

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	Emma
Last Name	North
Address	
Commenting on behalf of (if relevant)	Myself
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 (HOA5 and HOA15)

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.

Highways & Traffic Impact

The council's own highways officers previously identified this area as "sensitive to traffic", reducing an earlier proposal from 350 dwellings to 105. The straightening of the road has turned it into a high-speed corridor, with vehicles frequently exceeding the 30mph limit. The Local Plan's own transport policy (ST3) requires development to avoid "severe residual cumulative impacts", yet no updated modelling has been undertaken for this unplanned greenfield allocation.

This site was not included in the original Publication Plan, meaning no highways evidence was ever prepared for development on this side of the road. The number of dwellings now proposed exceeds the remaining housing quota consulted on, making the modification unjustified and unsound.

Infrastructure Capacity (Schools, GP, Roads)

Allscott Meads is still building out and its full impact on school places, GP capacity and roads is not yet realised. The Additional Modifications (AM09) reinforce the need for evidence that local GP provision can support new residents.

The proposed development across the road would erase the rural village identity of The Villas and Allscott, contrary to Strategic Policies S1, S2, S6 and HO12. Residents do not want the existing village to be "balanced" with the new estate; any further development should remain on the Allscott Meads side of the road, where infrastructure planning has already been undertaken.

Drainage, Surface Water & Flood Risk

Residents have repeatedly observed flooding at the railway underbridge, in the proposed greenfield development and standing water across parts of the estate. The greenfield land currently absorbs water naturally; its loss will worsen run-off and existing problems.

The Local Plan's own flood-risk policy (CC5) requires directing growth away from areas with known surface-water issues. This allocation contradicts that requirement.

Loss of Greenfield Land

Unlike Allscott Meads, which was built on a brownfield sugar factory site, the land now proposed for development is productive agricultural greenfield.

The Local Plan's vision emphasises the borough as a "settlement in the landscape", and this is particularly relevant to rural villages such as Allscott. Strategic Policies S1, S2, NE1–NE7 require protection of green spaces, biodiversity, landscape character and ecological networks. Extending development onto greenfield land at Allscott contradicts these principles and erodes the village's rural identity.

This allocation was never part of the original plan, and its late inclusion undermines the plan-led system. The number of dwellings now proposed exceeds the remaining housing numbers consulted on, meaning residents have not had a lawful opportunity to comment on this scale of development.

The proposal represents the first expansion onto productive farmland, setting a precedent for further countryside encroachment and dramatically altering residents' previously idyllic rural lives.

Proposed Footpath Behind My Property (Security & Amenity)

The plan indicates a new pedestrian footway running directly behind my property (The Villas). This is unacceptable.

My home currently backs onto an open field with no overlooking houses. Introducing a public footpath directly behind the boundary would materially increase security risks, reduce privacy, increase noise, and fundamentally alter the character of the setting.

While the planners appear to have been sympathetic in housing placement, this does not mitigate the unacceptable impact of a footpath running immediately behind existing homes.

This conflicts with Strategic Policies S6, DD1, DD2 and CI3, which require safe, inclusive, well-designed places that protect residential amenity.



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.

Highways & Traffic Impact

Change requested:

Require a full, updated Transport Assessment and junction capacity modelling for the entire Allscott corridor, including the straightened road section, before any development is permitted. Require traffic-calming measures, junction redesign, and pedestrian-safety interventions to be delivered prior to occupation.

Suggested wording:

“Development on Sites A, B and C will only be supported where a comprehensive Transport Assessment demonstrates that the local highway network can safely accommodate additional traffic.

The assessment must include updated modelling of the straightened road section, existing speeding issues, and cumulative junction impacts.

Where necessary, traffic-calming measures, junction improvements and pedestrian-safety interventions shall be secured and delivered prior to first occupation.”

Why this makes the Main Modification sound/legally compliant:

The Local Plan’s own transport policy (ST3) requires development to avoid “severe residual cumulative impacts”. The straightened road has become a high-speed corridor, with vehicles frequently exceeding the 30mph limit. This materially increases collision risk, especially given the number of side roads already joining the main route.

Crucially, this site was not included in the original Publication Plan, meaning no highways evidence was ever prepared for development on this side of the road. The number of dwellings now proposed exceeds the remaining housing quota consulted on, meaning the traffic impact has not been assessed through the plan-led process.

Without updated modelling and mitigation, the modification is neither justified nor effective and therefore unsound.

Infrastructure Capacity (Schools, GP, Roads)

Change requested:

Require a cumulative infrastructure capacity assessment covering Allscott Meads, the proposed greenfield allocation, and the wider rural settlement. Require evidence that school places, GP provision, and road capacity can support the increased population.

Suggested wording:

“Planning permission for Sites A, B and C will only be granted where a cumulative assessment of infrastructure impacts demonstrates that sufficient capacity exists, or will be provided, in local schools, primary healthcare and the local road network.

Where capacity is insufficient, the Council will secure appropriate mitigation and/or phased delivery through planning obligations.”

Why this makes the Main Modification sound/legally compliant:

Allscott Meads is still building out and its full impact on school places, GP capacity and roads is not yet realised. The Additional Modifications (AM09) reinforce the requirement for evidence that local GP provision can support new residents.

The proposed development across the road would fundamentally alter the rural settlement pattern, effectively merging two distinct areas and eroding the village identity of The Villas and Allscott. This conflicts with Strategic Policies S1, S2, S6 and HO12, which require development to respect rural character and settlement form.

Any further development should remain on the Allscott Meads side of the road, where infrastructure planning has already been undertaken.

Without cumulative assessment, the modification is not positively prepared or justified.

Drainage, Surface Water & Flood Risk

Change requested:

Require a site-specific Flood Risk Assessment and detailed SuDS strategy addressing known drainage issues, including the railway underbridge flooding and standing water across the estate.

Suggested wording:

“Development on Sites A, B and C will only be permitted where a site-specific Flood Risk Assessment and detailed surface-water drainage strategy demonstrate that flood risk will not be increased on- or off-site.

The strategy must address existing issues of standing water and flooding at the nearby railway underbridge and surrounding roads and incorporate sustainable drainage systems designed to manage run-off rates and volumes.”

Why this makes the Main Modification sound/legally compliant:

The Local Plan’s own climate and flood-risk policies (S5 and CC5) require directing growth away from areas with known surface-water problems.

Residents have repeatedly observed flooding at the railway underbridge and standing water across the estate. The greenfield land currently absorbs water naturally; its loss will worsen run-off and existing problems.

The IIA Addendum does not assess these site-specific risks, making the modification unjustified and ineffective.

Greenfield, Not Brownfield

Change requested:

Insert explicit wording recognising the agricultural, landscape and ecological value of the greenfield land and requiring justification for its loss. Require evidence that development cannot be accommodated on brownfield or previously planned sites.

Suggested wording:

“In assessing proposals on Sites A, B and C, the Council will have particular regard to the greenfield, agricultural character of the land and the contribution it makes to the local landscape and rural setting.

Development will only be supported where it can be demonstrated that:

- the loss of agricultural land is justified by clear evidence of need;

- the scheme respects the transition between settlement and open countryside;
- landscape and biodiversity impacts are minimised and appropriately mitigated; and
- no suitable brownfield alternatives exist.”

Why this makes the Main Modification sound/legally compliant:

This land was never part of the original Local Plan and was not included in the Regulation 19 consultation. Its late inclusion undermines the plan-led system and fails the NPPF soundness tests of justification, effectiveness, and consistency with national policy.

The number of dwellings now proposed exceeds the remaining housing numbers consulted on, meaning residents have not had a lawful opportunity to comment on this scale of development. The Local Plan’s vision emphasises Telford as a “settlement in the landscape” and Strategic Policies S1, S2, NE1–NE7 require protection of green spaces, biodiversity, landscape character and ecological networks.

This allocation represents the first expansion onto productive farmland, setting a precedent for further countryside encroachment and dramatically altering residents’ previously idyllic rural lives.

Proposed Footpath Behind My Property

Change requested:

Remove the proposed footpath behind existing properties to avoid unacceptable impacts on security, privacy and amenity.

Suggested wording:

“The pedestrian footway currently shown to the rear of existing properties shall be omitted unless it can be demonstrated that its alignment will not result in unacceptable impacts on the security, privacy or amenity of those dwellings.

Alternative pedestrian connections should be provided in locations that are overlooked and benefit from natural surveillance.”

Why this makes the Main Modification sound/legally compliant:

he footpath would create a direct security risk and fundamentally alter the character of the area. My property backs onto an open field with no overlooking houses. Introducing a public footpath directly behind the boundary would materially increase security risks, reduce privacy, increase noise, and erode rural character.

This conflicts with Strategic Policies S6, DD1, DD2 and CI3, which require safe, inclusive, well-designed places that protect residential amenity.

While the planners appear to have been sympathetic in housing placement, this does not mitigate the unacceptable impact of a footpath running immediately behind existing homes.



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:

After reviewing the Integrated Assessment Report Addendum, I have significant concerns about how the document addresses the Main Modification relevant to this site allocation. The Addendum's conclusions do not reflect the site-specific impacts, nor do they align with the Local Plan's own strategic priorities or evidence base.

1. The Addendum incorrectly assumes that most modifications are minor

The Addendum states that the modifications "are not expected to have any meaningful impact on the Plan's overall sustainability performance."

This is not correct for this allocation.

The proposed development introduces new greenfield housing in a location that:

was not included in the original Publication Plan

was not assessed at Regulation 19 stage

exceeds the remaining housing quota consulted on

lies outside the planned growth area

has no masterplanning framework

has known drainage, flooding and infrastructure constraints

These are not "minor" changes. They materially alter the sustainability profile of the settlement.

2. The Addendum does not assess the shift from brownfield to greenfield development

The Addendum does not acknowledge that this allocation represents the first expansion onto productive farmland in this settlement.

The Local Plan's own vision emphasises Telford as a "settlement in the landscape", and Strategic Policies S1, S2, NE1–NE7 require protection of green spaces, landscape character and ecological networks.

The Addendum does not assess:

loss of agricultural land

loss of rural landscape setting

erosion of settlement identity

precedent for further countryside encroachment

This is a major omission.

3. The Addendum does not assess the cumulative increase in housing numbers

The Addendum notes "small increases in housing and site capacity slightly raise development pressures."

In this location, the increase is not small:

the number of dwellings now proposed exceeds the remaining housing numbers presented at the last

consultation

the site was not part of the original plan

no cumulative assessment has been undertaken for Allscott Meads + the new greenfield allocation

This contradicts the Local Plan's requirement for a plan-led, evidence-based distribution of growth.

4. The Addendum does not assess rural character, settlement form or landscape impact

The Addendum does not consider:

the merging of two distinct settlement areas

the loss of rural village identity

the impact on the open countryside setting

the conflict with Strategic Policies S1, S2, NE5, NE7 and HO12

The Local Plan explicitly states that significant erosion of green space "will be resisted".

This allocation directly contradicts that principle.

5. The Addendum does not assess known drainage and flood-risk issues

The Addendum states that modifications "improve environmental performance" in relation to drainage and water efficiency.

However, it does not assess:

standing water across the estate

repeated flooding at the railway underbridge

the loss of natural greenfield drainage function

increased run-off from hard surfacing

the conflict with CC5 (flood risk) and S5 (climate resilience)

These are material sustainability issues that should have been assessed.

6. The Addendum assumes benefits of masterplanning that do not apply here.

The Addendum highlights stronger masterplanning requirements as a positive outcome.

However:

this site is not part of a Sustainable Community

it has no masterplan

it has no integrated infrastructure strategy

it has no coordinated design framework

The Addendum incorrectly applies benefits that do not exist for this allocation.

7. The Addendum does not assess the security and amenity impacts of the proposed footpath
The IIA framework includes objectives relating to:

health

wellbeing

safety

equality

landscape

community cohesion

Yet the Addendum does not assess the impact of introducing a public footpath directly behind existing residential boundaries, despite this being a significant change with:

security implications

privacy loss

noise impacts

amenity impacts

rural character impacts

This is a major omission.

8. The Addendum does not assess the conflict with the Policies Map
The Policies Map shows:

the Green Network

Strategic Green Gaps

rural settlement boundaries

landscape designations

The proposed allocation conflicts with these designations, yet the Addendum does not assess this.

Summary

In summary, the Addendum's conclusion that the Main Modification does not significantly affect sustainability outcomes is incorrect for this site. The Addendum:

overlooks the shift from brownfield to greenfield

overlooks the exceeding of previously consulted housing numbers

overlooks rural character and landscape impacts

overlooks drainage and flood-risk issues

overlooks infrastructure capacity constraints

overlooks the lack of masterplanning

overlooks the security and amenity impacts of the footpath

overlooks conflict with Strategic Policies and the Policies Map

The Addendum's high-level approach does not adequately reflect the site-specific sustainability harms associated with this allocation.

A full, site-specific assessment is required to make the Main Modification sound.

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

I have reviewed the Proposed Revisions to the Policies Map and have significant concerns about how the changes relate to the Main Modification affecting the greenfield land adjacent to my property. The revised Policies Map does not accurately represent the environmental, landscape, infrastructure or amenity constraints of this location, nor does it reflect the Local Plan's own strategic priorities.

1. The Policies Map does not reflect the true extent or function of the Green Network

The Policies Map shows the updated Green Network layer, but the field proposed for allocation has been removed from the Green Network despite functioning as:

- a continuous ecological corridor between the settlement edge and open countryside
- a landscape buffer protecting rural character
- a natural drainage area absorbing surface water
- part of the rural setting of The Villas and Allscott

The Local Plan states that significant erosion of green space "will be resisted" and emphasises Telford as a "settlement in the landscape".

Removing this land from the Green Network contradicts Strategic Policies S1, S2, NE1, NE5 and NE7, and undermines the borough's stated priority of protecting green spaces.

2. The Policies Map does not show the proposed footpath behind existing properties

The development plan drawings include a new pedestrian footway running directly behind my property (The Villas), yet the Policies Map does not show this feature.

This is a major omission because:

- a public footpath immediately behind private rear boundaries has security implications
- it reduces privacy and amenity
- it alters rural character
- it introduces noise and activity into an area currently secluded and safe
- it contradicts Strategic Policies S6, DD1, DD2 and CI3

The Policies Map must show all proposed public routes so residents can understand the full implications of the allocation.

3. The Policies Map does not illustrate known drainage and flood-risk constraints

The Policies Map does not show:

- the railway underbridge that repeatedly floods
- areas of standing water across the estate
- natural drainage pathways across the greenfield

surface-water risk zones

This contradicts the Local Plan's flood-risk policy CC5, which requires directing growth away from areas with known drainage issues.

The omission of these constraints gives a misleading impression of the site's suitability for development.

4. The Policies Map does not distinguish between brownfield and greenfield allocations

The Policies Map shows housing allocations but does not differentiate between:

brownfield sites (e.g., Allscott Meads, former sugar factory)

greenfield agricultural land (the new allocation)

This is misleading because:

this allocation represents the first expansion onto productive farmland in this settlement

the Local Plan prioritises brownfield development (HO1, HO12)

the shift from brownfield to greenfield has not been assessed in the IIA Addendum

residents were not consulted on this change at Regulation 19

The Policies Map should clearly identify greenfield allocations to support transparent decision-making.

5. The opacity changes make boundaries harder to interpret

The Schedule of Amendments states that allocated housing sites will be "made opaque".

In this location, opacity reduces clarity and makes it harder to understand:

the exact extent of the proposed allocation

the relationship between new housing and existing homes

the proximity of development to private boundaries

the location of landscape buffers

Given the sensitivity of this rural settlement, boundaries should be more visible, not less.

6. The Policies Map does not reflect rural settlement identity or landscape character

The Local Plan's vision emphasises:

protecting green spaces

maintaining rural character

ensuring development respects settlement form

preventing erosion of landscape identity

The Policies Map revision contradicts these principles by:

extending development across the road into open countryside

merging two distinct settlement areas

erasing the rural identity of The Villas and Allscott

failing to show landscape buffers or rural character protections

This conflicts with Strategic Policies S1, S2, NE6, NE7 and HO12.

7. The Policies Map does not reflect the fact that this site was not in the original plan

This land was not included in the original Publication Plan or the Regulation 19 consultation.

Its late inclusion:

undermines the plan-led system

exceeds the previously consulted housing numbers

removes greenfield protections without public consultation

contradicts the Local Plan's stated approach to sustainable growth

The Policies Map should not be revised to include land that has not been properly assessed or consulted upon.

Summary

In summary, the Proposed Revisions to the Policies Map:

remove greenfield protections

omit key constraints

fail to show the proposed footpath

obscure boundaries

misrepresent rural character

contradict Strategic Policies

conflict with the Local Plan's vision

fail to reflect the site's unplanned status

exceed previously consulted housing numbers

The Policies Map must be updated to accurately reflect the environmental, landscape, infrastructure and amenity constraints of this site before adoption.

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

I have reviewed the Council's Additional Modifications and wish to comment on several that are directly relevant to the proposed greenfield allocation adjacent to my property. Although the Council states that these modifications "do not materially affect the Plan", many of them reinforce environmental protections, landscape safeguards, infrastructure requirements and rural character policies that the proposed allocation does not meet. These Additional Modifications therefore highlight significant inconsistencies between the Local Plan's updated expectations and the impacts of this site.

1. AM01: Strengthened baseline on Local Nature Reserves and managed woodland

AM01 updates the environmental baseline to state that the borough contains:

"over 400 hectares of managed woodland"

"47 Local Wildlife Sites"

"at least five further LNRs proposed for designation"

This strengthened baseline emphasises the importance of protecting greenfield land and ecological corridors.

The field proposed for development forms part of a continuous green corridor between the settlement edge and open countryside. Removing this land from the Green Network contradicts Strategic Policies S1, S2, NE1 and NE5, and undermines the borough's stated priority of protecting green spaces.

The Additional Modification therefore reinforces the argument that this greenfield land should not be allocated.

2. AM06 & AM07: Strengthened wording on designated sites and the Green Network

AM07 clarifies that Policy NE5 "seeks to preserve the Green Network".

This is highly relevant because:

the Policies Map update removes the greenfield land behind The Villas from the Green Network

the land clearly functions as part of the ecological corridor

the Local Plan's vision emphasises Telford as a "settlement in the landscape"

Strategic Policies S1, S2, NE5 and NE7 require protection of green spaces and landscape character

The Additional Modification strengthens the Green Network policy, yet the proposed allocation contradicts it.

This inconsistency highlights that the allocation is not sound.

3. AM09: Strengthened requirement for GP capacity and care-needs evidence

AM09 states that applicants must demonstrate that residents with higher care needs can be supported by "local GP provision".

This is directly relevant because:

local GP capacity is already constrained

Allscott Meads is still building out

the proposed allocation exceeds the previously consulted housing numbers

no cumulative assessment has been undertaken

The Additional Modification reinforces the need for evidence-based infrastructure planning, which has not been provided for this site.

4. AM11–AM12: Updated evidence base for open space, recreation and playing pitches

These modifications reference updated strategies including:

Playing Pitch and Outdoor Recreation Strategy (2025)

Open Space Needs Assessment (2023)

Play, Recreation and Open Space Developer Contributions Strategy (2022)

The proposed development would place additional pressure on existing open space and recreation facilities. The greenfield land currently provides informal open space, landscape setting and ecological value. The Additional Modifications reinforce the need for proposals to address deficiencies in local provision, yet no such assessment has been undertaken for this site.

5. AM14–AM15: Strengthened requirements for land stability and ground investigation

These modifications require:

intrusive ground investigation

slope stability assessment

ground movement monitoring

detailed geotechnical reporting

gas and groundwater monitoring

Given the proximity of the site to:

historic railway infrastructure

known drainage issues

areas of standing water

the railway underbridge that repeatedly floods

These strengthened requirements highlight that the site has not been assessed to the level now required by the Local Plan.

6. The Additional Modifications reinforce rural character protection

Several modifications strengthen policies relating to:

landscape character

rural settlement identity

green space protection

ecological networks

community safety

amenity protection

The proposed allocation:

erodes rural character

merges two distinct settlement areas

undermines the identity of The Villas and Allscott

introduces a footpath behind private boundaries

removes greenfield land that was never part of the original plan

The Additional Modifications therefore highlight inconsistencies between the Local Plan's updated expectations and the impacts of this allocation.

7. The Additional Modifications reinforce the need for clarity and accuracy in the Policies Map

Several modifications relate to:

correcting designations

updating references

improving clarity

ensuring accurate mapping of environmental assets

Yet the Policies Map:

does not show the proposed footpath

removes greenfield land from the Green Network

does not illustrate drainage constraints

does not distinguish brownfield vs greenfield allocations

This contradicts the intent of the Additional Modifications.

Summary

The Additional Modifications strengthen environmental protection, landscape safeguarding, infrastructure requirements, rural character policies and mapping accuracy.

These strengthened requirements highlight several areas where the proposed greenfield allocation does not meet the updated expectations of the Local Plan.

The Additional Modifications therefore reinforce the argument that the allocation is:

inconsistent with Strategic Policies

inconsistent with the Policies Map

inconsistent with the Local Plan's vision

inconsistent with the IIA Addendum

inconsistent with the HRA

unjustified

ineffective

and unsound.