

**Home Builders Federation  
Respondent No.**

**Hearing Session : Matter 3 - Development Strategy**

**TELFORD & WREKIN LOCAL PLAN EXAMINATION**

**MATTER 3 – DEVELOPMENT STRATEGY**

**Inspector's Key Issues and Questions in bold text.**

The following Hearing Statement is made for and on behalf of the Home Builders Federation (HBF) in regard to the Telford & Wrekin Local Plan. This Statement responds to selected questions set out in the Inspectors Matters & Issues document. The following answers should be read in conjunction with our representations to the Local Plan pre submission consultation ended on 15<sup>th</sup> March 2016.

**Questions**

**3.2 Is the Local Plan's settlement hierarchy and proposed distribution of development, particularly between the urban and rural areas, sufficiently justified? With reference to paragraph 28, 54 and 55 of the Framework, is adequate provision made for development in rural settlements?**

Locally within the Telford & Wrekin Housing Market Area (HMA) housing affordability is a challenge. The cost of a typical house is 7 times mean income rising to 9 times in parts of the rural area and Newport (Local Plan paragraph 2.33). Moreover average house prices are 36 – 46% higher in the rural areas (Technical Paper Rural Settlement paragraph 2.14). Of the 900 dwellings proposed in the rural areas 64% are proposed on 2 brown-field sites at Allscott and Crudgington. The Council should re-consider if this proposed housing distribution in the rural area is sufficiently justified given unaffordability of rural housing. Since all settlements can play a role in delivering sustainable development in rural areas blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided. Moreover to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. Whilst some Sustainable Urban Extensions (SUEs) may have multiple outlets, in general increasing the number of sales outlets available means increasing the number of housing sites. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand.

**3.3 Are (1) the prioritisation of previously developed sites within Telford and Newport (policies SP1, SP2 and SP4) sufficiently justified and in line with national policy in the Framework?**

The prioritising of previously developed sites in Policies SP1, SP2 and SP4 is contrary to national policy. It is suggested that the wording of these policies is

changed from “prioritisation” to “encouragement”. The core planning principle set out in the National Planning Policy Framework (NPPF) is to “*encourage the effective use of land by re-using land that has been previously developed (brownfield land)*” (para 14) such encouragement is not setting out a principle of prioritising brownfield before green-field land. Whilst the NPPF states that “*Local Planning Authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land*” (para 111) there is no reference to prioritising the use of brownfield land. The Council’s proposal to prioritisation relates back to previous national policies which are now inconsistent with current national policy. In paragraph 17 of his determination of the Planning Appeal at Burgess Farm in Worsley Manchester (APP/U4230/A/11/215743) dated July 2012 (4 months after the introduction of the NPPF) the Secretary of State confirms that “*national planning policy in the Framework encourages the use of previously developed land but does not promote a sequential approach to land use. It stresses the importance of achieving sustainable development to meet identified needs*”.

**Susan E Green MRTPI**  
**Planning Manager – Local Plans**