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Your Ref: JJ/30667

Our Ref: Longden Village Planning

Email: Planningpolicy@Shropshire.gov.uk

Shropshire Council,  
Shirehall,  
Abbey Foregate,  
Shrewsbury,  
Shropshire SY2 6ND

24<sup>th</sup> February 2021

Dear Sirs,

Re: Shropshire Local Plan Review Consultation Exercise  
LONGDEN VILLAGE REPRESENTATIONS/

I have seen and fully support and endorse the submission and comments made by both the Longden Parish Council and Longden Village Action Group. I have given the matter further consideration and whilst I totally agree with the submissions of the Longden Parish Council and Longden Village Action Group, I would like to express my own detailed concerns over various policies concerning the soundness of "hubs". These are set out in the attached:

- Part A – Personal Details
- Part B – Policy SP2
- Part B – Policy SP7
- Part B – Policy SP8
- Part B – Policy DP7

In the last three days, I have discussed this with a number of neighbours and Longden parishioners, who live close to Longden village.. They all agreed unanimously with and endorsed my comments. They have all expressed a wish that their names and addresses be placed on a list of those supporting this submission ~~which~~ is therefore attached.

Yours faithfully,

J.R. B. Lovegrove –Fielden, FRICS.

Mike Rushton  
Mrs Stevens  
Jill Laskowski  
George Jones  
Joyce Jones  
Rowan Lovegrove-Gray  
Adrian Lovegrove-Gray  
Jill Phillips  
Ian Sturrock  
John Edwards  
Hannah Edwards  
Hefin Edwards  
Janet Edwards  
Anne Price  
Peter Griffiths  
Ruth Griffiths  
John Jones  
Jean Jones  
David Kent  
Helen Kent  
Sarah Howie Kent  
Duncan Howie  
Martin Davies  
Helen Davies  
Joe Davies  
Dave Flint  
Rachel Shingler  
Trystan Davies  
Helen Davies  
Stuart Jones  
Catherine Macfarl  
Lyn Evans  
Dave Breese  
Karen Lovegrove-Fie  
Jos Lovegrove-Fielden  
Anthony Cooke  
Danielle Cooke  
Chris Wheelton  
Sue Wheelton  
Annette Hughes  
John Hughes  
Julie Davies  
Natalie Kane  
Alister Kane  
John Groombridge  
Dorothy Groombridge  
John Groombridge  
Phil Lewis  
Nigel Ingham  
Jackie Ingham  
Paul Arnold  
Jill Arnold

Paul Carter  
Angela Jones  
Terry Jones

Jon Thrift  
Beth Willis

*J Lovegrove-Fielden 27.2.21*

## 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)**.

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### Part B: Representation

Name and Organisation:	Jonathan Lovegrove-Fielden
------------------------	----------------------------

#### 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:	DP7	Site:	Click or tap here to enter text.	Policies Map:	S16
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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).

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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.

Policy DP7 allows for schemes where the provision of affordable housing can be cross-subsidised by a percentage of open market housing on sites that may be located "immediately adjoining" the built form of a Community Hub or Cluster.

It seems to me that this is an invitation for developers to propose development outside the boundary now proposed for Longden on the basis that they wish to construct affordable homes (which are then cross-subsidised by a percentage of open market housing, but having the effect of ensuring that any development within the boundary is retained, in its entirety, for open market housing. I am concerned that this will result in the situation that the village endured during the 2014 – 2020 period.



(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.**

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The Local Plan should be modified to delete Longden from the list of proposed Community Hubs and re-schedule it within the list of Community Clusters. It is suggested that Policy DP7 should be revised such that it does not apply to large scale developments proposals set alongside Community Clusters.

(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:**

Jointly, the Parish Council and the Longden residents withstood the pressure for development that was unauthorised by the SAMDev plan but which was supported by the Council's Planning Officers, in the period 2014 – 2020, resulting in four appeals all of which were dismissed. I believe that the wishes and concerns of the residents should be heard and discussed in open forum at the Public Examination of the Plan.

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Office Use Only	Part A Reference:
	Part B Reference:

Signature:

Date:

26/2/21

Office Use Only	Part A Reference:
	Part B Reference:



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Policy SP2 sets out the manner in which the Council intends to distribute the 30,800 new dwellings that it calculates are needed in the Plan period, across the County. 27.5% of these houses are to be assigned to the rural area. The distribution of this rural element will be focussed on Community Hubs and Community Clusters, with Community Hubs being identified by a "scoring" system based on population and the current level of community services.

This method however, is too rigid and insensitive to the needs and desires of local communities to be adopted as a hard and fast means of determining the future of all settlements in the County.

If the scoring system wrongly categorises a particular village, it will lead to unsuitable levels of development and disharmony in communities.



As the policy stands it will not be effective in achieving its stated aims, and will conflict with the National Planning Policy Framework, as it will,

- a) Not be responsive to local circumstances, or needs, as required by NPPF para 77, and
- b) Not promote sustainable development in rural area or enhance the vitality of rural communities as required by NPPF para 76

*(Please continue on a separate sheet if necessary)*

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The Local Plan should be modified to delete Longden from the list of proposed Community Hubs and re-schedule it within the list of Community Clusters. Policy SP7 should be modified to ensure that large scale proposals for affordable housing outside Community Clusters will not be approved.

*(Please continue on a separate sheet if necessary)*

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*(Please tick one box)*

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

Office Use Only	Part A Reference:
	Part B Reference:



**Jointly, the Parish Council and the Longden residents withstood the pressure for development that was unauthorised by the SAMDev plan but which was supported by the Council's Planning Officers, in the period 2014 – 2020, resulting in four appeals all of which were dismissed. I believe that the wishes and concerns of the residents should be heard and discussed in open forum at the Public Examination of the Plan.**

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Name and Organisation:	Jonathan Lovegrove-Fielden
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#### Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	SP7	Site:	Click or tap here to enter text.	Policies Map:	S16
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The experience of a period between 2014 – 2020 spent by the Parish Council and residents fending off development that they felt inappropriate in the village, has in my recent experience, has aroused unanimous opposition about the likely effect of the Community Hub designation. During 2014- 2020 period jointly the Parish Council and the Longden residents withstood the pressure for development that was unauthorised by the SAMDEV plan but which was supported by the Council's Planning Officers before being rejected by the Planning Committee and on four occasions dismissed on appeal. In particular, Policy SP7.4 says that,

*“additional market housing development outside the settlement boundaries shown on the Policies Map.....will only be considered potentially acceptable where there is clear evidence that the residential development guidance for the settlement appears unlikely to be met over the plan period.....”*



Allocating Longden as a Community Hub with a development boundary and development target of 50 but with no allocated sites, could well lead to a situation where infill sites are soon used up and then pressure to develop outside the boundary will mount. The village could easily find itself having to fight the same development pressure as in the period 2014 – 2020, but this time against a background of a Policy which seeks to achieve an unrealistic level of development for the village. The effect of Policy SP7 in addition to Policy SP8 will be a significant problem for Longden for the whole of the period to 2038.

*(Please continue on a separate sheet if necessary)*

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The Local Plan should be modified to delete Longden from the list of proposed Community Hubs and re-schedule it within the list of Community Clusters. Policy SP 7 should be modified to ensure that large scale proposals for affordable housing outside Community Clusters will not be approved.

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Policy SP8 indicates that Community Hubs are considered to be significant rural centres which will be the focus for development in the rural area. Those settlements identified as Community Hubs are listed in Schedule SP2.2 to Policy SP2. Longden is identified as a Community Hub.

The process of identifying Community Hubs was developed mid-way through the Local Plan Review process, when Longden was not identified as a Hub. However, later re-calculations have caused the village to be re-classified as a Hub. The village has now been provided with a development boundary within which some 50 dwellings are to be accommodated, though no development sites have been allocated.

Longden was classified, in the current Local Plan (the SAMDev Plan element of the Plan) as being a settlement within a Community Cluster with five other villages. That Plan indicated that the amount of devel-

opment to be permitted in the Cluster was up to 50, with up to 30 of these to be built in Longden itself.

Longden Parish Council, and the local residents found this assessment to be acceptable – indeed it was based on their own assessment of need in the settlement. No development boundary was provided, and no specific sites were allocated for development. Nevertheless, the full quota of housing that was considered appropriate for the village in the SAMDev was soon achieved.

In the current Local Plan Review, however, Longden is categorised as a Community Hub and is required to accommodate 50 houses within a tightly drawn development boundary. No development sites are identified and so this figure is to be achieved by infilling and small groups of houses within the development boundary.

The Longden Parish Council and the residents of the village were prepared to accept the 30 dwellings provided for in the SAMDev Plan. However, once the SAMDev plan had been adopted, a series of planning applications were submitted which related to land on the periphery of the built up area of the village and which proposed new housing estates of anything between 6 and 60 houses. These applications were encouraged by the Council's Planning Officers but, thankfully, were rejected by the Council's Planning Committee and, in due course, on four occasions, by the Government's Appeal Inspectors.

I am very concerned that the change in categorisation of Longden to that of a Community Hub from its current designation as part of a Cluster, will encourage further applications on the periphery of the village, which will become difficult to resist.

I do not believe that Longden should have been identified as a Community Hub, or that it should be provided with a development boundary, or that it should be expected to accommodate 50 houses. This is an inappropriate level of development for the village.

Longden village has a population of just 332 (according to Table 9 at para A2.7 of the "Hierarchy of Settlements" documents (Review Evidence Base) and 135 houses. An increase of 37% in the size of the settlement and the resident population is too large an increase for the settlement to assimilate, especially in a timescale of 17 years.

Effectively, only 2 other villages out of the 42 settlements identified as Community Hubs in the Review have a lower level of population than Longden, whilst several other settlements not chosen to be Community Hubs have significantly higher population levels. Cockshutt, for instance, has a population level 2.6 times bigger than Longden (at 859), and yet is not classified as a Hub and has been allocated no new development sites.

I do not believe that the scoring system developed by the Council for identifying Community Hubs and Clusters is sufficiently sensitive to the needs of the communities that it will affect, and needs to be reconsidered. For instance, Longden was awarded a total of 50 points in the assessment whilst the lower cut-off point for a Community Hub is 48 points – the village, then, was right at the limit for designation. The merest change in the scoring for any one of the categories of service upon which the assessment was based, would mean the village would probably drop out of the designation, which would mean no development boundary and no allocation of 50 dwellings to be accommodated in the village. It ought to have been apparent that a village such as Longden did not need the same approach as a village such as say, Minsterley which has an existing population of 1,558 but which is expected to grow by only 155 dwellings (around 10%).

The experience of a period between 2014 – 2020 spent by the Parish Council and residents fending off development that they felt inappropriate in the village, has aroused, in my recent experience, unanimous opposition about the likely effect of the Community Hub designation. During 2014-20 period jointly the Parish Council and the Longden residents withstood the pressure for development that was unauthorised by the SAMDEV plan but which was supported by the Council's Planning Officers before being rejected by the

Office Use Only

Part A Reference:

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Allocating Longden as a Community Hub with a development boundary and development target of 50 but with no allocated sites, will from past experience, undoubtedly lead to a situation where infill sites are soon used up and then pressure to develop outside the boundary will mount. The village will then find itself having to fight the same development pressure as in the period 2014 – 2020, but this time against a background of a Policy which seeks to achieve an unrealistic level of development for the village. The effect of Policy SP7 in addition to Policy SP8 will be a significant problem for Longden for the whole of the period to 2038.

This concern is compounded by the provisions of Policy DP7 which allows for schemes where the provision of affordable housing can be cross-subsidised by a percentage of open market housing on sites that may be located “immediately adjoining” the built form of a Community Hub or Cluster. It seems to me that this is an invitation for developers to propose development outside the boundary now proposed for Longden on the basis that they wish to construct affordable homes (which are then cross-subsidised by a percentage of open market housing, but having the effect of ensuring that any development within the boundary is retained, in its entirety, for open market housing. I am concerned that this will result in the situation that the village endured during the 2014 – 2020 period.

The proposed designation as a Community Hub will adversely affect the balance of the community and fail to develop a sustainable settlement and retain rural vitality. It is not properly justified or evidenced and will not deliver sustainable development.

*(Please continue on a separate sheet if necessary)*

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