

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	Paul
Last Name	Dyson
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*):

MM03; MM04; MM019; MM020; MM021; MM037; MM038; MM045; MM056; MM057; MM058; MM064; MM068; MM070;

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.

Dear Planning Policy Team and Planning Inspectors,

RE: Formal Consultation Response – Main Modifications to the Telford & Wrekin Local Plan Review

Site Focus: Proposed allocation at the end of Brandon Avenue, the Bratton Green and Wappenshall developments, and the Impact on TF5 Periphery

I am writing to submit formal technical observations regarding the soundness and deliverability of the Main Modifications to the Local Plan Review, ahead of the consultation deadline on 20 July 2026.

While the Inspectors have outlined modifications to ensure sustainable growth, the current plan remains fundamentally unsound, unjustified, and undeliverable concerning the unallocated windfall site at Brandon Avenue and its interplay with the wider Sustainable Urban Extensions (SUEs) at Bratton Green and Wappenshall.

I urge the Inspectors to review the following critical conflicts:

1. Failure of Infrastructure Delivery & Healthcare Capacity (Soundness & Deliverability)

The Main Modifications require infrastructure capacity to directly align with housing delivery. However, there is a total, uncoordinated deficit in healthcare provision for the TF5 area.

The massive influx of up to 4,500 homes across the Bratton Green and Wappenshall developments will place unprecedented, catastrophic demand on the existing local medical centre at the end of Brandon Avenue and other practices in the area. The Local Authority has explicitly stated that it is not directly responsible for GP provision and has secured no funding to support the necessary developments. Additionally, I have confirmed that the practice is already close to its maximum capacity. This is likely to be reached maximum and present a significant problem after the current development at Alscott is completed.

By allowing Nuplace/Keon Homes to build 36 dwellings on the field immediately adjoining the medical centre, the council is permanently "landlocking" the facility, completely precluding any possible future physical expansion. Prioritising a short-term housing target on an unallocated windfall site at the expense of permanent, long-term healthcare capacity for the wider community directly violates the core principles of sustainable, infrastructure-led planning.

2. Unrealistic Sustainable Transport Models & Cumulative Highway Failure

The modifications rely heavily on a highly aspirational "modal shift"—assuming new residents will abandon private vehicles for active travel (walking/cycling) or public transport. In a historically decentralised, car-centric town like Telford, this model is completely divorced from real-world human behavior and geography.

Commuting from the northwest periphery to major decentralized employment and retail hubs via

active travel is unfeasible for families. Crucially, the Local Plan identifies no secured funding or binding operator commitments to deliver the high-frequency public transport network required to facilitate this shift.

Consequently, private car usage will remain a necessity. The cumulative impact of the Brandon Avenue site, combined with the strategic SUEs, will trigger severe, unmitigated gridlock on the surrounding strategic road network, specifically overloading the A518, A442 access points, and the narrow historic bottlenecks through Admaston and Wellington. The transport mitigation strategy is entirely undeliverable.

3. Immediate Failure of Waste Management Infrastructure (Soundness & Deliverability)

The Main Modifications mandate that development must be supported by viable public services. However, the borough's waste disposal infrastructure is already operating in a state of crisis. The Hortonwood Household Recycling Centre—which serves the TF5 and wider northern Telford area—routinely suffers from massive vehicle queuing and gridlock. The Borough Council's recent, emergency introduction of strict access controls and resident-only permit checks is explicit proof that this critical facility has run out of operational capacity. Flooding the immediate area with 36 homes at Brandon Avenue, alongside the thousands of homes across the Bratton Green and Wappenshall developments, will completely overwhelm this failing service. Pushing ahead with massive housing growth without identifying or funding a corresponding expansion of waste management infrastructure renders the plan entirely unsound and unsustainable.

4. Immediate Site Constraints, Access, and Environmental Nuisance

On a localized level, the infrastructure lacks the capacity to safely manage 36 additional homes down an established, narrow residential cul-de-sac like Brandon Avenue.

Furthermore, the proposed development directly borders a shared private driveway serving four detached properties. This shared access route is heavily encumbered by rights of way and sits directly adjacent to a strip of mature, council-owned trees. Heavy construction, alterations to the local water table, and subsequent soil compaction pose an immediate, unmitigated threat to the root protection zones of these established trees. Given that root encroachment is already causing actionable private nuisance by lifting the tarmac and threatening underground utility services, pushing a high-density development into this fragile boundary pocket violates the modified Green and Natural Environment policies regarding biodiversity net gain and asset protection.



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.

For the Telford & Wrekin Local Plan Review to be legally sound, housing delivery must not outpace secured infrastructure and associated funding; this should be clearly identified in the plan.

Because both the necessary highway upgrades and localized healthcare capacities are completely unfunded, uncoordinated, and unrealistic, I formally request that the Brandon Avenue allocation be deleted from the plan. The land should instead be strictly safeguarded for future community healthcare infrastructure and environmental buffers to absorb the impact of the wider strategic allocations.

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:

Please see comments in Section 3 and 4 above.

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.