

# SHROPSHIRE LOCAL PLAN EXAMINATION

## Stage 1 Hearing Statement

<b>Representor unique Part A Ref *</b>	<b>A0007</b>
<b>Matter</b>	<b>1</b>
<b>Relevant questions nos</b>	<b>4</b>

\*Your unique reference can be found in the Schedule of Respondents (Schedule 3 of document SD014.01) at:

<https://shropshire.gov.uk/planning-policy/local-planning/local-plan-review/draft-shropshire-local-plan-2016-2038-examination/examination-library/earlier-regulation-18-plan-making-stages-of-consultation/regulation-19-pre-submission-draft-of-the-shropshire-local-plan-consultation/>

12<sup>th</sup> May 2022

Submission to the Inspectors. Stage 1 Hearing Statement.

## SHROPSHIRE COUNCIL LOCAL PLAN REVIEW

### 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.

#### Background information

Firstly, it is strongly felt that such a small village, with only 135 residential dwellings, to become a Community Hub is 'unsound'. We are a very small and old village (First mentioned in the Domesday book), 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. Many residents are extremely distressed about the proposals and feel they are being ignored by the Council.

#### 1. 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 had only a very small village shop with a total sales area of only 32 square metres, (Only two persons were allowed in at any one

time during 'Covid 19' restrictions). At the time of the survey on 2020, the 'post office' was delivered over the same small counter as the shop/Convenience store. However, the shop got 4 points and the post office ALSO got 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.

It should be noted that in 2021 the Post Office was closed and the small shop moved into a portion of the Tankerville Arms public house. This alone has taken the points system below the threshold of the village becoming a 'Hub'.

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 shop premises. 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.

## 2. Climate Change

Theresa May’s Government passed legislation in June 2019 to reduce the UK’s carbon emissions to net zero by 2050 (the Council’s SP3 Climate Change policy states that this target is 80% by 2050 and this is incorrect as that was the previous target in the Climate Change Act of 2008).

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 CO<sub>2</sub> 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 CO<sub>2</sub>. 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 CO<sub>2</sub> 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 CO<sub>2</sub> 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 CO<sub>2</sub> 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 CO<sub>2</sub> 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 CO<sub>2</sub> capture and storage.

### 3. 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 four 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.
- iv) Also, one of the reasons taken into consideration in the Hierarchy assessment is population size, but again we feel that the Council is being simplistic – assuming the services are only

for Longden residents when in actual fact Longden's services are accessed by many people living outside of Longden.

4. 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.

Yours sincerely

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