

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.

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e understand and support t	he requirement to provide	e a mix of dwelling t	ypes to satisfy local needs.
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0% of houses to be 3 bedro		solios di oridonios k	o the contrary, to require at react
owever we object to the pro	posal that a minimum of	25% of dwellings sh	ould be 2 bedroom or less.
le note the explanation for y	our proposals but ask yo	u to note the followi	ng -

SHROPSHIRE HOMES LTD

POLICY DP1.2b

CONTINUATION OF RESPONSE TO QUESTION 4

 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.
- 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
- 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

	ject to the inclusion of a minimum provision of 2 be t above. We suggest this aspect of the policy is re		being unso	und for the reasons
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Signature:	Howard Thorne		Date:	19/01/2021
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We propose that this policy sho	ould be deleted.					
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SHROPSHIRE HOMES LTD

POLICY DP1.6a

CONTINUATION OF RESPONSE TO QUESTION 4

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

- 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.
- 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.
- 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
- 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

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

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Part B Reference:



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