

# WELLINGTON TOWN COUNCIL

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Chris Hall  
Executive Director – Community, Place and Economy  
Somerset Council

10 March 2026

Dear Chris

## **Concern Regarding Fragmented Consideration of Major Housing Growth in Wellington**

I am writing on behalf of the Council to raise its significant concerns about the way Somerset Council is currently assessing the numerous housing developments proposed in and around Wellington. As of this date, there are eight separate developments at various stages of the planning process, from initial consultation through to permission being granted, amounting collectively to approximately 1,900 new dwellings. Should the planning application for a development of 250 houses on land south of Olday Road (44/25/0013) be approved either directly or on appeal, this will open up the potential for further large-scale developments between the A38 and M5 from the Chelston Link Road to Pleamore Cross

Despite the scale of this combined growth, the Council appears to be considering each application in isolation, rather than assessing their cumulative impact on Wellington's infrastructure, services, environment, and overall spatial strategy. This fragmented approach is inconsistent with both the statutory plan-led system and the principles set out in the Wellington Place Plan.

### **1. Statutory Duty to Determine Applications in Accordance with the Development Plan**

Under section 38(6) of the Planning and Compulsory Purchase Act 2004, planning decisions must be made in accordance with the development plan unless material considerations indicate otherwise.

The development plan for Wellington includes:

- The adopted Local Plan
- The Wellington Place Plan, which sets out a shared vision for the town's future
- Relevant neighbourhood-level policies

The Place Plan is explicitly intended to guide coordinated, sustainable growth, ensuring that new development supports the town's long-term needs, identity, and infrastructure capacity. By treating each application as a standalone proposal, the Council risks undermining the strategic objectives of the Place Plan, which emphasises:

- integrated planning
- infrastructure-led growth
- protection of town character
- balanced distribution of development
- sustainable transport and movement patterns

None of these aims can be achieved if major schemes are assessed independently of one another.

## **2. Duty to Consider All Material Considerations, Including Cumulative Impacts**

Planning authorities must consider all material considerations, a principle established through long-standing case law. Material considerations include:

- cumulative traffic and transport impacts
- combined pressure on schools, healthcare, and utilities
- overall effect on Wellington's settlement pattern
- environmental impacts when developments are taken together
- infrastructure delivery and viability

The courts have repeatedly held that failure to consider cumulative impacts is unlawful, including in cases such as *Bromley LBC v Secretary of State for Communities and Local Government*. Given the scale of development proposed around Wellington, cumulative impact is not a peripheral issue - it is central to lawful decision-making.

## **3. Environmental Impact Assessment Regulations**

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 require authorities to consider:

- "the cumulation with other existing and/or approved projects"

Even where individual applications fall below EIA thresholds, the principle of cumulative assessment remains a material consideration.

With approximately 1,900 dwellings proposed across multiple sites, it is difficult to see how Somerset Council can meet its obligations without a coordinated, town-wide assessment.

## **4. The Wellington Place Plan Requires a Joined-Up Approach**

The Wellington Place Plan was developed precisely to avoid the kind of piecemeal, uncoordinated growth that now appears to be occurring. It emphasises:

- a holistic vision for the town
- infrastructure planning aligned with growth
- safeguarding the town's identity and character
- ensuring development supports community needs
- coherent movement and transport strategies

Yet there is currently no published evidence that the Council is using the Place Plan as a framework for assessing the combined impact of the eight major developments now in the pipeline.

This risks undermining the purpose of the Place Plan and eroding public confidence in the planning process.

## **Request for Action**

I respectfully request that Somerset Council:

1. Explain how it is assessing the cumulative impact of all current housing proposals in Wellington.
2. Clarify how these developments align with the Wellington Place Plan and the wider Local Plan strategy.
3. Publish or commission a cumulative impact assessment covering transport, education, healthcare, utilities, and environmental effects.

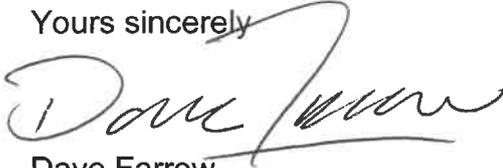
4. Demonstrate how future decisions will reflect the statutory duties outlined above, particularly the need to consider Wellington as a whole rather than as a collection of isolated sites.

Wellington is facing a level of growth unprecedented in its recent history. It is essential that this growth is managed in a way that is strategic, lawful, and aligned with the Wellington Place Plan.

The current piecemeal approach does not appear to meet those standards.

I look forward to your response and to understanding how the Council intends to address these concerns.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Dave Farrow', written over a horizontal line.

Dave Farrow  
Chief Executive Officer/Town Clerk  
Wellington Town Council

Cc Gideon Amos MP  
Cllr Mike Rigby  
Cllr Simon Coles  
Cllr Bill Revans  
Duncan Sharkey, CEO

