

HBF's Response to the Inspector's Matters Issues and Questions for the Telford Local Plan Examination- Matter 3

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.

Matter 3 – Strategic Policies (Housing)

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?

As set out in detail in our Reg 19 response, and so not repeated here, HBF would suggest a higher housing should be included. The wording of the policy needs to clearly set out these are minimum figures.

The Government is committed to delivering 1.5 million new homes within this Parliament. Government planning policy has clearly set out the need for a significant increase in house building in order to deliver this. The new Dec 2025 NPPF consultation included further proposed changes to help increase house building, which provides further evidence of the Government's intentions.

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?

National policy is clear that neighbouring authorities should assist in the delivery of any unmet need from neighbouring authorities. HBF is unclear how the Council arrived at a figure of 153 dwellings per annum to assist with the unmet need of the wider area, and why it is not doing, or being asked, to do more.

As you will be aware the Government published its long-awaited proposed revisions to the NPPF for consultation on 16th Dec 2025. Whilst this is, at this stage, only a consultation it clearly sets out the expectations and direction of travel of Government policy. The new Dec 2025 draft NPPF clearly shows the importance that is being placed on addressing the housing crisis and the clear move towards a more rules-based planning system that provides more certainty for everyone. It is very clear that the Government is expecting Local Plan to do more to help to address the housing crisis and there is a clear expectation that all Councils should be planning to meet their housing needs in full.

Although in the medium term it is anticipated that sub-regional housing numbers and issues of redistribution of any unmet housing needs where they occur will be addressed through SDSs. In the interim it is still essential that work with neighbouring authorities to address unmet needs continues.

Issue 2: The five-year supply and overall housing supply position

28. Will there be a five-year supply of specific, deliverable sites from the intended date of adoption of the Local Plan?

HBF set out detailed comments in our Reg 19 response, they are not repeated here. We do not comment on individual allocations, but we remain of the view the housing requirement for Telford and Wrekin should be higher and as such additional sites will be needed.

29. Does the plan make provision for a supply of specific, developable or broad locations for growth for the subsequent years 6-10 and where possible years 11-15 of the remaining plan period?

HBF do not comment on individual allocations, but we remain of the view the housing requirement for Telford and Wrekin should be higher and as such additional sites will be needed.

30. Are the allowances for windfalls and lapses soundly based? Are they justified?

HBF set out detailed comments on these issues in our Reg 19 response, they are not repeated here.

31. Are the Sustainable Communities fundamental to the housing delivery strategy such that they should be referred to in Policy Strategic S4?

HBF have provided detailed comments on policy S4 in our Reg 19 response. They are not repeated here.

32. What does criterion 4 of Policy Strategic S4 mean? Is it unambiguous in what it is requiring? Is the trigger level clear? Having regard to the policy and para 4.41 of the supporting text, are the actions which the Council would then take clear and achievable?

HBF have provided detailed comments on policy S4 including criterion 4 in our Reg 19 response. They are not repeated here. We have also provided detailed comments on the importance of Monitoring and the current inadequacies of the Plan in this rather in response to Matter 7- Monitoring. Identifying a problem of housing delivery is part of the plan, monitor, manage approach. What really matters is what is done once a problem has been identified.

33. What does criterion 5c of Policy Strategic S4 mean when it refers to a 'brownfield first' approach to windfalls? Is this justified? Is it clear as to how it would be applied?

HBF have provided detailed comments on policy S4 in our Reg 19 response including about the 'brownfield first' approach. They are not repeated here. To meet the housing needs of Telford and Wrekin will require both brownfield and greenfield development. This should be properly acknowledged in the Plan.

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