METRES		

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Construction Design and Management (CDM)
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← See Drawing 1056-SK-003A

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Hallam Land Management

Land at Wappenshall
Telford

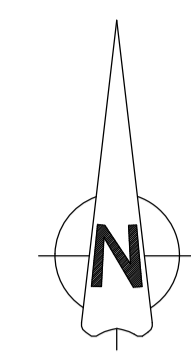
A442 Potential Dualling
between Peregrine Way &
Leegomery Roundabout

Draft		Aug 2024
BM	MA	14.08.2024
1:500	10563-SK-007	A
0 10 20 30 40 50 METRES		

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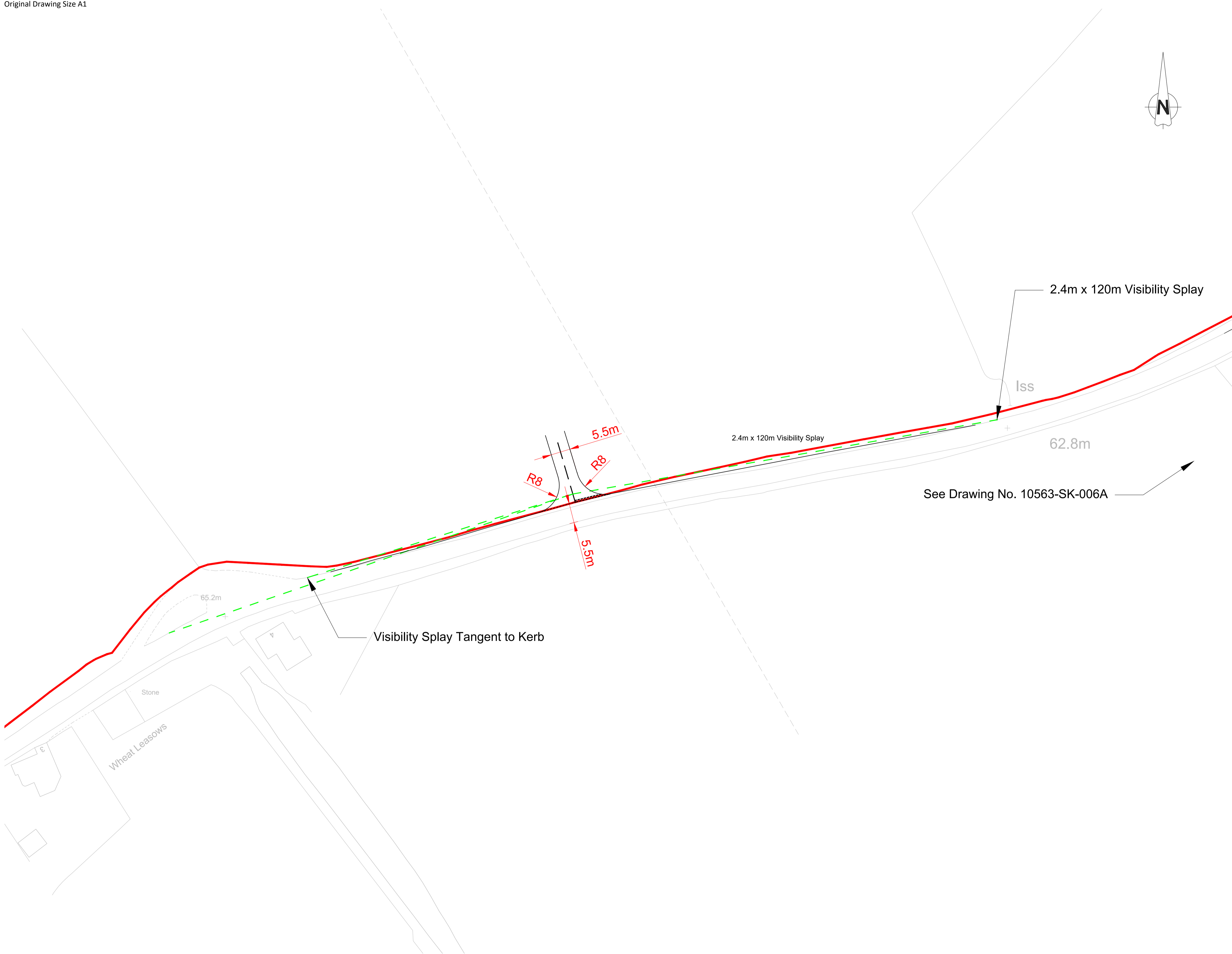
| Appendix C – Wheat Leasowes Accesses

Construction Design and Management (CDM)
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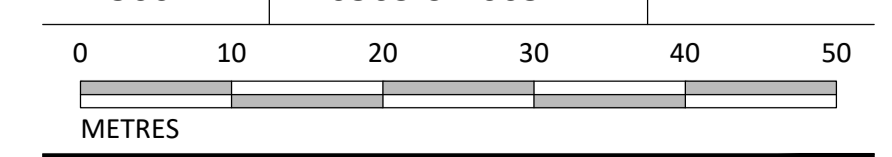
Hallam Land Management

Land at Wappenshall
Telford

Southern Access on Unnamed
Road (East of the site)

Draft		Aug 2024
BM	MA	12.08.2024
1:500	10563-SK-005	A

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Hallam Land Management

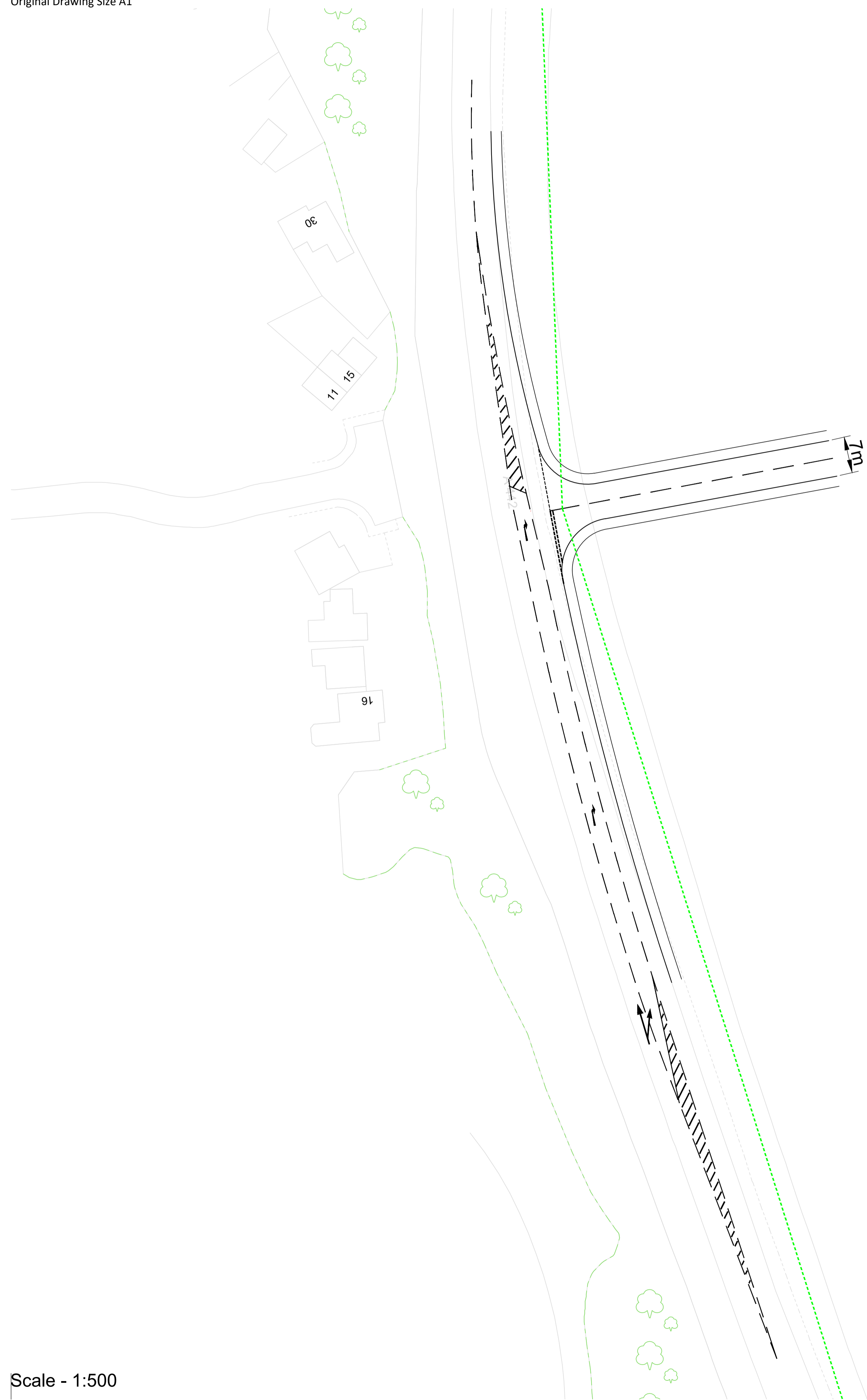
Land at Wappenshall
Telford

Northern Access on unnamed
Road (East of the Site)

Status	Status Date	
Draft	Sept 2024	
Drawn	Checked	Date
BM	MA	05.09.2024
Scale	Number	Rev
1:500	10563-SK-006	B

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| Appendix D – A442 Employment Access



Scale - 1:500



Scale - 1:1000

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Construction Design and Management (CDM)

Key Residual Risks

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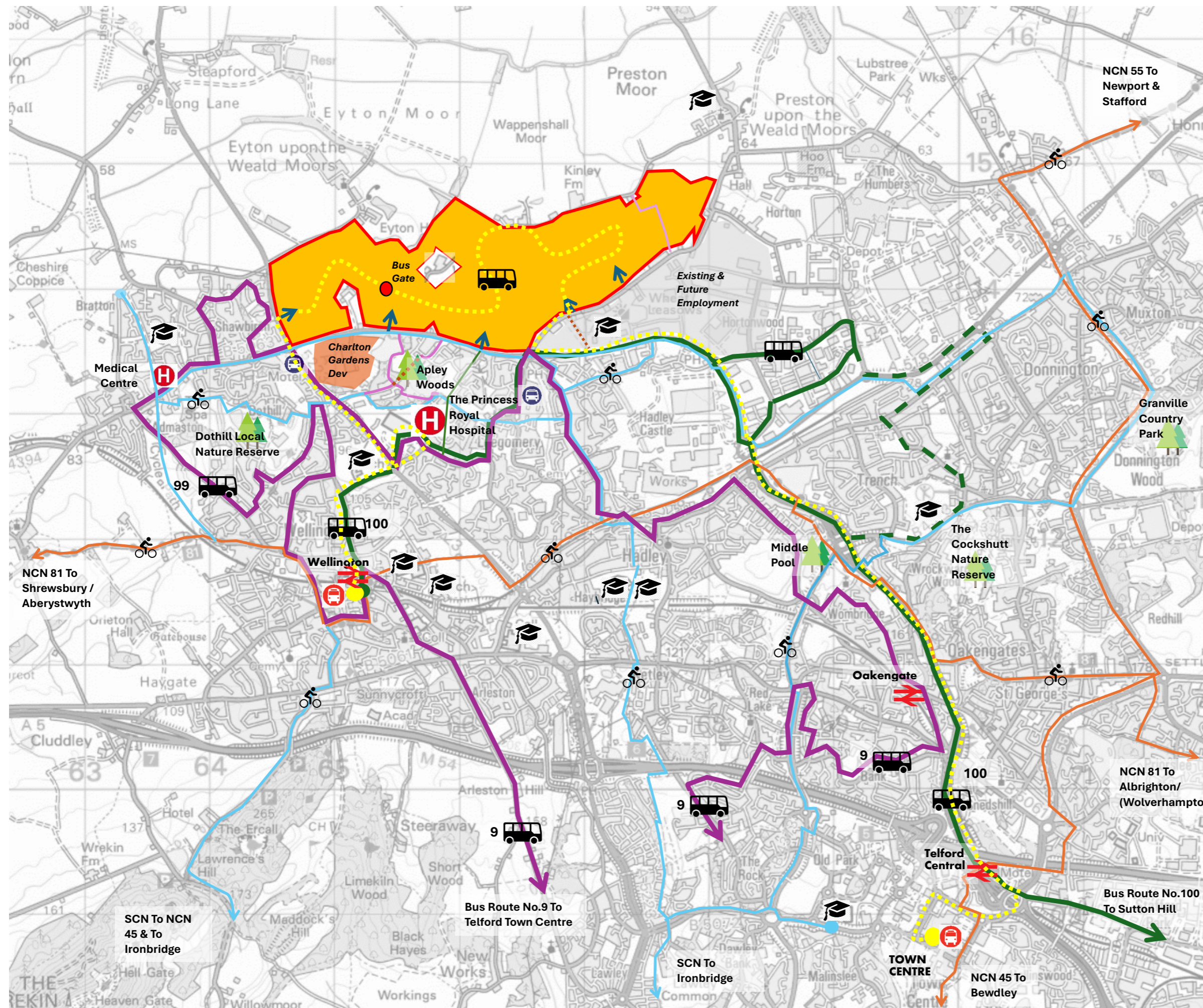
Hallam Land Management

Land at Wappenshall
Telford

Proposed Site Access to
Employment Area on A442

Draft		Aug 2024
BM	MA	28.08.2024
As Shown	10563-SK-010	
0 10 20 30 40 50 METRES		

| Appendix E – Accessibility Plan













- Key
- School/ College
 - Existing Bus Stops Close to the site
 - Bus Station
 - Hospital/ Medical Centre close to the site
 - Bus Route No. 100
 - Bus Route No. 99
 - Potential New Bus Route
 - National Cycle Network
 - Strategic Cycle Network
 - Existing PRoW – Potential Upgrade to include Cyclists
 - Existing Bridleway
 - Potential Cycle Route
 - Proposed Accesses

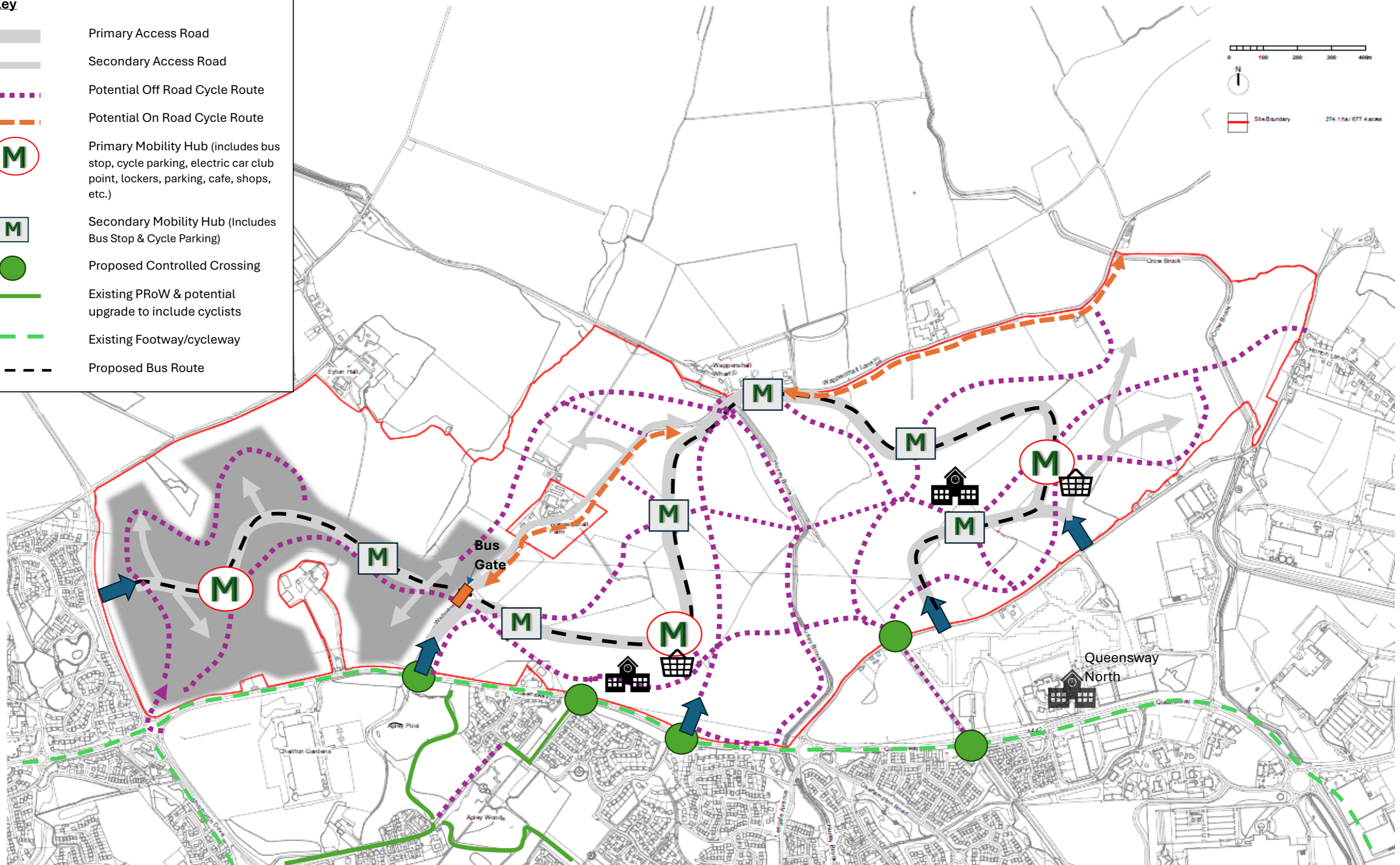
Land at Wappenshall – Accessibility Plan

| Appendix F – Site Accessibility Plan



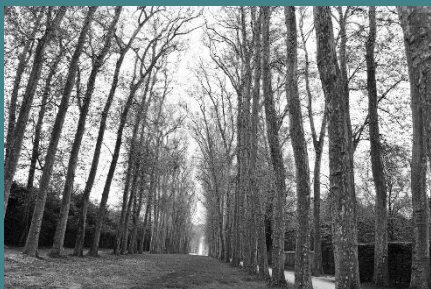
Key

-  Primary Access Road
-  Secondary Access Road
-  Potential Off Road Cycle Route
-  Potential On Road Cycle Route
-  Primary Mobility Hub (includes bus stop, cycle parking, electric car club point, lockers, parking, cafe, shops, etc.)
-  Secondary Mobility Hub (Includes Bus Stop & Cycle Parking)
-  Proposed Controlled Crossing
-  Existing PRow & potential upgrade to include cyclists
-  Existing Footway/cycleway
-  Proposed Bus Route



Land at Wappenshall – Site Accessibility Plan

FPCR | environment
& design



Preliminary Ecological Appraisal

Client

Hallam Land Management

Homes England

Telford & Wrekin Council

J.H. Sankey & Sons

David Udale Ltd

Sydney Farms Ltd

Bellway Homes Limited

Samuel Wood

Project

Wappenshall,

Telford

Date

September 2024

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- Figure 3b: Phase 1 Habitat Plan – East

APPENDICES

- Appendix A: Biodiversity Net Gain Summary Report
- Appendix B: Relevant Legislation and Policy

Rev	Issue Status	Prepared/Date	Approved/Date
-	Draft	ERD / 13.06.23	RJS / 16.06.23
A	Final	RJS / 27.07.23	RJS / 27.07.24
B	Final	ERD / 03.08.23	
C	Final	ERD / 06.10.23	
D	Final	ERD / 12.10.23	
E	Final	CH / 21.08.24	RJS / 27.09.24
F	Final	CH / 30.09.24	

1.0 NON-TECHNICAL SUMMARY

- 1.1 FPCR were commissioned by the Consortium to undertake a Preliminary Ecological Appraisal of land at Wappenshall, Telford to identify any potential constraints or opportunities for a proposed residential development of around 3,100 dwellings, employment land provision and associated community facilities and green infrastructure.
- 1.2 An Extended Phase I Habitat Survey and desktop study were completed by FPCR to inform this assessment. The survey included walkovers of the site in May 2023 and July 2024 mapping habitats present along with their potential to offer suitable habitat for protected and notable species.
- 1.3 A preliminary Biodiversity Net Gain Assessment has also been undertaken, which is included at Appendix A.
- 1.4 The site is within the Impact Risk Zone for three SSSIs however providing sustainable urban drainage proposals are appropriately designed, it is considered unlikely that development would impact these SSSIs.
- 1.5 Apely Woods LNR and LWS is located immediately adjacent the southern boundary. While the development may increase recreation visits to the site, the impacts are not likely to be significant given the extensive greenspace provided as part of the scheme, the nature of the habitats within the LWS and the network of established footpaths.
- 1.6 The site is dominated by arable land and species poor grassland which is considered to be of low nature conservation value. These are common and widespread habitats supporting limited botanical diversity.
- 1.7 Hedgerows formed the boundary of the site and field compartments. All hedgerows comprised at least 80% native woody species and were therefore considered habitats of principal importance (NERC, S41). It is anticipated boundary hedgerows will be largely retained in development proposals, however, there may be some limited loss of central hedgerows. Any retained hedgerows should be appropriately protected during works. Any loss of hedgerows should be compensated for through appropriate planting, ensuring habitat corridors are maintained and enhanced.
- 1.8 Mature trees were located within hedgerows and fields. A small number were considered likely to be veteran, supporting features that are typical of old trees. Standing dead trees were also recorded. An Arboricultural Survey should be undertaken to identify trees of value and to inform a planning application. Mature trees should be retained where feasible.
- 1.9 Mature trees within the site also provided features that may have the potential to support roosting bats. Trees should be subject to further bat surveys where removal or the potential for impacts may result from the proposals. Given the size of the site and nature of habitats, further bat activity surveys are recommended. Transect surveys should be undertaken once per season (spring, summer and autumn) along with 5 nights of data collection with an automated static bat detector per month.
- 1.10 Potential habitat for notable farmland bird species was provided by the arable/grassland habitat and overwintering birds may use the site to forage. Breeding and wintering bird surveys should be undertaken within the site to inform a planning application. Further nesting habitat

was provided in the trees and hedgerows. Any woody vegetation removal should be undertaken outside of the breeding bird season (March to August inclusive).

- 1.11 Grassland habitats on-site were considered to offer some suitability to support populations of reptile species however the site overall was generally considered to be unsuitable due to its arable nature.
- 1.12 Otter have been recorded to the south of the site in association with Shrewsbury Canal and the watercourses on-site may provide suitable commuting habitat as well as places of rest or shelter.
- 1.13 No badger activity was recorded during the survey however further survey should be undertaken to inform a planning application.
- 1.14 Limited areas of on-site habitat provided potential to support other species including great crested newts, water vole and white-clawed crayfish. Further survey should be undertaken to determine suitability of the on-site habitats prior to a planning application, with further surveys to determine presence/absence undertaken where considered necessary.
- 1.15 A range of enhancements should be introduced including bat and bird boxes, and opportunities for amphibians and reptiles such as wildlife ponds and hibernacula.

2.0 INTRODUCTION

- 2.1 The following report has been prepared by FPCR Environment & Design Ltd. on behalf of 'the Consortium' (including Hallam Land Management, Homes England, Telford & Wrekin Council, J.H. Sankey & Sons, David Udale Ltd, Sydney Farms Ltd, Bellway Homes Limited and Samuel Wood) and provides a Preliminary Ecological Appraisal of a site at Wappenshall, Telford (Central OS Grid Ref: SJ 665 141) herein referred to as 'the site'. This report details the findings of the Extended Phase 1 Habitat surveys including initial observations of any suitable habitats for, or evidence of, protected species.
- 2.2 This Preliminary Ecological Appraisal is based on the Chartered Institute of Ecology and Environmental Management (CIEEM) guidance¹. The scope and objectives of this report are to:
- Present the findings of the Extended Phase 1 Habitat survey and preliminary protected species assessment.
 - Identify the likely ecological constraints associated with the proposed development.
 - Identify any habitat retention, mitigation and/or compensation measures likely to be required.
 - Identify any additional surveys that may be required to further inform the development proposals.
 - Identify the opportunities available within the proposals to deliver ecological enhancement.

Site Location and Context

- 2.3 The site is located to the north of Telford. It largely comprises arable fields, along with eight grassland fields, small areas of woodland and scrub, and watercourses. Fields are bound and divided by native hedgerows and trees, with several scattered individual trees within the fields.
- 2.4 The A442 Queensway is adjacent to part of the southern boundary with a smaller unnamed road forming the remainder of the southern boundary. To the south, west and east of the site is the existing outer residential edge of Telford and the village of Horton, as well as a commercial/light industrial development and a solar farm to the south-east. Wappenshall Lane forms the majority of the north-eastern boundary beyond which is further arable land, whilst the remainder of the northern boundary is formed by arable land and woodlands.

Site Proposals

- 2.5 The site will be promoted through Telford and Wrekin Council's Local Plan Review as a new Sustainable Urban Extension to Telford. Proposals include residential development of around 3,160 dwellings, the provision of employment land, a neighbourhood centre, educational facilities and other community facilities. Significant green infrastructure provision is proposed, in part to ensure at least 10% Biodiversity Net Gain (BNG) can be achieved.
- 2.6 A preliminary BNG Assessment has been undertaken to inform this ecological appraisal, the results of which are presented in Appendix A: Biodiversity Net Gain Summary Report.

¹ CIEEM (2017) Guidelines for Preliminary Ecological Appraisal, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.

3.0 LEGISLATION

3.1 Detail on the relevant national policy and legislation for ecology in relation to development sites are provided in Appendix B. The national policy and legislation most relevant here are:

- The Conservation of Habitats and Species Regulations (“The Habitats Regulations”) (Amendment) 2017 in relation to the European Protected Species (EPS) including great crested newt, (GCN), bats (all species) and dormouse; and European protected sites i.e., Special Areas of Conservation (SAC), Special Protection Areas (SPAs) and internationally protected “Ramsar Sites” (collectively known as “Natura 2000 sites”). Annex II bat species are of particular relevance in relation to SACs designated for bats.
- The Wildlife and Countryside Act 1981 (WCA) (as amended) in relation to all wild birds (including Schedule 1 species), other animals (notably Schedule 5 species), flora (those listed in Schedules 8 and 9) and Sites of Special Scientific Interest (SSSI);
- Protection of Badgers Act 1992;
- Natural Environmental and Rural Communities (NERC) Act 2006 in relation to various priority species and habitats;
- Hedgerow Regulations 1997 made under Section 97 of the Environment Act 1995;
- National Planning Policy Framework (NPPF) (2023);
- The Environment Act (2021)
- Local Nature Reserves (LNR) as designated most recently by the NERC Act 2006;
- Non-statutory protected local sites including County Wildlife Sites (CWS), Sites of Importance for Nature Conservation (SINC), Local Wildlife Sites (LWS) and Ancient Woodland Inventory (AWI) sites;
- Local Biodiversity Action Plans (LBAP); and
- Birds of Conservation Concern (BoCC).

4.0 METHODOLOGY

- 4.1 In order to compile existing baseline information, relevant ecological information was requested from both statutory and non-statutory nature conservation organisations including:
- Multi Agency Geographic Information for the Countryside (MAGIC)².
 - Telford Ecological Data Service.
- 4.2 Further inspection of colour 1:25,000 OS base maps (www.ordnancesurvey.co.uk) and aerial photographs from Google Earth (www.maps.google.co.uk) was also undertaken in order to provide additional context and identify any features of potential importance for nature conservation in the wider countryside.
- 4.3 The search area for biodiversity information was related to the significance of sites and species and potential zones of influence, as follows:
- 10km around the application area for sites of International Importance (e.g. Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites).
 - 2km around the application area for sites of National or Regional Importance (e.g. Sites of Special Scientific Interest (SSSIs)) and species records (e.g. protected, Local Biodiversity Action Plan (LBAP) or notable species).
 - 1km around the application site for sites of County Importance (e.g. Biological Heritage Sites Local Wildlife Sites).
- 4.4 When reporting consultation data, records were filtered to include only those from the previous twenty years (since 2003), however, professional judgement has also been used and older records included where deemed appropriate to the overall assessment.

Extended Phase 1 Habitat Survey

- 4.5 A field survey was conducted on 23rd and 31st May 2023, and a survey of additional field compartments was conducted on 26th July 2024. Survey methods followed the Phase 1 Survey (JNCC, 2010³) technique. This involved a systematic walkover of the site to classify the broad habitat types and identify any Habitats of Principal Importance (HPI) for the conservation of biodiversity as listed within Section 41 (S41) of the Natural Environment and Rural Communities (NERC) Act 2006. Habitats were broadly mapped in the field using an OS base map.
- 4.6 Where feasible, target notes and species lists were compiled for individual areas and assessments of abundance were made using the DAFOR scale. Vascular plant nomenclature follows Stace (2019)⁴. Whilst the species lists collected should not be regarded as exhaustive, sufficient information was gained during the survey to enable classification and assessment of broad habitat types and identify features likely to be of interest.

² magic.defra.gov.uk

³ JNCC (2010). Handbook for Phase 1 habitat survey – a technique for environmental audit. Peterborough: JNCC

⁴ Stace, C.A. (2011). New Flora of the British Isles. (4th Ed.). Cambridge: Cambridge University Press

Invasive Plants, Notifiable Weed Species and Other Notable Flora

- 4.7 Consideration was given as to the presence of invasive species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) (WCA 1981) and the presence of any notable weeds including those covered under the Weed Act 1959 (where population is significant enough to be considered injurious).

Preliminary Protected Species Assessment

- 4.8 During the Extended Phase 1 Habitat survey, observations, identification and signs of any species protected under the following list of Acts and Regulations (collectively referred to herein as 'Protected Species') were recorded:

- Schedule 1 of the Wildlife and Countryside Act 1981 (as amended).
- The Protection of Badgers Act 1992.
- The Conservation of Habitats and Species Regulations 2017 (as amended).

- 4.9 Consideration was also given to the existence and use of the site by other fauna listed as one or more of the following (collectively referred to herein as 'Notable Species'):

- Species of Principal Importance (SPI) for the conservation of biodiversity in England on the Natural Environment and Rural Communities (NERC) Act, Section 41 (S41).
- Species listed on any Local Biodiversity Action Plan (LBAP) initiatives.
- Red Data Book (RDB) species.

- 4.10 The likely presence or absence of protected and notable species has been assessed by a number of factors including the availability or suitable habitat, connectivity, known species distribution, local records and an understanding of the ecology and habitats requirement of the individual species assessed. Examples of the types of criteria for likely presence/absence used as part of this assessment are provided in Table 1.

Table 1: Existing Habitats

Likelihood of Presence	Example Criteria
Negligible	Where one or more of the following is true for the site: it offers no suitable habitat; it is isolated from known areas of suitable habitats/species presence; displays no evidence of use by the species in question; it is outside of the known local/regional/national distribution for the species; and there are no desk study records are present during the data search.
Low	Where one or more of the following is true for the site: the habitats present are of poor to moderate suitability; it is limited or restricted connectivity to areas of suitable offsite habitat or areas with known presence; it is in a location where the species distribution is known to be sparse at a local or regional scale; the desk study indicates the presence of the species in the locality in small to moderate numbers.
Moderate	Where one or more of the following is true for the site: the habitats present are of moderate to high suitability; it is clearly connected to suitable offsite habitat offsite habitat or areas with known presence; it is in a location where the species is known to be well distributed; the desk study indicates the presence of the species in the locality in moderate to good numbers.
High	Where one or more of the following is true for the site: the habitats present are of optimal suitability; it is adjacent to areas of suitable offsite habitat offsite habitat or areas with known presence; it is in a location where the species is known to be well distributed; there are field signs evidencing that a species has been present on the site; the desk study indicates the presence of the species has been historically present on or within the immediate vicinity of the site.

Likelihood of Presence	Example Criteria
Present	The species was observed using the site during the extended phase 1 habitat survey or, where appropriate for certain species, field signs indicate the regular use of the site i.e. the presence of a badger sett.

Limitations

- 4.11 This assessment aims to provide baseline ecological data for the site and as such presents an overview of the habitats and features present. Due to the transient and complex nature of ecosystems, no investigation can provide a complete representation or prediction of the natural environment present, however every effort has been made to ensure an accurate description of the site in presented following best practice guidance, experience and professional judgement.
- 4.12 The Phase I Habitat map has been reproduced from detailed field notes and informed by aerial imagery, OS mapping and site maps provided by the client. The accuracy of this figure is therefore ultimately guided by the accuracy of these sources and can only be relied upon to a certain degree of resolution.
- 4.13 Data provided by third party sources collated during the desktop study is generally made up from a wide range of sources including (but not limited to) those submitted by ecological consultancies, wildlife conservation organisations and volunteers. As such, this data is typically focused on areas of known nature conservation, is reliant upon formal surveys having been undertaken within an area or the presence of an expert within the locality (particularly for invertebrate records) and as such this data can never be fully relied upon as a complete ecological dataset for any given area. Rather, this data is used as a guide to likely presence of notable ecological features and can never be relied upon for likely absence.
- 4.14 Given the transient nature of natural processes, the findings of this report should not be relied upon for more than 18 months from completion of surveys.

5.0 RESULTS

Desk Study

Designated Sites

5.1 Results of the desk study are shown on Figures 1 & 2: Designated Sites and Protected Species Plan.

Statutory Designated Sites

5.2 An area of the Midlands Meres & Mosses Phase 2 Ramsar Site is located approximately 9.4km north-east of the site. The wider Ramsar Site comprises a series of 18 component open waterbodies (meres) and associated habitats located in the north-west Midlands and north-east Wales. The area closest to the site corresponds with Aqualate Mere which is also designated as a National Nature Reserve (NNR) and Site of Special Scientific Interest (SSSI). This is a large mere with associated habitats that include a complex of open water, fen, grassland and woodland. The site also supports a wide variety of mammal, bird, and plants associated with reed beds and low-lying wet grassland.

5.3 No statutory designated sites of national importance are present within 2km of the site boundary however the site is within the Impact Risk Zone (IRZ) for a number of SSSIs including The Wrekin and the Ercall SSSI, Muxton Marsh SSSI and Newport Canal SSSI. According to the MAGIC website, IRZ information can be used 'to assess planning applications for likely impacts on SSSIs/SACs/SPAs & Ramsar sites (England)'. In the location of the site, the IRZ information indicates that the LPA should consult Natural England on likely risks from the following:

- **All planning applications** – not applicable;
- **Infrastructure** – Livestock & poultry units with floorspace > 500m², slurry lagoons & digestate stores > 750m², manure stores > 3500t.
- **Combustion** - General combustion processes >50MW energy input. Incl: energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis/gasification, anaerobic digestion, sewage treatment works, other incineration/ combustion.
- **Discharges** - Any discharge of water or liquid waste of more than 20m³/day to ground (ie to seep away) or to surface water, such as a beck or stream.

Non-Statutory Designated Sites

5.4 Two non-statutory designated sites are located within 1km of the site boundary. These are both designated as both Local Nature Reserves and Local Wildlife Sites:

- Apley Woods is located adjacent to the south of the site beyond the A442 Queensway. The LNR and LWS citations mention the site is located within the former grounds of a stately home with arboretum specimen trees within the woodlands and an avenue of yew *Taxus baccata*. There is a lake and meadow and the site supports summer migrant warblers and bats.
- Dothill Park is located approximately 750m south-west of the site. The LNR and LWS citations mention the site supports wetland and watercourses, woodland, scrub and wet grassland, with a variety of fauna including invertebrates, small mammals, overwintering wildfowl and other notable bird species.

Protected/Notable Species

- 5.5 A number of protected or notable species records from the previous 20 years were highlighted either within the site or the surrounding area by Telford Ecological Data Service.
- Three records of badger *Meles meles* were returned, all located over 500m to the south of the site from 2015 and 2016. No descriptions of the type of record (e.g. sett or badger sighting) were provided.
 - Three records of otter *Lutra lutra* were located to the south of the site, from 2007, 2009 and 2015. Records were located approximately 130m and 420m to the south, within land near to Hadley Brook and Shrewsbury Canal.
 - One record of water vole was recorded approximately 250m to the east of the site from 1998.
 - One record of brown hare from 2015 was located within the site (at OS grid ref: SJ 663 140).
 - Four records of hedgehog *Erinaceus europaeus* were located to the south of the site, the closest being at Apley Pool, 100m to the south of the site boundary. Records were from 2016 and 2017. A number of four-figure grid references were also returned for the area around the site.
 - Five species of moth listed as SPI under S41 of the NERC Act (2006) were recorded at Wappenshall Wharf in the north of the site (likely outside of the site boundary) in 2016. This included cinnabar *Tyria jacobaeae*, small square-spot *Diarsia rubi*, dusky thorn *Ennomos fuscantaria*, blood-vein *Timandra comae* and dark-barred twin-spot carpet *Xanthorhoe ferrugata*. A number of other notable butterfly and moth species were returned in the desk study, all located to the south of the site at Apley Woods LNR/LWS.
 - Records of great crested newt *Triturus cristatus* (GCN) were located 70m, 480m, 600m, 700m and, 950m to the east and south-east of the site with additional records over 1km to the east indicating a population was present in this location in 2013 and 2014. Records were also located 830m and 960m south-west of the site with further records over 1km in this location at Dothill Park, indicating a population was present over a number of years from 1996 to 2016 in this location.
 - Common toad *Bufo bufo* were recorded 580m to the south of the site in 1997, and also to the east, south-east and south-west of the site in similar locations to the above GCN records.
 - A number of bat species, including brown long-eared *Plecotus auratus*, common pipistrelle *Pipistrellus pipistrellus*, Daubenton's bat *Myotis daubentonii*, Natterer's *Myotis nattereri*, noctule *Nyctalus noctule*, soprano pipistrelle *Pipistrellus pygmaeus* and whiskered *Myotis mystacinus* were recorded within the search area. No records identified as roosts were provided.
- 5.6 Twenty notable bird species were recorded within the search area. Bird species records were provided with a four-figure grid reference only. Records included typical species associated with farmland and woodland/scrub including yellowhammer *Emberiza citrinella*, tree sparrow *Passer montanus*, brambling *Fringilla montifringilla*, cuckoo *Cuculus canorus*, greylag goose *Anser anser*, grey partridge *Perdix perdix*, barn owl *Tyto alba*, lapwing *Vanellus vanellus* and skylark *Alauda arvensis*. Winter migrants included redwing *Turdus iliacus* and fieldfare *Turdus pilaris*. Species associated with wetland/watercourses included reed bunting *Emberiza schoeniclus* and kingfisher *Alcedo atthis*.

Extended Phase 1 Habitat Survey – Habitats

- 5.7 The locations of the habitats described below are illustrated in Figures 3, 3a and 3b: Phase 1 Habitat Plan.

Arable

- 5.8 Arable land was dominant within the site. The majority of fields were planted with a cereal crop however a few recently-ploughed fields were also noted.
- 5.9 Field margins varied in width throughout the site however most comprised species-poor rough grassland with tall ruderal herbs. Grass species comprised rough meadow-grass *Poa trivialis*, barren brome *Bromus sterilis*, cock's-foot *Dactylis glomerata*, Yorkshire-fog *Holcus lanatus* and false oat-grass *Arrhenatherum elatius*, with herb species including cleavers *Galium aparine*, cow parsley *Anthriscus sylvestris*, common nettle *Urtica dioica*, mugwort *Artemisia vulgaris*, common hogweed *Heracleum sphondylium*, red campion *Silene dioica*, creeping thistle *Cirsium arvense*, green alkanet *Pentaglottis sempervirens* and a burdock *Arctium sp.*
- 5.10 In addition to cultivated fields, some areas of uncultivated/fallow ground were present. These were vegetated with common arable weeds such as common poppy *Papaver rhoeas*, groundsel *Senecio vulgaris*, fat-hen *Senecio vulgaris*, knotgrass *Polygonum aviculare*, a willowherb *Epilobium sp.*, scented mayweed *Matricaria chamomilla* and common field speedwell *Veronica persica*.

Semi-Improved Grassland

- 5.11 Two fields of poor semi-improved grassland were present within the site (fields 1 and 2). The fields were adjacent to each other and located in the east of the site and had tall swards (average 1m) which were considered potentially to be managed for hay.
- 5.12 The swards were similar in composition and were dominated by grasses including Yorkshire-fog, meadow foxtail *Alopecurus pratensis*, sweet vernal-grass *Anthoxanthum odoratum* and false oat-grass with perennial rye-grass *Lolium perenne* occurring rarely. Herbs included frequent common sorrel *Rumex acetosa* and meadow buttercup *Ranunculus acris* with occasional common vetch *Vicia sativa* and cuckooflower *Cardamine pratensis* with rarely occurring creeping cinquefoil *Potentilla reptans*, common mouse-ear *Cerastium fontanum* and meadow vetchling *Lathyrus pratensis*.
- 5.13 In addition to these fields, three arable headlands were located in the south of the site which had relatively diverse grassland swards with frequent Yorkshire-fog, crested dog's-tail *Cynosurus cristatus*, creeping bent *Agrostis stolonifera* and teasel *Dipsacus fullonum*, and occasional creeping buttercup *Ranunculus repens*, common vetch, ribwort plantain *Plantago lanceolata*, oxeye daisy *Leucanthemum vulgare*, common knapweed *Centaurea nigra*, curled dock *Rumex crispus* and yarrow *Achillea millefolium*, as well as hedge bedstraw *Galium mollugo*, lady's bedstraw *Galium verum*, common bird's-foot trefoil *Lotus corniculatus*, meadow vetchling and ragged robin *Silene flos-cuculi* occurring rarely.

Improved Grassland

- 5.14 Six fields of improved grassland were present within the site and wider survey area. The majority of these appeared to be grazed by livestock on rotation, with cows, horses and sheep present within five of the fields during the survey.

5.15 Fields 3, 4 and 5 along the eastern boundary and fields 6 and 7 within the centre of the site were species-poor and dominated by perennial rye-grass, with abundant rough meadow-grass and Yorkshire-fog in fields 4, 5, 6 and 7 which were cattle grazed. Herb species were scattered throughout and included meadow buttercup, dandelion *Taraxacum agg.*, common hogweed and cow parsley.

5.16 Field 8 was unmanaged and dominated by perennial rye-grass with rough meadow-grass, meadow foxtail and Yorkshire-fog. Herbs were restricted to scattered meadow buttercup, white clover and creeping buttercup.

Broadleaved Semi-Natural Woodland

5.17 Six small areas of woodland were present within the site and wider survey area, largely restricted to the edges of watercourses.

5.18 Woodland 1 in the north of the site was associated with Hurley Brook, and had a canopy dominated by sycamore *Acer pseudoplatanus*, with ash *Fraxinus excelsior*, a willow *Salix sp.*, a poplar *Populus sp.* and a cherry *Prunus sp.* The understorey was dense and well developed and comprised young trees of the canopy species and hawthorn *Crataegus monogyna*. Ground flora included locally abundant dog's mercury *Mercurialis perennis*, as well as common nettle, cleavers, ivy *Hedera helix* and red campion.

5.19 Crow Brook in the east of the site was lined with mature trees along its length, which in places was up to 15m wide and classified as Woodland 2. Mature trees comprised common alder *Alnus glutinosa*, a willow and ash, with understorey shrubs of hawthorn, hazel and field maple. The understorey comprised tall ruderal herbs with a high proportion of bare ground.

5.20 Woodland 3 was not surveyed during the extended Phase I Habitat survey as it was outside of the survey boundary at the time. This is named Park Covert on the OS map.

5.21 Woodland 4 was in the western extent of the Site, situated adjacently to the northern boundary. Mature trees were located close the woodland edges, with younger trees scattered throughout. The canopy was comprised of field maple, sycamore, oak and wych elm. The understorey was dominated by bramble, with occasional patches of tall forbs.

5.22 Woodland 5 was also located in the west and was dominated by large mature sycamore trees. Deadwood was frequent throughout, with a small number of fallen trees scattered throughout the woodland. Other canopy species included oak, field maple, ash and wych elm. The ground-flora was comprised of species including black horehound, red campion, white campion, Yorkshire-fog, fox glove, yellow rattle, and white dead-nettle. The woodland also had large areas of bare ground where the canopy was unbroken.

5.23 Woodland 6 in the western arable fields was small and dominated by early-mature crack willow trees. A large mature oak tree was located on the eastern side of the woodland and contained many deadwood features. At the centre of the woodland was a small pond, which contained limited water at the time of survey.

Scrub

5.24 Small areas of dense willow scrub were limited to woodland edge habitat and field margins. Scattered scrub was also present along woodland edges, including sycamore, aspen *Populus tremula*, willow, bramble *Rubus fruticosus agg.* and hawthorn.

Watercourses

- 5.25 Hurley Brook flowed through the site and crossed the northern and southern site boundaries. In the north the watercourse was bordered and overshadowed by Woodland 1. The stream had a slow flow with shallow earth banks and a mud substrate. No aquatic vegetation was recorded within the stream. The banks were largely vegetated with common ivy and the invasive Himalayan balsam *Impatiens glandulifera*, with wild garlic *Allium ursinum* also recorded.
- 5.26 To the south of Wappenshall Lane, Hurley Brook was characterised by a deep channel with very steep sides, which was fenced-off from the surrounding farmland and also lined with tall, dense hedgerows on both sides. The banks, where visible, either comprised bare ground (where shading was heavy) or rough grassland and tall ruderal herbs. Further south, Hurley Brook was lined with hedgerow to the west and mature trees including sycamore, willow, pedunculate oak, ash and silver birch *Betula pendula* to the east. The stream had a slow flow over a mud substrate. No aquatic vegetation was recorded.
- 5.27 Crow Brook was present in the east of the site and comprised an approximate 20m corridor including the watercourse and tree lined banks (Woodland 2). Banks comprised tall ruderal herbs including common nettle, cow parsley and cleavers, as well as the invasive Himalayan balsam. The stream had a slow to moderate flow over a mud substrate and also included some manmade sections with concrete steps. The majority of the stream was heavily overshadowed with only very short sections of more open grassland banks which comprised false oat-grass, a St. John's-wort *Hypericum sp.*, wood avens *Geum urbanum* and common hogweed. Aquatic vegetation was limited to small stands of great reedmace *Typha latifolia* in sections of the watercourse where water pooled and the stream had a very slow flow.

Ditches

- 5.28 Sections of wet and dry ditch were present across the site, both associated with hedgerows and also forming more 'open' boundaries to arable fields.
- 5.29 Where wet ditches formed field boundaries, the upper banks were typically vegetated with tall ruderal herbs and lower banks included meadowsweet *Filipendula ulmaria*, a figwort *Scrophularia sp.* and soft-rush. In channel vegetation included common reed *Phragmites australis*, brooklime *Veronica beccabunga*, fool's-water-cress *Apium nodiflorum* and floating sweet grass *Glyceria fluitans*.
- 5.30 Dry ditches were vegetated with rough grassland and tall ruderal herbs, as well as bramble scrub.

Hedgerows

- 5.31 A large number of hedgerows were present within the site, all of which comprised >80% native woody species and were therefore Habitats of Principal Importance under section 41 of the NERC Act (2006).
- 5.32 The majority of hedgerows were species poor⁵, dominated by hawthorn with occasional additional species including blackthorn *Prunus spinosa*, pedunculate oak, field maple, dog-rose *Rosa canina* and hazel *Corylus avellana*. Species-rich hedgerows were also recorded

⁵ Defra (2007) Hedgerow Survey Handbook. A standard procedure for local surveys in the UK. Defra, London

comprising similar species with a more even distribution in addition to an elm *Ulmus sp.*, dogwood *Cornus sanguinea*, spindle *Euonymus europaeus*, ash and alder.

- 5.33 Hedgerows with trees and ditches were also present throughout the site. Tree species included field maple, beech *Fagus sylvatica*, pedunculate oak and ash.

Trees

- 5.34 As well as within hedgerows, trees were also scattered individually throughout the field compartments. Pedunculate oak was the predominant species. Four trees in the west of the site (T1, T2, T3 and T4) were considered likely to be veteran, supporting features that are typical of old trees. Standing dead trees were also recorded. Of these mature trees, a number were observed to have features that may have the potential to support roosting bats, as discussed in the Fauna section below.

Tall Ruderal Herb

- 5.35 Stands of tall ruderal herb including common nettle dominated vegetation as well as mixed species stands of broad-leaved dock, cleavers, great willowherb *Epilobium hirsutum* and creeping thistle were present throughout the site. These were largely present in association with woodland edge and field margins, as well as rough/disturbed ground the edges of farm tracks.

Ponds

- 5.36 Two ponds were present within the western extent of the site. One pond was situated between two arable compartments and was surrounded by early-mature willow trees, forming a small area of woodland. The second pond was located within a moderately sized woodland and held water of poor quality.

Fauna

Preliminary Protected Species Assessment

- 5.37 The potential for the site to support protected and notable species has been assessed based on the desktop study results, the habitats present on site and their connectivity to suitable offsite habitats. Based on the evaluation of these factors, the habitats present on site are considered to have potential to support a number of protected/notable species as discussed in Table 2.

Table 2: Preliminary Protected/Notable Species Assessment

Species	Relevant Legislation / Policy	Site Assessment	Likelihood of Presence
Bats	CHSR, WCA	The hedgerows and trees provide suitable foraging and commuting habitats for bats. Bats are a common species group that will range far for foraging, and it is therefore considered highly likely that bat species will be using the site as commuting and/or foraging habitat. Mature trees on the field boundaries provided potential for roosting bats with features such as rot holes, cavities, flaking bark and broken limbs. There is moderate to high potential for roosting bats to be utilising trees within the site.	High
Nesting Birds	WCA	The site supports nesting opportunities for birds within hedgerows, trees, small pockets of woodland and scrub. The arable and grassland habitats are likely to provide nesting habitat for ground nesting farmland birds, such as tree sparrow <i>Passer montanus</i> , yellowhammer <i>Emberiza citrinella</i> and skylark <i>Alauda arvensis</i> which were identified in the desk study	High
Badgers	PBA	The core of the arable habitats on site were sub-optimal for badgers, however, the hedgerows, woodland, woodland edge, scrub, arable margins and grassland provides potential to support foraging badgers. Furthermore, the woodland, woodland edge, hedgerows and areas of scrub and trees provide suitable sett creation habitat. No evidence of badger activity was recorded within the site. The desktop study also indicates that badger activity is limited in the location of the site with only three records returned, all located over 500m from the site boundary.	Low
Water Vole	WCA	On-site habitats were generally limited for this species, with Hurley and Crow Brook being largely heavily overshadowed and therefore providing limited foraging habitat. Arable field ditches were of higher suitability although these were generally isolated features with limited connectivity. One record of water vole was returned in the desk study located 250m to the east of the site, however this was from 1998.	Low
Otter	CHSR, WCA	Otters have been recorded to the south of the site, potentially associated with the Shrewsbury Canal, with relatively recent records from 2015. On-site habitats were of limited potential for this species, although Hurley and Crow Brook and associated habitats may provide commuting habitat and places of rest or shelter.	Moderate
White-clawed crayfish	WCA	On-site habitats were considered to be of negligible suitability for this species and no desk study records were returned within 1km of the site.	Low
Great Crested Newt	CHSR, WCA	Two ponds were situated within the western extent of the Site boundary and were deemed suitable to support GCN. Terrestrial habitat was very limited to the base of hedgerows, pocket of dense scrub and woodland and rough margins. The field compartments were considered unsuitable for this species due to nature of the associated arable land. Records of GCN were returned to the east of the site, the closest being 70m from the eastern boundary. Records indicate an off-site population was present to the east in 2013/2014. Records were also located off-site to the south however these were separated from the site by the A442 which has kerbs and gully pots and therefore likely presents a significant barrier to dispersal. Five ponds and a wet ditch exist within 250m of the site boundary, a wet ditch located immediately adjacent. Off-site ponds were not assessed during the extended Phase I Habitat survey however it is considered likely that some will likely provide suitable habitat for breeding great crested newt given their size and presence of surrounding suitable terrestrial habitat. However, given the generally unsuitable nature of terrestrial habitat on-site it is considered unlikely that significant numbers of GCN from these off-site ponds would utilise on-site habitats.	Low
Reptiles	WCA	The arable habitats on site were generally unsuitable or suboptimal for reptiles with grassland fields providing some potential to support populations of species such as grass snake. Hedgerows may provide connectivity and/or refuge throughout the site but are considered offer low potential to support this species group.	Moderate

Species	Relevant Legislation / Policy	Site Assessment	Likelihood of Presence
Brown hare	NERC	Brown hare were recorded on-site during the survey.	High
Hedgehog	NERC	Habitats on-site including woodland edge and hedgerows provided some suitable habitat however this was limited by the largely arable nature of the land.	Moderate

KEY: CHSR - Conservation of Habitat and Species Regulations 2017 (as amended), WCA - Wildlife and Countryside Act 1981 (as amended), NERC - Species of Principal Importance (SPI) for the conservation of biodiversity in England on the Natural Environment and Rural Communities (NERC) Act, Section 41 (S41)

6.0 DISCUSSION AND RECOMMENDATIONS

- 6.1 The results of this Preliminary Ecological Appraisal of the site have been assessed against the most up-to-date understanding of the proposals which include allocation of the site in the Local Plan for residential development of around 3,100 dwellings, employment land and associated infrastructure. A Framework Masterplan (11521-FPCR-ZZ-XX-DR-L-0002 P10) has been produced which details the proposals.
- 6.2 It is anticipated that boundary hedgerows and trees can be retained within the layout of the site, with a potential loss of small sections to allow for access and visibility splays. Loss or partial loss of hedgerows within development parcels is anticipated and this has been considered within the BNG Assessment at Appendix A.
- 6.3 Loss of trees should be avoided wherever possible, particularly along the boundaries, however, some loss of field and hedgerow trees may be required. Where this is the case, any potential veteran trees, or trees with potential to support roosting bats would require further survey, and it would be recommended that these are retained and buffered within the proposals.
- 6.4 All woodlands and watercourses have been retained and incorporated into the green infrastructure proposals. These habitats should be protected during construction work and where feasible, buffered and enhanced through appropriate management/landscape design.
- 6.5 Table 3 provides an overview of the potential ecological constraints associated with the site along with recommendations for avoidance, protection, mitigation and/or compensation measures that can be designed into the scheme as appropriate. The following ecological features identified during this appraisal are not considered to pose a constraint to the proposals and are therefore not discussed in Table 3.
- **Midland Meres and Mosses Phase 2 Ramsar Site** – Given the distance between the Midland Meres and Mosses Phase 2 Ramsar site and the site boundary (9.4km) it is considered unlikely that the proposals would negatively impact this Statutory site. The site is also outside of the IRZ for Aqualate Mere SSSI, which is the SSSI that corresponds with the Ramsar designation.
 - **Non-Statutory Designated Sites** – Apley Woods LNR and LWS lies adjacent to the southern boundary of the site. The proposal could lead to an increase in people using this site for recreation, however, the impacts are not considered to be significant with the extensive areas of proposed on-site greenspace providing alternative recreation areas. The remaining non-statutory designated site, Dothill Park LNR and LWS, is considered to be sufficiently distant that it would not be impacted by effects associated with the scheme.
 - **Habitats of low conservation importance** – the arable, semi-improved grassland, improved grassland, small areas of scrub and tall ruderal herb habitats are considered to be of low nature conservation value. These habitats have limited species diversity, and all species recorded are common and widespread. The loss of these habitats is therefore not considered to be a constraint to proposals. As detailed in Appendix A, extensive areas of species-rich grassland can be created within the network of green infrastructure that is proposed, along with areas of scrub planting. Additionally, habitats not currently present within the site, such as ponds and wetland, could be created within the extensive areas of green infrastructure.

Table 3: Potential Ecological Constraints and Recommended Mitigation/Further Survey

Ecological Feature	Potential Constraints	Recommended Mitigation/Further Work	Recommended timings
Statutory Designated Sites	The site is located within the IRZ for three SSSIs which indicates that proposals leading to a discharge of water of more than 20m ³ /day to ground or to surface water (such as a stream) may have the potential to impact these Statutory sites.	Drainage proposals should be appropriately designed to include measures to treat surface water using sustainable urban drainage systems, which are sufficient to ensure no adverse impacts to the SSSIs.	N/A
Broadleaved semi-natural woodland	The woodlands provide habitat diversity within the site and opportunities for wildlife. Park Covert (woodland 3) may qualify as a Habitat of Principal Importance under NERC S.41.	All woodlands are retained within the proposals and buffered from the development. Woodlands should be protected during works through the implementation of appropriate measures including root protection areas and protective fencing. Any loss of woodland would require significant compensation to provide a net gain in biodiversity value.	N/A
Watercourses and wet ditches	The watercourses of Hurley Brook and Crow Brook are of conservation value and wet ditches provided habitat diversity within the site and opportunities for wildlife.	All watercourses are currently retained in full with no, or very minor impacts anticipated. The proposed Public Rights of Way and pedestrian/cycle routes crossing the watercourses will use existing crossing points where concrete farm crossings are present. Where these are to be altered, crossings should be designed and constructed to have minimal impacts on the watercourses. Sections of wet ditch should be retained where feasible.	N/A
Ponds	The two ponds in the western extent of the site are of ecological value and provide opportunities for wildlife.	All ponds are retained within the proposals with minimal impacts anticipated from surrounding development. A 10m buffer from any developed land is to be incorporated as part of the proposals, with measures incorporated to prevent pollution from surface run-off.	N/A
Trees	A number of mature and potentially veteran trees located within field parcels and hedgerows provide habitat diversity within the site and veteran trees may qualify as irreplaceable habitats under the NPPF.	Mature and veteran trees should be subject to an Arboricultural survey to determine their value and veteran status and how they can be incorporated into the development.	As required
Hedgerows	All hedgerows are Habitats of Principal Importance under S41 of the NERC Act 2006. It is anticipated there will be some loss of internal hedgerows. Furthermore, retained hedgerows will be in close proximity to the works and are therefore susceptible to damage either through direct above-ground damage or through damage to roots in the absence of mitigation.	Suitable compensation through new hedgerow planting should be undertaken using native species. All retained hedgerows should be protected during works through the implementation of appropriate measures including root protection areas and protective fencing.	N/A
Roosting bats	A large number of mature trees exist within site that provided potentially suitable features for roosting bats.	It is anticipated that boundary trees can be retained within proposals, however, individual field trees may require removal or pruning works. Where this is the case (or where there is the potential risk of indirect impacts on the trees, such as from increased lighting), any trees with bat potential should be subject to further survey by a licenced bat worker. This would involve a detailed aerial inspection by roped access in order to confirm the	Aerial inspection – anytime May – August if nocturnal surveys are required

Ecological Feature	Potential Constraints	Recommended Mitigation/Further Work	Recommended timings
		roosting potential of features. Should it not be possible to inspect the features fully and/or some potential remains, nocturnal surveys between May and August will be required.	
Bat activity	The field compartments provided a limited resource owing to the dominance of intensively managed arable habitats and species-poor grassland, however, the woodland, woodland edges, lines of trees and hedgerows are likely to support foraging and commuting bats.	Given the suitability of habitats for bats, further surveys should be undertaken to determine the levels of activity on the site. The site is considered to have moderate suitability for bats, and therefore seasonal transect surveys (one per spring, summer and autumn) and monthly automated/static bat detector surveys would be required across the site to determine activity levels and assess potential impacts. One static location per transect, collecting data for five consecutive nights per month would be sufficient. It is also recommended that the proposals are guided by a Construction and Environment Management Plan (CEMP) informed by the results of bat surveys and includes a sensitive lighting strategy in accordance with best practice guidance.	One automated/static survey per month between April and October, for 5 consecutive nights One transect per season (spring, summer and autumn)
Nesting and overwintering birds	The habitats onsite could support farmland bird specialists; however, the numbers are considered unlikely to be highly significant given the relatively low suitability of habitats (owing to intensive management, crop type and grazing). The site provides nesting opportunities for a range of common and widespread bird species utilising the trees and hedgerows. Notable overwintering bird species may utilise the site for foraging.	Breeding and wintering bird surveys comprising surveys between April and June, and between November and February should be undertaken to inform a planning application. Additional breeding bird surveys may be recommended should notable species assemblages be recorded. Where removal of woody vegetation (trees and hedgerows) is necessary, this should take place outside of the bird breeding season to minimise the risk of disturbance to breeding birds. If this is not possible, such vegetation should be checked prior to removal by a suitably experienced ecologist. If active nests are found, vegetation should be left untouched and suitably buffered from works until all birds have fledged. Specific ecological advice should be sought prior to undertaking the clearance.	Breeding bird surveys between April and June, inclusive Wintering bird surveys between November and February, inclusive Avoid vegetation removal March - August
Badgers	The site offers suitable foraging and sett creation habitat for badgers, however no evidence of badger activity was recorded.	A survey should be undertaken prior to submission of a planning application to ascertain the status of badgers within the site at this time.	Anytime
Great crested newt	The site offers some very limited suitable habitat for shelter, with ponds on-site and off-site waterbodies within 250m of the site.	Survey to establish the presence/likely absence of this species should be undertaken prior to the submission of a planning application. Surveys should be undertaken on on-site and suitable off-site ponds within 250m of the site, where connectivity is present for this species.	6 surveys should be undertaken with three of these carried out within the optimal season of mid-April and mid-May
Water vole	On-site watercourses are of limited suitability for this species however some sections of wet ditch may provide suitable habitat.	A re-survey of the site to establish suitability of habitats should be undertaken prior to a planning application being submitted. Any suitable sections of watercourse or ditch should be subject to further survey.	Water vole survey should be undertaken between mid-April and September. Two survey visits should be undertaken: one from mid-April to June and one from July to September.

Ecological Feature	Potential Constraints	Recommended Mitigation/Further Work	Recommended timings
Otter	Hurley Brook and Crow Brook may provide commuting habitats and woodland along Crow Brook may provide places of rest or shelter.	A re-survey of the site to establish suitability of habitats should be undertaken prior to a planning application being submitted. Any suitable sections of watercourse or ditch should be subject to further survey.	As required.
White-clawed crayfish	On-site habitats were considered to be largely unsuitable.	A re-survey of the site to establish suitability of habitats should be undertaken prior to a planning application being submitted. Any suitable sections of watercourse or ditch should be subject to further survey.	July – October
Reptiles	On-site habitats were considered to be largely unsuitable, however some grassland fields may support populations.	A re-survey of the site to establish suitability of habitats should be undertaken prior to a planning application being submitted. Suitable habitat should be subject to presence/absence surveys.	Presence/absence surveys between March/April and September.
Brown hare	Brown hare were recorded within the site during the Extended Phase I Habitat survey.	Appropriate working measures to be outlined within a CEMP at an appropriate stage of planning to ensure this species is not harmed/killed during works.	As required
Hedgehogs	Habitats onsite provided some suitability for hedgehog, particularly within hedgerows, woodland and scrub habitats. Proposals could lead to a loss of temporary foraging habitat used by this species and could lead to hedgehogs becoming trapped and injured.	Appropriate working measures to be outlined within a CEMP at an appropriate stage of planning to ensure this species is not harmed/killed during works.	N/A

Habitat Enhancements/Net Gain

- 6.6 Future detailed design of the development will be required to demonstrate a biodiversity net gain of habitats and linear features, calculated using the Defra Biodiversity Metric 4.0 (or the most-recent version at the time). Subsequent to the Environment Act 2021, a net gain in biodiversity value of 10% is likely to be required to be delivered either within the site layout, utilising off-site land, or through the use of a 'bio bank'.
- 6.7 Loss of habitats of moderate or high distinctiveness including woodland and scrub would result in a large loss of biodiversity units, whereas loss of low distinctiveness habitats including improved grassland and arable land would result in loss of fewer biodiversity units. Therefore, any retention of habitats to include or enhance within the site layout as part of the green infrastructure proposals should favour higher distinctiveness habitats with built development focused on the low distinctiveness habitats.
- 6.8 The current proposals have been subject to a Biodiversity Net Gain Assessment which is presented at Appendix A. The development site delivers a baseline of 597.44 habitat units with arable land as the primary habitat contributor. Post intervention the site will deliver 680.42 habitat units under the current proposals which represents a net gain of 82.98 habitat units which equates to a 13.89% net gain.
- 6.9 It has been assumed that 15.46km of hedgerows within the site boundary can be retained, equating to 112.41 hedgerow units. Post-intervention, providing the scheme can include 1km of species-rich native hedgerow which are associated with a bank or a ditch and 2.5km of species-rich native hedgerow (both in moderate condition), the current proposals can deliver 139.18 hedgerow units which equates to a 10.16% gain.
- 6.10 In addition, providing the current proposals can deliver 0.65km of wet ditch in moderate condition, there will be a gain of 3.05 watercourse units which equates to a gain of 10.97%.
- 6.11 The extensive areas of green infrastructure included within the scheme allow for significant areas of habitat creation as well as enhancement of existing habitats. The current assessment assumes that large swathes of wildflower grassland could be created on-site, which could be managed specifically for nature conservation and cut in the style of a traditional hay meadow (with one or two cuts only per year). In addition, it has been assumed that some of the existing grassland pasture could be enhanced (such as through reseeding or overseeding) to increase the biodiversity value of the swards, and these could be managed as per the proposed wildflower grasslands. All grassland creation and enhancement would be informed by preparatory works (such as soil testing for nutrient levels to inform a strategy for nutrient striping (if required) and seed mix selection) which would be undertaken at an early stage to ensure successful establishment of grasslands. Proposals also include the creation of areas of woodland and scrub, and the inclusion of drainage basins.
- 6.12 A phased approach to Biodiversity Net Gain will be targeted through the inclusion of appropriate areas of green infrastructure at each phase of development, guided by an overarching green infrastructure strategy to ensure continuity across the scheme.
- 6.13 To increase the biodiversity net gain score further, habitats such as scrub or ponds managed specifically for wildlife could be included within the green infrastructure in appropriate locations. As discussed above, the amount of hedgerow and wet ditch loss has been assumed

and should additional hedgerow and wet ditch lengths be retained at the detailed design stage, then the amount of hedgerow compensation and wet ditch would reduce.

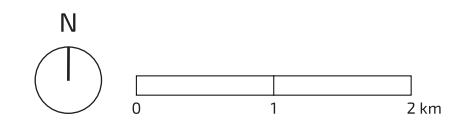
- 6.14 A River Condition Assessment to determine impacts to the on-site watercourses has not been undertaken at this stage as all watercourses are to be retained and buffered, and the proposed crossings (footpath and cycleways) are largely proposed in locations which currently have concrete farm track crossings. As such, it is considered likely that impacts will be minimal, and crossings can be designed to be sympathetic to each watercourse.
- 6.15 Furthermore, and in addition to Biodiversity Net Gain enhancements detailed above, the site offers a range of opportunities to incorporate enhancement features for a variety of faunal species. Table 4 provides a number of recommendations that could be easily incorporated within the scheme.









Table 4: Fauna Enhancement Opportunities

Target Species/ Groups	Enhancement Opportunities	Recommended Specifications
Bats	Given the presence of mature boundary trees around the site boundaries, there are opportunities available to introduce roosting opportunities for this group through the erection of suitable bat boxes. These can be installed during the operational phase of the proposals.	A variety of Schwegler (or similar alternative) bat boxes placed on suitable trees.
Birds	A range of nest boxes suitable for generalist species should be affixed to retained mature trees around the site peripheries, while nest boxes suitable for urban species should be affixed to dwellings around the development periphery.	A mixture of small hole (26mm and 32mm) nest boxes such as the 1B Schwegler nest box.
Amphibians	Any new ponds created should be designed to hold some degree of water throughout the year where feasible and should be planted with a diverse range of native species.	Pond planting should include a native species rich marginal vegetation seed mix that grades into species pond-edge or wet grassland seed-mix.
Reptiles	Reptiles would benefit from the construction of new wildlife ponds as well as inclusion of log piles or hibernacula in strategic locations.	As above for ponds. Log piles and hibernacula should be created at field boundaries near to proposed ponds, within areas of low intensively managed grassland.
Invertebrates	Invertebrates would benefit from the inclusion of log piles and hibernacula designed for amphibians/reptiles but would also benefit from specific features such as insect houses.	Insect houses are readily available from online retailer, but larger features that are designed for a range of species should be used where possible, such as the 'Minibeast HQ.'
Hedgehogs	The development will provide new opportunities for hedgehogs with new residential gardens providing foraging habitat.	Inclusion of gaps at the base of fences measuring 13cm x 13cm to allow hedgehogs free movement between residential gardens and areas of proposed green infrastructure.

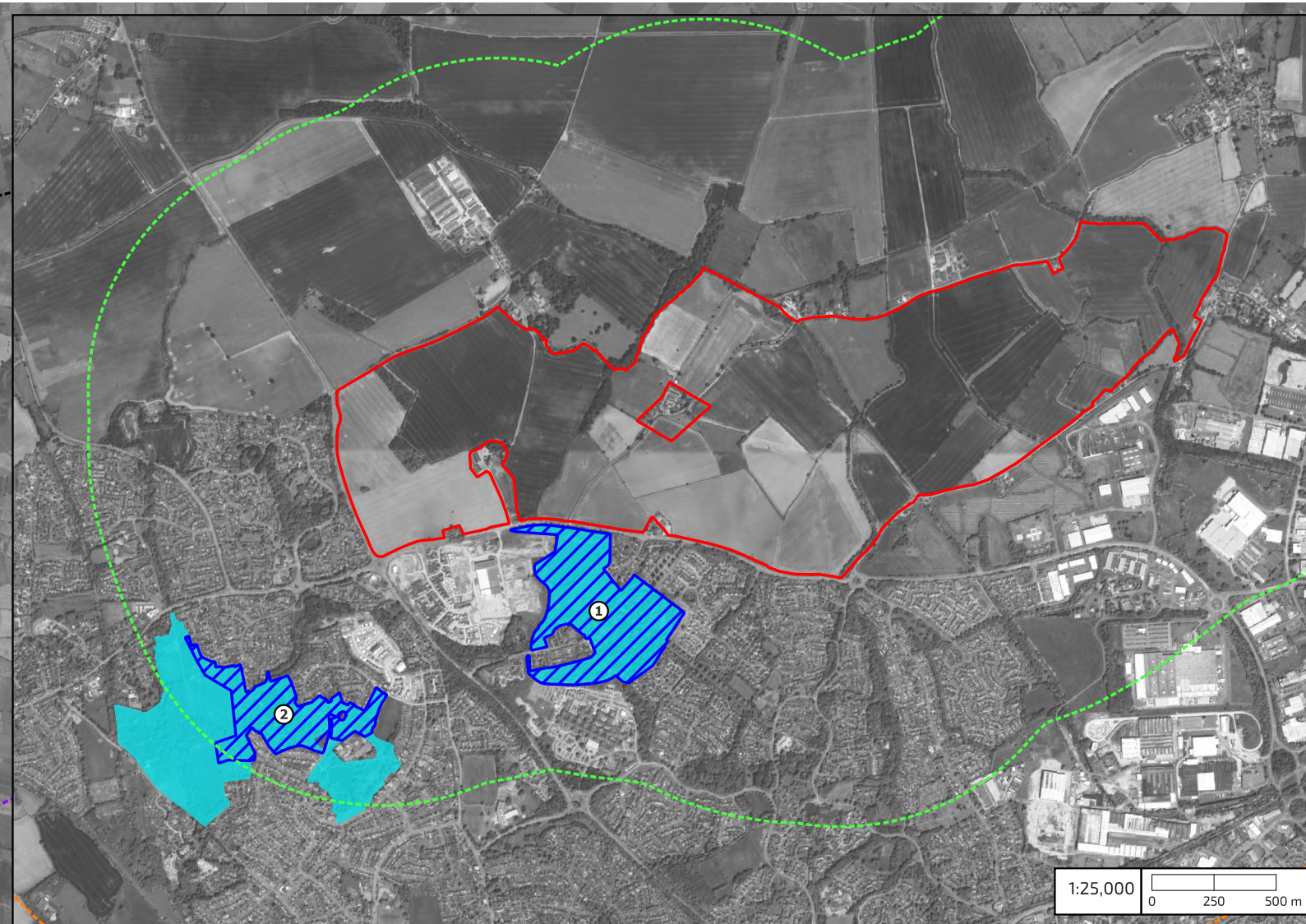
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-  Site Boundary
-  1km Buffer
-  2km Buffer
-  5km Buffer
-  10km Buffer
-  Local Wildlife Site (LWS)
-  Local Nature Reserve (LNR)
-  RAMSAR

- 1 - Apley Wood LWS, LNR
- 2 - Dothill Park LWS, LNR
- 3 - Midland Meres & Mosses Phase 2 RAMSAR

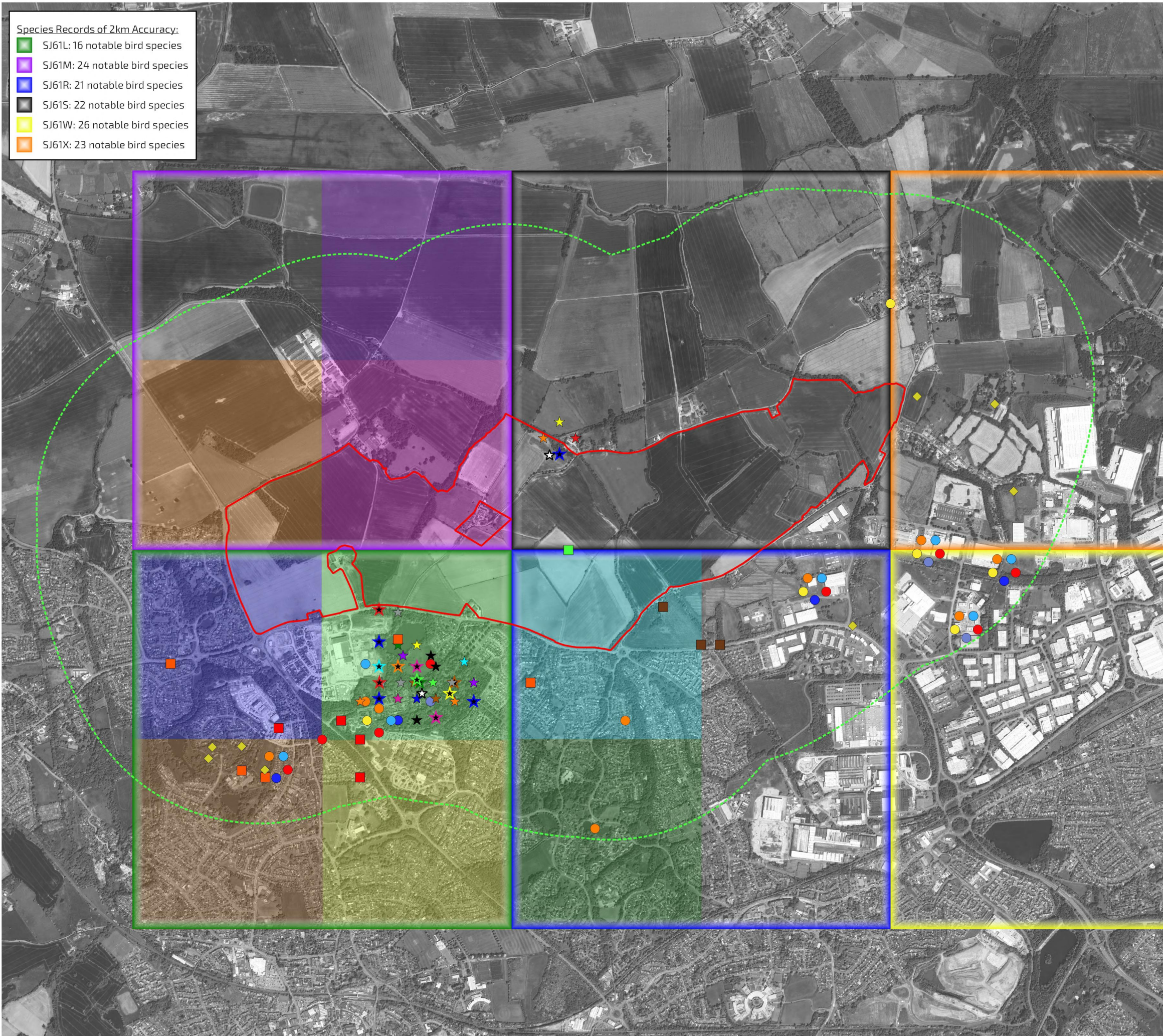


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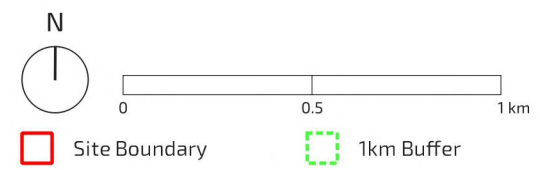
client
The Consortium
project
**Wappenshall,
Telford**

title
SITE LOCATION AND CONSULTATION 1:55,000 @ A3
RESULTS PLAN - DESIGNATED SITES
number rev

FIGURE 1 **E**



- Species Records of 2km Accuracy:**
- SJ61L: 16 notable bird species
 - SJ61M: 24 notable bird species
 - SJ61R: 21 notable bird species
 - SJ61S: 22 notable bird species
 - SJ61W: 26 notable bird species
 - SJ61X: 23 notable bird species



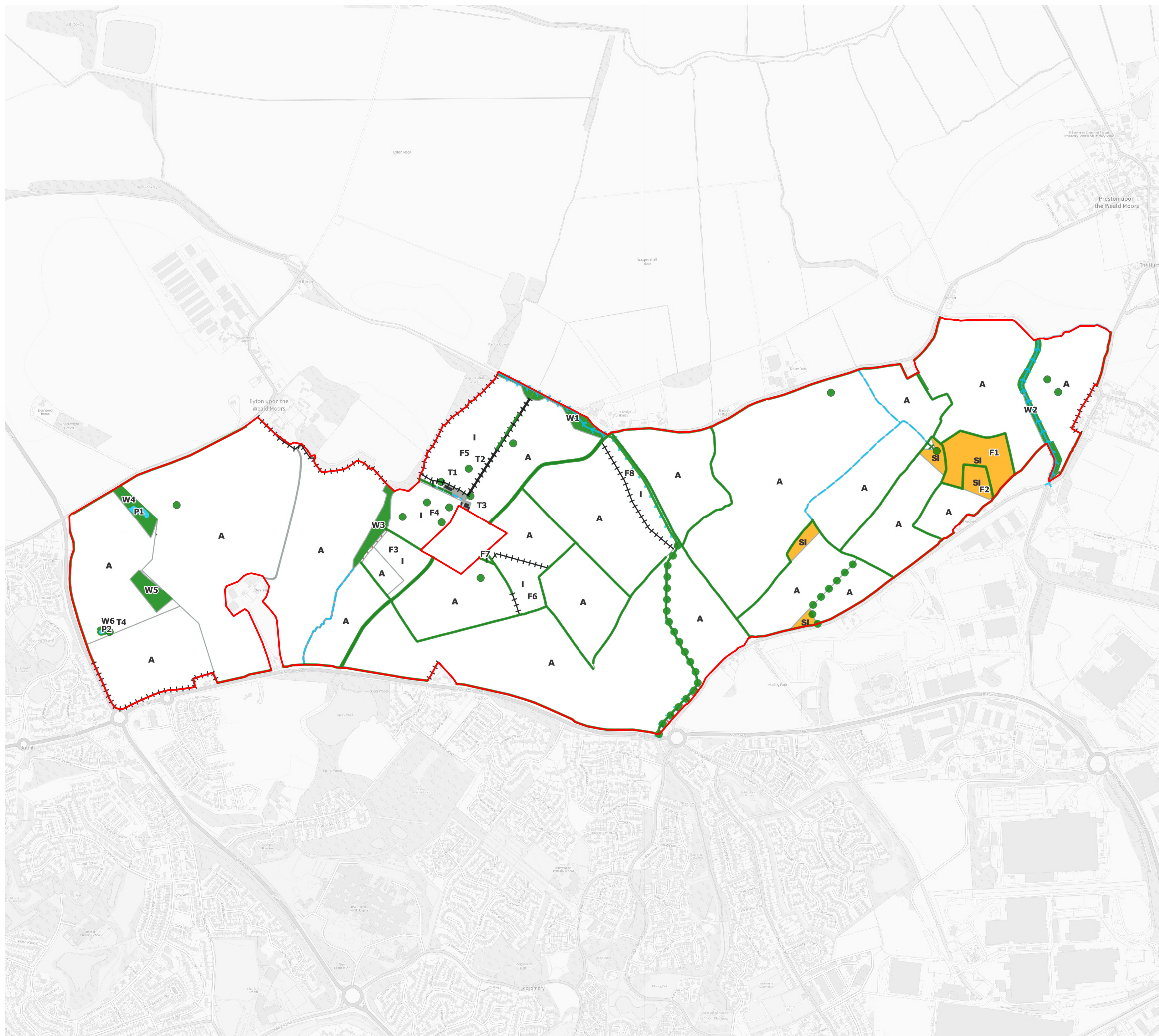
- Site Boundary
 - 1km Buffer
- Bats**
- Brown Long-eared
 - Common Pipistrelle
 - Daubenton's
 - Noctule
 - Soprano Pipistrelle
 - Whiskered
- Herpetofauna**
- ◆ Great Crested Newt
- Mammals**
- Badger
 - Brown Hare
 - Hedgehog
 - Otter
- Notable Invertebrates**
- ★ August Thorn
 - ★ Blood-vein
 - ★ Centre-barred Sallow
 - ★ Cinnabar Moth
 - ★ Common Fan-foot
 - ★ Dark-barred Twin-spot Carpet
 - ★ Dot Moth
 - ★ Dusky Thorn
 - ★ Ghost Moth
 - ★ Grey Dagger
 - ★ Knot Grass
 - ★ Mottled Rustic
 - ★ Oak Hook-tip
 - ★ Powdered Quaker
 - ★ Red Carpet
 - ★ Rosy Rustic
 - ★ September Thorn
 - ★ Shaded Broad-bar
 - ★ Small Emerald
 - ★ Small Phoenix
 - ★ Small Square-spot
 - ★ White Ermine

- Species Records of 1km Accuracy:**
- SJ6412: Common pipistrelle, Common toad, Daubenton's, Great crested newt, Hedgehog, Noctule, Soprano pipistrelle and Whiskered.
 - SJ6413: Badger
 - SJ6414: Hedgehog
 - SJ6512: Hedgehog
 - SJ6513: August thorn, Badger, Bluebell, Dusky thorn, Hedgehog and Small phoenix.
 - SJ6514: Bluebell
 - SJ6515: Common pipistrelle and Noctule
 - SJ6612: Hedgehog
 - SJ6613: Hedgehog

date: 26/09/24 drwn/chkd
CH / RJS

client: **The Consortium**
 project: **Wappenshall, Telford**

title: **SITE LOCATION AND CONSULTATION RESULTS PLAN - SPECIES RECORDS** scale: 1:20,000 @ A3
 number: **FIGURE 2** rev: E



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- Site Boundary
- Broadleaved woodland - semi-natural
- Buildings
- Built Environment: Buildings/hardstanding
- A Cultivated/disturbed land - arable
- I Improved grassland
- SI Neutral grassland - semi-improved
- Other tall herb and fern - ruderal
- Scrub - dense/continuous
- Standing water
- Broadleaved trees
- Standing water
- Running water
- Intact hedge - species-poor
- Fence
- Dry ditch
- Broadleaved tree

date 26/09/24 drwn/chkd
CH / RJS

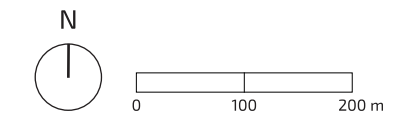
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project
**Wappenshall,
Telford**

title **PHASE 1 HABITAT PLAN -
OVERVIEW** scale
1:13,000 @ A3

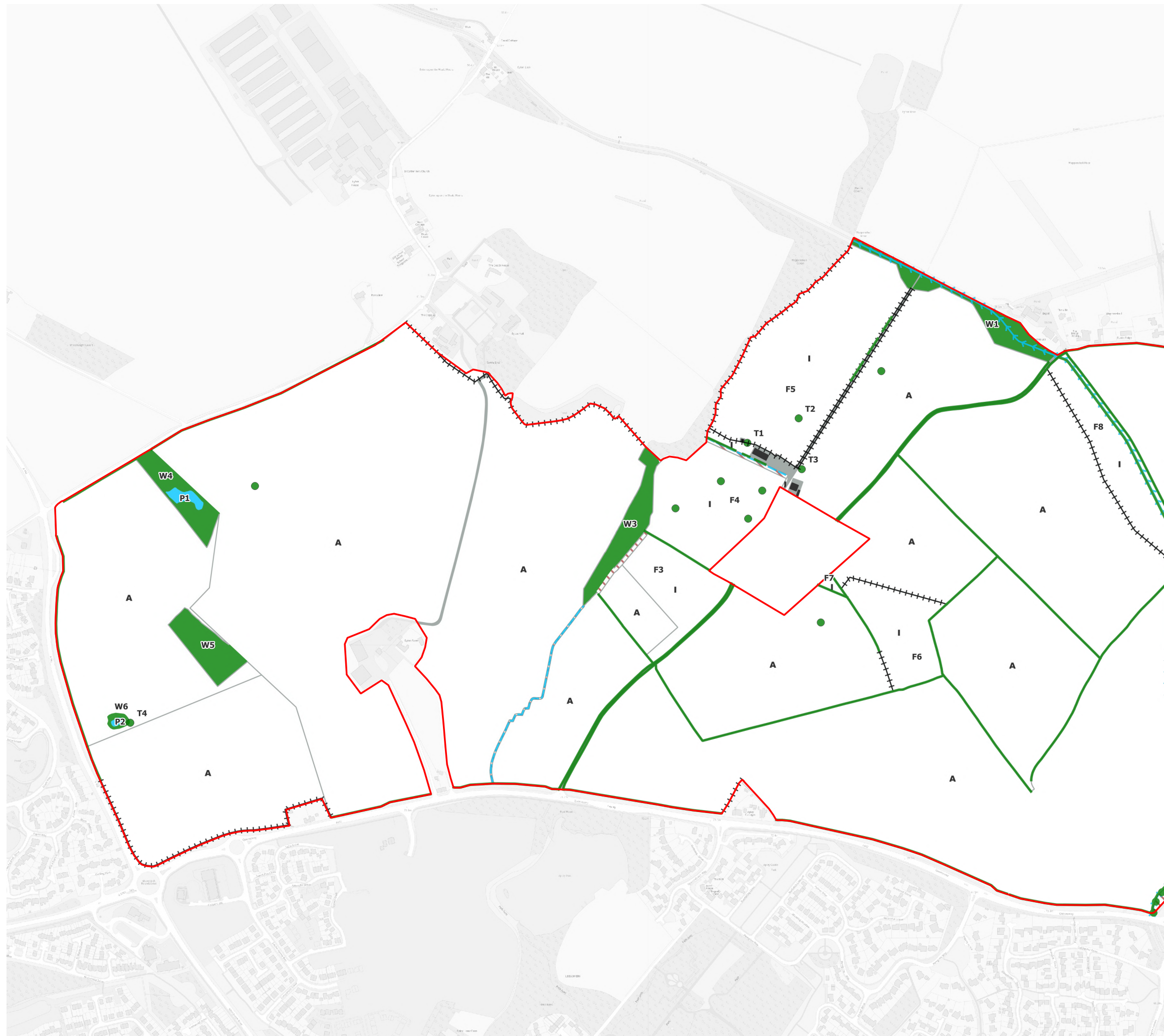
number **FIGURE 3** rev
E

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- Fence
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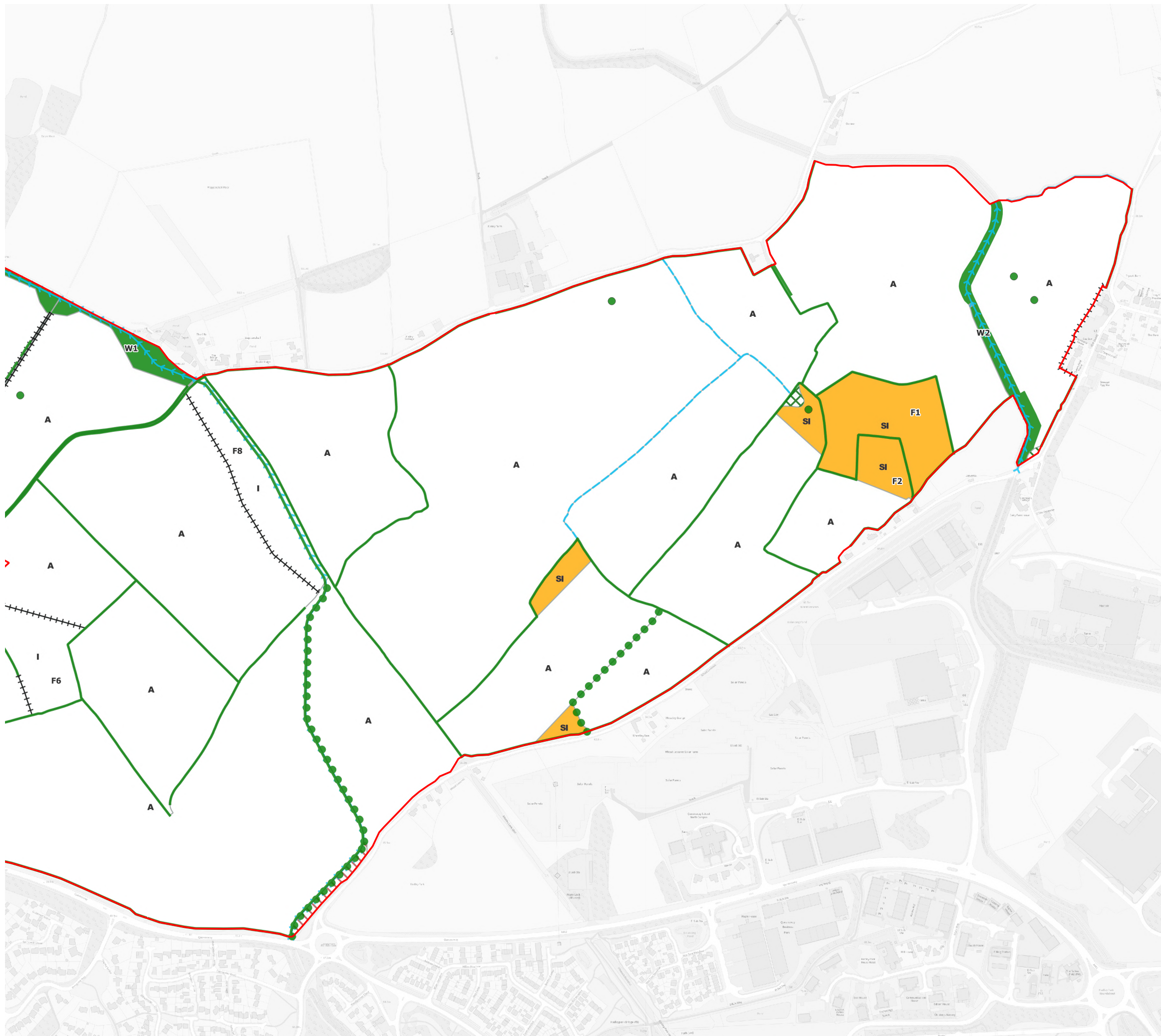


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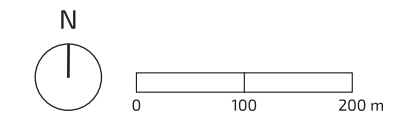
title **PHASE 1 HABITAT PLAN - WEST** scale
1:7,000 @ A3

number **FIGURE 3a** rev
E



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- Site Boundary
- Broadleaved woodland - semi-natural
- Built Environment: Buildings/hardstanding
- A Cultivated/disturbed land - arable
- I Improved grassland
- SI Neutral grassland - semi-improved
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- X Scrub - dense/continuous
- Broadleaved trees
- Standing water
- Running water
- Intact hedge - species-poor
- +++ Fence
- - - Dry ditch
- Broadleaved tree

date 26/09/24 drwn/chkd
CH / RJS

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Telford**

title **PHASE 1 HABITAT PLAN - EAST** scale
1:7,000 @ A3

number **FIGURE 3b** rev
E

APPENDIX B: ENGLISH NATURE CONSERVATION LEGISLATION

The Environment Act 2021

In England, biodiversity net gain is now required under statutory frameworks introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). Under this framework, every grant of planning permission will be deemed to have been granted subject to a general biodiversity gain condition. This will require an objective for developments to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of all onsite habitats.

This is a pre-commencement condition requiring the provision of a Biodiversity Gain Plan to be submitted and approved before works can be commenced, but after planning permission has been granted.

In principle, the grant of planning permission is not within the scope of BNG, however it is important to consider as part of the consenting body's decision-making process how a scheme will be able to demonstrate BNG after permission is granted. Therefore, this biodiversity net gain report presents the results of a Biodiversity Net Gain assessment that has been completed in order to demonstrate how the proposals will be compliant with the requirements of the Environment Act. Bat roost present in tree avenue – cursory mention of observation during activity surveys. No location given in previous work, although mitigation suggested in ES.

Biodiversity Net Gain Hierarchy

The statutory framework allows for the 10% biodiversity gain to be delivered through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits. However, as set out in Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015, development must consider the biodiversity net gain hierarchy when designing scheme proposals.

Proposals must demonstrate how the biodiversity hierarchy has been applied to or provide the reasons for any deviation. This biodiversity net gain hierarchy is distinct from the mitigation hierarchy set out in paragraph 186(a) of the National Planning Policy Framework (2023).

Exemptions

There are a number of circumstances where a Site will be exempt from biodiversity net gain including:

- Development impacting habitat of an area below a 'de minimis' threshold of 25m², or 5m for linear habitats.
- Householder applications (as defined within article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015).
- Self-build and custom-build applications (no more than 9 dwellings, site no larger than 0.5 ha and consists exclusively of self-build/ custom dwellings).
- Biodiversity gain sites (where habitats are being enhanced for wildlife only).
- Previously developed land with a baseline score of zero (exempted via the metric).

The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019

The Regulations ensure that the habitat and species protection and standards derived from EU law as per “The Habitat Regulations” Amendment will continue to apply after Brexit.

The Conservation of Habitats and Species Regulations (“The Habitats Regulations”) (Amendment) 2017

European Protected Sites

The Habitats Regulations ratifies into UK law the “Habitats Directive” (92/43/EEC) and the “Birds Directive” (79/409/EEC). It places a duty on the Secretary of State to propose a list of sites which are important for species listed in Annex I and II of the Habitats Directive respectively to the European Commission. Once the Commission and EU Member States have agreed that the sites submitted are worthy of designation, they are identified as Sites of Community Importance (SCIs). The EU Member States must then designate these sites as Special Areas of Conservation (SACs) within six years.

The Regulations require the compilation and maintenance of a register of European sites to include SACs as well as Special Protection Areas (SPAs) designated for birds and sites designated as internationally important wetlands under the Ramsar Convention known as “Ramsar Sites”. These three designations form a collective Europe wide network of internationally protected sites known as Natura 2000. All European sites are also designated under UK law as Sites of Special Scientific Interest (SSSIs; please see below).

Habitats Regulation Assessment

There is a requirement under EU law that Member States’ take measures to reach and maintain European Protected Sites’ at Favourable Conservation Status (FCS). An Appropriate Assessment is required for plans or projects that may potentially damage a European Protected Site. This is based on an assessment against a given European Protected Site’s Conservation Objectives. The process is commonly known as a Habitats Regulations Assessment (HRA).

The HRA must be conducted by, or on behalf of, the Competent Authority. The HRA process assesses plans or projects alone or in combination. It involves a four stage approach as follows:

- Stage One: Screening - also known as the Test of Likely Significant Effect (TOLSE). If the Competent Authority cannot screen out a likely significant effect, an Appropriate Assessment is required.
- Stage Two: Appropriate Assessment - the Competent Authority will only agree to plans or projects that will not affect the integrity of a European site also known as the “Integrity Test”.
- Stage Three: Alternative Solutions - assesses any alternative solutions of a potentially damaging plan or project that failed the Integrity Test, and if it is determined there are no alternative solutions, the project cannot be agreed to and it will either need to be changed or refused.
- Stage Four: The final stage may allow a plan or project to proceed if after failing stage three if it is for Imperative Reasons of Overriding Public Interest, and only if suitable compensatory measures are secured.

Any plan or project that may have a potentially damaging effect on a transient species or the habitat on which it relies (for example bats or birds), that is both a Qualifying Features of a European Protected Site and considered functionally linked with a European Protected Site, are required under law to be considered as part of any HRA process.

Habitats Regulation Assessment

The Habitats Regulations includes a list of animals and plant species taken from the Annex IV of the Habitats Directive that have a natural range which includes any area in Great Britain. These are collectively known as European Protected Species (EPS). The regulations make it an offence to deliberately capture, kill, disturb, take or destroy eggs of, or damage or destroy a breeding or resting place of animals listed in Schedule 2 of the Regulations, and to pick, collect, cut, uproot or destroy wild plants listed in Schedule 5 of the Regulations. All listed EPS are shown in Table 1 below. The Regulations also protect these species alive or dead and parts thereof from various forms of possession and trade.

Table1: The Habitats Regulations Schedule 2 and Schedule 5 Species.

Schedule 2 European Protected Animal Species		Schedule 5 – European Protected Plant Species	
Common name	Scientific name	Common name	Scientific name
Horseshoe bats – all species	<i>Rhinolophidae</i>	Shore dock	<i>Rumex rupestris</i>
Bats – all species	<i>Vespertilionidae</i>	Killarney fern	<i>Trichomanes speciosum</i>
Large blue butterfly	<i>Maculinea arion</i>	Early gentian	<i>Gentianella anglica</i>
Wild cat	<i>Felis silvestris</i>	Lady's slipper	<i>Cypripedium calceolus</i>
Dolphins, porpoises & whales – all species	<i>Cetacea</i>	Creeping marshwort	<i>Apium repens</i>
Hazel dormouse	<i>Muscardinus avellanarius</i>	Slender naiad	<i>Najas flexilis</i>
Pool frog	<i>Rana lessonae</i>	Fen orchid	<i>Liparis loeselii</i>
Sand lizard	<i>Lacerta agilis</i>	Floating-leaved water plantain	<i>Luronium natans</i>
Fisher's estuarine moth	<i>Gortyna borelli lunata</i>	Yellow marsh saxifrage	<i>Saxifraga hirculus</i>
Great crested newt	<i>Triturus cristatus</i>		
Otter	<i>Lutra lutra</i>		
Lesser whirlpool ram's-horn snail	<i>Anisus vorticulus</i>		
Smooth snake	<i>Coronella austriaca</i>		
Sturgeon	<i>Acipenser sturio</i>		
Natterjack toad	<i>Bufo calamita</i>		
Marine turtles	<i>Caretta caretta</i> <i>Chelonia mydas</i> <i>Lepidochelys kempii</i> <i>Eretmochelys imbricata</i> <i>Dermochelys coriacea</i>		

These actions may be made lawful in certain circumstances through the granting of licences by the appropriate authority (Natural England). Licences must only be granted after the appropriate authority is satisfied that no satisfactory alternatives are available. In most circumstances, licences are only applied for and granted following full planning permission.

In determining whether or not to grant a licence Natural England must apply the requirements of The Conservation of Habitats and Species Regulations 2012 (amendment) and, in particular, the three derogation tests:

- Test 1: A licence can be granted for the purposes of “preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment”.
- Test 2: The appropriate authority shall not grant a licence unless they are satisfied “that there is no satisfactory alternative”.
- Test 3: The appropriate authority shall not grant a licence unless they are satisfied “that the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.

The Wildlife and Countryside Act 1981 (as amended)

The Wildlife and Countryside Act 1981 (WCA) (as amended) is the principal legislation providing protection for wildlife in the UK. It prescribes legislation for wild birds, other animals, wild plants and non-native species. In addition, it provides for the designation of Sites of Special Scientific Interest (SSSI) in England.

Wild birds

The WCA as amended by Schedule 12 of the Countryside and Rights of Way Act 2000 makes it an offence (with exception to species listed in Schedule 2) to intentionally or recklessly:

- kill, injure, or take any wild bird;
- take, damage or destroy the nest of any wild bird while that nest is in use or being built (also [take, damage or destroy the nest of a wild bird included in Schedule ZA1] under the Natural Environment and Rural Communities Act 2006); or
- take or destroy an egg of any wild bird.

For birds listed on Schedule 1 of the WCA, protection extends to offences relating to the intentional or reckless disturbance of these birds while at their nests or their dependent young.

Other animals

The WCA (as amended) makes it an offence to (subject to exceptions) intentionally or recklessly kill, injure or take wild animals listed on Schedule 5 of the Act. For some species, the protection extends to interference with places used for shelter or protection, or disturbing animals occupying or obstructing access to such places. These species are regarded as “fully protected” and as well as the EPS species listed above include the mammal species water vole *Arvicola*

amphibia, pine marten *Martes martes* and red squirrel *Sciurus vulgaris* as well as selected others from a range of species groups including, fish, butterflies, hemipteran bugs, beetles, crickets, dragonflies, moths, spiders, crustaceans, sea-mats, molluscs, Annelid worms and sea anemones (and allies).

There are seven species on Schedule 5 of the Act that not fully protected but are still protected against killing and injuring these include the common reptile species slow worm *Anguis fragilis*, viviparous lizard *Zootoca vivipara*, grass snake *Natrix helvetica* and adder *Vipera berus*.

The Act prohibits certain methods of killing, injuring, or taking wild animals, and numerous species are protected against sale only as well as other variations for example Atlantic stream (white-clawed) crayfish *Austropotamobius pallipes* are protected against taking and sale.

Vascular plants, bryophytes, lichens and fungi

With regards to native flora the Act makes it an offence to (subject to exceptions) intentionally or recklessly pick, uproot or destroy any wild plant listed in Schedule 8. Similarly, the Act prevents the sale, offer or expose for sale, or possess (for the purposes of trade), any live or dead wild plant included in Schedule 8, or any part of, or anything derived from, such a plant.

Non-native species

The Act contains measures for preventing the establishment of non-native species which may be detrimental to native wildlife, prohibiting the release of animals and planting of plants listed in Schedule 9 in England and Wales.

Sites of Special Scientific Interest

The Act provides for the notification and confirmation of Sites of Special Scientific Interest (SSSIs). These sites can be identified for their flora, fauna, geological or physiological interest. In England, the power to confirm an SSSI lies with Natural England.

Laws protecting areas designated as SSSIs are described in Sections 28 to 33 of Part 2 of the Wildlife and Countryside Act 1981 (as amended). SSSIs are the principle statutory designation of sites in the UK and offences are enforced through Natural England. Offences include the following:

SSSI owners and occupiers

- carrying out, causing or allowing operations likely to damage an SSSI without Natural England consent.
- failing to keep to a management notice.
- failing to let us know about a change in ownership or occupation of land in an SSSI.

Public bodies

- carrying out or authorising operations likely to damage an SSSI without meeting the requirements to notify Natural England.
- failing to minimise any damage to an SSSI and if there is any damage, failing to restore it to its former state so far as is reasonably practical and possible.

Any person

- intentionally or recklessly damaging, destroying or disturbing any of the habitats or features of an SSSI.
- intentionally or recklessly damaging, destroying, obscuring or taking down a site notice put up on land within an SSSI.
- preventing a Natural England officer lawfully accessing an SSSI.

Protection of Badgers Act 1992

Badgers and their setts are protected under the Protection of Badgers Act 1992. This act is based on the need to protect badgers from persecution by baiting and deliberate harm or injury.

The act makes it an offence to:

- intentionally capture, kill or injure a badger;
- damage, destroy or block access to their setts;
- disturb badgers in setts;
- treat a badger cruelly;
- deliberately send or intentionally allow a dog into a sett; and
- bait or dig for badgers.
- A sett is defined as:

“Any structure or place that displays signs indicating current use by a badger”.

Natural Environmental and Rural Communities (NERC) Act 2006

Section 40 of the NERC Act 2006 imposes a duty on every public authority to conserve biodiversity in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity. Conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat.

Section 41 (S41) of the NERC Act 2006 requires the Secretary of State to publish a list of habitats and species that are of principal importance for the conservation of biodiversity in England. The list (including 56 habitats and 943 species) has been drawn up in consultation with Natural England and draws upon the UK BAP List of Priority Species and Habitats. The S41 list is used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under section 40 of the Natural Environment and Rural Communities Act 2006.

National Planning Policy Framework (NPPF) (2023)

The National Planning Policy Framework (NPPF) sets out the Government's planning policy for England. As such, the NPPF must be a material consideration for local authorities when considering planning decisions. The following points highlight those policies/statements which particularly relate to ecology/biodiversity and the planning system.

Policy 15 – Conserving and enhancing the natural environment

180. Planning policies and decisions should contribute to and enhance the natural and local environment by:

- (a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- (b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- (c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- (d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- (e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- (f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

181. Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

182. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks. Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- (a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- (b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- (c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

184. Within areas designated as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 182), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.

185. To protect and enhance areas of biodiversity and geodiversity, plans should:

(a) Identify, map and safeguard components of wildlife rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

(b) Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

186. When determining planning applications, local planning authorities should apply the following principles:

(a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

(b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

(c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

(d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.

187. The following should be given the same protection as habitats sites:

(a) potential Special Protection Areas and possible Special Areas of Conservation;

(b) listed or proposed Ramsar sites; and

(c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Area of Conservation, and listed or proposed Ramsar sites.

188. The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination

with other plans or projects) unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

Local Nature Reserves

Local Nature Reserve (LNR) is a statutory designation made under Section 21 of the National Parks and Access to the Countryside Act 1949, and amended by Schedule 11 of the Natural Environment and Rural Communities Act 2006, by principal local authorities.

Local authorities have the powers to acquire, declare and manage LNRs. Parish and town councils can declare LNRs providing power is given by the district or county council. LNRs may or may not have other statutory designations such as SSSI status. LNRs must be controlled by the local authority through ownership, lease or agreement with the owner. The main aim must be to care for the natural features which make the site special. LNRs are of local, but not necessarily national, importance.

LNRs are usually owned by local authorities, with management often passed onto other organisations such as County Wildlife Trusts etc. They often have good public access and facilities. There is no legal necessity to manage an LNR to any set standard but management agreements and plans often exist. Protection of LNRs is usually provided through local planning policy and through local bylaws.

Non-Statutory Protected Local Sites

Non-statutory Designated Sites are sites designated by local authorities which fall outside the statutory criteria for designation. They are policy protected and included in the National Planning Policy Framework (NPPF) as "Local Sites". Local Planning Authorities should set criteria based policies against which proposals for developments on or affecting protected wildlife sites should be judged. Non-statutory sites are given various names including County Wildlife Sites (CWS), Sites of Importance for Nature Conservation (SINC) and Local Wildlife Sites (LWS). To this end Ancient Woodland Inventory (AWI) sites are also considered non-statutory sites.

Hedgerows

Hedgerows are designated as Habitats of Principal Importance under the NERC Act 2006. The National Planning Policy Framework (NPPF) emphasises the preservation, restoration and re-creation of priority habitats and ecological networks. Hedgerows are important components of ecological networks linking other important habitats and designated sites.

Hedgerows also receive statutory protection under the Hedgerow Regulations 1997 made under Section 97 of the Environment Act 1995, which came into force in 1997. The regulations introduced new arrangements for local planning authorities in England and Wales to protect important hedgerows in the countryside, by controlling their removal through a system of notification. Important hedgerows are defined by complex assessment criteria, which draw on biodiversity features, historical context and the landscape value of the hedgerow.

Local Biodiversity Action Plan (LBAP)

Local Biodiversity Action Plans (LBAP) identify habitat and species conservation priorities at a local level (typically at the County level) and are usually drawn up by a consortium of local Government organisations and conservation charities.

Birds of Conservation Concern (BoCC)

The Birds of Conservation Concern (BoCC) is jointly prepared by the British Trust for Ornithology (BTO), Joint Nature Conservation Committee (JNCC) and The Royal Society for the Protection of Birds (RSPB).

The report classifies birds according to the extent that they are known to be declining. The classifications are split into groups, Red, Amber and Green, with species classified as Red being those with the greatest declines. The criteria for classifications are presented in *Table 2*.

Table 2: BoCC species classification criteria

Red list criteria	Amber list criteria	Green list criteria
Global Conservation Status - Species listed by BirdLife International as being Globally Threatened using IUCN criteria.	European Conservation status - Categorised as a Species of European Conservation Concern.	All regularly occurring species that do not qualify under any of the red or amber criteria are green listed.
Historical Decline - A severe decline in the UK between 1800 and 1995, without substantial recent recovery.	Historical Decline – Recovery - Red listed for Historical Decline in a previous review but with substantial recent recovery (more than doubled in the last 25 years).	Includes those species listed as recovering from Historical Decline in the last review that have continued to recover and do not qualify under any of the other criteria.
Breeding Population Decline - Severe decline in the UK breeding population size, of more than 50%, over 25 years or the entire period used for assessments since the first BoCC review, starting in 1969 ("longer-term").	Breeding Population Decline - As for red list criteria and, but with moderate decline (by more than 25% but less than 50%).	
Non-breeding Population Decline - Severe decline in the UK non-breeding population size, of more than 50%, over 25 years or the longer-term.	Non-breeding Population Decline - As for red list criteria and, but with moderate decline (by more than 25% but less than 50%).	
Breeding Range Decline - Severe decline in the UK range, of more than 50%, as measured by number of 10 km squares occupied by breeding birds, over 25 years or the longer-term.	Breeding Range Decline - As for red list criteria and, but with moderate decline (by more than 25% but less than 50%).	
	Rarity - UK breeding population of less than 300 pairs, or non-breeding population of less than 900 individuals.	
	Localisation - At least 50% of the UK breeding or non-breeding population found in 10 or fewer sites.	
	International Importance - At least 20% of the European breeding or non-breeding population found in the UK.	
Fisher's estuarine moth	Gortyna borelli lunata	Yellow marsh saxifrage
Great crested newt	Triturus cristatus	

Red list criteria	Amber list criteria	Green list criteria
Otter	Lutra lutra	
Lesser whirlpool ram's-horn snail	Anisus vorticulus	
Smooth snake	Coronella austriaca	
Sturgeon	Acipenser sturio	
Natterjack toad	Bufo calamita	
Marine turtles	Caretta caretta Chelonia mydas Lepidochelys kempii Eretmochelys imbricata Dermochelys coriacea	

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