

Consultation Response – Ian Cabtree - Resident

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

MM069 Site Description

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

Sound

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.

Current wording The site description opens by stating that the land is within the built-up area of northeastern Telford. Issue This is a factual inaccuracy that goes to the heart of the plan's soundness. The SC2 site is greenfield agricultural land beyond the existing settlement edge, separated from the built-up area by open countryside, and — as the Council's own Local Plan documents describe elsewhere — sits within a landscape gap valued for maintaining separation between Telford's urban area and Lilleshall. Describing the site as already "within the built-up area" mischaracterises its baseline character in a way that understates the scale of change involved in developing it, and is inconsistent with the site's own description elsewhere in the plan and supporting evidence base as a strategic countryside allocation. A plan that misdescribes the fundamental character of its own largest allocation cannot be said to be positively prepared or justified on an accurate evidence base.

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.

Proposed modification The site description should be corrected to state that the land is currently outside the built-up area of northeastern Telford, in open countryside, and that the allocation itself would extend the built-up area boundary to incorporate it. If the Council intends to rely on any Green Belt or equivalent designation for this land, I would ask that this be explicitly identified and evidenced; I have not been able to identify any statutory Green Belt designation applying to this site in the published evidence base, and the description should not imply one that does not exist. Justification Accuracy in the plan's own description of the baseline character of its allocations is a basic soundness requirement. This is not a drafting nicety: the degree of change involved in developing genuinely open countryside is materially greater than infill or edge-of-settlement development, and the plan's policies on landscape character, the Strategic Green Gap, and countryside protection are only coherent if the plan itself accurately describes which land is, and is not, already built-up.

NEW RESPONSE

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

MM0069 Point 2

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.

Current wording As I understand it, the Delivery section of MM069 (point 2, on phasing) restricts the use of Wellington Road for construction traffic and site access to the allocation. Issue No equivalent restriction is proposed for Humber Lane, despite Humber Lane being at least as

unsuitable, and on the evidence I have gathered, considerably more unsuitable, for construction traffic and long-term site access. Humber Lane is narrow, cannot be widened due to fixed boundary constraints, is unlit for its full length, has no continuous footway, floods to depths reported at up to 20cm after normal rainfall, and has a documented history of serious collisions spanning from at least 2015 to as recently as July 2026. The Council's own Local Highways Authority has separately noted, in consultation responses on a related planning application for this same allocation, that the necessary strategic transport modelling for this corridor is not yet complete. If Wellington Road is considered unsuitable for construction traffic and warrants an explicit restriction, Humber Lane self-evidently warrants the same treatment, and arguably more urgently.

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.

Proposed modification Point 2 of the Delivery section should be amended to extend the same restriction on use for construction traffic and permanent site access to Humber Lane, not solely Wellington Road. Justification A plan is not effective if it selectively restricts unsuitable routes while leaving an equally or more unsuitable route unrestricted for the same development. I have compiled substantial photographic and documentary evidence of collision history, flooding, and highway safety concerns on Humber Lane, which I can provide in full if helpful to the Inspector's consideration of this point. Leaving Humber Lane unrestricted while restricting Wellington Road would not adequately mitigate the adverse effects of the allocation and would undermine the soundness of the plan on highway safety grounds.

NEW RESPONSE

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

MM069 Point 5

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.

Current wording Point 5 of the Delivery section (Landscaping strategy) states that "where appropriate, a suitable buffer should be included to clearly maintain a physical separation to protect existing communities." Issue The word "should," combined with the qualifier "where appropriate," makes this requirement discretionary rather than binding. In practice, this leaves it open to a developer to argue that a buffer is not "appropriate" in a given location, or to provide only a token buffer, without breaching the policy as drafted. I have direct experience of this risk: in reviewing the parameter plans submitted with a live planning application on part of this allocation, I found that the landscape buffer proposed along the boundary shared with existing Humber Lane properties is, for much of its length, a narrow linear tree and hedgerow planting strip only, rather than a substantial buffer, notwithstanding much larger blocks of open space provided elsewhere within the same site. This is precisely the outcome a discretionary "should, where appropriate" policy permits, and precisely the outcome existing residents need the policy to prevent.

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.

Proposed modification Point 5 should be amended from "a suitable buffer should be included" to "a suitable buffer will be included," removing the discretionary qualifier and making provision of an adequate landscaped buffer between the development and existing residential communities a firm requirement of the Design Brief and Masterplan, not an aspiration. Justification A policy intended to protect existing communities from the amenity, landscape and visual impacts of a development of this scale is not effective, and does not serve the plan's own Priority 6 objective of protecting health and wellbeing, if it can be satisfied without actually delivering a meaningful buffer in the locations where existing residents live. Strengthening "should" to "will" costs the plan nothing in flexibility of design elsewhere on the site, but removes a loophole that, on the evidence already emerging from the first live application on this allocation, is already being relied upon to minimise buffer provision precisely where it matters most to existing residents.