

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

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| Name and Organisation: | MR. BRIAN OAKLEY |
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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?

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|------------|--|---------|----|-------|--|---------------|--|
| Paragraph: | | Policy: | 13 | 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.

I suggest that the process has not been legally compliant because there has not been any genuine consultation. At LA level over 270 submissions were made (my own included) and yet we did not receive any response at all from the LA. A number of issues were raised as to the validity of the points scoring system which has the potential to designate Cressage, for planning purposes, as a Hub but there was no response from the LA. A genuine consultation process would have required the LA to justify the point scoring system to the objectors. The Cressage, Harley & Sheinton Parish Council did attempt to consult with the community in Cressage but ignored the views expressed at that meeting and on the advice of the County Councillor for the Severn Valley Ward and voted to accept the proposal that Cressage be designated as a Hub. This was despite an overwhelming majority of those present (This was before Covid) voting to remain as Open Countryside. Despite two parish meetings (via zoom) with the majority again voting to remain as Open Countryside the PC has ignored the views of Cressage residents. As much of the consultation has been via zoom because of Government restrictions many residents have been discriminated against because they do not have the technology to get involved in any form of consultation. Apart from making a three week

extension to the so called consultation process no other account has been taken by the LA to help and support those it has clearly discriminated against.

My main argument is that Cressage was wrongly designated as Hub based on the arguments below which have already been put to the LA but without any response.

The scoring system is unfair and unjust. Cressage receives the same points for a mobile library as Bayston Hill, also a Hub, but it has a permanent Library open for three and a half days per week. Shrewsbury with a County & Reference Library as well as permanent facilities at Sundome and Monkmoor scores only two points more than Cressage thus highlighting the unfairness of the scoring system. If a realistic comparison is made then Cressage should be awarded no more than two points for this facility. Other designated Hubs are in the same or similar position as Cressage thus exposing a system of scoring which is not fit for purpose.

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. Cressage has one bus per hour into Shrewsbury (not in the evenings) whilst Shrewsbury has numerous town routes as well as country busses in and out throughout the day. Public transport in Shrewsbury also includes the train with regular services to all points of the compass. It cannot in any circumstances be right to award the same number of points. We suggest that in both categories Cressage should be awarded no more than three points. At least this would be equitable.

We also get 3 points for a "Place of Worship" which only has festival services and for the rest of the year is closed, other than the 35 other days it is open to fulfil the terms of grant aid given for renovation work. This will be the case until 2023 when that obligation finishes. The Parish Council, in their argument to justify Cressage becoming a Hub, suggests that an increased population could well invigorate the Church. The Church of England in their latest published statistics (2016) on Church attendance "*The Church of England's Worshipping Community was 2.0% of the population in 2016. The overall attendance in an average week in October 2016 was 1.7% of the population, rising to 4.6% of the population at Christmas*" On this basis we can expect 4 or 5 new communicants. Importantly though growth in the Christian Church is in the BAME communities and not in white middle class areas such as ours.

The inside of the Church needs urgent maintenance, the clock does not work and the local Clergy have said that with the absence of a PCC there is no chance of any remedial work being undertaken. Given that other villages classed as Hubs having a Church with a regular pattern of services also get 3 points it cannot be right that Cressage is treated the same. The most a "Place of Worship" in Cressage warrants is 1 and after 2023 that will go.

We are awarded 3 points for having a Chemist/Pharmacy yet we only have a Dispensing Surgery. Below in green, as defined on the NHS website, is what can be expected from a Pharmacy. Clearly Cressage does not meet this criteria and so the 3 points given for this facility should be deducted. Given the long waiting time now to see a Doctor or a Nurse it is impossible to see how the Practice would cope with an increased population.

Pharmacists are experts in medicines and use their clinical expertise, together with their practical knowledge, to advise you on minor health concerns, such as coughs, colds, aches and pains, as well as [healthy eating](#) and [stopping smoking](#). Pharmacists can also help you decide whether you need to see another medical health professional. They can help you consider the alternatives next time you're thinking of making a GP appointment.

(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.

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

There is an urgent need for the Independent Inspector to rule on the legitimacy of the whole process. Clearly there has not been a proper and fair consultation process either at LA or Parish Council level. Views have been expressed at both these levels but there has been no engagement in a consultation process at all. No account has been made of the impossibility of communities meeting in this era of Covid-19, which as suggested above discriminates disproportionately against older people.

Given that the argument for designation as Hub status is based on an incorrect scoring process it follows that the outcome in this instance is unsound and should be revisited.

The Inspector must consider the 270 responses made at the earlier consultation stage, the ones ignored by the LA with no evidence that they were even looked at.

I would like a response from the Inspector as to the need in Shropshire for the total houses needed and if brownfield sites have been fully exhausted.

Did the LA take into consideration proposals for development put forward by the Raby Estate

(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:

At the point of writing I have no confidence that any arguments have been listened to and unless I am able to present views in person I have no confidence that they will be in the future.

(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.

Signature:

Date:

Office Use Only

Part A Reference:

Part B Reference: