

HBF's Response to the Inspector's Matters Issues and Questions for the Telford Local Plan Examination- Matter 5

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 5 – Allocations

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?

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. We have also provided comments about our concerns around the approach of relegating site allocations to an Appendix of the Plan in our Reg 19 comments. Again, they are not repeated here.

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

HBF have provided detailed comments on policy HO1 in our Reg 19 response. They are not repeated here. As we have said above, it is unusual for the settlement hierarchy and site allocations not to be included within the policy of the Plan but relegated to an Appendix. HBF suggest this approach is unsound as policy should be clearly set out with the policy of the Plan. The purpose of allocating sites is to provide certainty for both the development industry and communities on where new development should be located, anything that creates uncertainty about this is unhelpful.

45. Do any of the proposed site allocations in Appendix 15 have specific requirements which should be set out in the Plan?

We do not comment on individual sites but on the point of principle if there are any site-specific policy requirements for a particular site they should be clearly set out within the Local Plan. It is more usual for each site allocated to have a specific policy about it including setting out specific policy requirements for that site.

Issue 2: Whether each of the Sustainable Communities allocations in Policy HO2 and their policy requirements are soundly based?

47. Are each of the Sustainable Communities (SCs) allocations and their policy requirements justified, deliverable/developable, consistent with national policy and supported by the evidence? Do they accord with the development strategy of the Plan?

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. The Plan needs to provide for a range of sites, which can include large allocations like the SCs in this Plan

We note that the new Dec 2025 draft NPPF is much more explicit about the importance Local Plans including of large allocations in Local Plan to help to meet the increase in housing delivery necessary to deliver the Government's ambitions for 1.5 million new homes in this Parliament.

Overall, the Plan also needs to deliver an appropriate balance of development, to ensure that all of their housing needs are met in terms of types and tenures, locations and markets, and to ensure that the Plan can deliver against its housing requirements. Large allocations can play an important role in such an approach.