

Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Howard Thornp, Shropshire Homes Ltd
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Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

(Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	DP1 2.b	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |

(Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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<p>We understand and support the requirement to provide a mix of dwelling types to satisfy local needs.</p> <p>We also accept the need, in most cases and in the absence of evidence to the contrary, to require at least 50% of houses to be 3 bedroom or smaller.</p> <p>However we object to the proposal that a minimum of 25% of dwellings should be 2 bedroom or less.</p> <p>We note the explanation for your proposals but ask you to note the following -</p>
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(Please continue on a separate sheet if necessary)

SHROPSHIRE HOMES LTD

POLICY DP1.2b

CONTINUATION OF RESPONSE TO QUESTION 4

1. Our experience in delivering homes in most parts of Shropshire is that demand for 2 bedroomed houses is limited and has diminished further in recent years. The majority of first time buyers and young families aspire to 3 bedrooms to allow families to grow. On traditional housing developments we now expect to sell two to three times more 3 bedroomed houses than 2 bedroomed ones.

We can cite a number of our recent developments to evidence this argument-

- The Furlongs, Shrewsbury. This site completed in 2019 and comprised 56 market houses – 13 x 4 bed, 29 x 3 bed and 14 x 2 bed (25%). Demand for two bedroom houses was limited and despite being available throughout the marketing period four of the last seven sales to be agreed were 2 bed and two were sold at a small discount to an investor. We have subsequently reduced the proportion of two bed homes on similar developments
 - Parkers Place, Ironbridge. The site is nearing completion and comprises 44 market houses – 12 x 4 bed, 23 x 3 bed and 9 x 2 bed (20%). Demand for 2 bed houses has been slower than for 3 bed houses and we have agreed the sale of three 2 bed homes to an investor.
 - Cricketers Meadow, Pontesbury, Shrewsbury. All sales now agreed. 72 market houses comprising 25 x 4 bed, 33 x 3 bed and 12 x 2 bed (16%). Despite being available for most of the marketing period eight of the last twenty dwellings to sell were 2 bed.
 - Hanwood Heights, Shrewsbury. All sales now agreed.. 43 market houses comprising 11 x 4 bed, 27x 3 bed and 5 x 2 bed (10%). Despite being a much smaller proportion of the development we again encountered resistance to 2 bed homes which were amongst the slowest to sell.
2. The above pattern is reflected in affordable housing requirements from Registered Providers under s106 agreements who generally require a minimum of 65% 3 bed homes with the balance being 2 bed. This provides further evidence of housing demand
 3. We understand that one of the Councils arguments for a large provision of two bedroom homes is to ensure an adequate supply of homes that are affordable to lower income earners.

We accept that some prospective purchasers might only be able to afford a 2 bedroom home. However the difference in price between a 2 bedroom semi-detached home and the smallest 3 bedroom home on the developments cited above was generally around

10% (typically £185,000 and £205,000) and most purchasers were willing and able to pay the higher price to secure a third bedroom..

4. There has been a trend in recent years for people to work from home and require space to do so. This has been accelerated in recent months as a result of Covid 19 and has further accentuated the requirement for an extra bedroom.

This trend has been confirmed in numerous recent surveys and reports which suggest that this is likely to represent a permanent shift in work patterns. It is important that emerging policy recognises this distinct change in occupier's requirements

5. Our experience has been that a high proportion of purchasers of 2 bedroom homes are currently investors who perceive the rent yield as being better than larger properties. Whilst not suggesting that investors do not contribute to the overall housing market current government policy, including Help to Buy, is supportive of increased home ownership
6. Two bedroom houses generally represent a less efficient use of land in terms of bedroom provision.

We therefore contend that the draft policy is unsound because –

- It does not meet Shropshire's development needs
- It is not justified and based on proportionate evidence

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We object to the inclusion of a minimum provision of 2 bedroom houses as being unsound for the reasons set out above. We suggest this aspect of the policy is removed.

If it is thought desirable that a minimum proportion of homes should be 2 this should be reduced to 10%

(Please continue on a separate sheet if necessary)

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Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

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No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To expand on my argument, to respond to any points raised by the Council and reply to any questions asked by the Inspector.

(Please continue on a separate sheet if necessary)

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Signature: []

Date: 03/02/2021

Part A Reference:

Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Howard Thorne. Shropshire Homes Ltd
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Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

(Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	DP1.3	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |

(Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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We support the principle of requiring national space standards. However we believe policy DP1.3 is unsound in differentiating between market and affordable dwellings.

We suggest policy should be more prescriptive in the case of open market dwellings stating that national space standards will apply unless specific considerations justify otherwise. This might apply to conversion schemes or developments targeted at specific user groups.

The proposed requirement that affordable homes should comply with space standards and that open market housing doesn't not have to also contradicts policy DP3 which requires affordable and open market homes to be indistinguishable. In this respect policy DP1.3 is also unsound.

(Please continue on a separate sheet if necessary)

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Policy should require all dwellings to comply with national space standards unless specific considerations justify a departure.

(Please continue on a separate sheet if necessary)

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Signature: Date:

Office Use Only	Part A Reference:
	Part B Reference:

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(Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph: Policy: Site: Policies Map:

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|--|-------------------------------|---|
| A. Legally compliant | Yes: <input type="checkbox"/> | No: <input type="checkbox"/> |
| B. Sound | Yes: <input type="checkbox"/> | No: <input checked="" type="checkbox"/> |
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We object to the requirement that 70% of dwellings should comply to M4(2) standards and that 5% of dwellings should meet M4(3). This is above and beyond current Building Regulations. This is not based on proportionate evidence and as such is not sound.

A requirement for this level of provision will require significant changes to developers house ranges and undermine the viability of many developments.

We also question the real demand for this type of provision . As a company we try to meet customer's specific requirements and have only been requested to provide adapted homes of this type twice in recent years. We do not believe that proportionate evidence justifies this level of provision and that this policy is therefore not sound.

We suggest that mandatory compliance with national space standards as we have proposed in our comments on policy DP1.3 will provide a reasonable level of wheelchair and disabled accessibility.

(Please continue on a separate sheet if necessary)

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We propose that this policy should be deleted.

If the Inspector is minded to require a provision of M4(2) housing we suggest this should be at a much lower level of 10%. This will ensure adequate provision without undermining viability and deliverability.

If the Inspector is minded to retain the requirement for M4(3) dwellings should be increased to 20 dwellings (How can 5% be applied to less than 20 dwellings?)

(Please continue on a separate sheet if necessary)

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Yes, I wish to participate in hearing session(s)

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Date: 19/01/2021

Office Use Only	Part A Reference:
	Part B Reference:

Representation Form

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Name and Organisation:	Howard Thorne. Shropshire Homes Ltd
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(Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	DP1.6a	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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- | | | | | |
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| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |

(Please tick as appropriate).

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We strongly object to this policy on the grounds that it will undermine viability and delivery and adversely affect the ability of the Local Plan to meet its housing targets. As such it is unsound.

We do not believe it appropriate, logical or viable to require specialist housing of this type to be provided on general market housing sites. This is not necessary to ensure adequate provision of specialist housing which is usually developed and operated by specialist organisations.

We suggest the following factors should be considered in respect of this proposed policy.

PLEASE SEE CONTINUATION SHEET

(Please continue on a separate sheet if necessary)

We request the following factors should be considered in respect of this proposed policy

1. It is generally accepted that developers of specialist housing can pay higher residual land valuers than general market developers and a supply of suitable land is likely to be provided by the market.
2. It should also be recognised that many proposed sites are not suited to this type of development because of location or specific site conditions. Specialist housing generally needs to have services and transport facilities in close proximity and to be reasonably level. A number of sites of proposed in the draft Local Plan do not meet this criteria.
3. Many medium sized sites are in locations which are not appropriate for specialist living and where demand might not exist. We suggest that in these circumstances the onus to require evidence of need should be on the Council.
4. It is also important to consider that specialist housing of this type will in many instances qualify as affordable housing and reduce the provision of general need affordable homes
5. The policy as drafted will deter SME developers from delivering medium sized sites and undermine the ability of the Local Plan to meet its delivery targets
6. If applied to schemes below 200 dwellings and of a scale to be viable this type of provision would comprise a large proportion of the site and reduce the number of market houses delivered.

For the above reasons we believe the policy is unsound and –

- Will undermine the ability of the plan to meet Shropshire's development needs
- Is not based on proportionate evidence of widespread or general need or evidence that the policy will satisfy any need without disproportionate harm to the plans ability to deliver housing targets
- Will be effective and deliverable

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This policy should be removed from the Local Plan

If the inspector is minded to retain this policy the threshold for provision of specialist housing should be increased to 200 dwellings and subject to evidence of need.

(Please continue on a separate sheet if necessary)

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No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To respond to any points made by the Council and answer any questions from the Inspector

(Please continue on a separate sheet if necessary)

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Date: 19/01/2021

Office use only

Part A Reference:

Part B Reference:

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Name and Organisation:	Howard Thorne. Shropshire Homes Ltd
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(Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph: Policy: Site: Policies Map:

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:
- C. Compliant with the Duty to Co-operate Yes: No:

(Please tick as appropriate).

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We generally support the proposed Affordable Housing policies but believe policy DP3.1c is unsound in that it conflicts with policy DP3.1h, particularly on larger sites.

It may also distort build programmes on smaller sites and be particularly difficult for SME's to accommodate

(Please continue on a separate sheet if necessary)

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We suggest this is addressed by introducing a graduated requirement – eg 50% of affordable dwellings to be provided before 50% general market occupancy and 100% before 80% general market occupancy.

(Please continue on a separate sheet if necessary)

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Signature: Date:

Office Use Only	Part A Reference:
	Part B Reference:

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Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	DP11.1b,1c and 1d	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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These policies appear to go beyond the requirements of current building regulations and are unsound.

Previous guidance in 'The Code for Sustainable Homes' was withdrawn as that document required dwellings to perform thermally in excess of Building Regulations. Subsequent government guidance confirmed that compliance with the Building Regulations should be considered as appropriate.

(Please continue on a separate sheet if necessary)

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These policies should be amended to require all developments to comply with the requirements of the Building Regulations prevailing at the time.

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Howard Thorne

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