

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:	Alistair Horn, Ford Parish Council
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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:	Hierarchy of Settlements & Open Space Assessment & para 5.234	Policy:	S16.2	Site:	FRD011	Policies Map:	S16 – Ford Map
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:
- C. Compliant with the Duty to Co-operate Yes: No:

(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.

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Please refer to attached sheets & to attached petition which shows that the vast majority of Ford residents do not support the designation of Ford as a community hub. With the overwhelming positive response to the statement of the petition – some 258 of 304 households – this submission to the planning inspectorate by Ford Parish Council carries a mandate from the community and represents the views of over 93% of residents.

(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.

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Ford should not be scored as a hub in the settlement hierarchy document; this document is flawed. Ford should no longer be designated as a community hub in Policy S16.2 and associated maps and supporting text. Ford should instead be Open Countryside

(Please continue on a separate sheet if necessary)

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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)?

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- 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:

Office Use Only	Part A Reference:
	Part B Reference:

The Local Plan will have a major effect on the future of Ford, and as the elected local authority for Ford parish, the parish council needs to have the opportunity to present its views to the Inspector and to have a dialogue with other stakeholders.

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Signature: A.Horn

Date: 25/02/2021

Office Use Only

Part A Reference:

Part B Reference:



Regulation 19 Pre-Submission Draft Shropshire Council Local Plan Consultation
Additional sheets to supplement Ford PC Comments on the consultation.

Ref Policy S16.2

Question 4

WHY THE DESIGNATION OF FORD AS A COMMUNITY HUB IS UNSOUND AND ASSOCIATED MAP & EVIDENCE

The Parish Council unanimously objects to the proposed designation of Ford as a community hub. The Hierarchy of Settlements assessment (August 2020) sets out the approach to identifying hubs and scores are awarded for a range of services/infrastructure. The threshold to incur Hub status is set by Shropshire Council (SC) at 49. Under the assessment Ford has scored 51 points but the scoring system has been misapplied and the correct number of points is 42 for the following reasons:

1. Amenity green space at Quail Ridge – the Hierarchy of Settlements criteria for amenity green space states that spaces below 0.2ha should be excluded and not awarded points. SC says it is 0.22ha in size and therefore is larger than the threshold of 0.2ha it sets out in the Hierarchy of Settlements. This meant Ford was awarded 3 points.

It is not clear from the Open Space Assessment, due to lack of a map, where the amenity green space at Quail Ridge is but we assume that it is the plot at this link <https://www.daftlogic.com/projects-google-maps-area-calculator-tool.htm?showarea=105683&verify=89f52a24dae96530602aafd0eed37a6c> as it is the only one of any significant size.

At first glance, this area is 0.22 ha, but this is inaccurate as there are two spaces within it that are not amenity green spaces.

It includes an area of 0.02ha, partly concreted with posts around and warning signs, that refer to the below ground gas storage tanks. To see this area click on this link:

<https://www.daftlogic.com/projects-google-maps-area-calculator-tool.htm?showarea=105747&verify=3f6d17d82b917c645964bcd86a277c42>

There is also a fenced off children's play area of 0.01ha (for which Ford has already been allocated points under the Hierarchy of Settlements). To see this area click on this link:

<https://www.daftlogic.com/projects-google-maps-area-calculator-tool.htm?showarea=105748&verify=d88d377bbee9693ae9de400a508d4fcb>

Deducting these two areas from the total area gives us a green amenity space, that adheres to SC's Open Spaces Policy, of 1917.2 sqm or 0.19ha. This figure is below SC's threshold of 0.2ha to gain points. Therefore the 3 points awarded should be removed.

2. "Peak" Bus service – There is not a return service between 3pm and 6pm, the timescale set by SC for points to be awarded. The bus which stops within the development boundary, at Butt Lane, gets in at 6.09pm. There is one bus that arrives outside Ford's development boundary at 4.52pm but, according to the timetable, it stops opposite The Cross Gates Hotel (now 'The Smoke Stop') – see map link for location of the stop:

<https://www.daftlogic.com/projects-google-maps-area-calculator-tool.htm?showarea=105778&verify=9c96ad0c19dd1e5be1b52efd58526628>

This is circa 600 metres by paved walking routes from the edge of the proposed development boundary at the Rural Cottages on the A458. It is our understanding that where bus stops are more than 480 metres by pavement from the edge of the development boundary, they should not be counted as being a service for the purpose of the hub scoring.

We therefore request the removal of the 5 points allocated by SC for a peak hour bus service.

3. Outdoor sports facility - the former Bowling Green does not qualify as a sports facility and, according to Sports England, should not be regarded as such. It has not been used as a bowling green for 6 years, is overgrown, is not accessible to the public and is in private ownership with no arrangements in place for its former use to resume. There are two planning applications for the site logged with SC, one for storage units and one for two dwellings, both are pending consideration. The one point assigned for this facility should therefore be removed.

In addition the parish council disagrees that mobile libraries should only get 1 point less than permanent libraries as it is a far more limited service. In Ford the mobile library only visits for 20 minutes once a fortnight, therefore the allocation of points for this service should be reduced to 1.

The Parish Council also objects to the hub designation for the following additional reasons:

- The Parish Council has concerns over the lack of infrastructure to support a medium/large scale development, including the fact that the only shop is on the opposite side of the busy A458 to the village, with no safe crossing facility;
- The Ford development boundary includes a Conservation Area, limiting potential for infill and potential harm to the character of this essential resource;
- Soil types in the parish are classed as good or very good for agricultural warranting protection (Grade 2 or 3);
- The ridge and furrow soil pattern at FRD011 should be protected as per SC's policy DP24;
- Ford is in a mineral safeguarding area and development would therefore contravene SC's policies SP13 and DP31;
- A comprehensive Environmental Impact Assessment should be carried out for site FRD011 prior to any further investigation into its suitability as a site for development, as it contains many significant species of importance;
- The Right Home, Right Place Housing Survey carried out in 2020 (copy attached), and the Housing Needs survey prior to that, showed that the scale of demand for new housing in Ford is low. SC's Place Plan Officer, Mathew Mead, commented when sending the 2020 survey results to the parish council that "The scale of the demand is relatively low and should be met through the planned new development (Cross Gates Meadow) in the Parish – there doesn't seem to be much evidence for a big increase in development". This is further evidenced by the fact that the housing association letting the recent local needs development at Cross Gates Meadow have failed to find significant local interest from potential tenants/shared ownership, following months of advertising. One third of the properties are now advertised nationally on Rightmove and to date there has been little interest here too;
- In 2020 the parish council issued a statement and conducted an associated petition of the community (copy attached), the overwhelming results showed that 93% of parishioners are opposed to SC's Planning proposals and Ford's classification as a community hub and the subsequent over development of our community.
- The parish council is extremely concerned that if Ford gets hub status it will be permanent and lead to development beyond the boundary in the medium to longer term

FURTHER COMMENTS RE WHY THE LOCAL PLAN, AS A WHOLE, IS UNSOUND AND NOT LEGALLY COMPLIANT

These comments were made by our Ward Councillor, Roger Evans and several other councillors and the parish council fully supports his comments, as reproduced below:

The Shropshire Council Cabinet Decision was:

- A. That Cabinet approves the Pre-Submission Version (Regulation 19) of the Local Plan (Appendix 1) for public consultation in line with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, for a period of seven weeks;
- B. That Cabinet agrees the principle for Shropshire Council to accept up to 30 hectares of employment need from the Association of Black Country Authorities (ABCA) as part of the legal Duty to Cooperate process, in order to supplement the acceptance of up to 1,500 dwellings from ABCA to 2038 (previously agreed in principle), and for this employment provision to be distributed in accordance with draft policy SP2 of the draft Local Plan.
- C. That Cabinet approves an updated version of the Local Development Scheme (Appendix 3)
- D. That authority is delegated to the Executive Director of Place in consultation with the Portfolio Holder for Housing and Strategic Planning Development to make additional minor editorial changes to the Pre-submission Version of the Local Plan and the Local Development Scheme ahead of its publication for public consultation, and to agree associated documents for publication, including the Sustainability Appraisal, Habitats Regulation Assessment and the Consultation Strategy.

A request was made, and supported by a number of councillors.

The reasons for this “call in” are many and the main ones are shown below.

We would especially draw attention to what is stated in the document’s considered by the Cabinet and especially section 1.4 of the summary as shown here

1.4The Plan should respond to local issues, including settlement and site-specific evidence and from public consultation responses, but should also have full regard to national planning policy and guidance.....

It is accepted that there is a need to have an updated local plan and it is acknowledged that the Cabinet has presided over five separate public consultation stages. Several times however the resolved decision of the cabinet differed to the consultation result. Many responses have been disregarded with no explanation. **There is concern therefore that the plan when examined by the Inspectorate will be deemed as unsound. A considered response to this question is needed and reassurance sought?**

These concerns need to be scrutinised before the Regulation 19 Consultation is started. In July the Cabinet agreed to consult on a full Draft version of the local Plan. The results of this were many and as stated over 2,500 unique responses were received. The actual number of responses have of course not been published. The list of responses was also of course only published on the last working day before the Cabinet considered this last review. This deprived many the opportunity to raise them with the cabinet in person.

It had been assumed by many that responses to their unique concerns would be published. They have not been.

What was the point of holding a Regulation 18 consultation.

A considered response and explanation to this question is needed?

Many are now questioning the soundness of the plan?

The responses even though shortened occupy 396 pages. The precis of the responses has been queried by many as not reflecting their concerns.

Again an explanation is needed together with scrutinising this decision?

Other concerns included:

House Numbers

1. The “Local Housing Need” calculated in accordance with the established current methodology for 2016-2038 is 25,894. This calculation essentially comprises 20,748 derived from demographic projections (dominated by estimated inward migration to Shropshire from other local areas) and uplifted by 24.8% (5,146) as an adjustment to take account of market signals (affordability). The Cabinet decided to increase this to 30,800 homes and adopt a balanced growth strategy. Effectively the Cabinet decided to aim for nearly 50% growth in households over and above what would be required for projected demographic growth.

No evidence has been produced that this is realistically achievable at the County level and the process by which allocations have been made to individual Place Plan areas is opaque. An explanation is needed?

2. The demographic projections used as the starting point for the “Local Housing Need” are the 2014 based sub-national household projections (SNHP). Data up to 2030 has been used and projected forward pro-rata. The ONS projections indicate a slower rate of growth after 2030. A significant component of the growth is demand for 1-person households - up from 40,318 in 2016 to an estimated 48,753 in 2038 (growth of 8435).

is it anticipated that the plan will provide the appropriate dwellings for this group? How is the requirement to be addressed at local levels?

3. The projected housing demand in the SNHP excluding growth in single person households (i.e. the demand to meet projected population growth, driven by inward migration) is 12,313. On the assumption that the higher target of 30,800 homes overall is not aiming to attract extra single person households, the Council is proposing that 22,365 homes (30,800-8,435) are built to accommodate population growth at 182% of the ONS projected level.

Again, where is the evidence of achievability for this?

How

Infrastructure need.

1. There is, as yet, no infrastructure plan - it is still to be prepared.

No proof is offered that the infrastructure (particularly transport) required to support the targeted level of development will be there or can be provided through developer contributions?

2. As was displayed at the recent cabinet meeting there is great concern about road capacity in certain villages and towns. It is understood a study of the road network is now beginning, with a targeted completion date of early 2021.

The concerns have so far been dealt with by unevidenced assertions that necessary improvements can be made. These concerns include for example those expressed by many contributors including Shropshire Councillors from Bridgnorth, Much Wenlock, Whitchurch, Bucknall, Ford, Longden and many others?

3. For Shropshire as a whole, we do not have an up to date Local Transport Plan (LTP). Questions have been raised with us as to whether LTP3 was ever formally adopted. As per the report to the Place Overview Committee on 9th December, the process to develop LTP4 is effectively beginning again and it is not likely to be adopted until Winter 2021. It is at present proposed that the updated Local Plan will be submitted for examination without an updated Local Transport Plan in place.

Is this, will this be acceptable no indication is given, and will this be acceptable to the planning inspectorate. We would like to hear what others think of this possibility?

4. **Have the issues identified in SP1 as a gateway policy been satisfied?**

Resources to consider responses

Have the council devolved sufficient resources to the production of the Local Plan Review. Has the work evolved into a great task than was originally envisaged?

Strategic Approach

Has SP2 and especially SP2.2 and 2.3 as highlighted in section 6 of this proposal been justified/ Many communities query as unjustified the scoring mechanism used identify whether a village is nominated as “Hub”. The methodology used has never been scrutinised and is a basic premise of the revised plan. Should this be found to be in error the whole plan may be found to be unsound.

It needs to be scrutinised and examined

Have the creation of new Garden Villages been sufficiently examined and justified to pass the “Soundness” test. This is especially true in Bridgnorth, the new community proposal at Edgebold on the outskirts of Shrewsbury and the former Ironbridge Site with its effect on Much Wenlock. It is note that the proposed Uttlesford District Council plan has failed its recent examination.

This should be subject to a Scrutiny review

Development Management Policies.

DP6 Single Plot Exception sites.

This has been the subject of much dispute in the past. Many communities dispute the way the interpretation of the policy has changed since it was first introduced.

This should and must be scrutinised, so all understand it and there is a communality of approach?

DP7 cross-Subsidy Exception Schemes.

This is a new policy and has never been subject to examination by Members or a Scrutiny Committee of this council. It is very likely to be a policy that is challenged many times during the next few years if not at the hearing before the Inspector. The support of members is needed and has never been tested.

This new policy should be examined and Scrutinised, members views obtained

Climate Change

This is covered in both the Strategic section as in SP3 and in DP11

Again, new policies put forward it is assumed to meet with the Council's decision to declare a Climate Emergency.

Scrutiny should be given the opportunity to examine this. To look at what is proposed and if needed receive assurance that it will deliver the policy it has set.

We consider there is a great risk that as the Local Plan at present exists is very likely to be declared unsound and hence the residents of Shropshire are at risk due to the likely challenges regarding the 5-year land supply.

We consider the above provides an alternative and will enable any and all likely challenges to be discounted. We ask for the present resolved decision to be called in, to be Scrutinised.

Representation Form

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Part B: Representation

Name and Organisation:	Alistair Horn, Ford Parish Council
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Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
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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: No:
- B. Sound Yes: No:
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CROSS-SUBSIDY HOUSING – WHY THE POLICY IS UNSOUND

The Reg 19 consultation is the first time that this policy has been subject to consultation on the detailed criteria for where and how cross-subsidy housing can be delivered. This is a procedural flaw and stakeholders should have had prior opportunity to comment on the detail of the policy at earlier stages in the Local Plan preparation process.

The Parish Council is concerned that Part a.iii. of the policy states that cross-subsidy housing can be built in “Another settlement {ie an unclassified settlement} with a school or the ability to access a school by public transport”. A school alone is not an indication of whether a location is unsustainable. In Ford, the village is not sustainable (see our comments on S16.2) and the school is at capacity. Further development would put excessive pressure on its finite resources.

(Please continue on a separate sheet if necessary)

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Policy DP7 should be subject to further consultation and cross-subsidy housing should not be allowed outside of designated settlements and should be focused in or on the edge of Strategic Key and Principal areas where there is an appropriate range of facilities. Criteria a.ii & iii of the policy should be removed to ensure such development is not allowed in village/rural locations.

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- 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:

The Local Plan will have a major effect on the future of Ford, and as the elected local authority for Ford parish, the parish council needs to have the opportunity to present its views to the Inspector and to have a dialogue with other stakeholders.

(Please continue on a separate sheet if necessary)

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Signature:

A.HORN

Date:

25/02/2021

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From the early submissions to the questionnaires on the Local Plan it became absolutely clear that individual respondents were emphatically opposed (88% against) to the high level of growth being proposed by Shropshire Council. This attitude was also backed by both town and parish councils (74% against) who were also opposed to such high growth levels.

These strongly held views of the wider public are being ignored by the Cabinet members (no doubt backed by central government policy) who are undemocratically pursuing their own agenda.

For Shropshire Council to totally ignore the overwhelming view of its electorate and their local government representatives is unsound.

A high degree of arrogance has been shown by Shropshire Council with their lack of a response at all the consultation phases when perfectly legitimate concerns and/or questions were raised – all the meetings and consultations were simply a box ticking exercise.

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Please refer to attached sheets – endorsement of comments of Shropshire Councillor Roger Evans

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Signature:

A.Horn

Date:

25/02/2021

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Part A Reference:

Part B Reference:



Ford: RHRP Survey Analysis

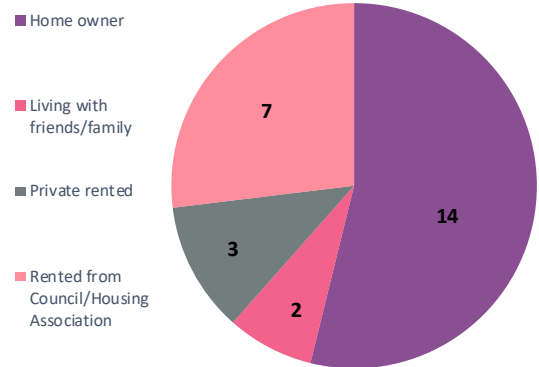
March 2020

85 responses from residents of Ford as at 9th March 2020. 29 residents were thinking of moving and of these 12 indicated that their first choice would be to live somewhere else, 17 wished to remain in Ford.

Of those thinking of moving:

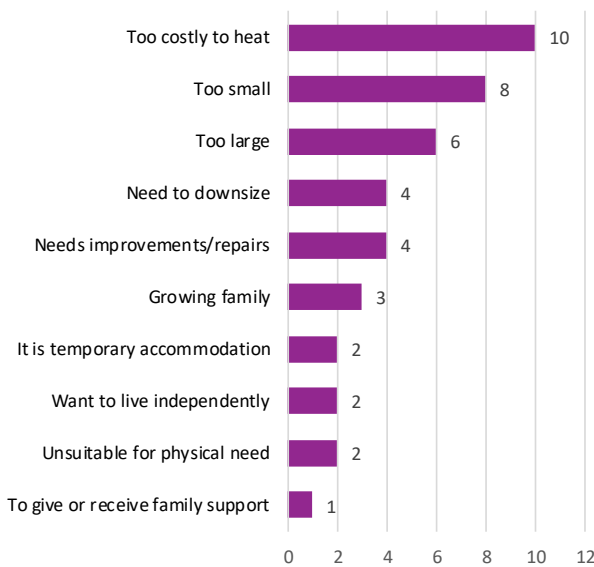
- 48% of respondents were home owners.
- 10 respondents were living in rented accommodation.
- 2 respondents were living with friends/family.
- Of those wanting to move household size ranged from one to five, with the average number of people per household being 2.81
- Of those wanting to move 3 households had a resident aged over 75 and 7 households had children under the age of 16.

Type of Accommodation Currently Occupied*



*Results of those who indicated current type of accommodation occupied

Reasons for wanting to move



Out of the 85 people living in Ford who responded to the survey 29 said they were thinking of moving.

Of those wanting to move, 24% (10) reported that they “need to downsize” or their current home was “too large”.

24% (10) said their property was “too costly to heat”.

26% (11) needed to move due to “Growing Family” or property “too small”.

2 (5%) wanted to “live independently”.

1 wanted to move to “give or receive family support”.

2 respondents said they wanted to move because property “unsuitable for physical need”.

56 respondents were not thinking of moving.

Please note some respondents wishing to move may have indicated more than one reason to move and therefore figures may not sum to the total expressing a wish to move

– 20 respondents stated that they require housing to buy, affordable, open market, key worker and entry level housing.

– Of those wanting open market housing to buy 6 were currently home owners.

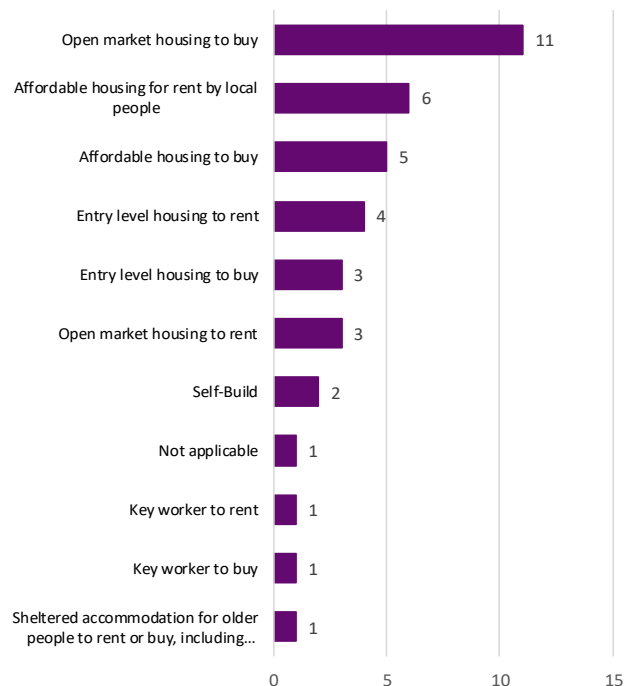
– 5 respondents said they needed affordable housing to buy, 1 was currently a home owner, 2 lived in rented accommodation & two lived with friends/family.

– 14 respondents expressed a need for housing to rent, 3 said open market housing to rent, 6 said they required affordable housing for rent by local people and 4 said entry level housing to rent and 1 stated key worker to rent

– 2 respondents wanted “self-build”

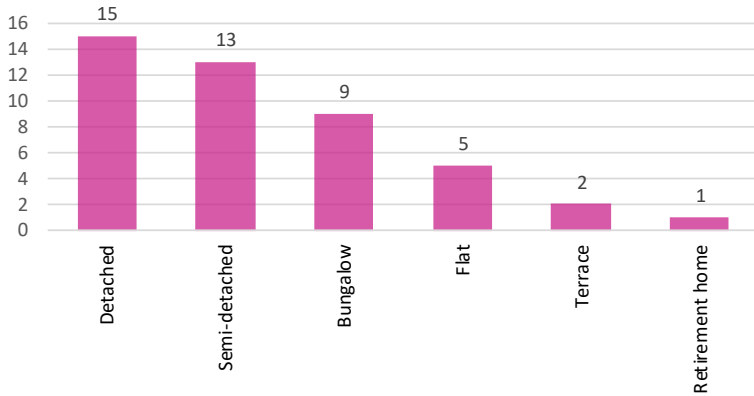
– 1 wanted “Sheltered Accommodation” and was currently “living with friends/family”.

Types of housing required



Please note some respondents wishing to move may be prepared to consider more than one type of housing and therefore figures may not sum to total expressing a wish to move.

Housing Types Wanted



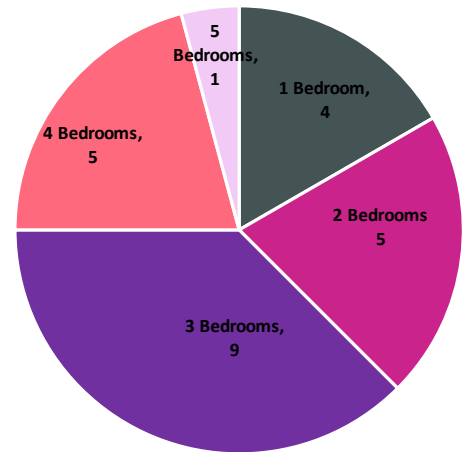
- 62% of respondents who were thinking of moving wanted either a detached or semi-detached property.
- 36% of those wanting a detached or semi-detached property were home owners.
- 20% (9) of respondents thinking of moving said they wanted a bungalow and 6 were currently home owners.

**Results of those who were thinking of moving and indicated type of accommodation required*

Please note some respondents wishing to move may be prepared to consider more than one type of housing and therefore figures may not sum to total expressing a wish to move.

- 4 respondents require 1 bedroom, 5 require 2 bedrooms, 9 require 3 bedrooms and 5 require 4 bedrooms and 1 stated 5 bedrooms. Those that require 3 or more bedrooms typically want a detached property.
- Respondents that require one or two bedrooms were more likely to consider a wider range of property.
- Nine respondents reported a need to move within the next 12 months, with a further 10 anticipating moving in the next 2 years.

Number of Bedrooms Needed



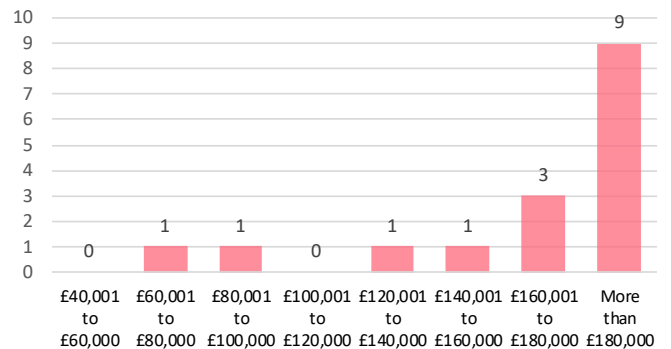
Timescale for Moving	Number of Respondents
In the next 6 months	4
In the next 6-12 months	5
In the next 2 years	10
In the next 5 years	5

Affordable Rents



- Two respondents considered monthly rent above £520 to be acceptable.
- In terms of house prices, nine households considered a price above £180,000 would be acceptable and 78% of these were currently home owners.
- 29 respondents who currently live in Ford are thinking of moving. Six people stated that they required “open market housing to buy”, 2 “affordable housing to buy”, 2 “entry level housing to buy” 3 “affordable housing to rent”, 1 “open market housing to rent” 1 “self build” and expressed no other option.
- All other respondents selected more than one option when asked what type of housing they required.

Affordable House Purchase Price



As at 1st April 2019 there were nine households on the waiting list that had expressed a first preference to live in Ford. Initial analysis suggests that all nine households had a local connection to Ford and all currently live within Shropshire.