Telford & Wrekin Local Plan Examination

Response to Matter 5 - Allocations

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

St Philips Land Limited

14 January 2026

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Contents

1.0 Introduction

1.1 This statement to Matter 5 (Allocations) 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 3 (Strategic Policies (Housing)); and
- Matter 6 (Development Management Policies).

1.3 This Statement has been prepared in line with the Guidance Note (ID03) for the Examination.

2.0 Response to Inspectors' Matters

Issue 1: Whether the allocations and their requirements are justified, effective, and consistent with national policy.

43. Are the site allocations in Appendix 15 justified? Do they accord with the development strategy? Are they deliverable/developable and supported by the evidence? Is the estimated housing number for each site a reasonable figure based upon the evidence?

2.1 As stated in St Philips' response to Matter 2 Issue 1, the evidence supporting the LPR – namely the Council's 'Telford and Wrekin Site Selection Technical Paper' (AS01) ("the SSTP"), the 'Telford and Wrekin Housing Allocations - Site Assessments' (AS02) ("the Site Assessments"), and iterative Integrated Impact Assessment [IIA] evidence (PDO2 and CD04), clearly supports the Council's proportionate approach to directing growth to the most sustainable areas within the Borough, such as to Wellington.

2.2 To this end, St Philips supports the Council's proposed spatial strategy and site allocations, and in particular the identification of Land South of Holyhead Road, Wellington (Site Reference: HO6) as an allocation. 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, alongside benefiting from good public transportation access.

2.3 One of the LPR's objectives is to *"Strengthen Newport and Wellington's role as key market towns in the borough"*. As such, St Philips strongly supports draft Policy HO1 (Housing Allocations), which sets out that the housing sites listed within Appendix 15 of the LPR (CD08) have been allocated for residential development. This includes the Land south of Holyhead Road, Wellington (Site Reference: HO6), which St Philips considers to be a sustainable location for residential development, and a logical urban extension to Wellington. On this basis, St Philips considers that the identification of Land South of Holyhead Road, Wellington (Site Reference: HO6) within the development strategy is 'justified' (Para 36b) and is consistent with the development strategy and would assist the Council in 'strengthening' the town's role.

2.4 In respect of the site itself, to support the site, St Philips submitted a Vision Document [VD] to the Council's Call for Sites. This VD demonstrated that the 5.58-hectare site could deliver c.105 residential dwellings (Class C3), alongside (*inter alia*) wider public open space and urban greening. Importantly, the VD demonstrated that, working in the knowledge that Wellington is one of the most sustainable locations within the Borough, the site is strategically located with good access to the existing transport network and local services and amenities, and is sustainable and unconstrained. Consequently, the Council assessed the site within the SSTP (AS01) as site reference HO6. 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 Councils growth strategy*." Fundamentally, St Philips agrees with the Council's conclusions.

2.5 Indeed, St Philips has already made a pre-application submission for the site. A pre-application meeting was held with the Council in April 2025 (Pre-Application Ref: PE/2025/0206) to discuss the proposed development, with the Council's technical consultants also in attendance – a written response from the Council was provided in June 2025. Subsequently, an application will be made by St Philips in due course. St Philips can confirm that this application can – and will – address in detail any of the constraints identified within the 'Site Assessment Sheet' and feedback received from the Council.

2.6 In terms of the wider policy requirements more generally, St Philips can confirm that the development can – and will – deliver the policy requirements set out in draft Policy H01, and the wider LPR policy requirements, subject to the policies being found sound at Examination. Again, when coupled with the Council's 'Telford & Wrekin Council Regulation 19 Viability Note – December 2024' (VS02) ("the Viability Note") findings, St Philips considers that Land south of Holyhead Road, Wellington (Site Reference: HO6) has a reasonable prospect of meeting the wider LPR policies. Indeed, the planning application will be submitted within the context of the emerging LPR policies. In essence, St Philips considers that the Council's LPR has had regard to the economic viability of sites (Para 72) and does not undermine the deliverability of the LPR (Para 35), in accordance with the NPPF.

2.7 It is also envisaged that this application could be granted planning permission at the point of adoption of the LPR. Given the scale of development envisaged, St Philips strongly contends that the site could be delivered well within the plan period at a realistic and deliverable rate. In addition, it is considered that there is clear evidence that the site is viable and deliverable at the scale of development expected within the plan period. The above serves to highlight that, for Land South of Holyhead Road, Wellington (Site Reference: HO6), St Philips is committed to delivering allocation identified within the LPR, and it is therefore 'deliverable' (Paras 16d, 36c, 72).

44. Are the requirements within Policy HO1 justified, sufficiently unambiguous?

2.8 St Philips is supportive of draft Policy H01's requirements and the need to bring forward strategic developments within the Borough comprehensively. In general, St Philips considers that parts a-i of draft Policy H01 are necessary and 'justified' (Para 36b) to ensure that major sites are properly masterplanned in a comprehensive way that addresses the Council's key social, environmental and economic policy objectives, alongside the site allocation requirements. As such, St Philips considers that draft Policy H01's requirements are *"clearly written and unambiguous"* (Para 16d).

[redacted]

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