

Telford and Wrekin Main Modifications to the Publication Version of the Local Plan Public consultation 8th June to 5pm Monday 20th July

Word consultation response form

Please use this form if you wish to comment on the Telford and Wrekin Main Modifications to the Publication Version of the Local Plan. Further information can be found on the Councils website at www.telfordandwrekinlocalplan.co.uk

This form may be scanned or returned via e-mail to: LocalPlan@telford.gov.uk

Alternatively, forms can be posted to; Strategic Planning Team, Telford & Wrekin Council, Southwater One, TF2 2FH

How we will use your information

The information you have provided will be used to inform Main Modifications to the Publication Version of the Telford and Wrekin Local Plan. We will only publish anonymised responses, parts of responses, or a summarised version of responses and will ensure individual survey respondents cannot be identified. This information is being processed under DPA – Schedule 2 (2a) (GDPR 2018 -Article 6 (1)e).

We will not share your personal information with any other external third parties unless required/permitted to do so by law. Your personal information will be held securely, and if shared it will be shared securely. We comply with data protection laws concerning the protection of personal information, including the General Data Protection Regulation (GDPR). For more information on how information is held by Telford & Wrekin Council please view the privacy page at <https://www.telford.gov.uk/terms>

We are asking for your personal details to allow us to contact you where we require clarification/further information. You do not have to include your personal details but not doing so might affect the council's ability to act on the information you have provided.

Personal Details

Title	Mr
First Name	Ishmael
Last Name	Scarratt
Address	
Commenting on behalf of (if relevant)	N/A

Organisation (if relevant)	N/A
Telephone	[REDACTED]
Email	[REDACTED]

NOTE: The questions below are numbered 1 to 7. Please attach any typed or written responses related to the questions below when submitting this form.

The Planning Inspectors appointed to examine the Local Plan have recommended several Main Modifications to make the plan sound and legally compliant. These are shown on the **Schedule of Main Modifications** that has been published for consultation and have been subject to a further **Integrated Assessment Report Addendum**. These do not form part of the Main Modifications but are published alongside them and should be read in conjunction with the Main Modifications proposed.

All comments received will be sent to the independent Planning Inspector for consideration. Any comments received after the consultation close deadline will not be accepted.

The Council has also published proposed revisions to the Policies Map. These do not form part of the Main Modifications but are published alongside them and should be read in conjunction with the proposed Main Modifications.

Furthermore, the Council has prepared a schedule of 'Additional Modifications' to the Plan. These are minor changes to the Local Plan to deal with factual updates and clarifications, or address typographical, grammatical and presentational issues that do not affect soundness or legal compliance of the document. The Council considers that these do not materially affect the Plan. These 'Additional Modifications' are not subject to consideration by the Inspector and do not form part of the formal examination.

Representations should only relate to the proposed Main Modifications. This consultation is not an opportunity to repeat or raise further representations about the published plan or to seek further changes to the plan.

Q1: Which proposed Main Modification does this comment relate to? Please state clearly the modification reference (*for example MM008*):

Click or tap here to enter Telford and Wrekin Local Plan Main Modification.

Q2: Do you consider that this Main Modification is:

☐ None of the above

Q3: Please give details of why you consider this Main Modification is not legally compliant and/or unsound. Please be as precise as possible.

Alternatively, if you wish to support the legal compliance or soundness of the Main Modification, please also use this box to set out your comments.

My feedback/challenge in regard to the planning Main Modifications, are as follows:

Environmental and biodiversity policy modifications

I do not see how these changes are going to only exacerbate:

- Habitat loss for wildlife.
- The impact on protected species.
- Loss of hedgerows and mature trees.
- Fragmentation of wildlife

Flood-risk / Drainage

- Are there current drainage issues around SC3, as there are surface water problems at times of heavy rainfall across the agricultural land. These modifications do not resolve these issues,
- Pressure on the Northern Interceptor Channel will only increase

The Council has not yet demonstrated compliance with its own revised flood policies. Does SC3 satisfies the new requirements?

Infrastructure obligations

The policy modifications look to strengthen the delivery of:

- Schools,
- Transport infrastructure,
- Open space,
- Community facilities,
- Affordable housing,
- Long-term maintenance funding.

Can the Council prove all this infrastructure is deliverable, funded and timed correctly - including the secondary school provisions of land, which one presumes does not include a school building?

The Council still needs to demonstrate that the A442 corridor and surrounding roads can cope with the cumulative impact of approximately 3,100 homes and major employment land, which these modifications do not resolve.

Apley Woods

The Main Modifications strengthen the Plan's commitment to woodland protection, biodiversity enhancement and nature recovery. However, insufficient evidence has been presented to demonstrate the significant increase in population associated with SC3 will not result in adverse recreational impacts on Apley Woods. Increased footfall, dog walking, path erosion, habitat disturbance and pressure on sensitive woodland ecology are all

foreseeable consequences of a development of this vast scale. The Plan therefore fails to demonstrate that SC3 is consistent with its own strengthened environmental policies.

If Apley Woods is a key recreational resource for future residents, where is the evidence that it has the ecological capacity to absorb that additional use without harm?

Consistency with the Council's own "Forest Community" vision

The modifications repeatedly emphasise nature recovery, woodland protection, green infrastructure and climate resilience. Replacing a large area of open countryside with a settlement of 3,100 homes and employment land is difficult to reconcile with that stated vision unless the Council can provide further strong evidence.



Q4: Please set out what change(s) you consider necessary to make the Main Modification legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness.

You will need to say why the change(s) will make the Main Modification legally compliant and/or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

A reduction in the volume of houses planned.

Q5: Do you have any comments on the Integrated Assessment Report Addendum, in respect to this particular Main Modification? Please provide them in the box below:



No comment, other than the points detailed in Q3.

Q6: Do you have any comments on a Proposed Revision to the Policies Map? Please provide them in the box below:

No comment, other than the points detailed in Q3.

Q7: Do you have any comments on one of the Councils Additional Modifications? Please provide them in the box below:

No comment, other than the points detailed in Q3.

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