

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	Click or tap here to enter text.
First Name	Stephen
Last Name	Massey
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: HOA5 and HOA15 (Land North and West of Allscott Meads, Allscott).

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.

I object to Main Modification MM130 in relation to HOA5 and HOA15 because I do not consider it to be sound as currently proposed.

The proposed allocation of approximately 165 additional dwellings has not been sufficiently justified against the cumulative impact of development already taking place at Allscott Meads. The former sugar factory redevelopment has already resulted in significant growth and remains under construction. The full impacts on traffic, public services and local infrastructure are not yet understood.

My principal concern is highways. The local road network is already under pressure at peak times and the Council's own evidence has previously identified traffic sensitivity in this area. The reduction of one of the related sites from 350 dwellings to 105 because of highway concerns indicates that cumulative transport impacts remain a significant issue. Further allocation should not proceed without a transparent reassessment of the combined impact of existing and proposed development.

I am also concerned about the adequacy of local infrastructure, particularly GP provision, primary school capacity and other community services. It is not clear that these services can accommodate further growth. Drainage and flooding are also important concerns. Residents have experienced standing water issues and concerns around the railway underbridge. The Local Plan should demonstrate that drainage, surface water and sewerage issues can be satisfactorily addressed before allocation, rather than relying on future resolution at planning application stage.

Finally, HOA5 and HOA15 would extend development beyond the brownfield regeneration of the former sugar factory site onto greenfield agricultural land. This represents a materially different planning decision which requires stronger justification, particularly regarding the loss of farmland, landscape character and the rural setting of Allscott.

For these reasons I consider MM130 unsound.



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 MM130 sound, HOA5 and HOA15 should be removed from Appendix A Housing Allocations. If the Inspector is not minded to remove the allocations entirely, the sites should be deferred pending a comprehensive reassessment of:

- cumulative highway impacts;
- GP and health service capacity;
- school capacity;
- drainage and flood risk;
- sewerage and utility infrastructure;
- landscape and greenfield impacts.

Any future allocation should only proceed once robust evidence demonstrates that these impacts can be mitigated and that the required infrastructure is deliverable and funded.



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:

I do not believe the Integrated Assessment Report Addendum adequately considers the cumulative impact of existing and proposed development at Allscott.

The assessment should place greater weight on:

- highway capacity and cumulative traffic effects;
- pressure on local services and infrastructure;
- drainage and flood risk;
- loss of greenfield agricultural land;
- impacts on the character of the rural settlement.

The assessment should also clearly explain why these allocations are preferable to reasonable alternatives elsewhere in the borough.

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

If HOA5 and HOA15 are removed from the Local Plan, the Policies Map should be amended accordingly. If the allocations remain under consideration, the Policies Map should not be finalised until updated evidence on highways, infrastructure, drainage and environmental impacts has been publicly consulted upon.

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

No comment.