

Telford & Wrekin Council – Responses to Matters, Issues and Questions

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Matter 6, Issue 1

Matter 6 – Development Management Policies

Issue 1: Whether the other housing policies are justified, effective, and consistent with national policy.

Policy HO3 – Housing mix and quality

Q59. Are the requirements of Policy HO3 including requirements for internal space standard (Criterion 2) and M4 (2)/M4 (3) housing justified by the evidence? Can all developments provide a mix of house types and sizes?

The requirements set out in Policy HO3 are fully justified by the evidence.

Criterion 2 requires all development, across all tenures, to meet as a minimum the internal space standards set out in the Nationally Described Space Standards (NDSS). The Government's *Nationally Described Space Standard – Technical Requirements* (March 2015) states in Paragraph 1: *"This standard deals with internal space within new dwellings and is suitable for application across all tenures"*.

This requirement has been fully tested in the Telford and Wrekin Local Plan Review Viability Study (October 2023) (VS01) which has assumed in its assessment that the units are assumed to be aligned with NDSS or larger (paragraph 8.19). Improving the quality of housing is an important objective of the Council, this includes ensuring that residents have homes that provide appropriate living space.

Criterion 6 requires that all major developments must include M4(2) / M4(3) housing in accordance with the Council's requirements or national standards (whichever is higher). The Council's requirements are set out in the policy supporting text and the Homes for All Supplementary Planning Document (January 2022) which details the requirements in Table 2. The requirements in Policy HO3 are further justified by evidence set out in the Economic and Housing Development Needs Assessment Update (February 2025) (EH01) which in Chapter 7 identifies an annual need for 180 dwellings to be built with appropriate adaptations and 51 dwellings to be wheelchair adaptable over the plan period.

The Telford and Wrekin Local Plan Review Viability Study (October 2023) (VS01) has tested the assumption that all new homes are to be designed to be Accessible and Adaptable (M4(2)) in line with the Government's previous announcement. In addition, 5% of all new homes are assumed to be designed to be Wheelchair Adaptability M4(3). The Draft National Planning Policy Framework (December 2025)

is now proposing that a minimum 40% of new homes meet the M4(2) accessible and adaptable standard.

The requirements that will be applied in Policy HO3 will be those set out in Table 2 of the Homes for All Supplementary Planning Document (January 2022) or those prescribed by national standards, whichever is higher, as set out in criterion 6 of Policy HO3.

The housing mix to be delivered on major sites will be guided by the recommendations set out in Table 6 of the Submission Version Local Plan (CD08). These recommendations are derived from evidence set out in the Economic and Housing Development Needs Assessment Update (February 2025) (EH01). These recommendations will be applied flexibly as the Council recognises there may be instances where adjustments may need to be applied due to the latest local profile of housing, character of the area and viability depending on the surrounding submarket characteristics, as stated in paragraph 9.21 of the Submission Version Local Plan (CD08).

The recommendations set out in Table 6 were also fully tested through the Telford and Wrekin Local Plan Review Viability Study (October 2023) (VS01) however, in line with the flexibility within the policy the number of very small units was reduced for the purposes of modelling.

Q60. Is criterion 4 of Policy HO3 clear and unambiguous so as to be effective?

A number of modifications have been proposed to Criterion 4 of Policy HO3 in the Submission Version Local Plan (CD08) in order to improve the clarity and effectiveness of this criterion. The proposed revised wording of this criterion is as follows:

4. In certain circumstances, where it can be demonstrated that the creation of private amenity space is not possible due to land availability and/or property constraints, alternative outdoor spaces such as useable balconies and roof gardens would be acceptable in lieu of ground floor outdoor amenity space, where it is practicable to provide them.

The Council considers that these modifications are necessary to ensure that this policy criterion is clear and effective.

Polices HO4 and HO5 – Affordable Housing

Q61. Are the provisions of Policy HO4 in terms of affordable housing requirements justified by the evidence and deliverable?

Policy HO4 sets out the affordable housing requirements that will be applied to major residential developments, including a minimum delivery of 25% affordable homes in the Telford built-up area, and 35% affordable homes in Newport and the rural area.

These requirements are supported by evidence set out in the Economic and Housing Development Needs Assessment Update (February 2025) (EH01 which identifies a need for 824 affordable homes per year to 2040. In developing a policy requirement, the identified need set out in the EHDNA Update was balanced against the assessment and recommendations detailed in the Telford and Wrekin Local Plan Review Viability Study (October 2023) (VS01).

The Viability Study (VS01) confirms that the affordable housing requirements set out in Policy HO4 are justified and deliverable.

A modification is proposed to Policy HO4 in the Submission Version Local Plan (CD08) which includes the addition of the following criterion after criterion 1:

Affordable housing secured through section 106 obligations is a priority, however where it can be demonstrated that this cannot be achieved other sources of supply will be considered appropriate in order to meet the thresholds set out in policy.

This modification is considered necessary to ensure clarity in terms of how the policy would be applied in the context of non-Section 106 schemes, such as those delivered through Homes England grant funding or Registered Provider led schemes.

Q62. Is it clear how Policy HO4 and Policy HO5 are expected to work together? In particular, are the policies clear and unambiguous in respect of reduced or zero provision in terms of how criterion 4 of Policy HO4 and criterion 3 of Policy HO5 apply and relate to each other? Policy HO6 Supported and specialist housing

The Council accepts that there is currently some repetition in the requirements set out in Policy HO4 and Policy HO5 where developments are proposing reduced affordable housing contributions. To avoid unnecessary repetition and enhance clarity the Council proposes a modification to Policy HO4 which would delete criterion 5. The requirements for schemes proposing reduced or zero affordable housing provision would then be as currently set out in criteria 3(a) and (b) of Policy HO5.

The Council also notes a minor error in the wording of criterion 3 of Policy HO5. The reference to “...below the requirements of Policy HO5” should be corrected to read “...below the requirements of Policy HO4”.

Q63. Is Policy HO6 clear and unambiguous in its requirements including what constitutes an identified local need?

The purpose of Policy HO6 is to provide a clear set of criteria for applicants bringing forward proposals for supported and specialist accommodation. Due to the nature of these uses the policy requires early engagement between the applicant and the Council to ensure that proposals are meeting an identified local need. The Council has a Supported and Specialist Accommodation Strategy that provides evidence of what constitutes local needs. To maintain a reasonable degree of flexibility, where

proposals come forward that are over and above local needs for a certain cohort or use, developers are required engage with the Council to explore whether any other (deficient) needs could be met. In the absence of a mechanism to control uses the Council could be subject to over delivery of accommodation that does not meet the needs of the local population and as a result become unduly burdened with additional costs associated with health and social care.

Policy HO8 Gypsy, traveller and showpeoples accommodation

Q64. Is Policy HO8 positively prepared and in accordance with national policy and guidance? Does it make sufficient provision for the needs of Gypsies and Travellers and Travelling Showpeople? Does it need to safeguard the future of the existing Travelling Showpersons site in Hadley, as recommended in the GTAA?

Policy HO8 is positively prepared and in accordance with national policy and guidance. The policy has been prepared taking account of the Gypsy and Traveller Accommodation Assessment (GTAA) (EH07) and makes provision for the allocation of sites for gypsy and traveller accommodation as well as providing a positive policy framework to support windfall sites coming forward, for example requiring broadband connectivity that can help with remote education.

The Council would welcome the inclusion of protection for the Travelling Show persons site in Hadley within the plan to secure that use in the long term.

Note that the GTAA evidence base was published in October 2023 and therefore before the changes in definition set out in the December 2024 Planning Policy for Traveller Sites (PPTS). However, the GTAA did include a need figure which took into account an overall 'cultural' need which reflects the updated 2024 definition regarding Gypsies and Travellers.

The definition in the 2024 PPTS has been extended to cover the accommodation needs other groups who have a cultural need to live in a caravan. These are not clearly defined but could include New Age Travellers. During the preparation of the GTAA, arc4 visited variety of sites and there was no specific evidence of needs from other cultural groups. However, any emerging need from other cultural groups can be considered through the provisions of Policy HO8.

Policy HO11 Self and custom housebuilding

Q65. Is Policy HO11 justified and supported by the evidence in its approach to self-build and custom housebuilding?

The Council consider that the policy is justified and supported by evidence in its approach to self-build and custom housebuilding. The Council has an obligation to grant permissions for serviced self-build and custom-build plots under section 1 of

the Self-Build and Custom-Build Housebuilding Act 2015. The Council maintains a self-build register which currently has 230 entries showing local demand for self-build and custom-build housing justifying its overall policy approach.

The Council undertook a review of LPA self-build policy to help inform policy drafting, this demonstrated a range of between 5-10% of new homes to be self-build or custom-build housing. In some cases, thresholds were set for when the % requirement for homes would apply, this was between 40 and 100 units. The Council have reflected in the Regulation 19 responses received and reduce the % of self-build or custom-build homes from 5% to 3% as part of a suggested modification. The Council consider that it is justified in seeking a supply of self-build and custom-build plots through new development over 100 units as well as providing other avenue to enable windfall self-build or custom-build through the policy. The Council consider that the approach set out in the Submission version of the plan (CD08), including suggested modifications, is a reasonable and proportionate approach to take, which provides flexibility for developers especially when considering 'turnkey' options for building.

The policy also sets a minimum time period for marketing of plots as self-build and custom-build at 6 months. If no buyers are found within this period the developer will be permitted to return the plot to open market use.

Policy HO12 Housing in Rural Areas

Q66. Is Policy HO12 justified and effective? Is it consistent with, and does not duplicate, national policy?

The Council considers that Policy HO12 is justified and effective, is consistent with national policy, and does not inappropriately duplicate it. The policy provides a clear local framework for managing rural housing delivery in a manner that is responsive to local circumstances and supports sustainable rural communities, consistent with NPPF paragraphs 82-84.

Policy HO12 is justified because rural areas form an established component of the borough's housing delivery, including through small windfall sites. Based on the Council's latest monitoring position (commitments at December 2025), approximately 18% of minor site commitments are located in the rural area. This demonstrates that small rural sites make a meaningful contribution to overall supply and require an appropriate policy framework to ensure consistent decision-taking. In addition, approximately 4.1% of major commitments are also located in the rural area, confirming that rural delivery is not limited to one site type.

Policy HO12 is effective because it supports delivery in sustainable rural locations and provides clear criteria for commonly arising proposal types. Part (1) directs rural housing towards unimplemented permissions, allocations in some rural villages,

limited development in key settlements, and infill self-build/custom build within defined settlement confines. This aligns with NPPF paragraph 83, which seeks housing in locations that will enhance or maintain the vitality of rural communities and support local services. Part (2) provides clarity that proposals will only be supported where they meet national policy tests (NPPF paragraph 82 / successor policy), ensuring that isolated homes in the countryside are controlled in accordance with the NPPF.

Parts (3)-(5) provide locally specific criteria for replacement dwellings, conversions and rural worker dwellings, aligning with the circumstances set out in NPPF paragraph 84. These criteria ensure proposals protect rural character and amenity, are structurally feasible, and are supported by appropriate justification. This approach supports consistency and transparency in decision-making, without undermining national policy.

Overall, the Council considers that Policy HO12 provides a justified, locally responsive, and effective rural housing policy which applies national policy tests in a clear and decision-useful way, and supports appropriate rural housing delivery, including the important contribution made by small sites.

Policy HO13 Affordable rural exception sites

Q67. Is Policy HO13 justified, effective and consistent with national policy?

The Council considers that Policy HO13 is justified and effective, and is consistent with national policy. The policy provides a clear local mechanism to support delivery of affordable housing in rural areas, as an exception to normal countryside restraint policies, where there is an evidenced local need and proposals are appropriately located and controlled.

National policy requires that strategic policies should assess and reflect the need for affordable housing (NPPF paragraphs 63-67) and, specifically in rural areas, that planning policies and decisions should be responsive to local circumstances and support opportunities to bring forward rural exception sites to provide affordable housing to meet identified local needs (NPPF paragraph 82). Policy HO13 implements this national policy approach by setting out criteria under which rural exception schemes will be supported.

Policy HO13 is justified because it supports delivery of rural affordable housing in locations where conventional site allocation and market delivery may not meet local needs. It provides a structured route to meeting identified local affordable housing need in smaller settlements, whilst ensuring such development remains proportionate, properly located, and does not lead to isolated development in the countryside.

The policy is effective because it includes clear and enforceable criteria. It requires proposals to be minor development and consist of 100% affordable housing, ensures sites are within or immediately adjoining and well-related to the built-up area of a rural settlement (thereby avoiding isolated locations), and requires robust evidence that the proposal meets a local affordable housing need for people with a local connection. It also requires adequate controls to ensure homes remain affordable in perpetuity, consistent with Policy HO6, and requires development to be of an appropriate scale and design for the location. These criteria ensure that proposals deliver genuine local benefit and remain plan-compliant over the long term.

The Council considers that Policy HO13 does not duplicate national policy. Rather, it provides locally specific criteria that give clarity and consistency in decision-taking and ensure that rural exception proposals align with national policy expectations, including the requirement to meet identified local affordable needs and maintain sustainable settlement patterns.