

Response to Telford & Wrekin Council Local Plan consultation from Rodington Climate & Nature Steering Group

Background information

The Rodington Climate & Nature Steering Group is a volunteer-led initiative working with Rodington Parish Council to improve the environmental performance of the parish to benefit nature, residents and the wider community.

Having developed a Climate & Nature vision document for the parish (see 'A greener Rodington Parish' at the bottom of [this page](#)), this group meets monthly to develop and deliver projects under the four banners of 'Wildlife & Habitats', 'Energy & Carbon', 'Waste & Recycling' and 'Access & Travel'.

This response to the Local Plan consultation concentrates on potential impacts on wildlife and habitats relating to proposed sites 197, 200 and 202 which are within the Rodington parish area that the group focuses on.

Habitat and connectivity impacts

Rodington Parish is currently dominated by highly intensive agriculture; mainly arable but also some intensive grazing. As a result, the natural environment is challenged and can little afford to see more pressure on existing habitats. Rather, we think that Telford & Wrekin Council should be investing into areas to protect and improve biodiversity (TWC Policy NE1).

Proposed site 200 has an established line of mature trees on its western boundary which is currently providing important connectivity to the areas to the north of Rodington village. Rodington Climate and Nature Strategy Group is concerned that large developments such as that proposed here put undue pressure onto linear habitats like this and effectively render them incapable of providing beneficial habitat for species including birds and small mammals to feed and breed.

We have similar concerns about the impacts on the southern and western boundaries of proposed site 202 which are providing a similar ecosystem function which would be adversely impacted by these site proposals.

We are extremely concerned about the pressures that these proposed developments will place on our already struggling watercourses. Development on this scale will add significant amounts of domestic pollution as well as a localised increase in microplastic and other pollutants. The drainage and watercourse infrastructure in this rural location cannot cope with those inputs.

Species impacts

Rodington Climate and Nature Strategy Group is concerned about the impact on wildlife from these proposed developments. The parish currently supports significant numbers of scarce farmland bird species such as corn bunting, linnet and yellow wagtail which are

known to suffer from blanket development on the scale of that being proposed at these 3 sites.

These proposals would impact a number of mature hedgerow trees which will further adversely affect any bat populations (as reported by many residents adjoining the proposed sites) being supported by them. The increase in artificial light at night that inevitably follows new housing at this scale will also impact the insect food source for these bats (see also [this article](#)). All bats and their roosts are protected (Conservation of Habitats and Species Regs, 2010, and Schedule 5, Wildlife and Countryside Act, 1981).

Natural England's Great Crested Newts Strategic Opportunity Areas mapping (available from <https://magic.defra.gov.uk/magicmap.aspx>) shows Rodington Parish to be a hotspot for these protected amphibians. Proposed site 200 shows an overlap with a 'core area' for the species and sites 197 and 202 overlap with 'fringe areas' and are adjacent to an abundance of core areas. The hedgerows highlighted in the habitat section above are therefore very likely to be providing overwintering habitat for the species and this would be at risk from the proposed developments.

Evidence indicates that the carbon footprint of the UK built environment (buildings and infrastructure) based on the most up to date emissions data is responsible for 25% of total UK greenhouse gas emissions (source: UK Green Building Council, Dec 2020, report to Central Government). Emissions from vehicles are likely to be mitigated by Government policy for phasing out diesel and petrol vehicle beyond 2035, but the scale of the proposed building in Rodington would result in an exponential increase of carbon emissions which is counter to Telford and Wrekin's Policy on Carbon reduction (Net Zero target, 2019 and Climate change and sustainability updated report, 24.1.23).

The NPPF identifies, "**Patterns of growth should be actively managed to make fullest possible use of public transport, walking and cycling and focus significant development in locations which are or can be made sustainable** (paragraph 17). This principle cannot be met without substantial investment.

An alternative

The Rodington Parish Climate & Nature Steering Group does not consider that development on the scale of those proposed is suitable for a relatively remote and rural area such as this. There are serious concerns about how already struggling infrastructure will cope; something we know that many residents will be picking up in their own response.

We therefore invite Telford & Wrekin Council to consider an alternative approach of small-scale, wildlife-friendly and environmentally ambitious housing provision alongside significant investment in nature in the area. With the group's support, perhaps one of these proposed sites could be bought for reversion to a Local Nature Reserve. We would be interested to discuss this with relevant representatives of the Council.