

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	John
Last Name	Townsend
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 – HOA5 and HOA15 - 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 insofar as it relates to housing allocations HOA5 and HOA15 at Allscott.

The proposed additional housing appears to underestimate the cumulative pressure already being placed on the village and surrounding roads. Allscott Meads has brought major change, with about 470 homes on the former sugar factory site. Before a further 165 homes are added to the Local Plan, the Council should be able to demonstrate that the existing development has been fully absorbed and that infrastructure is coping.

At present, I do not believe that has been shown. The highway network is a particular concern. Peak time traffic is already noticeable, and the local junctions were not designed for continuing expansion without consequence. If Council officers previously considered the area sensitive to traffic, then a cautious approach is required. A reduction in one site from 350 homes to 105 also suggests that highway capacity has been a material concern.

Education and healthcare provision require the same level of scrutiny. It should be clear how primary school demand and GP capacity will be managed. These are practical issues for residents, not abstract planning matters.

Drainage and flooding also need to be resolved before further allocations are made. The railway underbridge and standing water around the estate have caused concern locally. The Plan should not rely on later technical solutions if the basic suitability of the land is still uncertain.

I also question the justification for moving beyond brownfield land onto greenfield farmland. Redeveloping the former sugar factory was understandable; extending into productive fields is a separate and more damaging proposal.

In my view, MM130 is not sufficiently justified or effective as currently written. I request that HOA5 and HOA15 are removed or subject to further evidence and consultation before being included in the Local Plan.



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 modification sound, HOA5 and HOA15 should be removed from Appendix A Housing Allocations.

If the Inspector does not remove the allocations entirely, the sites should be deferred whilst a comprehensive reassessment of the following is undertaken:

- Cumulative highway impacts;
- GP and health 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.