

Consultation Response – Jenny Gould – Resident

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

MM069

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

None of the above

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.

1) First paragraph- states that 'the land is within a built up area' 2) Re: Delivery- Objection to Soundness: Incompatible Vehicular Access (Sites SC2 & SC3) 1. Failure to Recognize Severe Highway Hazards Despite recent modifications, the paragraph remains fundamentally unsound due to critical inconsistencies. It fails to demonstrate that the Council has properly assessed or recognized the severe, documented hazards associated with using Humber Lane for vehicular access. As currently drafted, the policy creates a loophole that significantly undermines highway safety, compromises community welfare, and directly violates the Council's own design and transport policies. 2. Inconsistent Standards Across Vulnerable Networks The Vehicular Access Statement must apply a consistent, rigorous standard across all vulnerable road networks in the area. Humber Lane is a highly constrained and vulnerable route that requires explicit safeguarding, yet it is being treated with an unacceptable level of leniency. 3. Overwhelming Evidence of Substandard Infrastructure The empirical evidence demonstrating Humber Lane's unsuitability is overwhelming. A site visit, combined with over a decade of documented resident complaints and road safety incidents, confirms that the local network lacks the residual capacity to absorb the traffic influx. The local network cannot sustain the severe cumulative impacts of developing both sites SC2 and SC3 simultaneously. 4. A Permanent, Non-Mitigatable Physical Constraint Most importantly, Humber Lane cannot be engineered into suitability. Due to fixed physical constraints and third-party land boundaries, widening the road or delivering safe pedestrian infrastructure is a physical impossibility. Because this constraint is permanent and unresolvable, it cannot be overcome by planning conditions, Section 106 financial contributions, or mitigation schemes. The proposed allocations are fundamentally incompatible with the road network that must serve them—a fact already conceded by the land promoter in their own submission. Because safe and suitable access cannot be achieved, the development of these sites is legally undeliverable. The policy is unsound and the allocations must be removed from the Plan. 3) Also re: Delivery- Document states, 'a suitable buffer should be included to clearly maintain a physical separation to protect existing communities.' Telford and Wrekin must ensure that the developer adheres to a minimum and specific buffer zone, not a vague notion of one which is open to interpretation and whereby the developer has no interest in protecting existing houses.

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.

1) The proposed 800 houses are in a rural greenbelt and this must be stated 2) The document should state: Phasing & Access Requirements: Phasing Plans: All applications must include a detailed phasing plan and delivery trajectory specifying the development quantum and parameters for each phase. Connectivity: Submissions must detail internal site circulation, access/egress strategies, and active links to adjacent sustainable transport routes and rights of way. Access Restrictions: Vehicular access from Wellington Road or Humber Lane is strictly prohibited during both the construction phase and post-completion operational use. 3) Rephrase: 'A minimum 20-meter landscape buffer must be provided where the site borders

existing residential curtilages to maintain distinct physical separation. To ensure effective visual screening and protect neighboring amenity, this buffer must be established and matured prior to the commencement of the first phase of construction.'

Question 5: 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.

No

Question 6: Do you have any comments on a Proposed Revision to the Policies Map? Please provide them in the box below.

No