

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	Mrs
First Name	Wendy
Last Name	Tonge
Address	
Commenting on behalf of (if relevant)	Click or tap here to enter text.
Organisation (if relevant)	Lilleshall Parish Council
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*):

See text below

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.

Lilleshall Parish Council Response to the Modifications of the Local Plan

We wish to object to a number of the proposed Main Modifications and request that the Inspector consider the following representations.

MM004 – Strategic Local Plan Priorities (Page 8)

The proposed modification increases the housing requirement from 20,200 dwellings to 20,680 dwellings, an increase of 480 homes.

This represents a significant increase in housing numbers and requires stronger justification in relation to:

Infrastructure capacity.

School provision.

Healthcare provision.

Highway capacity.

Environmental impacts.

Delivery confidence.

The increase appears disproportionate given existing concerns regarding infrastructure delivery across the borough. Additional housing numbers should not be supported without clear evidence that the necessary infrastructure can be delivered in parallel.

MM047 – Supporting Text to Policy NE7 (Page 31)

We object to the wording:

"Some level of development within and around the gaps could be deemed as acceptable..."

The purpose of Strategic Green Gaps is to maintain separation between settlements and prevent coalescence.

The wording "within and around" and "could be deemed acceptable" is vague, subjective and open to interpretation. It weakens the protection afforded by the designation and creates uncertainty for residents and decision makers.

We request that this wording is removed and replaced with stronger wording that clearly limits development to essential infrastructure only where there is no adverse impact on the function of the Strategic Green Gap.

MM068 – Policy HO2 Sustainable Communities – SC1 Land at Bratton (Pages 42–44)

We object to the replacement of the original wording relating to the proposed primary school.

The modification changes the wording from:

"The sustainable community must provide one primary school, comprising three forms of entry and nursery provision."

to:

"The sustainable community must provide one primary school, with capacity to provide up to three forms of entry and nursery provision."

This is a significant weakening of the policy requirement.

MM069 – Policy HO2 Sustainable Communities – SC2 Land North East of Muxton (Pages 44–47)

Site Description

The first sentence should revert to the original wording.

The site is not within the built-up area of Telford. It is adjacent to the built-up area and therefore the original wording more accurately reflects the site's position.

Suggested amendment:

"The land is to the immediate north-east of the built-up area of Telford."

and explicitly state:

"The site is not within the built-up area of Telford."

Residential and Industrial Land Uses

The fourth paragraph from the bottom (p.44) introduces wording that risks creating circumstances where employment and industrial land are integrated into residential areas.

This should be completely reworded to ensure:

Residential amenity is protected.

Industrial uses are appropriately separated from housing.

Future land use conflicts are avoided.

Noise, traffic and environmental impacts are minimised.

Wording to be changed back to the original of "must"

Throughout pages 44 to 47 a number of requirements use the word "will" rather than "must".

Where infrastructure or mitigation is essential, "must" should be used.

"Will" describes an intention.

"Must" creates a policy requirement.

Examples include:

The dwellings must provide...

The site must provide...

The sustainable community must provide...

These should all remain as mandatory requirements.

Infrastructure Capacity

Wording referring to infrastructure capacity should revert to the original wording and be strengthened to ensure infrastructure delivery is not merely considered but demonstrated and delivered.

Infrastructure Delivery

Current wording:

"The required infrastructure shall include..."

Should be amended to:

"The required infrastructure must include..."

This infrastructure is fundamental to making development acceptable and should not be discretionary.

Landscaping Buffer

Page 46, Item 5.

The current wording is insufficient.

A mandatory physical landscape buffer should be required between existing and proposed communities.

Suggested wording:

"A physical landscaped buffer of not less than 20 metres must be provided and retained in perpetuity."

Retention of Deleted Wording

We also wish for the following to be re-added to the document, as they have been removed.

Contributions to the provision of a secondary school on a separate site at SC3 as identified in the Infrastructure Delivery Plan.

Delivery of highway and transport infrastructure to an agreed phasing plan to allow for highways adoption as soon as possible.

Delivery of on-site and off-site utilities infrastructure to a phasing plan approved by all utility undertakers.

The proposal needs to incorporate recommendations from the Level 2 Strategic Flood Risk Assessment outcomes for this site.

A comprehensive Green Infrastructure strategy incorporating the Council's vision for a forest community including:

Structural landscaping and public open space

Extension of Green Network

Connection to the Silkin Way

Footpath and cycleway connections into and around the site

Identified areas of existing woodland and new planting

This policy needs to be read alongside all relevant other policies within the local plan

MM070 – Policy HO2 Sustainable Communities – SC3 Land North of A442 Wheat Leasows (Pages 47–49)

Site Location

The modification seeks to describe the site as being within the built-up area.

This is inaccurate.

The wording should state:

"The land is immediately adjacent to, but is not within, the built-up area of Telford."

Housing Requirements

All references currently changed from "must" to "will" should be reverted.

Examples:

The dwellings must provide...

The site must provide...

The sustainable community must provide...

These are essential requirements and should remain mandatory.

Retention of Deleted Text

All of the following deleted wording that secures infrastructure delivery, environmental mitigation and development controls should be reinstated.

Delivery of highway and transport infrastructure to an agreed phasing plan to allow for highways adoption as soon as possible.

Delivery of on-site and off-site utilities infrastructure to a phasing plan approved by all utility undertakers.

The proposal needs to incorporate recommendations from the Level 2 Strategic

Flood Risk Assessment outcomes for this site.

Maintenance of the functionality of the Northern Interceptor Channel as a strategic drainage asset.

A comprehensive Green Infrastructure strategy incorporating the Council's vision for a forest community including:

Structural landscaping and public open space

Extension of Green Network

Connection to the Silkin Way and Apley Woods

Footpath and cycleway connections into and around the site

Identified areas of existing woodland and new planting

This policy needs to be read alongside all relevant other policies within the local plan

MM071 – Policy HO3 Housing Mix and Quality (Page 49)

We object to the removal of the word:

"exceptional"

The amended wording weakens the policy significantly.

Communal amenity space should only be accepted instead of private amenity space in genuinely exceptional circumstances.

The original wording provides a clear policy test and should be reinstated.



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.

Click or tap here to enter text.

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:



Click or tap here to enter text.

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



Click or tap here to enter text.

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.