

Telford & Wrekin Local Plan 2022-2040

Examination Matters Statement

Matter 2 - Vision, Priorities and Development
Strategy

Richborough

Professional memberships and accreditations



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1. Introduction

- 1.1. These representations are prepared by Fisher German on behalf of our client Richborough, in respect of their land interests west of Wellington Road, Horsehay, Telford. This land, as identified on Figure 1 below, is a proposed allocation for circa 70 dwellings in the Regulation 19 document (Local Plan Policy HO1 – Site Reference HO12). The identification of the site as a residential allocation is fully supported.

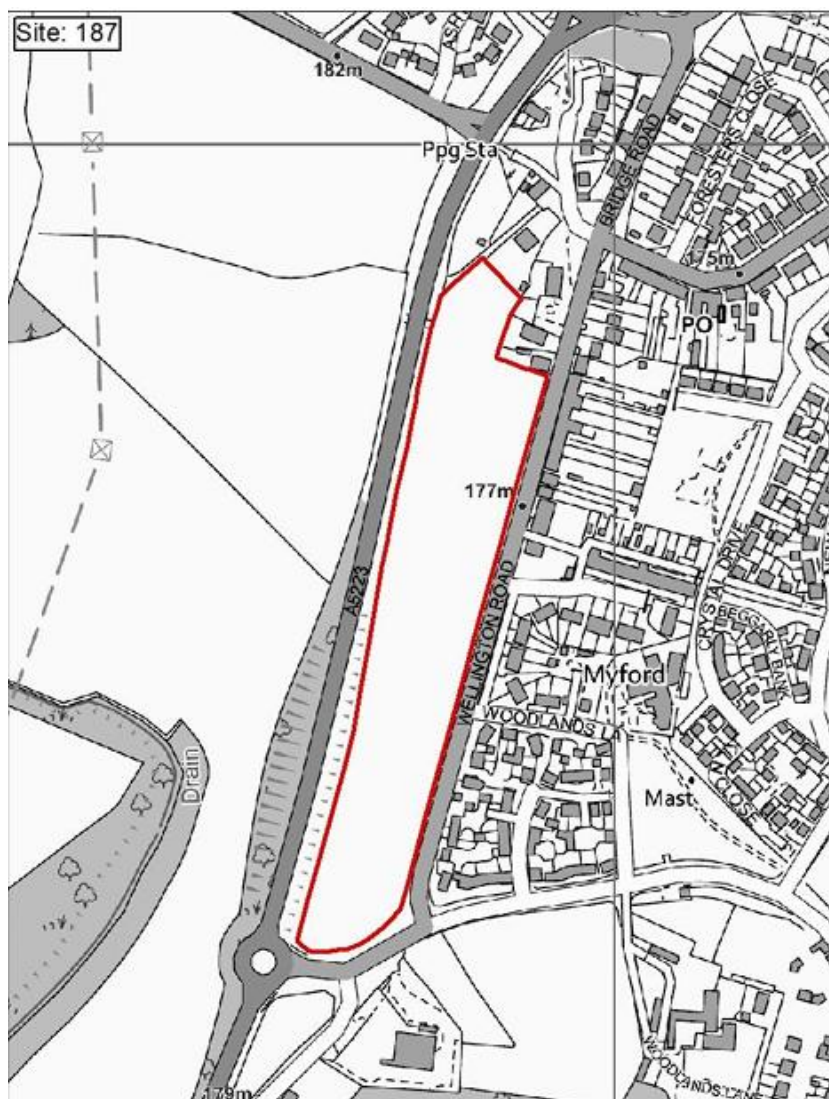


Figure 1: Site Boundary of residential allocation – West of Wellington Road, Telford.

- 1.2. Richborough submitted an outline planning application for 80 dwellings on the 17 December 2025 (App ref: TWC/2026/0005), and it was validated on the 7 January 2026. Updates can be provided if useful at the examination hearing sessions.

2. Representations

Q2 - Is the site selection process clear and suitably robust, supported by the SA and other evidence?

- 2.1. Yes, the Council has set out a clear approach to Site Selection as contained in document AS01 – Telford and Wrekin Site Selection Technical Paper – March 2025, with the entire process set out clearly at Table 3.
- 2.2. The existence of another method of assessing sites, which may yield different outcomes, does not render an adopted approach unsound in isolation, particularly not if the approach adopted can be described as appropriate. Modifications to this Plan, including the deletion of draft allocations, can only be done if they are unsound.
- 2.3. The NPPF sets out the tests of soundness at Paragraph 36 of the Framework. In relation to this question, this means:
 - 2.3.1. **Positively prepared** – sufficient housing has been allocated to meet objectively assessed needs in full, including any applicable unmet needs.
 - 2.3.2. **Justified** – Sites selected amount to ‘an appropriate strategy’, based on reasonable alternatives
 - 2.3.3. **Effective** – Site allocations are deliverable over the Plan period
 - 2.3.4. **Consistent with National Policy** – there are no specific parts of the Framework, particularly, but not limited to Footnote 7, which would suggest that a site should not be allocated
- 2.4. As set out the process is abundantly clear, having been set out clearly at Table 3 of the aforementioned evidence. Moreover, the benefit of a clear and precise methodology is consistency of assessment, which is essential for fair and impartial plan making.
- 2.5. Turning to robustness, our view is that the process undertaken has been robust. This is demonstrated in both the process but also within the published site appraisals (AS02 – Telford and Wrekin Housing Allocation – Site Assessments (April 2025)) and iterations of the SA, certainly insofar as it relates to our client’s land interests.
- 2.6. Our client’s land interests are assessed under reference 187 of document AS01. Whilst we support the process undertaken by the Council, any comments on site-specifics relate only to site 187. Through the proforma, relative indicators of site suitability are considered, in accordance with the adopted methodology. This brings together various sources of evidence to provide a clear and concise assessment of each site assessed. In any exercise of this nature, there will be the potential for both minor errors and difference in opinion, however as set out above they would need to be somewhat substantial to render either any specific allocation or the process in general as unsound. When considering the process and the site specific appraisal, informed by the recently submitted planning application for 187, we are clear that the process has accurately described the site in its assessment, thus must be considered robust.
- 2.7. As such, the clear view of Richborough is that the site selection process has been sufficiently clear and suitably robust when viewed overall. If there are site specific issues raised, than that does not equate to flaws in the overall process and they are best explored in site specific questioning, but in terms of process insofar as it relates to Matter 2 there is support for the work undertaken by the Council. Should additional sites be required due to wider flaws in the Plan, then they should be pooled from the next best available under the Council’s assessment regime.