

Telford & Wrekin Local Plan Examination

Response to Matter 3 - Strategic Policies (Housing)

**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 3 (Strategic Policies (Housing)) 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 2 (Vision, Priorities and Development Strategy);
 - 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: The approach to the housing requirement

26. Is the housing requirement figure of 1,010 dwellings per annum/20,200 over the plan period as set out in Policy Strategic S4 soundly based, and does it accord with the evidence and national planning policy and guidance?

- 2.1 Yes, St Philips considers that the proposed housing requirement of 1,010 dwellings per annum [dpa] set out in draft Policy Strategic S4 is sound and accords with the National Planning Policy Framework [NPPF].
- 2.2 The Council's housing requirement has had regard to the 881 dpa local housing need [LHN] figure generated by the revised Standard Method [SM], which is confirmed by the Council's 'Telford and Wrekin Housing Delivery - Topic Paper' (TP01) ("Housing Topic Paper") and 'Telford and Wrekin Economic and Housing Development Need Assessment' (EH01) ("EHDNA"). Moreover, the Council's LHN calculation set out in this evidence has correctly utilised the 2024 median work-place-based affordability ratios and dwelling stock data – in line with the Planning Practice Guidance [PPG]¹. However, as the Inspectors will be aware, the LPR proposes a higher housing requirement of 1,010 dpa. In principle, St Philips considers that the Council's proposed housing requirement accords with the requirements of paragraph 61 of the NPPF.
- 2.3 This is because, whilst paragraph 61 of the NPPF requires the plan-makers to utilise the revised SM, this is to determine the 'minimum number of homes needed', rather than the maximum number. In essence, it is a 'Policy-off' housing need, and it is up to the Council to determine whether they can meet these needs in full (i.e. unmet needs) or wish to plan for higher levels of growth (i.e. 'Policy-on'). In this regard, as the Inspectors will be aware, neither the NPPF nor PPG preclude a local authority from seeking to plan for a housing requirement in excess of the revised SM.
- 2.4 Indeed, the NPPF is clear that for a Local Plan to be found sound, it must be 'positively prepared', which means that they must provide a "*strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development*" (Para 36a). In essence, a Council's housing requirement could exceed its SM-based housing needs by virtue of planning for additional growth to address neighbouring unmet housing needs.
- 2.5 Moreover, the PPG is clear that:
- "The housing requirement is the minimum number of homes that a plan seeks to provide during the plan period..."*

¹ PPG ID: 2a-004

The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The National Planning Policy Framework explains that the housing requirement may be higher than the identified housing need, and authorities should consider the merits of planning for higher growth if, for example, this would seek to reflect economic growth aspirations. Where authorities plan for higher growth this should not normally have to be thoroughly justified at examination.” (PPG ID: 2a-040-20241212) (Emphasis Added)

- 2.6 Equally, on the basis of the above, a Council’s housing requirement could exceed its SM-based housing needs by virtue of planning for additional growth to align with economic growth ambitions. In either event, when considering all of the above, it is clear that there is support within national planning policy and guidance for Councils who wish to apply housing requirements that exceed the SM, which should not be required to be ‘thoroughly justified at examination’.
- 2.7 Nevertheless, St Philips contends that the evidence within the EHDNA (EH01) and Housing Topic Paper (TP01) demonstrates that a higher housing requirement than the figure generated by the revised-SM is appropriate and soundly based for Telford and Wrekin. Moreover, the scale of the unmet housing needs arising from the Greater Birmingham and Black Country Housing Market Area [GBBCHMA] – discussed further below in response to Question 27 – further substantiates the Council’s decisions to assist in meeting some of these needs through its 153 dpa proposed contribution, and therefore increasing its housing requirement.
- 2.8 On the basis of the above, even if not required by the PPG, St Philips strongly supports the Council’s conclusions and considers that the Council’s evidence base provides sufficient evidence to justify the Council exceeding the revised-SM figure. In conclusion, St Philips considers that the proposed 1,010 dpa housing requirement set out in draft Policy Strategic S4 is underpinned by relevant and up-to-date evidence (Para 32), ‘justified’ (Para 36b) and consistent with national policy (Para 36d).

27. Is the inclusion of 153 dwellings per annum as a contribution to the unmet needs of the Black Country Authorities justified and supported by evidence?

- 2.9 Yes. As briefly mentioned in St Philips’ response to Matter 1, St Philips strongly supports the Council’s proposed contribution towards the unmet housing needs of the GBBCHMA, which reflects the proximity of the Council to the Black Country, and considers that it is underpinned by relevant and up-to-date evidence (Para 32), ‘justified’ (Para 36b) and is consistent with national policy (Para 36d).
- 2.10 The NPPF is clear that “Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas” (Para 11b), and is clear that the Council remain under the DtC and the New Local Plan will need to assist in addressing any unmet housing needs from its neighbouring authorities (Paras 11b, 24, and 35a). It is also clear that contributions towards unmet housing needs should be based on ‘available information’ (Para 28), rather than being deferred (Para 35c). It is noted that the Minister of State for Housing and Planning’s (“the Minister of State”) 'Reforming Local Plan-Making' Written Ministerial Statement (dated 27th November 2025) removed the ‘Legal’ DtC; however, it does not remove the clear

requirements set out in the NPPF (i.e. the ‘Soundness’ element of the DtC). Therefore, it remains appropriate for the Council to contribute towards addressing unmet housing needs under the DtC.

The Scale of the Unmet Needs

- 2.11 Whilst it is accepted that the Council does not fall within the GBBCHMA, and the EHDNA concludes that the Borough continues to form a ‘self-contained’ housing market area [HMA] (Paras 12.102-12.104), as a part of the former Black Country Authority’s [BCA] now abandoned Black Country Plan Review [BCPR], the BCAs set out the direct and indirect ‘offers’ from neighbouring authorities. This included the BCAs requesting assistance from councils falling outside of the GBBCHMA, such as Stafford, Shropshire, Telford and Wrekin and Wyre Forest. This is because the scale of their unmet needs is unlikely to be met by the BCAs or GBBCHMA authorities alone, without conflicting with the wider policies in the NPPF. This highlights the importance and critical nature of the Council in making an appropriate contribution towards assisting the BCAs in addressing this unmet housing need.
- 2.12 However, in this regard, the Inspectors should note that several Local Plan Reviews within the GBBCHMA have advanced, which have materially altered the previously assessed shortfalls. By way of example, to benefit from the revised NPPF’s transitional arrangements,² Sandwell, Wolverhampton, and Dudley submitted their emerging Local Plan Reviews for Examination in Public in advance of the March 2025 deadline. As such, these plans are being examined on the basis of the previous SM-based housing needs for these areas, and more importantly, do not make provision for Green belt release – in respect of paragraph 145 of the 2023 NPPF (i.e. not required to release Green Belt). Conversely, Walsall did not advance a plan on this basis, and is currently consulting on a Regulation 18 plan, which considers the revised SM-based LHN, and includes some Green Belt release.
- 2.13 In this respect, the current likely adopted unmet need (Scenario 1) is, in part, based on lower housing need requirements and an incomplete picture of the available land supply in Sandwell, Wolverhampton, and Dudley. Notwithstanding this, if adopted, conceivably, the ‘available information’ on the WMCA-wide shortfall would now indicate a shortfall in the order of c.32,800 homes up to 2042.
- 2.14 However, as required by the revised NPPF, Sandwell, Dudley and Wolverhampton will be required to transition to the new plan-making system shortly after adoption. In this scenario (Scenario 2), the ‘available information’ on the WMCA-wide shortfall would rise to a shortfall in the order of c.45,000 homes up to 2042. It is noted that this is, of course, the position without any Green Belt release in those three LPAs – which the revised NPPF will require in due course – and these figures could be reduced further, but it is unlikely that these unmet needs will be met even with further land supply identified in the conurbations.
- 2.15 Notwithstanding this, an unmet housing need of c.45,000 dwellings up to 2042 is, in essence, the unmet housing needs that need to be addressed via the DtC (Soundness).

² Allowing local planning authorities at Regulation 19 – with housing requirements not less than 80% of their revised SM LHN – or post-submission to be assessed under the previous NPPF and Standard Method where submitted in advance of 12th March 2025.

Table 1 Level of Unmet Need in the GBBCHMA

	Dudley		Sandwell		Walsall		Wolverhampton	
Plan Stage	Submission		Submission		Regulation 18		Submission	
Relevant NPPF for EiP	2023		2023		2024		2023	
Plan Period	2024	2041	2024	2041	2025	2042	2024	2042
Emerging Housing Requirement (Previous SM) <i>per annum</i>	643		1,531		~		1,077	
Revised Standard Method <i>per annum</i>	1,478		1,374		1,172		1,115	
Supply	10,470		10,434		12,609		9,930	
Scenario 1: Potential Adopted Unmet Need (if Adopted as Proposed, based on Transitional Arrangements)	-461		-15,593		-7,315		-9,456	
Scenario 2: SDS Future Unmet Need (Post-Transitional Arrangements and Review Required at Earliest Convenience)	-14,656		-12,924		-7,315		-10,140	
Scenario 1 Total BCA Shortfall*	-32,825							
Scenario 2 Total BCA Shortfall*	-45,035							

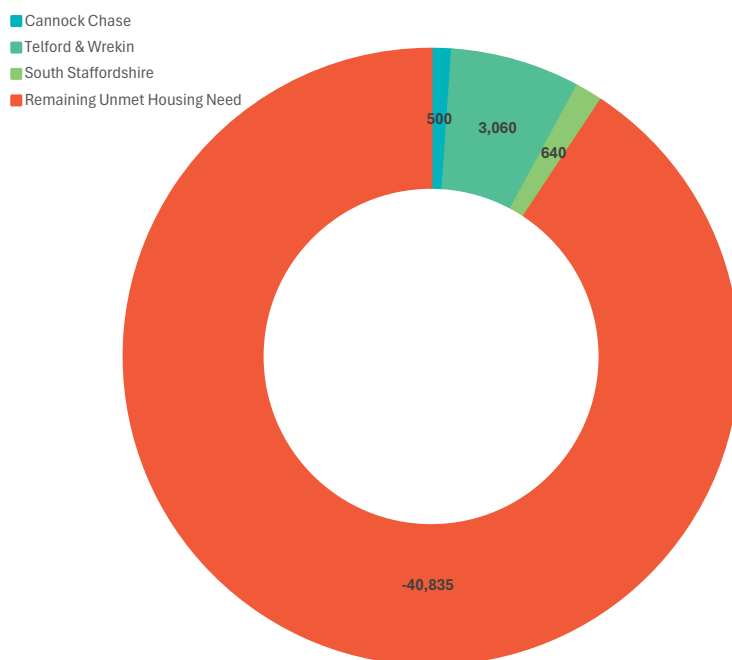
Source: Lichfields analysis

* Without Green Belt release in Dudley, Sandwell or Wolverhampton

Emerging Contributions

- 2.16 In addition, with respect to the emerging contributions towards addressing these needs, several Local Plan Reviews have fallen away – either being found ‘unsound’ or ‘withdrawn’ from EiP. Namely, Shropshire’s emerging plan has now been withdrawn; therefore, their previously proposed contribution of 1,500 dwellings has fallen away. Similarly, Stafford is no longer proceeding with its Local Plan Review, and a further 2,000 dwellings have been omitted. Conversely, the Council has increased its proposed contribution (i.e. 3,060 dwellings, compared to the previous 1,680 dwellings).
- 2.17 Despite this increase, only three LPAs are proposing to make a contribution towards addressing these unmet housing needs, totalling 4,200 dwellings between 2018 and 2042, suggesting that at present, c.40,800 dwellings remain to be addressed; albeit, it could be argued that many of these ‘contributions’ are insufficient in and of themselves – such as South Staffordshire. As such, it remains the case that the current level of contributions from neighbouring authorities is significantly insufficient to meet the existing shortfall, meaning that a considerable proportion of the unmet need will be deferred rather than dealt with, contrary to paragraph 35c of the NPPF.

Figure 1 Currently Proposed Unmet Need Contributions



Source: Lichfields analysis

Conclusion

- 2.18 Given the scale of the unmet needs arising from the GBBCHMA and given that the BCAs have formally requested the Council's assistance in addressing these needs through the DtC, it is entirely appropriate – and indeed, in accordance with the NPPF – for the Council to make provision for unmet needs within the LPR.
- 2.19 Moreover, there is no single, or definitive, approach to determining the proportion of unmet needs that any single Council should accommodate, set out in the NPPF or PPG. This is despite a clear instruction within the NPPF that councils should accommodate unmet needs from neighbouring authorities where they are identified.
- 2.20 Given that many authorities within the GBBCHMA have sought to 'defer' meeting these needs, St Philips contends that the Inspectors should strongly support the Council's proposed approach of meaningfully seeking to address these needs through the LPR. Furthermore, it is self-evident that a simplistic 'fair share' approach to distributing these unmet needs is impractical, as many of the GBBCHMA authorities face significant constraints, such as NPPF Footnote 7 restrictions, making them nearly as limited as the source of unmet needs. The Council's approach is supported by the Housing Topic Paper (TP01) and the EHDNA (EH01), which considers the 'Relationship Between Alternative Migration Trends and Requests to Accommodate Unmet Housing Need' in section 3.0, and is based on potential out-migration (i.e. a functional relationship) from the BCAs to Telford & Wrekin.
- 2.21 On the basis of the above, St Philips strongly supports the Council's conclusions and considers that the Council's evidence base provides sufficient evidence to justify the

Council's approach to addressing the unmet housing needs of the GBBCHMA. In conclusion, St Philips considers that the proposed 153 dpa contribution set out in draft Policy Strategic S4 is underpinned by relevant and up-to-date evidence (Para 32), 'justified' (Para 36b) and consistent with national policy (Para 36d).



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