

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:	Longden Village Action Group (LVAG)
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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:	<input type="text" value="x"/>	Site:	<input type="text" value="x"/>	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.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Longden Village Action Group (LVAG) representing the parishioners of Longden do not consider the Plan sound or sustainable.

Please see attached letter and also the Parish Council submission and large number of community responses to the Regulation 18 and Regulation 19 consultation.

Furthermore we do not understand why some proposed development sites are included when they have been subject to appeals and previously rejected. In particular, sites 016 and 002. In particular, The hierarchy assessment as applied to Longden is not sound. Longden is much smaller than any of the other proposed hubs. Has the methodology been properly scrutinised? If not, why not?

Where is the infrastructure plan? Where is the sustainable up to date transport plan? Climate Change. Building many houses in villages which do not have adequate public transport and no local employment will encourage more cars on to the road and will be in direct contradiction to the National Net Zero Carbon target.

Attached – letter and appendices from LVAG

(Please continue on a separate sheet if necessary)

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.

The hierarchy assessment should include 'weighting' so that the scoring reflects the size of the infrastructure/services/employment opportunities.

The Plan should have been 'paused' following earlier consultations as all the above issues have been raised by communities across Shropshire but they have not been addressed rigorously. The Council seems to be determined to keep to a rigid timetable with insufficient staff to produce an updated Plan that is sound. We appreciate that the planning officers that have been retained by the Council have been very stretched and worked incredibly hard. Please see attached letter with full explanation from LVAG.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

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)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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:

We represent the LVAG and feel that the community has a right to be heard. Despite extensive local consultation undertaken by the Parish Council and LVAG we do not feel that Shropshire Council has listened to the responses from the community. The Council made it clear from the start, prior to its Regulation 18 consultation, that "Longden will become a hub". Their approach seems illogical and unfair in relation to this very small community. Please see attached letter.

(Please continue on a separate sheet if necessary)

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Office Use Only	Part A Reference:
	Part B Reference:

Signature:

P Arnold J Ingham

Date:

09/01/2021

Office Use Only	Part A Reference:
	Part B Reference:

To: Mr Eddie West, Principal Planning Policy Officer, Shropshire Council,
Planning Policy, Shirehall, Abbey Foregate, Shrewsbury. SY2 6ND

cc. Councillor R Macey, Portfolio holder for Planning and Housing Development

County Councillor Roger Evans

Paul Carter, Chair, Longden Parish Council

09 January 2021

FOR ONWARD TRANSMISSION TO THE INSPECTOR

SHROPSHIRE COUNCIL LOCAL PLAN REVIEW - Consultation Regulation 19

OBJECTION FROM THE LONGDEN VILLAGE ACTION GROUP.

Representing the residents of Longden Village.

Dear Sir,

With reference to the above, we would make the following objections and changes to the above 'Plan' as we believe it is not sound or sustainable. We request that, in due course, this letter is brought to the attention of the Inspector and request that you confirm that this has been actioned.

1. Background information

Firstly, it is strongly felt that such a small village, with only 135 residential dwellings, to become a **Community Hub** is '*ridiculous*'. We are a very small and old village (First mentioned in the Domesday book) and only a fraction of the size of all the other hubs in the area, and only half the size of the next smallest proposed hubs. Our limited road infrastructure reflects the size of the current community.

Residents feel very strongly about this proposal. Indeed, in 2018 a survey was carried with over half the village taking part. The results were that **100%** wished to remain a '**Community Cluster**' and **AGAINST becoming a hub**. This culminated in Longden Village Development Statement which was endorsed by the Parish Council – Appendix 1. Many residents are extremely distressed about the proposals and feel they are being ignored by the Council.

2. Settlement Hierarchy Assessment

Policy SP7 'Managing Development in Community Hubs' states that community hubs have been identified by the extent to which the settlement provides services and facilities, including employment opportunities.

We have great reservations and believe that the plan is fundamentally flawed in the way that this 'points totalling system' for villages becoming a Hub are scored. The points system is not '*weighted*' i.e. *adjusted to reflect the size of the services and most importantly, the capacity to expand to cater for more residents*. That is to say, for example, other villages in the area have brick built substantial **libraries** and get 3 points, whereas Longden has a mobile library which attends once every two weeks for ten minutes and also gets 3 points.

This surely is unfair and not logical and it is felt that Longden should as a maximum get only **one** point for this item.

The same applies to the **shop/post office**. (4 +4 points) We have only a very small village shop with a total sales area of only 32 square metres, (Only two persons allowed in at any one time during 'Covid 19' restrictions). The 'post office' is delivered over the same small counter as the shop/Convenience store. However, the shop gets 4 points and the post office ALSO gets 4 points. Owing to the size of the store compared to other much larger establishments in the area, we feel that only one or two points should have been awarded. The same applies to the post office as other post offices in the area are separate purpose built premises and also get the same four points.

The 'Tankerville Arms' **Public House** in the village (3 points) is now very small as the large portion of it has been sold off for housing or is no longer used. The large portion of the car park has also been sold off for housing. It is also only open three days a week and the one remaining bar room is now very small. We recommend that a maximum of 2 points should have been awarded for this.

The **Primary School** has a total of approximately 100 pupils as opposed to other much larger schools in the area and the **Nursery/Pre-School** is also very small. Both are awarded 4 points each. This surely is unfair for such a small village school.

Super Fast Broadband. (5 points) The village does NOT have superfast broadband, or anywhere near that. It is understood from Council members that this was available via a satellite link. Surely this applies to EVERYONE in the UK, so why is it even in the scoring system???

Outdoor Sports Facility (3 points) and **Children's Playground** (3 points). The sports facility consists of two tennis courts, (Which are a private members club and Not open to the public) and a football field. The small Children's Playground has only recently been built and opened (2019) following a great deal of effort and fund raising from the village. We feel that these two items should be grouped together for 3 points rather separately for 6 points.

Public Transport Link (5 points), **Regular Service Offered During Peak Travel Times** (5 points).

The 546 **bus service** from Longden village to Shrewsbury is regular but it is not sufficiently frequent to have a major impact on sustainability. A copy of the timetable is attached at Appendix 2 and the buses generally run at about 2 hour intervals in each direction, with the exception that there is a one hour gap between services leaving Shrewsbury at 14.07 and 15.09 and the return journeys from Pulverbatch. It is impossible to connect with either trains or other buses out of Shrewsbury town centre to reach other destinations at a reasonable time in the morning or returning in the evening. There is no bus service to local catchment GP services at Pontesbury, Bayston Hill or Dorrington. These issues have been raised with the Council on many occasions, either through the planning application process or through public consultations of the bus strategy etc. These limitations force residents to use cars, often two per household.

In the Government's White Paper "Creating Growth, Cutting Carbon: Making Sustainable Local Transport Happen" (dated 2011) acknowledges (2.36) that one of the issues people prioritise with public transport is frequency. The document says in paragraph 8.9:

"For example, 20% of our population lives in rural areas where there are higher levels of car dependence (including for lower income households) coupled with a lower availability of public transport- meaning a higher proportion of transport carbon emissions from this sector of the population than others".

Whilst planning policy needs to provide some new housing in rural communities, sustainable principles require that most development takes place where alternative means of travel is best.

Recognising that the main connecting road to Shrewsbury is unclassified and that to connect East to the A49 and A5 requires travel through narrow, often single-track lanes, together with our infrequent bus service does not provide a sustainable transport link from Longden. To describe it as a transport link and award it 10 points does not reflect the true nature of the limited infrastructure. It should be awarded one or two points.

3. Climate Change

Theresa May's Government passed legislation in June 2019 to reduce the UK's **carbon emissions** to net zero by 2050.

There are very few employment opportunities in Longden Parish and most residents of working age are forced to commute to Shrewsbury or beyond.

Appendix 3 demonstrates the additional carbon emissions that would be generated by new housing development under the proposed hub status. This analysis demonstrates that Longden as a hub would generate significant additional levels of carbon which is contrary to Government policy and Shropshire Council's Climate Change strategy and policy SP3. For example, a two car household (with average sized cars) travelling to the town centre of Shrewsbury would generate 3.64 kg (3640 g) of CO₂ whilst a comparable household (if they do not walk or cycle), travelling in to Shrewsbury on a **one way journey** from a suburb would generate 1.23 kg of CO₂. This is based on the new development on Oteley Road near the football ground. Large vehicles, such as SUVs which are becoming more prevalent create even more CO₂ as demonstrated in Table 1 of Appendix 3. The Local Plan Review suggests "around 27" additional houses for Longden (this is not a ceiling), this would generate, at two average sized cars per household, 98.28 kg (98280 g) additional CO₂ **per single journey into Central Shrewsbury**. Even at an additional one car per household 27 houses would create a minimum of additional 49.14 kg CO₂ per single journey. As there are very few employment opportunities in Longden Parish most residents have to travel by vehicle to urban areas for employment and this increases the congestion in Shrewsbury and other routes out of the Parish, many of which are along single-track roads. There are no cycle lanes out of the village and as the roads are so narrow there is no potential to develop them.

There is one electric car in the whole village and the prohibitive price of such vehicles means that most residents (especially younger families and people living in affordable homes) will

not be able to afford such vehicles for the foreseeable future. The Government's target of reducing carbon emissions to zero by 2050 will not be achieved if rural communities such as Longden, with no viable alternative means of transport and very little employment locally, are expected to take 30% of the new housing in the county. The Council's pre-submission document makes it clear that key settlements and hubs will be the main focus for development over the forthcoming years. We argue that making Longden a hub will have a negative impact on the climate, increasing carbon emissions from this part of Shropshire, especially as the Council's policy SP3, 3.29 states that road transport contributes 33% to CO₂ emissions in Shropshire. Retaining cluster status would enable the village to experience some growth through infill (in addition to the significant growth experienced in recent years) whilst minimising carbon emissions. If we are to meet Climate Change targets, limitations in infrastructure needs to be addressed before significant numbers of housing are built.

Longden is an ancient village with mature **trees and hedgerows**. Shropshire Council's objective as stated in SP3 3c, is to increase hedgerows and trees. The boundary to any new development in Longden will require removal of mature hedgerows to enable access and this is surely contrary to this policy. At best hedgerows will only be partly replaced (to allow for access and visibility), so as well as an element of total destruction of hedgerows, it will take many years for any replacement hedgerow to mature, thereby reducing CO₂ capture and storage.

4. Numbers of houses

Residents have concerns in relation to the **housing** guideline of 50, reduced to 27 after completions/commitments since 2016, as follows:

i) Residents supported the Council with their survey 'Right Home, Right Place' which indicated Longden requires an additional 18 homes. This survey was conducted at the expense of the Public but does not now form the evidence base for the housing guideline. Residents feel that the survey has been conveniently forgotten about because it did not provide the Council with the anticipated numbers to fit the Local Plan Review. This is a waste of Public money and residents feel they have been misled by the Council, undermining trust and public confidence in the Council's actions.

ii) The **Local Plan Review** can be reviewed and updated every five years and the residents of Longden fear that in five years' time the numbers of new houses will change once again, especially as key settlements and hubs will be the focus for development. The residents of Longden engaged with the Council and willingly and enthusiastically took part in rural toolkit workshops to inform the SAMDev 2006-2026. The number of new houses for Longden was stated as between 25-30 to 2026. The Council is now suggesting that the numbers built since the start of SAMDev and 2016 be ignored in the new calculation of 50 and that the new reference point is houses completed/committed since 2016. Also, there is another six years to reach 2026. This continual shifting of the parameters engenders mistrust of local government, dis-engagement and hostility. Residents feel they have been 'hoodwinked' and regret previously engaging with the Council to assist with housing targets.

iii) Outside of the **development boundaries** of Community Hubs, new development will be managed in accordance with Policy SP9 and the residents fear that as the evidence base for Longden, established through the 'Right Home, Right Place' survey has been ignored in the Council's housing guideline number, exception sites will be identified through an ad hoc approach and highly valued agricultural fields will become housing estates over the period of the Plan.

5. Sites

We are unclear as to why sites 002 and 016 are still being considered as suitable for development when these sites have been the subject of planning applications and appeals which have been rejected. Surely these sites should not be included at this stage?

6. Concluding comments

As can be seen from the above, Longden is a very small rural village which has always been a rural cluster. To change this to a hub would be unfair, not logical and devastating for the village. We residents of Longden wish to remain a Rural Cluster and DO NOT want to become a hub for sound reasons and feel that the Shropshire Council Local Plan is flawed.

The residents of Longden have elected to remain a cluster because they feel that applying the cluster policy SP8 is best suited to Longden and will enable the village to retain its rural character whilst embracing sustainable levels of growth that our infrastructure and roads can accommodate. The Parish Council has consistently made the Council aware of these views and despite extensive local community consultation and the establishment of Longden Parish Plan and supplementary Development Statement, these views have been ignored by the Council in their review of the Local Plan and our concerns have not been addressed. The Council made it clear to us from the start that "Longden will become a hub" and this makes a mockery of Localism and community consultation.

Yours sincerely

Paul Arnold
Chair LVAG

Enclosed: Appendix 1 Longden Village Development Statement
Appendix 2 Bus timetable
Appendix 3 Carbon emissions analysis

1. **Background**

1.1 **Longden Village**

Longden village is a very rural and traditional community first mentioned in the Domesday Book, with generations of the same families living in the village.

Longden village is the largest village in the Parish of Longden with 135 houses and approximately 335 residents, a shop (with post office), primary school, pub, church and village hall. It lies 5 miles South of Shrewsbury on the Shrewsbury to Bishop's Castle unclassified road which is narrow in places. It lies approximately 3 miles west of the A49 to which it is connected mainly by single track lanes which are heavily used by commuters heading east to Telford and beyond. These roads are also heavily used by agricultural vehicles as well as walkers, horse riders and cyclists. The road between Shrewsbury and Bishop's Castle is on the National Cycle route and often used on the Land's End to John o Groats route.

It is a rural community with a number of farms and work opportunities are limited with most people commuting to Shrewsbury and further afield.

The first Development Statement 2013 was established as a supplementary document to the Longden Parish Plan 2010. This updated Development Statement relates solely to Longden village as the other villages in the Parish have been designated 'Open Countryside'.

1.2 **Reasons for Updating the Longden Development Statement 2013**

1.2.1 A new Parish Plan 2017 has been established.

1.2.2 Updating in light of Shropshire Council's Partial Review of the Local Plan which renders the current Longden Development Statement 2013 out of date.

1.2.3 To capture the views of new residents in the village since the Development Statement 2013 as well as the views of longer term residents. There have been 26 new building commitments and completions in Longden since March 2013 bringing new residents to the village – **Appendix 1**.

1.2.4 Experiences with planning applications since 2013.

The 2013 Development Statement reflected residents' aspirations for up to 50 new dwellings in the Parish, 25-30 of which would be in Longden. Since 2013, 97 new dwellings in the Parish have been approved. *Three* applications for large developments in the fields around Longden village (open countryside) were strongly resisted by the Parish Council and Longden residents and refused by Shropshire Council. These went to Appeal, dismissed mainly on the basis that the applications were in open countryside. The updated Development Statement emphasises the importance of these areas to the residents so as to retain the rural character of the village.

1.3 Public Consultation

1.3.1 Parish Plan 2017.

A questionnaire with an extensive housing section was delivered to each household. The results were analysed and collated and the Parish Plan 2017 adopted by the Parish Council in December 2017.

1.3.2 Public meeting in Longden held on 19th October 2017.

Flyers were delivered to all households inviting them to the Public Meeting. This gave residents an additional opportunity to express their views about development specifically in Longden. The results from this meeting were shared with the Parish Council at the meeting in November 2017. Also taking part in the meeting was Shropshire Council's Community Enablement officer, the Shropshire County Councillor and Parish Councillors.

1.3.3 Housing needs analysis undertaken by the Council – *to be included if it is available before Feb 2018 when this document will be presented to the Parish Council.*

2. Key Views of Residents that have emerged from the Consultation Process

- 2.1 Rural character of the village and preserving the open countryside surrounding the village is very important. At the Public meeting on 19th October the residents indicated which areas surrounding the village are particularly important to them and not suitable for development – **Appendices 3 and 4.**
- 2.2 Delineation between villages is important.
- 2.3 Road network not suitable for more vehicles associated with significantly more housing development. This is regarded as a major infrastructure constraint.
- 2.4 The bus service needs to be improved to assist those travelling to work, in places other than Shrewsbury town centre, to get there on time. This is particularly relevant in relation to affordable housing so that new residents are not isolated from work opportunities.
- 2.5 Residents recognise the importance of some growth so that services, such as the School, Shop, Public House and Church are supported and to encourage young people and families to stay in the community.
- 2.6 Inappropriate building will undermine the dynamics and character of the village destroying the essence of the village. Small-scale developments which are in keeping with the surroundings and sympathetically designed will respect and enhance the local character and distinctiveness of the village.
- 2.7 Establishing a balance between protecting the rurality of the village and allowing for some incremental growth has proved challenging in recent years since the adoption of the Longden Development Statement 2013. The current policy decision of the Shropshire Council is that Longden will continue to have cluster status – **Appendix 2** (Shropshire Council's criteria based policy for community clusters). This is supported by residents on the basis that the Council strictly enforces this policy and in particular:
- 2.8 In keeping with this policy new development should be infill or conversion. Specific opportunities for infill/conversion have not been identified as most new build /existing commitments for infill/conversion in the village since 2013 (nine new properties could be described as infill/conversion) has been opportunistic and were not foreseen when the 2013 Development Statement was established (i.e. pub conversion and development in car park, new build in existing gardens/land adjacent to houses).

3.0 Approach to Development

- 3.1 Any new build infill/conversion should meet residents' expectations for sustaining the rural character of the village, with brownfield sites given priority and new development limited to infill within the existing built form of the village.
- 3.2 New development should be small scale (up to 3 dwellings) which is in keeping with its surroundings and sympathetically designed to respect and enhance the local character and distinctiveness of the village.
- 3.3 Open countryside around the village is protected. Rural approaches to the village from the north and the south are considered particularly sensitive to development and should be protected.
- 3.4 Houses are small in size (2 bedroom terraces no more than 70 sq m, 2-3 bedroom semi-detached no more than 80sq m, 3-4 bedroom detached no more than 130 sq m). *Based on Golden Arrow Estate
- 3.5 Any affordable housing should be exclusively for local people and supported by an up to date local needs housing survey. Sites should be physically contained so that it does not lead to any one site becoming vulnerable to future overdevelopment in any one part of the village. All affordable housing schemes should be discussed with the Parish Council very early and should only be granted subject to S106 agreements requiring the Parish Council's agreement of first and future occupiers who must have a strong local connection.
- 3.6 The design and materials used for new housing should be in keeping with the village (typically but not exclusively red brick or white render with slate or red tiled roofs).
- 3.7 Given the heavy reliance on the private car and the limited availability of on street parking new proposals should include adequate car parking and turning areas.
- 3.8 To ensure that the rural character of the area is retained new builds and conversions should incorporate soft landscaping utilising native tree and hedge species.
- 3.9 Where new external lighting is considered essential this should not detract from the rural environment and should minimise light pollution.
- 3.10 To sustain the rural character of the village any development will be expected to retain the rural character of the village retaining existing hedgerows and trees

4. Concluding Comments

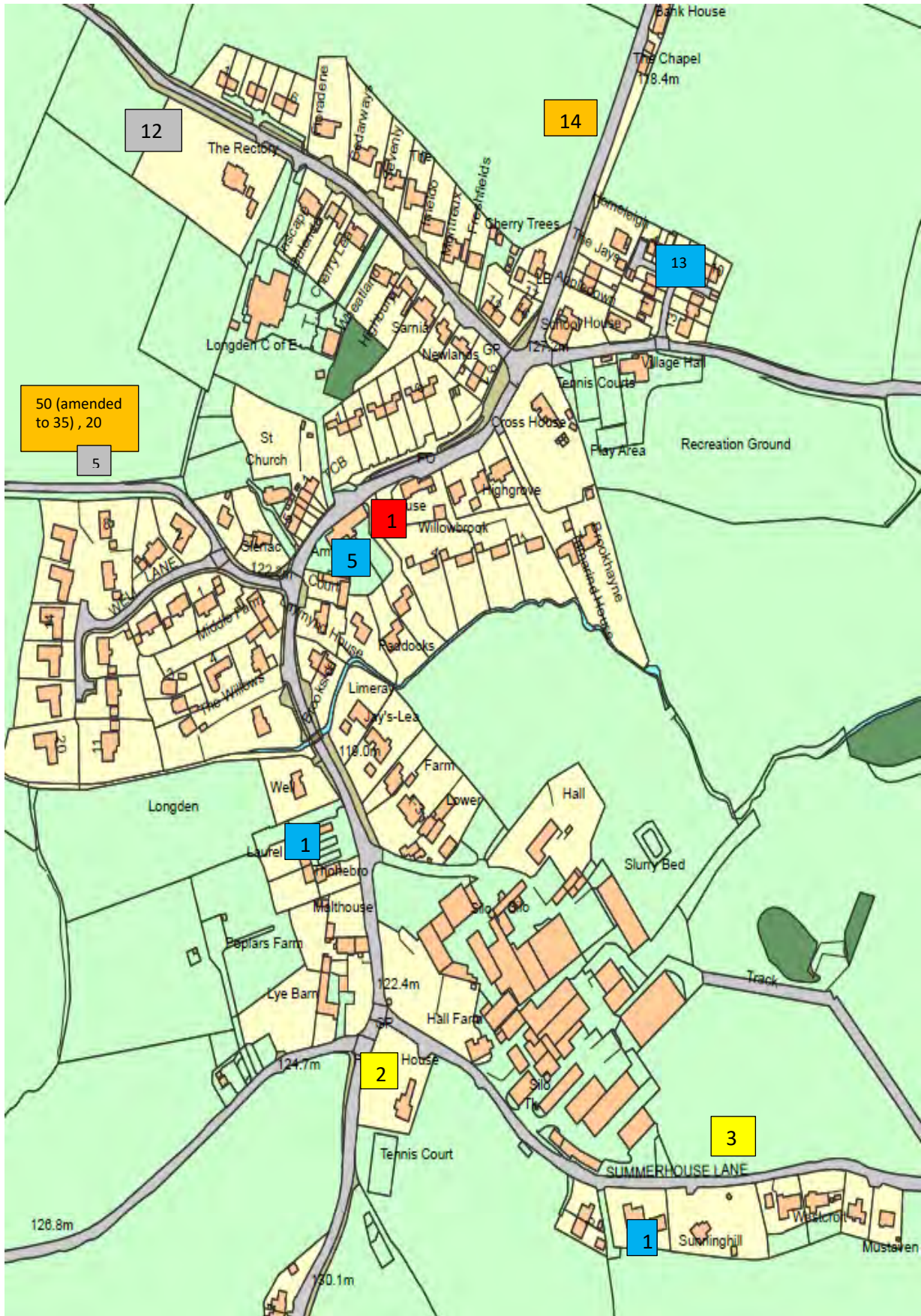
This document, along with the Parish Plan 2017, reflects the views of the residents of Longden following extensive consultation with the community and will be placed on the Parish Council website. In establishing these documents we anticipate that external agencies and decision makers will give full consideration to them.

This document will be reviewed if there are any changes to Council or Government policy that impact on the aspirations of the residents of Longden captured in this document.

Written by: Longden Development Statement Focus Group (a sub group of Longden Parish Plan Committee)

Jackie Ingham, Paul Arnold, Emma Pierce-Jenkins, Karen Lovegrove (Longden Parish Councillor).

Adopted by Longden Parish Council on: 7th February 2018



Appendix 1 – New dwellings built and planning applications since 2013

- Houses built
- Planning applications approved
- Conversion
- Planning applications refused
- Applications not yet determined

Appendix 2: Shropshire Council Local Plan Review 'Managing Development in Community Clusters'

Taken from Shropshire Local Plan Review 'Consultation on Preferred Scale and Distribution of Development – October 2017' (page 31)

Achieving appropriate development in Community Clusters

6.21 It is proposed that a single criteria based policy will manage development within Community Cluster settlements. Reflecting the types of development that are consistent with the criteria in this policy, it is not considered necessary to identify development boundaries; residential development guidelines; or to allocate sites in the Community Cluster settlements.

6.22 The proposed criteria based policy for Community Clusters is:

Managing Development in Community Clusters
<p>In Community Clusters, appropriate development will be encouraged on sites already allocated within the SAMDev Plan; suitable small-scale infill sites; or through the conversion of existing buildings within or immediately adjoining the built form of the settlement.</p> <ul style="list-style-type: none">i. A small-scale site is generally considered to be up to 3 dwellings or 0.1ha.ii. An infill site consists of land with built development on at least two sides, which is also clearly within the built form of a settlement. It should not however result in a cramped form of development.iii. The rural area between Community Cluster settlements is considered countryside, where development is strictly controlled.
<p>Development is considered to be appropriate in Community Clusters where:</p> <ul style="list-style-type: none">1. It is well and clearly related to the existing built form of the settlement and will not result in an isolated form of development.2. It is of a scale and design that is sympathetic to the character of the settlement and its environs, having regard to:<ul style="list-style-type: none">i. Local landscape character and visual amenity; andii. The need to maintain the integrity of strategically important gaps between settlements; andiii. The need to avoid harm to and conserve, enhance and restore natural assets in accordance with current policy MD13, andiv. National Green Belt policy; andv. Relevant policies on sustainable design and development principles; andvi. Design criteria and policies identified within relevant Neighbourhood Plans and Community Led Plans.3. There is sufficient infrastructure capacity, or any infrastructure capacity constraints can be addressed to appropriately meet the development needs.4. Residential development provides an appropriate mix of types; sizes; and tenures of dwellings. Particular regard will be given to the need to provide:<ul style="list-style-type: none">i. Appropriate forms of affordable accommodation, based on local evidence and community consultation where available; andii. Appropriate accommodation for families; andiii. For the needs of particular elements of society, such as the elderly.5. Non-residential sites should meet the needs of their intended occupiers; be designed to complement their setting; and be compatible with neighbouring uses.6. Existing affordable housing and rural exception sites within Community Clusters will be expected to be secured in perpetuity, as they are a valuable source of affordable housing.

7. Any necessary Habitats Regulations Assessment (HRA) is undertaken and demonstrates that the development has no likely significant effects on European designated wildlife sites. Specific avoidance or mitigation measures required to remove any adverse effects (*identified through the Habitats Regulations Assessment (HRA) of the Local Plan Review, or at the project stage*) must be implemented as part of the development.
8. **Proposed development sites, considered in combination with existing commitments; allocations and completions (since 31st March 2016), complement the size; character; and function of the settlement. This will seek to avoid the over development of settlements by assessing:**
 - i. The individual and cumulative impact of the proposed development on the settlement; and
 - ii. The cumulative increase to the size of the settlement; and
 - iii. The number of other development proposals in close proximity or adjacent to the proposal site; and
 - iv. The benefits arising from the development.

6.23 The criteria in this policy have been developed from criteria presented in the Issues and Strategic Options Consultation. These previous criteria were supported by the majority of respondents (approximately 70% of respondents ranked each criterion as either important or very important). However, the specific content of the policy has been refined to take account of the responses received.

6.24 The rural areas between Community Cluster settlements will be considered countryside and subject to countryside policies.



Village crossroads



Local Farming



Post office and shop





Areas residents consider unsuitable for development (taken from Public meeting October 2017)

This map whilst not up-to-date as of January 2018, was chosen because it illustrates the rural character of the village.

Appendix 2

Pulverbatch - Shrewsbury

Arriva 546

Pulverbatch, adj White Horse PH	08:05	10:32	12:32	14:35	15:35	17:32	18:32
Pulverbatch, adj Bebbington Cottages	08:05	10:32	12:32	14:35	15:35	17:32	18:32
Pulverbatch, adj Junction	08:06	10:33	12:33	14:36	15:36	17:33	18:33
Church Pulverbatch, opp Crossroads	08:07	10:34	12:34	14:37	15:37	17:34	18:34
Longden Common, opp Red Lion PH	08:08	10:35	12:35	14:38	15:38	17:35	18:35
Longden Common, opp Long Lane Crossroads	08:09	10:36	12:36	14:39	15:39	17:36	18:36
Longden, adj Poplars Farm	08:10	10:37	12:37	14:40	15:40	17:37	18:37
Longden, opp Post Office	08:11	10:38	12:38	14:41	15:41	17:38	18:38
Longden, opp Crossroads	08:12	10:39	12:39	14:42	15:42	17:39	18:39
Annscroft, adj Crossroads	08:14	10:41	12:41	14:44	15:44	17:41	18:41
Annscroft, adj Meadow Brook Cottages	08:15	10:42	12:42	14:45	15:45	17:42	18:42
Annscroft, adj Hazelcroft House	08:16	10:42	12:42	14:45	15:45	17:42	18:42
Annscroft, opp Lythbank Jct	08:17	10:43	12:43	14:46	15:46	17:43	18:43
Hook-a-Gate, adj Chapmans Cottage	08:19	10:43	12:43	14:46	15:46	17:43	18:43
Hook-a-Gate, adj Cygnets PH	08:21	10:44	12:44	14:47	15:47	17:44	18:44
Hook-a-Gate, adj Redhill Drive Jct	08:23	10:44	12:44	14:47	15:47	17:44	18:44
Meole Village, opp Business Park	08:25	10:45	12:45	14:48	15:48	17:45	18:45
Meole Village, adj Nuffield Hospital	08:26	10:46	12:46	14:49	15:49	17:46	18:46
Radbrook, adj Bank Farm Road Jct	08:27	10:47	12:47	14:50	15:50	17:47	18:47
Radbrook, adj Priory School	08:28	10:48	12:48	14:51	15:51	17:48	18:48
Kingsland, opp Cemetery	08:30	10:49	12:49	14:52	15:52	17:49	18:49
Kingsland, opp Central Drive Jct	08:31	10:50	12:50	14:53	15:53	17:50	18:50
Kingsland, opp South Hermitage Jct	08:33	10:51	12:51	14:54	15:54	17:51	18:51
Coleham, opp Belle Vue Gardens Jct	08:34	10:52	12:52	14:55	15:55	17:52	18:52
Coleham, opp Greyfriars Road Jct	08:35	10:53	12:53	14:56	15:56	17:53	18:53
Coleham, opp Mansers	08:36	10:54	12:54	14:57	15:57	17:54	18:54
Shrewsbury, adj St. Julians Friars	08:38	10:55	12:55	14:58	15:58	17:55	18:55
Shrewsbury, adj The Square	08:39	10:56	12:56	14:59	15:59	17:56	18:56
Shrewsbury, opp Market Hall	08:41	10:58	12:58	15:01	16:01	17:58	18:58
Shrewsbury, opp Rowleys House	08:43	11:00	13:00	15:03	16:03	18:00	19:00
Shrewsbury Bus Station (Stand L)	08:45	11:02	13:02	15:05	16:05	18:02	19:02

Shrewsbury - Pulverbatch

Shrewsbury Bus Station (Stand L)	10:05	12:05	14:07	15:09	17:05	18:05
Shrewsbury, adj County Services	10:07	12:07	14:09	15:11	17:07	18:07
Shrewsbury, adj Dogpole	10:07	12:07	14:09	15:11	17:07	18:07
Shrewsbury, adj Bridge	10:08	12:08	14:10	15:12	17:08	18:08
Coleham, adj Mansers	10:09	12:09	14:11	15:13	17:09	18:09
Coleham, opp Pumping Station	10:10	12:10	14:12	15:14	17:10	18:10
Coleham, adj Belle Vue Gardens Jct	10:11	12:11	14:13	15:15	17:11	18:11
Kingsland, adj South Hermitage Jct	10:12	12:12	14:14	15:16	17:12	18:12
Kingsland, adj Central Drive Jct	10:13	12:13	14:15	15:17	17:13	18:13
Kingsland, adj Cemetery	10:14	12:14	14:16	15:18	17:14	18:14
Radbrook, opp Priory School	10:14	12:14	14:16	15:18	17:14	18:14
Meole Village, opp Nuffield Hospital	10:15	12:15	14:17	15:19	17:15	18:15
Meole Village, adj Business Park	10:16	12:16	14:18	15:20	17:16	18:16
Hook-a-Gate, opp Redhill Drive Jct	10:18	12:18	14:20	15:22	17:18	18:18
Hook-a-Gate, opp Cygnets PH	10:20	12:20	14:22	15:24	17:20	18:20
Hook-a-Gate, opp Chapmans Cottage	10:20	12:20	14:22	15:24	17:20	18:20
Annscroft, adj Lythbank Jct	10:20	12:20	14:22	15:24	17:20	18:20
Annscroft, opp Hazelcroft House	10:21	12:21	14:23	15:25	17:21	18:21
Annscroft, opp Meadow Brook Cottages	10:21	12:21	14:23	15:25	17:21	18:21
Annscroft, opp Crossroads	10:22	12:22	14:24	15:26	17:22	18:22
Longden, adj Crossroads	10:23	12:23	14:25	15:27	17:23	18:23
Longden, adj Post Office	10:24	12:24	14:26	15:28	17:24	18:24
Longden, opp Poplars Farm	10:24	12:24	14:26	15:28	17:24	18:24
Longden Common, adj Long Lane Crossroads	10:25	12:25	14:27	15:29	17:25	18:25
Longden Common, adj Red Lion PH	10:26	12:26	14:28	15:30	17:26	18:26
Church Pulverbatch, adj Crossroads	10:28	12:28	14:30	15:32	17:28	18:28
Pulverbatch, opp Junction	10:30	12:30	14:32	15:34	17:30	18:30
Pulverbatch, opp Bebbington Cottages	10:30	12:30	14:32	15:34	17:30	18:30
Pulverbatch, opp White Horse PH	10:31	12:31	14:33	15:35	17:31	18:31

Appendix 3. Demonstrating increases in CO2 as a result of more housing in Longden

Table 1 - Carbon Dioxide and Miles Per Gallon

Source - <https://www.carbonindependent.org/17.html>

Size	Average mpg	gCO2 per mile*	example cars
Small, medium, large, city and estate cars	52	280	Ford Fiesta, Focus, Mondeo
MPVs and small & medium SUVs	46	310	Kia Sportage, Ford Kuga, Audi Q3
Sports cars and large SUVs	35	410	Range rover, Audi Q7

Note 1000g = 1kg

Table 2a - Carbon footprint to nearby destinations based on one car per household

For employment and shopping

All tables are for single (not return) journeys only

distance to	miles	gCO2 medium car	gCO2 medium SUV	gCO2 large SUV
Shrewsbury	6.5	1820	2015	2665
North Shrewsbury	9	2520	2790	3690
Telford	19.3	5404	5983	7913
Wolverhampton	37.4	10472	11594	15334

Table 2b - Carbon footprint to nearby destinations based on two cars per household

distance to	Miles*	gCO2 medium car	gCO2 medium SUV	gCO2 large SUV
Shrewsbury	13	3640	4030	5330
North Shrewsbury	18	5040	5580	7380
Telford	38.6	10808	11966	15826
Wolverhampton	74.8	20944	23188	30668

*Note miles have been doubled as two cars

3. In addition to this it is worth considering the excess miles covered when compared with a development in Central Shrewsbury

Table 3a - For one car per household – Central Shrewsbury

distance to	excess miles above Shrewsbury	gCO2 medium car	gCO2 medium SUV	gCO2 large SUV
Shrewsbury	0	0	0	0
North Shrewsbury	2.5	700	775	1025
Telford	4.3	1204	1333	1763
Wolverhampton	1.3	364	403	533

Table 3b - For two cars per household – Central Shrewsbury

distance to	excess miles above Shrewsbury *	gCO2 medium car	gCO2 medium SUV	gCO2 large SUV
Shrewsbury	0	0	0	0
North Shrewsbury	5	1400	1550	2050
Telford	8.6	2408	2666	3526
Wolverhampton	2.6	728	806	1066

*Miles have been doubled as two cars

4. In addition to this it is worth considering the excess miles covered when compared with a development such as East Shrewsbury (Oteley Road) beyond the football stadium, which is around 3 miles from the town centre.

Table 4a – For one car per household - From Oteley Road (East Shrewsbury)

distance to	excess miles above Shrewsbury	gCO2 medium car	gCO2 medium SUV	gCO2 large SUV
Shrewsbury	2.2	616	682	902
North Shrewsbury	4.2	1176	1302	1722
Telford	13.6	3808	4216	5576
Wolverhampton	5.8	1624	1798	2378

Table 4b - For two cars per household - From Oteley Road (East Shrewsbury)

distance to	excess miles above Shrewsbury	gCO2 medium car	gCO2 medium SUV	gCO2 large SUV
Shrewsbury	4.4	1232	1364	1804
North Shrewsbury	8.4	2352	2604	3444
Telford	27.2	7616	8432	11152
Wolverhampton	11.6	3248	3596	4756

5. Finally if the future development in Longden amounted to 27 additional properties (as projected), this would amount to the following figures

Table 5a - Carbon footprint to nearby destinations based on one car per household for 27 new dwellings

distance to	miles	gCO2 medium car	gCO2 medium SUV	gCO2 large SUV
Shrewsbury	175.5	49140	54405	71955
North Shrewsbury	243	68040	75330	99630
Telford	521.1	145908	161541	213651
Wolverhampton	1009.8	282744	313038	414018

Conversion note 49140 g = 49.14 kg

Table 5b - Carbon footprint to nearby destinations based on two cars per household for 27 new dwellings

distance to	miles	gCO2 medium car	gCO2 medium SUV	gCO2 large SUV
Shrewsbury	351	98280	108810	143910
North Shrewsbury	486	136080	150660	199260
Telford	1042.2	291816	323082	427302
Wolverhampton	2019.6	565488	626076	828036

To: Mr Eddie West, Principal Planning Policy Officer, Shropshire Council,
Planning Policy, Shirehall, Abbey Foregate, Shrewsbury. SY2 6ND

cc. Councillor R Macey, Portfolio holder for Planning and Housing Development

County Councillor Roger Evans

Paul Carter, Chair, Longden Parish Council

24/02/ 2021

FOR ONWARD TRANSMISSION TO THE INSPECTOR

SHROPSHIRE COUNCIL LOCAL PLAN REVIEW - Consultation Regulation 19

OBJECTION FROM THE LONGDEN VILLAGE ACTION GROUP.

Representing the residents of Longden Village.

ADDENDUM to letter and forms A and B dated 09/01/21

Dear Sir,

We appreciate the extension to the consultation period for Regulation 19 of the Local Plan Review as it has given the residents of Longden further time to consider the matter and this addendum to our letter sent to you in January reflects their further thoughts on the matter. However, an important point to note is that we have not been able to hold any meetings or discuss this matter with households in person at their homes because of COVID restrictions. Under normal circumstances we would have undertaken these activities and thereby informed more residents of the Local Plan Review. Consequently, there will be residents in the village unaware of this Review and they will not have had an opportunity to contribute to the consultations. This particularly applies to a number of older residents who do not have computers or access to email.

1. Longden Village Action Group (LVAG)

Longden Village Action Group was established in 2014 to inform planning in the village. The Group is very actively involved with the Parish Council in influencing planning decisions pertaining to larger sites and members of LVAG were instrumental in establishing a Development Statement for the village which was endorsed by the Parish Council. There are 130 members who have paid a small subscription to belong to the Group and this number represents around half of the households in the village which has around 135 houses and approximately 335 residents, around 70 of whom are children. The high level of membership and active participation reflects the strength of feeling towards planning and the development of the village. Residents care passionately about their environment.

2. Soundness of the Plan

A number of residents have telephoned us to express their great concern and increasing anger at the Council's decision to continue to designate Longden as a hub.

Our earlier letter explained the lengthy consultation we and the Parish Council had undertaken to establish residents' views when the Council first announced that the Local Plan would be reviewed. The village elected to remain a cluster and this was incorporated into the Village Development Statement.

As a very small community and much smaller than the other proposed hubs, the residents are of the view that the proposed allocation of Longden as a hub is not justified because it is not supported by the evidence presented by the hierarchy assessment methodology which is flawed. This is explained in detail in our earlier letter. We note that the National Planning Policy Framework requires such a decision to be 'justified' and in the case of Longden it clearly is not 'justified' because the evidence does not support such a decision.

We ask that the proposal to allocate Longden as a hub is reviewed as a matter of urgency and that the village is allocated as a community cluster in the Local Plan Review, for all the reasons set out in our earlier letter and this addendum.

Please forward our earlier letter, appendices and accompanying forms together with this addendum to the Inspector.

Yours faithfully,

Paul Arnold
Chair, LVAG

Jackie Ingham
Secretary, LVAG