

Consultation Response – William Gould - Reisdent

Question 1: Which Main Modification does this comment relate to?

MMO69

Question 2: Do you consider that this Main Modification is:

Legally Compliant

Question 3: Please give details of why you consider this Main Modification is not legally compliant and/or unsound. Please be as precise as possible.

The added text in the opening paragraph: "The land is within the built-up area of northeastern Telford" Modification is unsound as it is factually inaccurate. It is also misleading and suggests a gross misrepresentation of the site location. Numbered list 2. of the Delivery heading. The paragraph remains unsound despite the modification due to its inconsistencies which do not align the two vulnerable road networks. Concession should be given to both named roads. This statement leaves the opportunity open to a significant undermining of highway safety, negative existing resident impact and the principles outlined in the councils own good design policies. The Vehicular access statement should be consistent across both vulnerable road networks. Humber Lane being notably in need of safeguarding. The evidence which supports the unsuitability of the vulnerable and physically constrained Humber Lane, is overwhelming. The council need only perform a site case study and look at over a decade of complaints and road safety issues. The cumulative impact of site SC2 and SC3 on the local network cannot handle the influx. Currently, Humber Lane, a hazardous and physically constrained country lane, poorly handles roughly 2,360 vehicles per weekday as reported by recent surveys. Adding a 800-home development and a school will easily generate an additional 3,000 to 4,000 vehicular movements per day, excluding the additional through traffic from SC3. Humber Lane cannot be engineered into suitability. This is a physical impossibility due to the roads boundary constraints. No planning condition, financial contribution, or mitigation scheme can overcome this. It is a permanent, unresolvable constraint that makes the development fundamentally incompatible with the road network that must serve it. This has been recognised by the land promoter by their own admissions. Numbered list 5. of the Delivery heading. The added text: "Landscaping strategy. Where appropriate, a suitable buffer should be included to clearly maintain a physical separation to protect the vulnerable existing communities." This modification is unsound as the statement leaves the application of a buffer in suitable areas open to interpretation and challenge by the land developers. Where a buffer is deemed suitable the council should enforce via the Local Plan that the developers follows guidelines to protect communities.

Question 4: 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.

The text in the opening paragraph should be replaced in-keeping with the following: "The land is outside of the built-up area of northeastern Telford and within the rural greenbelt." Numbered list 2. of the Delivery heading. The Modification text should be replaced as follows: "Phasing. The proposed phasing of the development of the site should be detailed in phasing plans, including the quantum of development proposed in each phase and the parameters of each phase. Any planning applications should be supported by a detailed phasing plan for that phase and delivery trajectory for that phase. Access, egress, site circulation strategy and details of how the development will link with sustainable routes (rights of way etc) adjacent to the site. Vehicular access will not be permitted from Wellington Road or Humber Lane either during construction or after completion of the sustainable community." Numbered list 5. of the Delivery heading. The modification text should be replaced in-keeping with the following: "Landscaping strategy. Where appropriate, a suitable buffer should be included, not less than 20meters where existing communities curtilage borders the site. To clearly maintain a physical separation to protect existing communities, the buffer should be established timely and matured to provide suitable screening before the initial phase of development."

NEW RESPONSE

Question 1: Which Main Modification does this comment relate to?

MM069

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Legally Compliant

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Amendment to my initial submission, modifying my comments of this specific paragraph in the delivery paragraphs of MM069. All other comments from my initial submission remain unchanged. Numbered list 5. of the Delivery heading. The added text: "Landscaping strategy. Where appropriate, a suitable buffer should be included to clearly maintain a physical separation to protect the vulnerable existing communities." This modification is unsound as the statement leaves the application of a buffer in suitable areas open to interpretation and challenge by the land developers. Where a buffer is deemed suitable the council should enforce via the Local Plan that the developers follows guidelines to protect communities

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