

HBF's Response to the Inspector's Matters Issues and Questions for the Telford Local Plan Examination- Matter 2

HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

It is noted that where reference is made to specific paragraphs of the National Planning Policy Framework (the Framework) within the MIQs these relate to the December 2024 version. HBF have also referred to the current (Dec 2025) NPPF within our response to these MIQs. We have clearly identified where this has occurred.

SECTION B

SOUNDNESS

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?

19. Does the Plan set out an appropriate vision for the Borough based upon the evidence?

HBF continues to suggest that the role of new housing in creating a sustainable Borough could be more explicitly recognised within the vision itself.

20. What does 'a Forest Community' mean?

HBF are unclear about what this term means and have asked for clarification. It is important that this label does not become a barrier to much needed housing delivering, either explicitly or as an unintended consequence of the policy.

We are concerned that the aspiration for a 'Forest Community' is given as a reason for seeking 20% Biodiversity Net Gain. The 20% BNG policy appears not to have been subject to robust viability testing and HBF do not support it. In order for BNG to be successful nationally a plethora of local policies and variations should be avoided. We are unaware of any evidence that justified a specific need for Telford and Wrekin to have a higher percentage than the national approach, other than this unclear 'Forest Community' aspiration.

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

HBF continue to believe that delivering the housing needs of Telford and Wrekin in full and making a contribution to the wider unmet needs of the region should be clearly set out as an objective of this Local Plan.

made to local need and what is contributing to the wider housing needs.