

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	Allan
Last Name	Bowker
Address	
Commenting on behalf of (if relevant)	Click or tap here to enter text.
Organisation (if relevant)	Click or tap here to enter text.
Telephone	
Email	

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*):

MM130 (Appendix A – Housing Allocations), specifically allocation HOA5 – Land North of Allscott Meads (105 dwellings, Parish of Wrockwardine).

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.

Summary. I object to the retention of allocation HOA5 (Land North of Allscott Meads) on the grounds that the plan, as modified, is not effective or justified. My concerns, set out in full below, are: (1) the local highway network is recorded by the Council's own officers as sensitive to traffic; (2) the cumulative impact on school places, health and road capacity, including the reliance on a school extension that is only illustrative; (3) the highways case depends on junction mitigation that has not been delivered; (4) an unexplained conflict in the evidence on heritage, and unresolved drainage; (5) the loss of employment land through the conversion of HOA15 from employment to housing; (6) the loss of greenfield agricultural land, in contrast to the brownfield justification for Allscott Meads itself; and (7) the proximity of the site to a Site of Special Scientific Interest. Each is explained in turn below.

I consider that the plan is not sound in relation to this modification because it is not effective, as required by paragraph 35 of the National Planning Policy Framework. The retention of allocation HOA5 (Land North of Allscott Meads) is not supported by evidence demonstrating that the site is deliverable, and the modification does not embed the safeguards needed to make the allocation effective. My specific concerns are as follows.

1. Highways capacity and road safety. The Council's own Housing Allocations Site Assessment (AS02) records that the Highways officer considered the area "sensitive to traffic" and recommended that there was "merit for lower yield". As a direct result of these constraints, the allocation was reduced from 14.6 hectares with a capacity of circa 350 dwellings at Regulation 18 to 4.98 hectares and 105 dwellings in the Publication Plan (as confirmed in the landowner's representation, E112, paragraph 2.1) – that is, approximately two-thirds of the land originally proposed for development at this location was removed from the plan on the strength of the Council's own assessment. This is evidence that the local highway network cannot readily accommodate the scale of growth proposed, and that even 105 dwellings remains a matter of concern rather than a position the evidence positively supports. I am further concerned that the highways evidence relied upon to support the allocation is now out of date. The Highways Technical Note submitted by the landowner in support of these sites (representation E112, British Sugar PLC and Northern Trust Land Ltd) confirms at its paragraph 3.12 that the modelling was based on the earlier Regulation 18 proposals, and the supporting Landscape and Visual Appraisal is dated January 2024. Traffic conditions, and the build-out of the adjacent Allscott Meads development, have moved on since that work was undertaken, and the conclusions should not be treated as a current assessment of network capacity. The landowner's suggestion (paragraph 3.12) that the evidence "remains robust" because the proposed quantum of development has reduced does not answer this point: the reduction in dwelling numbers does not address the passage of time, the growth in background traffic and occupation of Allscott Meads since the modelling was undertaken, or the fact that the junction mitigation the modelling assumed has not been delivered (see point 3 below).

2. Cumulative impact on infrastructure and school capacity. The site assessment (Stage 7) expressly states that the site "needed to be reassessed" in light of the ongoing build-out of the adjacent Allscott Meads development (approximately 470 homes) and its impact on school capacity and highway infrastructure. The plan does not demonstrate that this reassessment has been satisfactorily concluded, nor that the cumulative effect of HOA5, the separate allocation HOA15 (Land West of Allscott Meads, 60 dwellings) and the existing 470-home estate on the local primary school, GP provision and road network has been properly evidenced. In particular, the landowner's representation (E112, paragraph 3.3) relies on the Allscott Meads primary school being capable of extension from 150 to 210 places to accommodate further growth. This is a statement of what could be done, not a commitment that has been secured or funded; the 150 places already provided were sized for the existing Allscott Meads development, and the plan should not assume additional capacity that rests only on an illustrative extension plan. Taken together these allocations represent a substantial concentration of growth around a single rural settlement.

3. The highways evidence depends on mitigation that has not been delivered. The landowner's Highways Technical Note (representation E112) acknowledges at paragraph 3.11 that one local junction, the B5061 Roman Road / Holyhead Road priority junction, is modelled to operate above its theoretical capacity. The conclusion that the proposed allocations would not result in an over-capacity junction is expressly stated to be conditional – it applies only "subject to this highway mitigation being implemented", namely the signalisation of that junction funded by the Allscott Meads development. This signalisation has not been installed. Google Street View imagery of the junction dated September 2025 (attached as Photograph 1)

shows that it remained an unsignalised priority junction, and I can confirm from my own observation as a local resident that this remains the position at the date of this representation. Street View imagery dated August 2024 (attached as Photograph 2) shows queuing on the approach to the junction, consistent with the conditions regularly experienced at peak times. Since the mitigation on which the highways case depends has not been delivered, the evidence does not demonstrate that the junction would operate within capacity, and the allocation cannot be shown to be effective or deliverable. I would ask the Council and the Inspector to confirm the current delivery status of this junction mitigation and to reassess network capacity on the basis of conditions as they actually exist, rather than on the assumption that mitigation has been provided.

4. Conflict in the evidence on heritage, and unresolved drainage. There is an unexplained conflict in the evidence base on heritage. The Council's own site assessment (Stage 8) treats heritage as a matter still to be "dealt with at planning application" stage, implying an identified constraint requiring resolution, whereas the landowner's representation (E112, paragraph 3.9) asserts that there are no heritage assets within or immediately adjacent to the sites. These two positions cannot both be correct, and I would ask the Inspector to be satisfied which is accurate and whether any heritage constraint has been properly assessed before the allocation is confirmed. On drainage, I note that the landowner's own statement (paragraph 3.7) records that the existing surface water drainage for much of the Allscott Meads development already runs through allocation HOA5 via an open watercourse. The implications of building over or around this existing drainage route, and the cumulative surface water position, should be demonstrated at plan-making stage rather than deferred entirely to a future application. While the sites are identified as Flood Zone 1, that designation addresses fluvial flood probability and does not answer the surface water position. Attached Photographs 3 to 6 show flooding experienced locally around Allscott Meads (photographs from local community social media), and contemporaneous posts by residents on local community social media record at least four separate flooding events in barely a year: on 20 October 2023, when residents reported that roads from the estate were blocked and the railway underbridge towards Admaston was flooded (Photographs 5 and 6); on 11 December 2023, when the underbridge near The Grove towards Walcot was reported as impassable due to standing water "again"; on 3 January 2024, when flooding under the railway bridge was reported "again" and referred to Network Rail (Photograph 3); and on 27 September 2024, when a footpath at Top Croft, within the Allscott Meads development itself, was reported as flooded with a significant amount of pooled water, with the developer aware of the issue. The recurrence of these events, and the fact that surface water flooding is already occurring within the recently built estate whose drainage discharges through allocation HOA5, demonstrate that the surface water position is a live, unresolved constraint rather than a matter that can safely be deferred. The flooding of the railway underbridge is also material to the resilience of the local highway network relied upon in the landowner's highways evidence, as its closure removes a local route.

5. Loss of employment land at HO15/HOA15. The landowner's representation (E112, paragraph 2.1) confirms that the adjoining allocation "Land West of Allscott Meads" (HO15/HOA15) was proposed for employment use in the Regulation 18 Preferred Options Plan and has since been changed to a housing allocation. This is a material change of land use that goes to whether the plan is justified. I would ask the Inspector to be satisfied that the Council has demonstrated, on a proportionate evidence base, that it retains sufficient employment land elsewhere in the borough following this conversion, and that the change from employment to housing at this location was properly assessed against reasonable alternatives, rather than driven by the landowner's preference. The two Allscott allocations should not be considered in isolation from this change.

6. Loss of greenfield agricultural land, in contrast to the brownfield basis of Allscott Meads. Both allocations comprise arable farmland, which the landowner's representation describes as "commonplace" (E112, paragraph 3.8). That description does not address the agricultural land classification of the sites. It is also important to distinguish these allocations from the Allscott Meads development itself. Allscott Meads was justified as the regeneration of previously developed land – the former sugar beet factory – consistent with the priority national policy gives to the use of brownfield land; outline permission for that scheme (470 dwellings, a new primary school, local hub, allotments, sports facilities and an ecology park) was granted in May 2016 under Council ref. TWC/2014/0113 (see E112, paragraphs 2.7–2.8). Allocations HOA5 and HOA15, by contrast, are greenfield agricultural fields. The landowner's representation describes them as "natural extensions" to the Allscott Meads development (E112, paragraph 3.6), but the existence of a brownfield regeneration scheme is not, of itself, a justification for successive greenfield extensions around it; that reasoning would invert the brownfield-first approach in national policy and could be repeated indefinitely. National planning policy requires the economic and other benefits of the best and most versatile agricultural land (Grades 1, 2 and 3a) to be recognised, and the use of areas of poorer quality land to be preferred. I would ask the Inspector to be satisfied that the agricultural land classification of these sites has been assessed, and that the loss of any best and most versatile land has been justified and weighed against the use of lower-grade or previously developed land elsewhere.

7. Proximity to a Site of Special Scientific Interest. Allocation HOA5 lies close to the former sugar beet settling ponds to the north, adjacent to the River Tern, which are designated as a Site of Special Scientific Interest (SSSI) on account of their county-important bird community. The landowner's representation (E112, paragraph 2.4 and paragraph 3.10) acknowledges the SSSI and asserts that it is hydrologically separate and can be protected by buffer zones. Given the national importance of this designation and its proximity to the allocation, I do not consider it sufficient for the plan to rely on assertion at this stage. I would ask the Inspector to be satisfied that the cumulative effects of HOA5, HOA15 and the existing Allscott Meads development on the SSSI – including in respect of hydrology, surface water drainage and recreational disturbance from a substantially increased local population – have been properly assessed through the Habitats and environmental assessment process, rather than left to the application stage. For these reasons I consider that, as currently modified, the plan does not contain sufficient evidence or site-specific safeguards to demonstrate that HOA5 is an effective and deliverable allocation.

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.

To make the allocation effective and therefore sound, I consider that the modification should be accompanied by site-specific requirements for HOA5 that are embedded in the plan itself, rather than left wholly to the planning application stage. Specifically:

- A requirement that the site be subject to a Transport Assessment demonstrating that a safe and suitable access can be achieved and that the residual cumulative impact on the local network (including in combination with the existing Allscott Meads development and allocation HOA15) would not be severe, before the allocation is relied upon, reflecting the Highways officer's recorded view that the area is sensitive to traffic.
- Confirmation that the Stage 7 reassessment of cumulative impacts on school capacity and highway infrastructure has been completed, with the outcome reflected in the allocation, so that the deliverability of the site is demonstrated rather than assumed.
- An up-to-date Transport Assessment based on current conditions, rather than the Regulation 18-era modelling relied upon in the landowner's evidence, which confirms the present delivery status of the Roman Road / Holyhead Road junction signalisation and demonstrates that the local network can accommodate the allocations as conditions actually exist. If that mitigation has not been delivered, the allocation should not proceed until network capacity has been re-evidenced.
- A site-specific requirement to identify and address the heritage and drainage constraints recorded in the site assessment, including any necessary buffers or mitigation, rather than deferring these matters entirely to the application stage.
- Evidence demonstrating that, following the conversion of HOA15 from an employment to a housing allocation, the plan retains sufficient employment land across the borough, and confirmation of the agricultural land classification of both sites with justification for the loss of any best and most versatile land. If this cannot be demonstrated, the housing allocation of HOA15 in particular should be reconsidered.

These changes would make the allocation effective by ensuring that the constraints identified in the Council's own evidence base are demonstrably capable of being resolved, and that the cumulative impact on this part of the borough is properly planned for, consistent with paragraph 35 of the National Planning Policy Framework. If the evidence cannot demonstrate that these matters are capable of resolution, I consider the indicative dwelling figure should be reduced further or the allocation removed.



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:

The Integrated Assessment Report Addendum concludes that the Local Plan strategy remains largely unchanged and that there is no significant change to the conclusions of the original Integrated Impact Assessment (CD06) or Habitat Regulations Assessment (CD05). I am concerned that this screening does not appear to revisit the cumulative effects of the allocations at Allscott (HOA5 and HOA15) alongside the existing Allscott Meads development, particularly in relation to traffic, surface water drainage, and impacts on the Site of Special Scientific Interest formed by the former settling ponds adjacent to the River Tern, immediately north of allocation HOA5. This SSSI is designated for its county-important bird community, and the concentration of additional housing close to it raises potential hydrological and recreational disturbance effects. I would ask the Inspector to be satisfied that the cumulative environmental effects of continued growth concentrated at this rural location, including effects on the SSSI, have been adequately assessed, rather than relying on the conclusion that the strategy is unchanged. Attached Photographs 3 to 6 illustrate surface water flooding experienced locally around Allscott Meads, as described in my answer to Q3.

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

I note that the Schedule of Policy Map Amendments does not propose any change to the boundary or extent of allocation HOA5 (Land North of Allscott Meads); the only changes shown are borough-wide presentational matters such as updating the Green Network layer, adding site reference labels and making allocations opaque. Given the highways, infrastructure and heritage concerns set out in my answer to Q3, I would ask that the Policies Map for this site be reviewed to ensure the mapped allocation boundary properly reflects any landscape, drainage or heritage buffers necessary to make the site deliverable, and that it does not extend development closer to the River Tern or the existing settlement than the constraints allow.

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

Click or tap here to enter text.



Photograph 1 - B5061 Roman Rd-Holyhead Rd junction unsignalised - Google Street View Sept 2025



Photograph 2 - B5061 Roman Rd-Holyhead Rd junction queuing - Google Street View Aug 2024



Photograph 3 - Watercourse by railway bridge Allscott - Jan 2024



Photograph 4 - Flooded railway underbridge Allscott



Photograph 5 - Flooded railway underbridge towards Admaston - Oct 2023



Photograph 6 - Surface water and debris on village road Allscott - Oct 2023