# Shropshire Council: Shropshire Local Plan

## 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: | Nigel Ingham |

### 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: | | Policy: | x | Site: | x | Policies Map: | |
|---|---|---|---|---|---|---|---|

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

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

*(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.*

As a resident of Longden and member of Longden Village Action Group (LVAG) I do not consider the Plan sound or sustainable.
The hierarchy assessment scoring is not sound and therefore the proposal that Longden becomes a hub is not justified as it is not supported by sound evidence. It is not an appropriate strategy.Therefore, with reference to the NPPF this Plan is not sound.
The methodology used by the Council does not have any `weighting' applied so that large settlements are scored the same way as small settlements. For instance, it seems ludicrous that a permanent library facility is scored the same as a mobile library that visits once a month. How can a very small settlement such as Longden with very few employment opportunities be judged on the same basis as a larger settlement? Please see letter from LVAG for more details.
Furthermore I 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.
Zero Carbon target- Building large numbers of housing in rural settlements is not sound. More residents wll need to commute and carbon emissions will increase - see LVAG letter.

*(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.*

Please see the letter submitted by LVAG which I fully endorse.
Concerns regarding the hierarchy scoring methodology have been raised with the Council throughout the consultation period. Has it been scrutinised by an external body? The methodology should be reviewed at this stage. If at a later stage it is found to be flawed it will leave Shropshire in a very precarious position with regard to the 5 year land supply.

*(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:**

**I wish for nominated representatives from LVAG to participate in the hearing sessions because despite wide local community consultation I do not feel that the residents of Longden have been given a fair hearing by Shropshire Council. I have grave reservations about the application of the hierarchy assessment to Longden and feel it is unfair, not logical, not sound and not sustainable.**

*(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: | Nigel Ingham | Date: | 06/02/2021 |
|---|---|---|---|

| Office Use Only | Part A Reference: |
|---|---|
| | Part B Reference: |