

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: Representa	ation				
Name and Organisation:	LAYLA	DA	vies.		
Q1. To which document do	es this represe	entatio	n relate?	A	
Regulation 19: Pre-Submi	ssion Draft of the	Shrops	hire Local Pl	an	
Sustainability Appraisal of Local Plan	the Regulation 19	9: Pre-S	Submission (Draft of	the Shropshire
Habitats Regulations Asse Shropshire Local Plan (Please tick one box)	ssment of the Reg	gulation	19: Pre-Sul	omissior	Draft of the
Q2. To which part of the do	ocument does	this re	presentat	ion rel	ate?
Paragraph: Poli	cy: 16715 TO	Site:		P	olicies Map:
Q3. Do you consider the Re Shropshire Local Plan is:	egulation 19: P	re-Sul	omission I	Draft o	f the
A. Legally compliant		Yes:	\square	No:	
B. Sound		Yes:		No:	\square
C. Compliant with the Duty to (Please tick as appropriate).	Co-operate	Yes:		No:	\square
Q4. Please give details of v Draft of the Shropshire Loc fails to comply with the du	cal Plan is not	legally	complian	t or is	unsound or
If you wish to support the legal co of the Shropshire Local Plan or its set out your comments.	mpliance or sound	ness of t	the Regulation	on 19: Pi	re-Submission Draft

I believe Cressage should remain as Open Countryside and not be designated a Community Hub so ensuring that no significant housing development will be allowed to take place for the life span of this Local Plan.

There is very strong evidence that the majority of residents in Cressage do not want any more large scale development of the village. In 2019, nearly 300 residents from Cressage responded to Shropshire Council asking not to be classed as a Community hub. In 2020, over 250 residents from Cressage and Cross Houses responded asking to remain Open Countryside.

A full scale needs assessment should be undertaken so that the community can understand exactly what it is that the village wants. Until this is done I am not sure how Shropshire Council Planning Department can understand what is right for our village.

I am concerned that the Parish Council are already taking as read that this Community Hub is a given – they should not be taking this view. This has led to confusion and uncertainty for many residents. The Parish Council has misrepresented the Village views throughout. It feels throughout this whole process that the people of Cressage have not been listened to I would ask that the Inspector at the Public Inquiry specifically looks into this issue.

I ask the Inspector to evaluate how and if, Shropshire council evaluated and processed the previous consultation resonses. Local reports told of staff shortages within Shropshire Council due to the Covid-19 outbreak and many believe this consultation process was unable to happen thoroughly or fairly. How can nearly 300 responses to previous rounds of consultation be ignored? Why was no feedback or acknowledgement given?

Shropshire Council will almost certainly face a legal challenge over its new local plan if it does not take into account how Covid 19 restrictions have impacted people's ability to have their say. Having not stopped this process due to Covid19 and the number of cases still to be heard in the courts, this case may not come up for a few months with the outcome being that the local authority must re-run the entire regulation 19 process again.

There are four 'Gunning principles' for public consultations, including the stipulation that "there is adequate time for consideration and response". The consultation has not taken into account the restrictions on public involvement because of Covid19 restrictions and it is therefore against government guidelines. One of the stated consultations means for people without internet access is through public libraries. Much Wenlock library is now closed, as are all libraries throughout Shropshire, resulting in those without internet access not being able to participate in the consultation process. The demographics of Shropshire on the 2011 census states that 24 per cent of the population (76,030 persons) in the county is over 65 and they are more likely to rely on libraries for internet access and are more likely to respond to consultations. As you can see, the consultation process has not been sound as these demographics have had no access to the resources they need to respond.

The way in which Cressage has been selected for Community Hub status is incorrect. I would make the following arguements. The proposed Hub status is based on a points system and there are several areas of contention in the scoring of services, facilities and employment for Cressage.

Cressage Parish Council (PC) along with Councillor Clare Wild held a public meeting on January 8th 2019. This was attended by over 80 people who all felt strongly against the classification of Cressage becoming a Hub. As well as this, nearly 300 Cressage residents responded to Shropshire Council opposing becoming a Community hub.

The scoring system that determined Cressage as a hub is incorrect, unfair and unjust. Cressage receives the same points for a mobile library as a fixed one, we also get 3 points for a "Place of Worship" which is closed.

Cressage is awarded 3 points for having a Chemist/Pharmacy yet we only have a Dispensing Surgery.

All villages designated as Hubs have been awarded the same points for having a "Public Transport Link" as well as having a "Peak Time Regular Service". However there is a complete lack of differentiation between Cressage and major towns like Shrewsbury.

I request that the Inspector at the forthcoming Public Inquiry comes and inspects these facilities to determine if this points scoring assessment by Shropshire Council is appropriate. Should it be found that a deduction of points is required to be made I believe that Cressage would remain as Open Countryside status which I assume will last for at least 20 years and will mean that no further large scale housing developments will occur within or around the village over this period of time.

The CPRE (the countryside charity) also agree the local plan is unsound because The Draft Plan's targets are too high and its plans for growth are not sustainable, particularly in view of the declared climate emergency. The charity also agrees the process is undemocratic and it still won't get enough affordable housing built.

(Please continue on a separate sheet if necessary)

Office Use Only
Part A Reference:
Part B Reference:

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 O4 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.

I ask that the Independent inspector looks into the points scoring system and the scores Cressage received to be designated a Community Hub. There are obvious irregularities and errors which need urgently addressing.

I ask that the Independent inspector looks at the previous responses to the consultation from Cressage residents. There were many hundreds of objections and it feels these have not been evaluated or assessed fairly by Shropshire Council. I ask the inspector to evaluate the consultation process.

I ask that the Independent inspector reviews the Countryside Charitys objections and responses and considers them in depth.

I ask the Independent inspector to review Shropshire Councils consultation process during Covid19 and the obvious impacts that has had on preventing people from replying.

(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.

O6. 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)?

	note that while this will provide an initial indication of your wish to participate in hearing n(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)
	f you wish to participate in the hearing session(s), please outline why consider this to be necessary:
	(Please continue on a separate sheet if necessary)
Please	e 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.		_	
Signature:		Date:	26-01-2021
	Office Hea Only	Part A Referen	ce:
	Office Use Only	Part B Referen	ce:



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.

Regulation 19: Pre-Submission Draft of the Sustainability Appraisal of the Regulation 1 Local Plan Habitats Regulations Assessment of the Resultan (Please tick one box) Paragraph: Policy: Section 13 3. Do you consider the Regulation 19: Shropshire Local Plan is: A. Legally compliant B. Sound	e Shrops 19: Pre-Segulation this re	Submission 19: Pre-Sepresent	Plan n Draft of the Shropshire Submission Draft of the cation relate? Policies Map:
Sustainability Appraisal of the Regulation Local Plan Habitats Regulations Assessment of the Resident Shropshire Local Plan (Please tick one box) 2. To which part of the document does aragraph: Policy: Section13 3. Do you consider the Regulation 19: Shropshire Local Plan is: A. Legally compliant	this re	Submissio 19: Pre-S epresent	n Draft of the Shropshire Submission Draft of the cation relate? Policies Map:
Habitats Regulations Assessment of the Resident Shropshire Local Plan (Please tick one box) 2. To which part of the document does aragraph: Policy: Section13 3. Do you consider the Regulation 19: hropshire Local Plan is: A. Legally compliant	this re	19: Pre-S	Submission Draft of the sation relate? Policies Map:
Shropshire Local Plan (Please tick one box) 2. To which part of the document does aragraph: Policy: Section13 3. Do you consider the Regulation 19: hropshire Local Plan is: A. Legally compliant	this re	epresent	Policies Map:
Policy: Section 13 3. Do you consider the Regulation 19: hropshire Local Plan is: A. Legally compliant	Site:		Policies Map:
3. Do you consider the Regulation 19: hropshire Local Plan is: A. Legally compliant	Pre-Sul		Map:
hropshire Local Plan is: A. Legally compliant		bmissio	n Draft of the
A. Legally compliant	Yes:		
B. Sound			No: 🔽
	Yes:		No: 🗹
C. Compliant with the Duty to Co-operate (Please tick as appropriate).	Yes:		No: 🗹
4. Please give details of why you consideraft of the Shropshire Local Plan is not ails to comply with the duty to co-operate you wish to support the legal compliance or sound the Shropshire Local Plan or its compliance with the out your comments.	legally ate. Ple dness of	complicase be a the Regula	ant or is unsound or as precise as possible ation 19: Pre-Submission D
Within the preferred sites consultation documen hub'.	t it clear	ly states t	that Cressage is a 'propos
However, the Local plan says that Cressage has	been a l	hub since	2015.
This is totally inaccurate, erroneous and mislead	ling.		
t means that the Local plan is not legally bindir	ng becaus	se of misi	nformation and error.

(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.

forward	d your suggested revised v	wording of any policy or text	. Please be as preci	se as possible.
There		take the results of a cons	ultation "conscient	ciously into
		uncil have met this require nin the Local Plan documen		these serious
		informed respondants and plaint with the Councils dut		the process isn't
I ask	that the inspector urgen	tly reviews these errors and	d restarts the cons	ulatation process.
		/Dleace ron	tinue on a cenarat	e sheet if necessary)
0/-		The second secon		
suppor	ting information necessa cation(s). You should no	tation you should provide s ry to support your represe t assume that you will have	ntation and your s	uggested
		missions may only be m sues he or she identifies		
06 1	vour ronrocontation	s le coalina a madific	tion to the Boa	vulation 10: Dea
		n is seeking a modifica hropshire Local Plan,		
		hearing session(s)?	uo you conside	r it necessary to
A Comment		provide an initial indication	of your wish to pa	articipate in hearing
		at a later point to confirm y		
	No, I do not wish to pa	rticipate in hearing session	(s)	
	Yes, I wish to participat	te in hearing session(s)		
	(Please tick one box)			
	you wish to participonsider this to be ne	pate in the hearing sea	ssion(s), please	outline why
		(Please conti	inue on a separate	sheet if necessary)
		Il determine the most appr		
		they wish to participate in late when the Inspector ha		
examii		ace more the impeded ma	o racinemed are ma	tiers and issues for
Class	was l		2	11
Signat	ure:		Date:	02/02/2021
		Office Hea Only	Part A Reference	ce:
		Office Use Only		

Part B Reference:



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.

Name and Organisation:	MISS LAYLE	DAVIES	
Q1. To which document	does this repre	sentation relate	7
Regulation 19: Pre-Sub	mission Draft of th	e Shropshire Local	Plan
Sustainability Appraisal Local Plan	of the Regulation	19: Pre-Submissio	n Draft of the Shropshire
Habitats Regulations As Shropshire Local Plan (Please tick one box)	ssessment of the R	egulation 19: Pre-S	Submission Draft of the
Q2. To which part of the	document does	this represent	ation relate?
Paragraph: F	Policy: 16-25 51	3 Site:	Policies Map:
Q3. Do you consider the Shropshire Local Plan is:		Pre-Submission	n Draft of the
A. Legally compliant		Yes:	No: 🗹
B. Sound		Yes:	No: 🗹
C. Compliant with the Duty (Please tick as appropriate)		Yes:	No: 🗹
Q4. Please give details of Draft of the Shropshire I fails to comply with the	ocal Plan is no	legally compli	ant or is unsound or

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.

There is a common law duty to take the results of a consultation "conscientiously into account". Therefore the inspector must investigate the fact that building more houses than the required amount in Shropshire is incompatible with the government's legally binding commitments to tackle the climate emergency.

The additional proposed number of houses breaches the government's legally binding commitment to hit net zero carbon by 2050.

It is important that decisions of local authorities that have significant ramifications for the environment for years to come be taken in a free and fair manner, not dictated by central government as appears to have happened here.

To confirm, there is a common law duty to take the results of a consultation "conscientiously into account". Therefore the inspector must investigate the fact that building more houses than the required amount in Shropshire is incompatible with the government's legally binding commitments to tackle the climate emergency.

Regul comp you h	ation 1 liant an ave ide	9: Pre-Su d sound, ntified at	bmission I in respect Q4 above.	raft of of any l	the Shrop egal comp		lan legally undness matters
examin Draft o	ation. You f the Shro	u will need to opshire Local	o say why ead Plan legally d	th modific compliant	ation will ma or sound. It	will be helpful if	ni 19: Pre-Submission you are able to put
					_	lease be as preci	
Shrop	shire is i	ncompatible					required amount in ents to tackle the
Сшпас	te emerg	епсу.					
						•	
			•				
				(Pl	ease contin	ue on a separat	e sheet if necessary)
After to based Q6. If Submipartic Please session Q7. If	this stag on the r your re ission t ipate in note that n(s), you No, I do Yes, I w (Please	e, further in atters and epresenta of the examinate while this may be asked not wish to particular one box	submission d issues he tion is see e Shropsh tion heari will provide a ed at a later participate cipate in hea	king a rine Localing session initial in point to coin the hearing session the hearing	the madientifies for nodification of on(s)? Indication of confirm your session(s) on(s)	on to the Reg you conside your wish to par r request to par	the Inspector, pulation 19: Pre- r it necessary to rticipate in hearing ticipate.
· ·					•	· .	
those v	who have firm your	indicated ti	hat they wish	ine the m to partic	ost appropi ipate in hea	riate procedure aring session(s).	sheet if necessary) to adopt to hear You may be asked tters and issues for
Signati	ure:				•	Date:	02/02/2021

Office Use Only

Part A Reference:

Part B Reference:



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.

housing guideline for Cressage.

Part B: Repre	sentati	on				
Name and Organisat	ion:	LAYLA	DAVI	ES.		
Q1. To which docur	ment does	this represe	entatio	n relat	e?	
Regulation 19: P	re-Submissio	n Draft of the	Shrops	hire Loca	l Plan	
Sustainability Ap	praisal of the	Regulation 1	9: Pre-S	Submissio	on Draft of the	Shropshire
Habitats Regulation Shropshire Local (Please tick one	Plan	ent of the Reg	gulation	19: Pre-	Submission Dr	aft of the
Q2. To which part o	of the docu	ment does	this re	presen	tation relate	?
Paragraph:	Policy:	Section13	Site		Polici Ma	10.15
Q3. Do you conside Shropshire Local Pl		lation 19: P	re-Su	bmissio	n Draft of th	ie
A. Legally compliant	ali is.		Yes:		No: 🔽	1
B. Sound			Yes:		No: 🗸	1
C. Compliant with the		-operate	Yes:		No: 🔽	1
Q4. Please give det Draft of the Shrops fails to comply with If you wish to support the of the Shropshire Local Poset out your comments.	hire Local the duty e legal compl	Plan is not to co-opera iance or sound	legally te. Ple ness of	compliase be the Regul	ant or is un as precise a ation 19: Pre-S	sound or s possible. ubmission Draft
Within appendix B.13 see the responses of lo						nmary you can
The breakdown of view	vs were as fo	llows -				
A.8. Question 32 (a) Q identification of Cressa			vs on w	hether re	spondents agr	eed with the
Of the unique respond of Cressage as a Comma a Community Hub; and Cressage as a Commu	munity Hub; d • 12% resp	 82% did not 	agree 1	with the i	dentification of	f Cressage as
A.9. Question 32 (b) Q	uestion 32 (b) asked respo	ondents	if they a	greed with the	preferred

Of the unique respondents that completed this question: • 5% agreed with the preferred housing guideline for Cressage; • 84% disagreed with the preferred housing guideline for Cressage; and • 11% responded don't know/ no opinion on preferred housing guideline for Cressage.

A.10. Question 32 (c) Question 31 (c) asked respondents if they agreed with the proposed development boundary for Cressage.

Of the unique respondents that completed this question: • 6% agreed with the proposed development boundary for Cressage; • 82% did not agreed with the proposed development boundary for Cressage; and • 12% responded don't know/ no opinion to the proposed development boundary for Cressage.

A.11. Question 32 (d) Question 32 (d) asked respondents if they agreed with the preferred housing allocation CES005 in Cressage.

Of the unique respondents that completed this question: • 5% agreed with preferred housing allocation CES005; • 83% did not agreed with preferred housing allocation CES005; and • 12% responded don't know/ no opinion on preferred housing allocation CES005.

It is very clear that the well over 82% of residents opposed the identification of Cressage as a comminuty hub.

It is also cleat the Shropshire Council have made a serious error in their calculations of the totals because they have classed identical responses as a single response. They only classed unique responses as singular responses. Over 300 people replied using pre filled forms!

This is totally undemocratic and needs urgent investigation. Is it legal to group together identical responses as one when they have come from indeivdual people? They have silenced the voices of hundreds of residents who responded using the same answer. Their voices should still be heard.

(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.

There is a common law duty to take the results of a consultation "conscientiously into account".

I do not believe Shropshire Council have met this requirement considering the extremely strong opposition to community hub status from within the community that has been ignored.

I also believe they have broken the law and/or rules of consultation by classing identical invidual responses as one response.

These issues need urgent investigation and reconsideration.

(Please continue on a separate sheet if necessary)

Office Has Only	Part A Reference:
Office Use Only	Part B Reference:

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.

	n(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)
	f you wish to participate in the hearing session(s), please outline why onsider this to be necessary:
	*
	(Please continue on a separate sheet if necessary)
those to con	(Please continue on a separate sheet if necessary) e note: The Inspector will determine the most appropriate procedure to adopt to hear who have indicated that they wish to participate in hearing session(s). You may be asked firm your wish to participate when the Inspector has identified the matters and issues for hation.

Office Use Only

Part A Reference:

Part B Reference: