



Telford & Wrekin Local Plan Review

Examination in Public

Matter 2 – Vision, Priorities, and Development Strategy

Boningale Developments

January 2026

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Document Control

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	Name	Position	Date
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Reviewed by:	MW	Director	
Approved by:	MW	Director	23.01.2026
For and on behalf of Marrons			

1. Introduction

- 1.1. This response to Matter 2, Issue 1 of the Inspectors' MIQs in respect of the Telford & Wrekin LP Review (TWLPR) Examination in Public has been prepared by Marrons on behalf of Boningale Developments Limited.
- 1.2. This hearing statement should be read alongside previous representation to the Regulation 19 Consultation submitted by Marrons on behalf of Boningale Developments and should be considered in the context of support for a plan led system.
- 1.3. Acting on behalf of our clients, Marrons will attend the Matter 2 Hearing Session and make further oral submission on behalf of our client. This statement outlines Boningale's comments in respect of Matter 2, Issue 1, with responses to the Inspectors' MIQs (Matter 2) are set out below.
- 1.4. In order to assist the Inspectors', the contents of this submission and the submissions made in respect of other matters, demonstrate that the submission version of the Plan is not, in our assessment, capable of being found sound, without significant additional evidence and the identification of additional sites in sustainable locations to accommodate housing growth over the Plan period.
- 1.5. These submissions reflect the position outlined in recent correspondence between Housing Minister Matthew Pennycook and the Chief Executive of the Planning Inspectorate. In the Minister letter of July 2024, he noted that in relation to the continued use of 'pragmatism' in the Examination of Plans and the recognition that any fundamental issues or areas of additional work that require a pause of more than six-months in the Examination process, should indicate that a Plan is incapable of being found sound. In his letter of 9 October 2025 Minister Pennycook expressed support for pragmatic decisions to support the adoption of local plans, however noted that it is important that poor-quality plans are not adopted, and overlay long examinations avoided. In his letter of 27 November 2025, the Minister noted that whilst it is the Government's intention to not save the Duty to Cooperate when regulations for new-style plans come into force, LPAs should continue to collaborate across their boundaries, including on unmet needs from neighbouring areas, and plans should still be examined in line with policies in the NPPF on 'maintaining effective co-operation.'

2. Matter 2 – Vision, Priorities, and Development Strategy

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?

Q19. Does the plan set out an appropriate vision for the Borough based upon the evidence?

2.1. No response.

Q20. What does ‘a Forest Community’ mean?

2.2. No response.

Q21. Are the vision, priorities and the development strategy justified, have they been positively prepared, and do they accord with the evidence and national policy?

2.3. Paragraph 61 of the NPPF states that *“to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed.”* Whilst national policy advocates that the supply of large numbers of new homes can often be best achieved through planning for larger scale development (NPPF paragraph 77), it also notes the important role of small and medium sites (paragraph 73), and how housing in rural areas can enhance or maintain the vitality of rural communities.

2.4. The proposed development strategy seeks to concentrate development within Telford, with the Submission Local Plan (CD08) setting out that approximately 86% of housing over the plan period will be delivered at Telford, with a further 7% at Newport.

2.5. The Council's Rural Settlements Technical Paper March 2025 notes the challenges the rural communities in Telford and Wrekin face in terms of infrastructure and service provision. This includes the lack of GP facilities in rural areas, and limited bus provision. It further notes the increase in over 65s living in rural areas, who are more likely to rely on local services and facilities (EH02). By failing to provide any meaningful strategy for the sustainable growth of the rural area, delivered through housing allocations in suitable locations, the current development strategy fails to reflect either the Council's own evidence or national policy, failing to support the sustainability and vitality of the rural area.

Q22. Has the development strategy been fully informed by the SA and other evidence? Is it soundly based?

2.6. As detailed in our response to Q23 below, the Council's development strategy, both in relation to the scale and distribution of growth proposed clearly has not been fully informed by the SA, as reasonable higher growth scenarios simply haven't been tested, and the concentration of housing growth in Telford is not an approach which reflects the findings of the SA. The Council's other evidence further highlights the challenges faced by the rural area in relation to maintaining and enhancing service provision, and meeting the needs of both older and younger people (EH02), and that new housing can plan a vital role in ensuring the vitality and sustainability of rural areas. As set out above, the strategy however is clearly not informed by this evidence and fails to plan for sustainable growth in suitable locations within the rural area. This approach is inconsistent with the evidence, with national policy, and is unsound.

2.7. The draft plan also includes a significant reliance on a series of strategic urban extensions (SUEs) on the northern side of Telford, amounting to 6,595 dwellings in the plan period, or 77% of the housing proposed to be delivered by new allocations. Whilst the inclusion of SUEs reflects national policy, an overreliance on such sites creates significant risks for the delivery of the plan. Complex infrastructure works are typically required upfront for SUEs, alongside masterplanning work with implications for the viability and delivery timetable for such sites, often resulting in considerable lead in times. The concentration of housing in a particular area also will also risk the delivery of these sites being sensitive to local market conditions, which can result in significant fluctuations in delivery rates. In accordance with NPPF paragraph 73, it is essential that the delivery strategy includes the allocation of a wider range of sites to provide

confidence that it can deliver the homes needed. The overreliance on SUEs under the current strategy is inconsistent with the evidence and national policy, and is unsound.

Q23. Have reasonable alternatives been considered and clearly discounted on the evidence?

Growth Scenarios

2.8. Three growth scenarios were assessed by the Council as set out in the Integrated Impact Assessment:

- 1 – EDNA employment led scenario – 848dpa
- 2 – Re-based housing projections – 1,010dpa
- 3 – High Economic Performance – 1,150dpa

2.9. The Council has not assessed any scenarios for growth above 1,150dpa, on the basis of its view that housing delivery has peaked and that this growth rate cannot be sustained, and would put unacceptable pressure on infrastructure and services. It is unclear how the Council has concluded a higher growth scenario would be unsustainable without having tested it through the SA process however, and there does not appear to be any evidence underpinning this assertion.

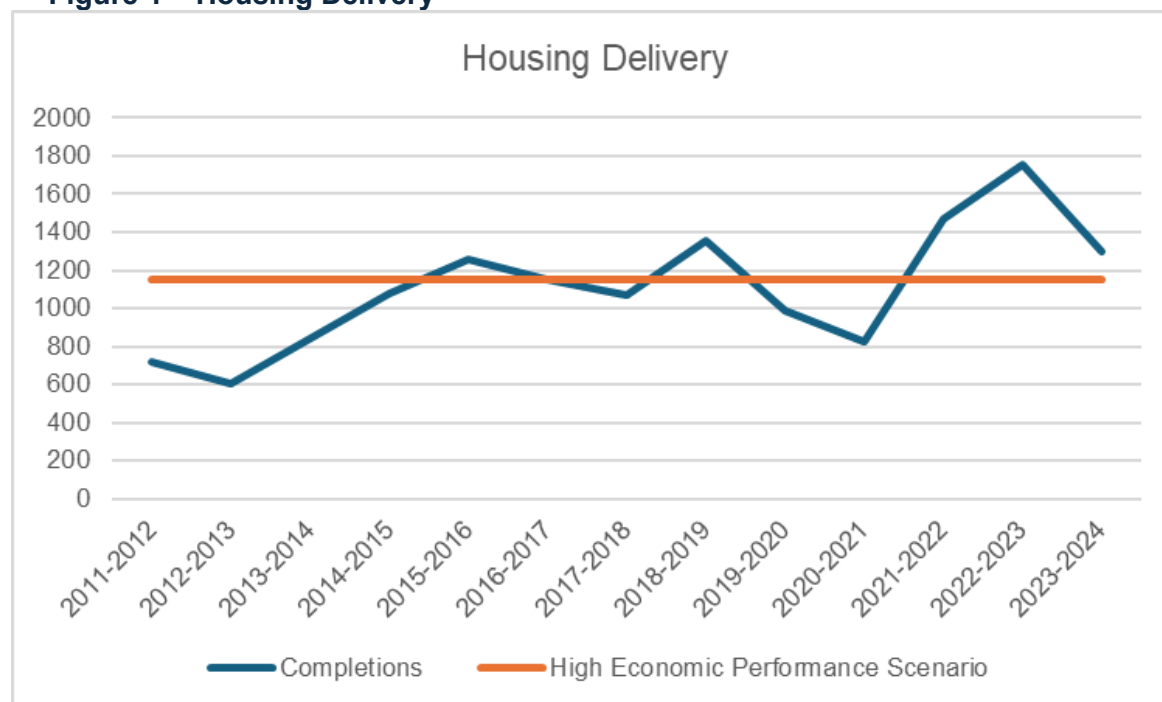
2.10. In relation to housing growth, the Council's assertion that growth has peak does not stand up to scrutiny.

2.11. As shown in figure 1 below, housing delivery in recent years has been significantly above the 'High Economic Performance' Scenario, reaching a high of 1,756 dwellings in 2022-2023¹. This does not indicate that housing delivery has peaked, particularly given that the existing strategy constrains growth outside of Telford, instead indicating a clear trend towards higher housing delivery. The Council has not provided any evidence that there are any fundamental infrastructure constraints which will limit future growth, or that the local housing market is unable to absorb additional growth. That the limit on growth is a matter of supply is clear from the fact that around 60% of planned housing has already been completed or consented, rising to around 90% of homes planned for

¹ EH09 Telford and Wrekin AMR March 2024

Newport and the rural areas. Clearly there is significant potential for continued levels of growth above and beyond the 'High Economic Performance' scenario.

Figure 1 – Housing Delivery



2.12. National policy clearly sets out that plan making and decisions should “support the Government’s objective of significantly boosting the supply of homes” (NPPF Paragraph 61). Rather than discounting a higher growth scenario without any clear or evidenced justification, the Council should be considering how the plan can contribute to the Government’s objective of significantly boosting housing supply. It is clear that a higher growth scenario represents a reasonable alternative which should at a minimum be assessed through the SEA process, and the Council’s failure to do so is a fundamental flaw with the draft Plan and Integrated Assessment.

Distribution of Growth

2.13. In relation to the distribution of growth, the Integrated Assessment (CD06) considers four broad scenarios:

- 1 - Maintain current strategy (growth focused in Telford)
- 2 - Increased growth in Rural Areas
- 3 - Increased growth in Newport
- 4 - Increased growth in Newport and Rural Areas

2.14. The preferred option selected by the Council is to maintain the current distribution strategy, alongside the medium growth scenario of 1,010dpa (scenario 2.1)

2.15. As is clear from the visual summary of the appraisal however (figure 2) the IIA indicates that the alternative distribution scenarios, particularly scenario 2.4, perform as well or better than scenario 2.1 against the majority of topics, including notably housing, economy and infrastructure, landscape, historic environment.

Figure 2 – Summary findings of appraisal of growth and distribution options

	Growth Scenario 1				Growth Scenario 2				Growth Scenario 3			
	1.1	1.2	1.3	1.4	2.1	2.2	2.3	2.4	3.1	3.2	3.3	3.4
Biodiversity				?			?					?
Air quality					?							
Water resources	?	?	?	?	?				?	?	?	?
Soil and land												
Landscape									?			
Historic Environment					?		?				?	
Waste												
Climate change resilience									?			
Climate change mitigation				?						?		?
Housing				?				?	?			
Health and Wellbeing										?	?	?
Economy and Infrastructure								?	?			
Transportation												
Equality and Diversity					?		?			?	?	?

2.16. The IIA does not provide any clear justification for the Council's approach, simply stating that the draft plan seeks to continue the previous distribution of growth. The plan making process should be iterative, taking account of the findings of the SA as it progresses. It appears the Council has prejudged its preferred approach to the

distribution of growth, and has discounted alternative scenarios without justification. Where there may be a justification for departing from the findings of the SEA process, this should be clearly set out. The failure of the Council to provide evidence and a clear justification for discounting alternative distributions of growth, which the IIA assess as likely to represent more sustainable options, is a further significant failure in the SEA and plan making process.

Q24. Is the site selection process clear and suitably robust, supported by the SA and other evidence?

- 2.17. The methodology and assessment of sites within the IIA adopts an approach of assessing the likely impacts of each site against topics based on geospatial data, primarily based on distance to/ overlap with relevant features/constraints. However some topics, such as housing and waste have no assessment criteria. The IIA does not explain the reasoning for this, despite the scoping section including assessment questions relevant to individual site assessments including whether proposal enable managed growth at rural communities, and support a mix of housing types and tenures. On this basis it cannot be concluded that the assessment of sites is clear and robust.

Q25. Is the development strategy sufficiently clear about the respective roles of Telford, Newport and the rural area?

- 2.18. The Publication Plan (CD01) identifies that growth in Telford means there are limited opportunities for major brownfield development, and a need to expand beyond the existing boundaries of the town. It also acknowledges that Newport plays a key role in the borough's economy, and the need for housing in the rural area to meet the needs of those of both younger and older people, and to support the vitality and sustainability of the rural areas. As discussed above, the roles these areas play is not reflected in the proposed development strategy which seeks to concentrate development in and around Telford, with only limited development in Newport and the rural area.



 **Marrons**



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