

Statement Regarding:

TELFORD & WREKIN LOCAL PLAN Review

**For the Attention of the Inspectors:
'Mike Worden and Catherine Carpenter'
From: David & Carole Hudson; Date: 5th January 2026**

The huge, proposed housing development of 7900 houses on the Northern side of Telford submitted to the Secretary of State on 12th September 2025, will have a devastating effect on the local infrastructure. The land that has been earmarked is on agricultural land outside the original Telford Development Corporation boundary:

The main issue is the scale of the development and that it is on the Northern side of Telford. When Telford Development Corporation was formed circa 1963 (the new town was originally called Dawley New Town and was renamed Telford in 1968) the road infrastructure was planned for the various residential and business areas to the South, East and West of Telford but **NOT** to the North.

Unfortunately, Telford and Wrekin 'Labour run' Council are hell-bent in pushing this vast development through on the **Northern side of Telford** and the Highways department have used out-dated 2019 data. TWC have tried to extrapolate the data, which bears 'no semblance of reality' to what is actually happening in the Shawbirch and A442 areas to the North and North East of Telford. However, there was a recommendation to part dual the A442 towards the East with no fixed completion date, and the all-important Whitchurch Drive, the A5223 improvements were only to the islands with no fixed completion date. In fact, there has already been a significant increase in commuter traffic in the northern Telford area since 2019 with housing developments at:

Allscott Meads - 350 homes
Crudgington Creamery site (Crudgington Fields) - approx 193 homes
Maxell Factory site at Shawbirch - over 495 houses
Plus many other small developments.

The outdated, under-invested road network has already become overwhelmed at peak times from these developments and TWC do not appear to care about the existing residents/commuters and, strangely, all the **new residents** and **new businesses** from this huge development. Therefore, the access to the M54 and Telford Town Centre on the North west side of Telford, together with the very important Princess Royal Hospital and Charlton School, which are situated off Whitchurch Drive (A5223), will endure unbelievable congestion.

It is hard to understand why TWC are pushing so hard for further development to the North side of Telford, especially when the infrastructure and land is already readily available for housing developments to the South of Telford, much of it within the Telford boundary.

The content of the IS01 Telford and Wrekin Local Plan Review Publication Plan (Evidence Documents section) Infrastructure Delivery plan 2020-2040 March 2025, on pages 54, are 'unreal' considering they depict **no** traffic problems to the northern side of Telford(!) (see snapshot below):

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4 Transport and Utilities Infrastructure

Figure 9: Hortonwood West



Whereas in reality, the opposite is true, where there is queuing morning commuter traffic to the East, please see photos A & B below (NB: exactly the same happens in late afternoon and evening going West (no photos attached below).

Photo A



Photo B



Also, the same can be seen with much of the photographic evidence provided by TWC showing the lack of vehicular traffic and pedestrians.

- Please see page 105 in the IS06 Telford and Wrekin Local Cycling and Walking Infrastructure Plan (Evidence Documents Section) 08 June 2022 (snapshot of figure 100 below, adjacent to Shawbirch island).
- Photos C and D below show the actual morning congestion with queuing to the South
- NB: exactly the same happens in late afternoon and evening with queuing North (no photos attached).



Figure 100. Existing cycle track on Whitchurch Drive





Interestingly, TWC have asked the Developer (Bloor Homes) for part of the Bratton site to present a scoping opinion (Application No: EIA/2025/0001 which should have been available late Autumn 2025) and the comment from TWC Highways department's Kristie Goffe, date 26/03/2025 refers to the **Heavy Congestion Traffic** problems on the Whitchurch Drive and **A449 East** and where the Senior Highways Development Engineer states:

"the majority of operational development traffic will route to the south of the site via Whitchurch Drive towards the M54 Motorway due to limited route choice. I would raise concern with this approach as there are a number of alternative suburban/rural routes that may be attractive noting the heavy congestion on Whitchurch Drive which may present a significant effect to sensitive receptors. It is also envisaged that the development site will have a significant traffic impact on the A449 Corridor west of the Shawbirch Roundabout to which a number of sensitive receptors are located within immediate proximity to the road corridor."

Please see actual email correspondence from Kristie Goffe below (snapshot of pdf document):

From: Goffe, Kristie
Sent: 26 March 2025 20:17
To: Planning, Control
Subject: EIA/2025/0001 - Site A, Land at Bratton, Telford , Shropshire
Attachments: DE_419B_Bratton EIA Scoping Request_2025 03 06 FINAL.pdf

Categories: Neighbour Comments

Hi Planning Team

The Highway Authority would offer the following comment on the EIA Scoping Opinion Request sought in regard to proposed residential-led mixed use development at Bratton Green:

The EIA scoping opinion appears to be robust and accords with relevant policies, standards and guidance. Cumulative effects arising from committed development including draft housing/employment allocations included in the emerging Local Plan will be considered in the Environmental Statement which is reassuring particularly noting the likely significant traffic impact to the north of Telford.

No Transport assessment/ information has been made available to support the EIA Scoping note which has led to a number of judgements being made informing the scoping of ' Transport and Movement' section 12.2. The basis for 'Transport and movement' being 'scoped out' of any Environmental Statement is that the majority of operational development traffic will route to the south of the site via Whitchurch Drive towards the M54 Motorway due to limited route choice. I would raise concern with this approach as there are a number of alternative suburban/ rural routes that may be attractive noting the heavy congestion on Whitchurch Drive which may present a significant effect to sensitive receptors. It is also envisaged that the development site will have a significant traffic impact on the A449 Corridor west of the Shawbirch Roundabout to which a number of sensitive receptors are located within immediate proximity to the road corridor. It is recommended that the traffic study area is considered in more detail based on forecast change in daily traffic volumes on affected highway links and more clearly defined whether the change/ resultant effect is significant or not before scoping out 'Transport and Movement' from the Environmental Statement. I would note that at this time no detailed transport information supporting the major residential-led mixed development has been shared with the LHA.

Air Quality and Noise and Vibration will be 'scoped in' to the Environmental Statement. The methodology for assessing environmental impacts in both the temporary construction and operational periods looks to be sound. I would note that baseline and forecast traffic data used to assess Air Quality impacts should be first agreed with the LHA to ensure a robust assessment is undertaken. As it stands no Transport submission has been provided to inform the conclusions of the scoping opinion.

Regards

Kristie Goffe
Senior Highways Development Engineer
Prosperity and Investment
Telford & Wrekin Council

It seems very strange, in fact totally bizarre, that TWC are very happy to propose a housing development for 7900 houses and industrial areas knowing full well the Highway infrastructure is totally inadequate for the construction traffic, let alone the impact of 7900 homes and industrial units, etc.

Bloor Homes have engaged PJA Consultants to complete their own surveys, one of which is Traffic modelling. We understood that this would be on the Planning Portal by early December 2025 but PJA have now advised us that this will not be available until mid to late January 2026. We sincerely hope the various reports will be made available to the inspectors before the commencement of the Hearing in February 2026.

It also appears that TWC Highways department engaged Tracsis Traffic Data Ltd to do further Traffic modelling during October and November 2025. Trap cameras could be seen from Shawbirch island to Trench Lock dual section and Whitchurch Drive (A5223) to Ketley Brook Roundabout (to the dual section). We hope the Highways department will make this vital information available to the inspectors and general public. However, from their past record, when there was a traffic survey in January 2023 on the A442 near to Long Lane, it took an exasperated Wrockwardine Parish Council eighteen months to be provided with the requested information! Please see screenshot below which shows approximately 30K vehicles in each direction in a quiet week in January 2023! We assume TWC will provide all the data from this survey for the inspectors if requested.

| 13682 - Telford X7 Site C1 | | | | | | | | | | | | | |
|--|--------------------------------|------------|-------------------------|----------------------|-----------|----------------|---|------------|--------------------|-------------------|------------|--------------|--|
| Summary | Northbound - Results | | | Southbound - Results | | | 13682 / TELFORD X7 JANUARY 2023 AUTOMATIC TRAFFIC COUNT | | | | | | |
| A | B | C | D | E | F | G | H | I | J | K | L | M | |
|  NDC NATIONAL DOWNSUMMON | | | | | | | | | | | | | |
| Site No. | Location. | Direction. | Speed Limit - PSL (mph) | Start Date. | End Date. | Total Vehicles | 5 Day Ave. | 7 Day Ave. | No. > Speed Limit. | %. > Speed Limit. | Mean Speed | 85%ile Speed | |
| C1 | A442 - OSGR: SJ 63674 15562 | Northbound | 60 | 23/01/2023 | 1/29/23 | 30910 | 4788 | 4416 | 2773 | 8.97 | 53.9 | 60.0 | |
| | | Southbound | 60 | 23/01/2023 | 1/29/23 | 29932 | 4599 | 4276 | 1128 | 3.77 | 50.7 | 56.8 | |
| | | | | | | | | | | | | | |
| | | | | | | | | | | | | | |
| | | | | | | | | | | | | | |

Hence, we are very concerned that TWC may with-hold these latest vital surveys by PJA and Tracsis Data Ltd in full or try to summarise them to their advantage. We note that in the Examination Guidance notes in section 13, TWC **has formally requested 'that we recommend any main modifications necessary to make the plan sound'**. Hopefully, the examination of the local plan will expose many flaws in their proposed plan and, should the plan go forward with any development, the Traffic Modelling will show that it is essential for Whitchurch Drive to be made dual carriageway from the Shawbirch island going South to the Ketley Brook Roundabout (approximate 2.5miles), and the A442 going East to the Trench Lock interchange to also be made a dual carriageway (approximately 3 miles). Hopefully, the recommendation by the Inspectors will state '**due to the existing traffic congestion all road improvements must be completed before any construction work starts on the development sites**'.

David and Carole Hudson

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*NB: 2 copies sent by post to: Telford Examination, Pendragon House, 1 Bertram Drive, Wirral CH47 0LG