

## **Telford & Wrekin Local Plan Examination**

### **Response to Matter 2 - Vision, Priorities and Development Strategy**

**Land South of Holyhead Road, Wellington (Site  
Reference: HO6)**

St Philips Land Limited

14 January 2026



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1.0

## Introduction

1.1 This statement to Matter 2 (Vision, Priorities and Development Strategy) of the examination of Telford & Wrekin Local Plan Review (“the LPR”) is submitted by Lichfields on behalf of St Philips Land Ltd (“St Philips”), in respect of their at land interests at Land South of Holyhead Road, Wellington (Site Reference: HO6).

1.2 Please refer to the full introduction included within St Philips’ Matter 1 (Compliance with statutory procedures and legal matters) in respect of their land interests. Separate representations have been submitted in respect of the following Matters:

- Matter 1 (Compliance with statutory procedures and legal matters);
- Matter 3 (Strategic Policies (Housing));
- Matter 5 (Allocations); and
- Matter 6 (Development Management Policies).

1.3 This Statement has been prepared in line with the Guidance Note (IDo3) for the Examination.

2.0

## Response to Inspectors' Matters

### **Issue 1: Have the vision, priorities and development strategy been positively prepared, are they justified and consistent with national policy, and can all be realistically achieved?**

#### **22. Has the development strategy been fully informed by the SA and other evidence? Is it soundly based?**

2.1 Yes, in St Philips' view, the Council's proposed development strategy has clearly been informed by the Council's evidence base; namely the Council's below evidence:

- Telford and Wrekin Site Selection Technical Paper (ASo1) ("the SSTP");
- Telford and Wrekin Housing Allocations - Site Assessments (ASo2) ("the Site Assessments");
- The iterative Integrated Impact Assessment [IIA] evidence, comprising:
  - i) Telford and Wrekin Integrated Appraisal Scoping Report (September 2020) (PD14);
  - ii) Telford and Wrekin Integrated Impact Assessment Scoping Report & Appendices (October 2020) (PD10-PD10a); and
  - iii) Telford and Wrekin Integrated Impact Assessment Report (December 2024) (PD02).

2.2 The iterative process is helpfully summarised in the Council's 'Telford and Wrekin Integrated Impact Assessment Non-Technical summary' (CD04) ("IIA Summary"). In essence, despite several changes to national planning policy and guidance, and requests for assisting other authorities in meeting their unmet housing needs, throughout the preparation of the LPR, the Council has consistently and iteratively assessed its proposed approach to its development strategy. This has principally been through the derivation of four alternative reasonable growth options, followed by the consideration of multiple reasonably alternative site options, at different points through the plan-making process.

2.3 This iterative exercise culminated in the section of Growth Scenario 2 Option 1; which seeks to broadly continue the growth strategy in the existing Local Plan through the distribution of growth based on the split of population between Telford, Newport and the rural area. Crucially, St Philips support this development strategy, as it continues to recognise Telford's role as the borough's key centre for services, facilities and employment opportunities, whilst also recognising the need to plan for some growth in other parts of the Borough to support those communities and provide housing that meets their needs over the plan period.

2.4 This option would, rightly, see Telford continue to be the focus for additional growth, whilst enabling other areas of the Borough to grow at a proportionate rate to their roles within the Borough. Importantly, St Philips considers that any spatial strategy which neglects to include Telford as the main focus of development would be unreasonable given its role as the strategic sub-regional centre and its primary role as the main employment area, and

would not promote sustainable patterns of development. Moreover, the benefit of directing growth to the most sustainable settlements (such as Telford), ensures that a sufficient supply of homes, within close proximity to existing and future employment opportunities, contributes to an efficiently functioning economy. This can also aid in minimising housing market pressures and unsustainable levels of commuting (and therefore congestion and carbon emissions).

2.5 As the Inspectors will be aware, the NPPF is clear that for Local Plans to be found ‘sound’, they must take into account ‘reasonable alternatives’ (Para 36b). In essence, the Council should be able to sufficiently demonstrate that it has tested reasonable alternatives through the Sustainability Appraisal [SA] process, as required by the Planning Practice Guidance<sup>1</sup> [PPG] and Friends of the Earth High Court judgment.<sup>2</sup>

2.6 In St Philips view, it is evident that the Council has undertaken a robust evaluation of reasonable alternatives in the SA – through the IIA evidence – in the context of the iterative process necessary for progressing a plan. St Philip is therefore satisfied that the Council’s approach to its development strategy accords with the NPPF and PPG, in that it is clearly underpinned by relevant and up-to-date evidence (Para 32), ‘justified’ (Para 36b), has taken into account ‘reasonable alternatives’ and is consistent with national policy (Para 36d).

#### **24. Is the site selection process clear and suitably robust, supported by the SA and other evidence?**

2.7 Whilst Telford is the primary focus of the development strategy, Wellington is one of the Borough’s two Market Towns and could be considered one of the most sustainable locations within the Borough, outside of Telford itself. The town provides convenient access to a range of commercial facilities, providing a mix of shops, restaurants and pubs, banks and markets.

2.8 As the Inspectors will be aware, the NPPF is clear that “*it is important that a sufficient amount and variety of land can come forward where it is needed*” (Para 73). It goes on to emphasise the important contribution small and medium sites can make to meeting housing needs (Para 68) and also highlights that it is important that developments are focused on locations which are, or can be made, sustainable, through limiting the need to travel and offering a genuine choice of transport modes (Para 110).

2.9 In this context, St Philips’ site – Land South of Holyhead Road, Wellington (Site Reference: HO6) – is located on the edge of Wellington, adjoining the settlement boundary. It is bounded by the B5061 (Holyhead Road) to the north and west, the M54 to the south and residential properties to the east. It is therefore well connected to the strategic road network. The site falls adjacent to the built-up boundary of Telford and is therefore sustainably located with a range of services and amenities accessible by public transport, and by walking.

2.10 The nearest bus stops are located along Holyhead Road and are within a 5-minute walk of the site. Frequent services are provided to Madeley, Newport and Leegomery. Wellington town centre can be reached by bus within approximately 10 minutes and offers a range of

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<sup>1</sup> PPG IDs: 11-017 and 11-018

<sup>2</sup> Paragraph 88 of R (Friends of the Earth England, Wales and Northern Ireland Ltd) v The Welsh Ministers [2015] EWHC 776 (Admin)

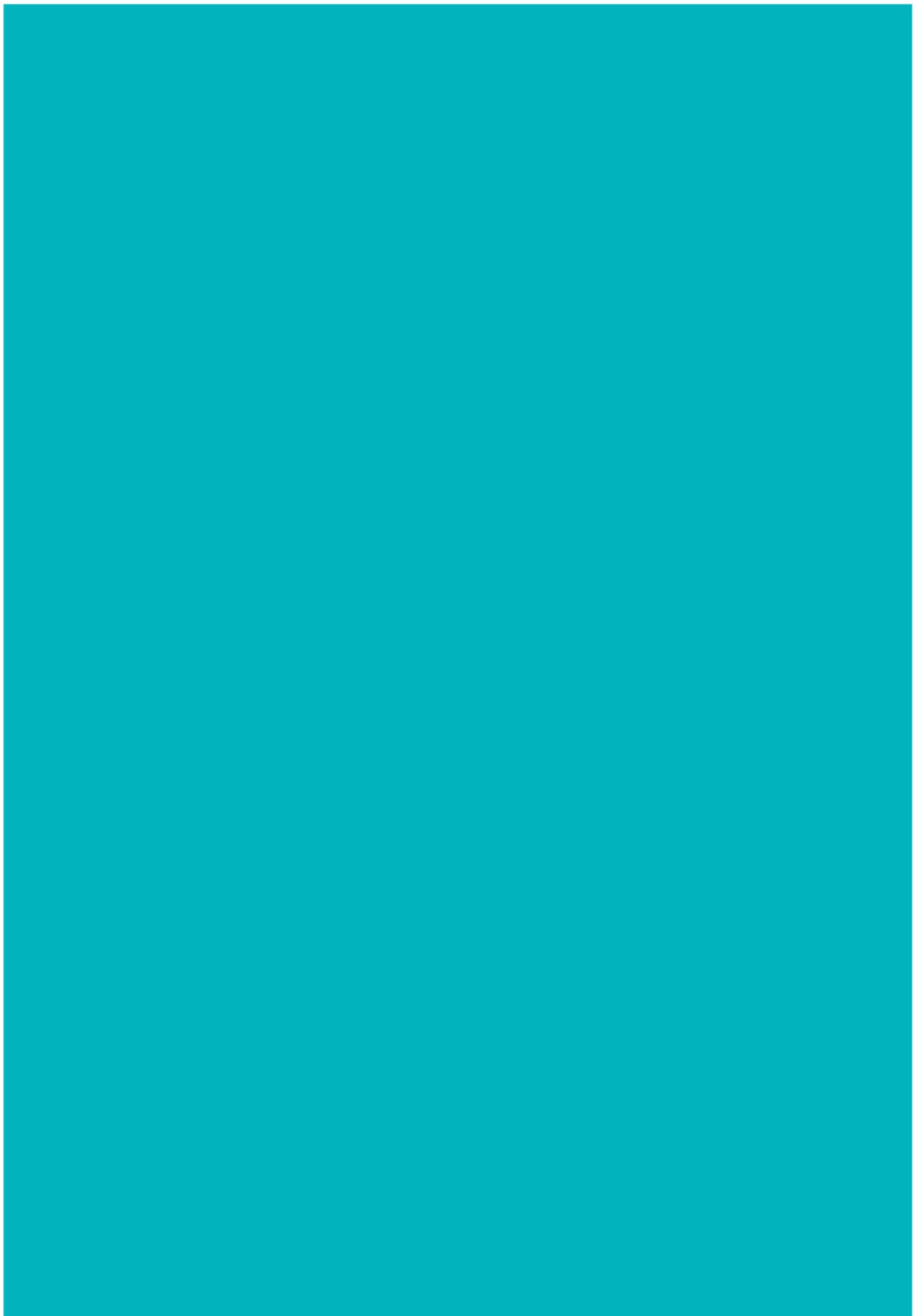
services including a Leisure Centre, banks, shops and restaurants. Wellington Station can also be reached by bus within eleven minutes and offers frequent services to Birmingham, Shrewsbury and Aberystwyth.

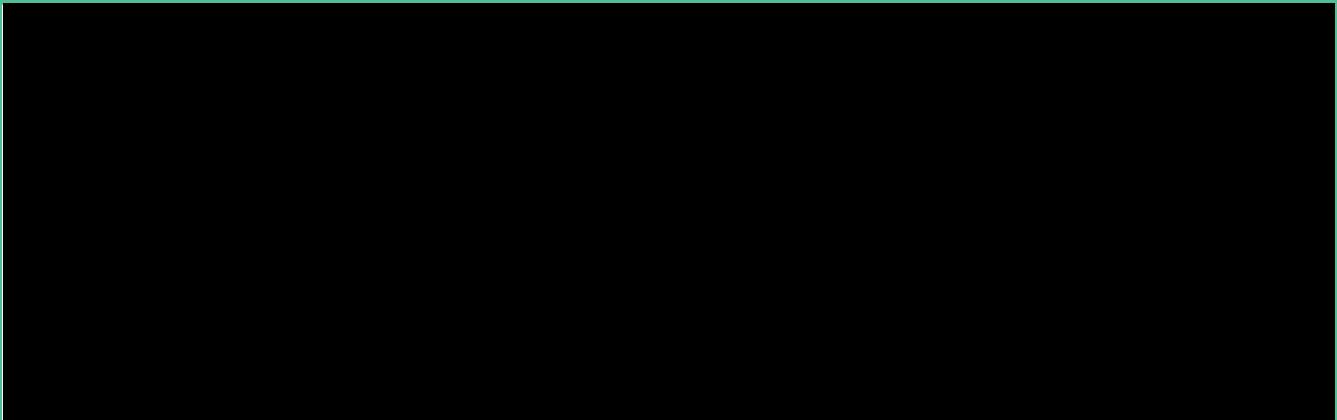
2.11 The nearest primary school is Short Wood Primary School, which is located 1.3 miles away from the site. The nearest secondary school is Ercall Wood Academy, which is 1.1 miles away. Both schools can be reached by bus within approximately 10 minutes, and by walking. The site is located to the south of Orelton Park, ensuring future residents have easy access to existing greenspace.

2.12 Ultimately, the Site is well-served by a range of public transport connections providing access to Wellington town centre, Telford, and Shrewsbury. In essence, the site is located on the edge of one of the main centres in the Borough, it has high sustainability credentials in terms of proximity to existing shops and services, relation to existing settlements and access to existing transport routes and infrastructure and lends itself well to achieving the aforementioned objectives of the NPPF. In this regard, St Philips considers that the Council's proposed approach to directing growth to Wellington, such as at Land South of Holyhead Road, Wellington (Site Reference: HO6), is entirely consistent with the NPPF.

2.13 Crucially, the site was assessed within the 'Sites Assessment Technical Paper, October 2023' as site ref. 251 and again in the Council's 'Telford and Wrekin Site Selection Technical Paper' (AS01) ("the SSTP") and 'Telford and Wrekin Housing Allocations - Site Assessments' (AS02) ("the Site Assessments"). The 'Site Assessment Sheet' found that "*in consideration of the available information, all technical constraints can be reasonably mitigated and the site fits with the Council's growth strategy.*" Moreover, the Council's latest IIA (PDO2) includes an assessment of the site.

2.14 The above, when taken together, demonstrate that – in terms of soundness – the Council's proposed approach to directing growth to Wellington, and particularly Land South of Holyhead Road, Wellington (Site Reference: HO6), is 'sound'. As set out in more detail in St Philips's response to Matter 5, St Philips considers that the identification of Land South of Holyhead Road, Wellington (Site Reference: HO6) within the site allocations is 'justified' (Para 36b) and is consistent with the development strategy. On this basis, St Philips considers that this suite of evidence, when read as a whole, demonstrates that the identification and selection of the site allocations have been robustly evidenced.





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