



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

Physical 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	DAVID
Last Name	HUDSON
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*):

MM095 & MM096

Q2: Do you consider that this Main Modification is:

- ☐ Legally compliant
☐ Sound
☒ 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.

The proposed Local plan is not Sound for various reasons: most importantly the existing road infrastructure is not conducive to the proposed huge housing development. There will be a dramatic increase in vehicular traffic on the surrounding areas, plus the impact of all the construction traffic. This issue was raised during the Hearing Sessions but has still not been addressed by the Council.

MM095 page 62

The Council requires all development to mitigate site specific highway issues and for major developments to: (A to E)

Regarding A:

With all the existing developments like the Maxell Site, Crudgington Creamery site, Allscott Meads and other developments, the existing road network around the Shawburch Island going towards Princess Royal Hospital and Charlton School leading to the M54 and going East towards Trench Lock is grid locked at peak times. Therefore, the Road improvements must take place before the developments commence.

Regarding B:

The actual Telford Strategic Transport Model (TSTM) DOES NOT EXIST, and this was confirmed by Patrick on the 26/06/2026 (member of the Council Local Plan team) and I was directed to the Telford Local Plan 2040 dated March 2025 Modelling Report by Atkins Realis IS04. However, the survey data used for this report was **2019** (see page 11) which is totally out of date and the report has many flaws in particular:

'Forecast year models have been developed for 2024, 2031 and 2039 for the AM peak hour (08:00- 09:00), Inter-Peak average hour (10:00-16:00) and PM peak hour (17:00-18:00).'

In the 'Real World' the AM Peak Hours start time is well before 08:00 - they have not taken into account the Telford and Wrekin industrial areas or the shift patterns at Princess Royal Hospital.

Interesting, the report has a total lack of understanding of the Telford and Wrekin area when making a comparison West Midlands 'A' Road Delays 2023 (page 9). Unfortunately, Atkins Realis do not understand the history of Telford Development Corporation when there were designated Residential and industrial areas, and all the necessary infrastructure was put in place. To make a comparison between a 'new town' and a 'conurbation' is ridiculous and using 2023 data when it is convenient!!!!. This further demonstrates that the report should be disregarded, and a new report commissioned by a reputable independent company. The question is why would TWC not provide recent data; what is the gain for TWC to use obsolete data which was re-hashed in the Telford Local Plan 2040 Modelling Report by Atkins Realis dated **March 2025**? Our views of the Telford and Wrekin Highways department have been previously described and, in summary, are at best incompetent.

Regarding C, D and E

The New Traffic report must be commissioned and the TWC must implement the improvements before any developments take place. If not, emergency services (Police, Fire, Ambulance and Blood Supplies) will suffer delays and will likely result in unnecessary deaths. The question is, if the



significant road improvements are not implemented before building works take place, and it is proven a death or deaths was/were caused by traffic delays, **who should be investigated for dereliction of duty? The inspectors, the Council or both?**

As regards funding: since it's the council who instigated this huge development on the northern side of Telford which has inadequate road infrastructure, TWC must secure the necessary funding from Government to make A442 east to Trench Lock, and Whitchurch Drive to the Ketley Roundabout, dual carriageway. The decided costs for the road improvements would be paid back to TWC over a period of time by the developers; at the present time the funding is based on a 'hope and prayer option'. Consequently, the council are in dereliction of duty and must be made accountable for their actions.

MM096

11.17 and 11.19 included above



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.

Details provided in Q3



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:

We are unsure where the Addendum report is located - we can only see version:
[Integrated Impact Assessment Report \(December 2024\) \(CD06\)](#)

The document search in Main Modifications does not reveal any further information for CD06

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

Unable to examine - Very poor quality due to scaling

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

The original local plan lacked actual detail, and the 'so called' modifications follow the same thought process, ie: all very woolly and just 'fluffed up' in order to look good, if you were to scan read the documents!!!

Using words like: '*mitigate, plan-led manner, having regard to, where relevant, cumulative impact, fair and reasonable, relative proportions, reasonable basis*', to name but a few, and this illustrates the problem with the soundness of the local plan. Unfortunately, it appears that the TWC local plan team have decided to give as much leeway as possible for the developers by having so many vague policies, so that when the actual development plans are submitted, the chance of objection will be much diminished. The question that must be asked is whether TWC is acting for the residents and businesses of Telford, or for the developers? The answer is obvious - the developers!

Please Note: The Physical Consultation Form is difficult to find. TWC continues to make life as difficult as possible for residents!