

## 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:	ELIZABETH ASSER
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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:	<input type="text"/>	Policy:	<input type="text" value="5. Settlement Policies S13.2"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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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 checked="" 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 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 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 my 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. Shropshire has an adopted Local Plan covering the Plan Period 2006-2026. (Core Strategy adopted 2011 and SAMDev Adopted in December 2015.) Cressage is not mentioned in this as a community hub. But the draft local plan for 2016-2038 describes it as a community hub and does not make it clear that this hub status is also draft.

It feels throughout this whole process that the people of Cressage have not been listened to. I would ask that the Independent inspector at the Public Inquiry specifically looks into this issue.

I ask the Independent inspector to assess 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 affected people's ability to have their say. Having not stopped this process due to Covid-19 and the number of cases still to be heard in the courts, this case may not come up for a few months. The outcome then is 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 Covid-19 restrictions and it is therefore against government guidelines. One of the stated consultation 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 people 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. These demographics have had no access to the resources they need to respond therefore the consultation process is unsound.

The process of so-called 'consultation' feels as though its intention is to make it so difficult for people that they will give up. Why has it been online only? Why did I not receive anything in the post?

Then there is the way in which Cressage has been selected for Community Hub status - it is incorrect. 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 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

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	Part B Reference:

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

It is given 3 points for a "Place of Worship" which is actually closed.

Cressage is awarded 3 points for having a Chemist/Pharmacy - we have a Dispensing Surgery that is only available for certain categories of patients and does not sell anything as a Chemist/Pharmacy would.

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. Cressage bus transport is limited to the Shrewsbury/ Bridgnorth route.

Cressage can't be described as a 'significant rural service centre' - one of the factors in being a community hub. It doesn't have the infrastructure or services to supply the needs that a growth in housing would demand.

Settlements identified as community hubs are generally considered to offer sufficient services and facilities to meet the day-to-day needs of their resident communities. Whereas settlements classified as 'other rural settlement' are likely to have at least a partial reliance upon other settlements to meet certain day-to-day needs.

Cressage is in the 'other rural settlement' situation – it has a:

- nursery/ primary school
- village shop selling basic food stuffs and newspapers
- village hall
- village social club – private, for members only
- GP surgery with rural dispensary
- private chiropody service
- bus service Shrewsbury/ Bridgnorth only
- mobile library service stop - alternate weeks only for 20+25 minutes
- redundant church
- derelict pub

Cressage residents rely on Much Wenlock and Cross Houses for:

- meat/ fish
- church
- post office
- pub
- cash machine
- fuel
- bus to Telford from Much Wenlock

I do not want Cressage to have community hub status. I want it to remain as an area of Open Countryside.

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.

**Additional comments**

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1. Cressage Parish Council (PC) along with Councillor Clare Wild held a public meeting on January 8<sup>th</sup> 2021. This was attended by over 80 people who all felt strongly against the classification of the village becoming a Community Hub. However, the PC then released a statement saying there was 'no clear view' from the people in attendance. Such disregard for residents' views is appalling and unacceptable.
2. It feels throughout this whole process that the people of Cressage have not been listened to. When issues are raised or scoring questioned, we have been accused of making 'protests' and 'ambushes' by our PC. Such language is undesirable and does bring into question the purpose of a PC if they are not going to represent the true views of the village or even listen.
3. 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 Sundorne 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.
4. 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.
  - a. Cressage has one bus per hour into Shrewsbury (not in the evenings) while Shrewsbury has numerous town routes as well as country buses in and out throughout the day.
  - b. 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.
  - c. I suggest that in both categories Cressage should be awarded no more than three points. At least this would be equitable.
5. Cressage also gets three points for a 'Place of Worship'.
  - a. Cressage Church 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.
  - b. The PC, 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 Cressage can expect four or five new communicants.
  - c. Importantly though, growth in the Christian Church is in the BAME communities and the Orthodox Christian church and not in predominantly white middle class areas such as Cressage.
  - d. 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.
  - e. Given that other villages classed as Hubs that have a church with a regular pattern of services also get three points, it cannot be right that Cressage is treated the same. The most a "Place of Worship" in Cressage warrants is one and after 2023 that will go.
6. Cressage is awarded three points for having a Chemist/Pharmacy yet we only have a Dispensing Surgery. Below, as defined on the NHS website, is what can be expected from a Pharmacy:

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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.

Clearly Cressage does not meet these criteria and so the three 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.

7. As mentioned, it is clear that our PC do not have the resources to let people know about these new housing schemes. If the Shropshire's parish councils don't have the resources to properly publicise these massive changes to our communities, I suggest that Shropshire Council needs to take on the task and publicise the situation. It is after all Shropshire Council that is pushing for these developments to take place.
8. I want to challenge the advice to residents that these plans are 'set-in-stone'. These plans are regularly refreshed every five years and are subject to change. Residents are being promised that agreeing to become a Hub will prevent future development, but this is unfortunately not true. And a review could quite possibly mean additional sites.
9. Shropshire Council says there is a requirement for 10250 new houses in the period up to 2036. This seems not to take account (according to our County Councillor at the last PC meeting) of the proposed developments at the Buildwas Power Station site (1000+ houses) or that at the redundant Clive Barracks.

*(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.*

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 is not clear that these have been evaluated or assessed fairly by Shropshire Council. I ask the Independent inspector to evaluate the consultation process.

I ask that the Independent inspector reviews the Countryside Charity CPRE's objections and responses and considers them in depth.

I ask the Independent inspector to review Shropshire Council's consultation process during the Covid-19 pandemic 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.**

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**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:**

*(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: 19/02/2021

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