



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:	Carey Cox
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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: Policy: Site: Policies Map:

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 checked="" 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 checked="" 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.

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.

(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 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. ✓

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No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

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Date:

3/2/21

Office Use Only

Part A Reference:

Part B Reference:



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There is a common law duty to take the results of a consultation "conscientiously into account". Therefore the inspector must investigate the responses of nearly 300 residents from Cressage opposing becoming a Community hub in the previous round of consultation and why feedback was not given and changes were not made considering the strong response from the community about the way in which Cressage has been selected for Community Hub status being incorrect. There are several areas of contention in the scoring of services, facilities and employment for Cressage and it is clear the scoring system that determined Cressage as a hub is incorrect, unfair and unjust.

I request that the Inspector at the forthcoming Public Inquiry comes and inspects the village facilities to determine if the 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 will last for at least 20 years. ✓

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I ask that Shropshire Council and the Inspector disclose the numbers of people in support of Cressage becoming a Community hub status compared to those who opposed it. I ask this as a formal request for information under the Environmental Information Regulations 2004. ✓

I request that the Inspector comes and inspects the village facilities to determine if the 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 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. ✓

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Part B Reference:



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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 they have not taken into account how Covid 19 restrictions have impacted people's ability to have their say and have not stopped this process due to Covid19.

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% of the population in the county is over 65 and are more likely to rely on libraries for internet access. 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. ✓

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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. ✓

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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 responses. 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 arguments. 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.

See additional sheets →

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:

additional
sheets

Mrs Carey Cox
72 Severn Way
Cressage
Shrewsbury
Shropshire
SY5 6DS

Monday, 1st February 2021

To whom it may concern,

Ref: Vehemently opposed to Cressage becoming a Hub.

I truly believe Cressage has been **INCORRECTLY** categorised as a "Hub". Cressage is deemed to have a number of services, which do not appear to exist; however, these are the public facing services, which the public has access to:

1. **Doctors Surgery & Dispensary** - Staff travel from other areas and the dispensary is only available for prescriptions provided by the doctor. You cannot go in and just purchase medication.
2. **Christ Church Primary School** – providing primary education for Cressage, Cross Houses, Cound, Coundmoor, Harley, Harnage and the surrounding area. This past year and I believe the one before has been at maximum capacity.
3. **Village Shop** – find they do not have a sufficient range for ones needs.
4. **Cressage Social Club** – public facility for drinks, but you have to be a member.
5. **Christ Church** – closed indefinitely.
6. **Mobile Library** – arrives for 1 hour a week during working hours; unwitnessed.
7. **Bus 436** – travels through the village once per hour; Shrewsbury to Bridgnorth; vice versa. The current pandemic means they can only half fill the bus. People of the village have had the bus sail past on lots of occasions this past year, meaning they miss college / work etc. Taxi's don't like to travel out this way; plus, it is not cost effective when the taxi takes up half a person's wages for the day.
8. **Old Hall Cressage** – three rooms available (B&B)
9. **The Old Eagles Inn** – no longer a pub and has been derelict in excess of 5 years. It has now received Grade II listed status; there is word the building will now be converted into a single residential dwelling.
10. **A458** – a fast moving road which often tears through the village at breakneck speed; but this is the situation for many villages throughout the country; on interlinking routes.

From the information provided above, there are not nearly enough services to entice the surrounding villages; in fact, they are more likely to travel to either Much Wenlock, Shrewsbury or Telford for their own particular needs. Cressage is a village on the outskirts of the county, which just happens to have one or two amenities, so Cressage has been deemed a central focal point. There aren't any pubs, takeaways, hairdressers, dentists, opticians, allotments, farm shops, bakery, butchers, greengrocers, or post office; these facilities are all absent.

It is well known that there is a point grading system, whereby Cressage fulfilled the criteria to meet "Hub" status. It is unclear where this information can be found; however, it has been referenced a lot over the past 5 years; the time my family has lived in the village. It is believed that the criteria has been stretched out of shape quite dramatically in order to make Cressage a "Hub". I vehemently disagree with the "Hub" status and feel we would be better suited to **OPEN COUNTRYSIDE** status.

Much Wenlock is 4 miles away; and this is where the older children of the village have to go for their education; this school "William Brookes" is already at capacity. In addition, a further 1000+ houses are proposed at Ironbridge Power Station site and more in Buildwas, which will further stretch services. Cross houses is also 4 miles away, but like us, they only have one or two amenities. Both Shrewsbury and Telford are approx. 10 miles away, which is where everyone travels to for work, their household needs and family entertainment.

Cressage **DOES NOT** provide jobs for local people. Self-employed people, which is entirely a different matter, are very unlikely to be an employer of local people. Anyone of working age has to commute out of the village on a daily basis.

Future proposals to build a significant number of houses around the village will extensively unbalance the status-quo; it is likely to strip the village of its individual identity and character. Cressage is a close-knit community, which is at risk of being destroyed by the additional layer of houses. **Cressage is a rural village, which needs protecting, not destroying.**

Sustainability

There are no proposals to generate employment land, therefore each additional house built, will contribute negatively to the CO2 emissions as they will continue to leave the village every day:

- It is the government's target to reduce CO2 emissions by at least 80% by 2050 (HM Government, 2020).
- Each home in the village is heated by either LPG or Heating Oil; fossil fuels; something the government wants to move away from.

- Each vehicle in the village; travelling a minimum 20 miles per day is also negatively contributing to the CO2 emissions. Yes, everyone is slowly moving to electric vehicles, but that is still in the future.

Services

Each new resident who moves to the village will put additional strain on an already over-stretched doctors' surgery and a school which does not have the capacity for any additional children. Of course, children of Cressage will become priority over other villages that rely on the primary school. So, where do the children of other villages go? This is the same with the doctors' surgery; Cressage residents will become priority; detriment to the surrounding villages. It is something that certainly needs further assessment, the system as it stands will not be able to cope with any additional people.

Future Housing

The villagers of Cressage have repeatedly expressed that they do not wish to see additional housing; particularly aimed at proposals for such large developments. It is clear that house prices have rocketed over the past 30 years, to a point where the next generation are having to save for decades before purchasing their first home; this is not acceptable. The "Affordable Housing" **WILL NOT** be affordable for local people. The 20% discount is not nearly enough to help people to buy their first home; although villagers may possibly be interested in seeing development of a range of homes; heavily weighted for the elderly and for first time buyers.

Too often the large corporate housebuilders are constructing homes that aren't suitable for the new occupants. They control the flow of development, which causes prices to increase. This is especially notable since the government stopped building houses back in the 1980s.

The villagers want more say on what goes on in Cressage. **We don't want white elephants to be built.**

CRESSAGE NEEDS:

- Homes for the people of the village (a range of houses serving first time buyers and the elderly).
- They **MUST** be affordable.
- They **MUST** be adaptable.
- They **MUST** have sufficient parking (no jobs in the local area, commuting every day, adult teenagers living at home because they can't get a mortgage).
- They **MUST** have space (a garden is necessary, Cressage is not a town or a city).
- They **MUST** be energy efficient (moving away from fossil fuels).
- They **MUST** be able to serve generations of the future (affordability).
- They **MUST NOT** be squashed in like sardines (as we have seen time and time again; Lawley in Telford is a prime example; the gardens are smaller than the footprint of the house).

The worry is that a large corporate house developers will swoop in, trash the village, contribute to additional CO2, not provide any new infrastructure and construct a town in a countryside village setting. This is not what the future of Cressage should look like.

Previous Consultations

Two years ago, in excess of 300 signatures were received from people in the village. Collectively, it was deemed that the public consultation form was very difficult to understand and complete. Collectively a group of villagers took days out of their own schedule; digested the consultation form, completed it as best as they could (generic) and contacted as many people as possible to discuss the future proposals of Cressage. The same information was consistently shared throughout the village. Each villager read the paragraphs on the "generic" forms. Most were interested in listening to the future proposals and were very keen to sign the consultation form in disagreement with Hub status. It was surprising to find so many people who were unaware of Shropshire Council's future proposals.

When the signatures were presented to the council; photos were taken of the transaction, but to date; having spoken to people from around the village, no responses have been received from Shropshire Council acknowledging the completed forms.

It has been learned that 300 signature were counted as one, due to the generic information. This is disgusting. People were not forced to sign the forms; they did this willingly. Once again the villagers have not been listened to.

Parish Council

I am **DISGUSTED** by the parish council's attitude. I have sat in on meetings and they are so very **RUDE**. They dismiss people's comments and ignore the voice of the community. I repeat, they **DO NOT** stand for the voice of our community. They dismissed the possibility of producing a Neighbourhood Plan, which I know has proven successful in numerous communities of other Local Authorities. The Parish Council claim they are too expensive to produce. I am led to believe support can be directly provided by Shropshire Council. Villagers need to know more about Neighbourhood Plan's and to decide for themselves whether they want to proceed forwards with a Neighbourhood Plan.

The Parish Council do not communicate effectively with the villagers. They seem secretive. They refuse to discuss openly about matters. They seem to have an ulterior motive, and that is not to work with the villagers.

One big question I have is, why do we have to continually go through the same consultation process time and time again about the same subject. The villagers are fed up going through the same process; their views have not changed, and I truly believe that Shropshire Council are hoping the villagers will eventually run out of steam, roll over and let Shropshire Council trample all over them.

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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 Charities 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. ✓

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