

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:	Ian Mason Resident
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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" value="S16.2(i)"/>	Policy:	<input type="text"/>	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 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 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.

The proposal designates Ford as a Community Hub which provides justification for the building of at least 125 new homes.

While the building of additional homes is recognised as both a national need and a Central Government requirement, these homes must be built into communities that can sustain the additional population and which has the local amenities and facilities that this requires. Ford does not enjoy such facilities and amenities and, as such, the Council's proposal will use Ford to create a large out-of-town housing estate with minimum local facilities.

Residents of Ford have seen a doubling of the village population with the Manor Crest and Quail Ridge developments. Proposals for both these developments were larded over with promises to improve amenities – none of which was delivered.

Further house building in Ford before the promised infrastructure changes are delivered is, therefore, contrary to the Government's and the Council's own guidelines

The main issues that present a legal challenge to the current proposal include the following:

1. Ford is not a 'Community Hub' by any nationally agreed definition.

Ford village has a primary school, a village hall, a cemetery and a sewage pumping station. At half a mile distant, it has a PFS/NISA, a curry house and a chip shop (these are across the busy A458 which has no pedestrian crossing of any description).

Ford Village does not have –

- A Post Office
- A medical centre
- A pharmacy
- A Nursery/Pre-school
- A bus service after 17:50 during weekdays
- Any bus service on a Sunday
- Adequate parking, especially for the 'school run'
- Sufficient capacity in Trinity School for 125 new families
- A village shop to which you can send children
- A nursing home
- A railway station
- A car repair garage
- A pub
- A café or other meeting place
- A library

Shropshire Council has recently upgraded Ford's status to that of 'Community Hub' based on its locally invented scoring system. While a scoring system can always be manufactured to produce a desired result, by any nationally published definition of a community hub – and in comparison with nearby Community Hubs in Shropshire (such as Pontesbury, Nesscliffe, Hanwood and Baschurch) – Ford cannot be considered a Hub until the amenities and facilities associated with a Community Hub are delivered.

2. Shropshire Council will be in default of its obligation to provide primary schooling for children from 125 new homes.

Trinity School, in Ford, is a Primary school that was enlarged when Yockleton and Wattlesborough schools were closed.

It currently has 3 free places for this year.

It has no room for expansion, unless the playground is dug up

ONS figures show an average of 30 primary age school children per 100 dwellings. 125 new dwellings equates to 37 additional children requiring primary education. This figure is likely to be higher as the proposed low cost housing will likely attract younger families.

These children will have no school available to them, unless they are bussed to a school in another area.

Ford cannot support additional house building until the Council defines, and implements, a strategy that delivers the additional school places.

3. Building 125 new homes in Ford is in direct contradiction to the Government's green strategy and the Council's 2019 declaration of a climate emergency

In 2019, Shropshire Council declared a 'Climate Emergency'.

Development of 125 new households in Ford contradicts the Council's stated aims on climate change and the environment.

1. Ford does not have a regular bus service – and none at all in the evening, on Sundays and on Bank Holidays.
2. Ford does not have a railway station
3. Ford does not have any local industry or other employment opportunities.

People moving to Ford, if they work, will need to drive to Shrewsbury or beyond, and return in the evening.

ONS statistics show an average of 1.3 vehicles per household. 125 new dwellings will yield

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Part A Reference:

Part B Reference:

162 new vehicles in the village. This is probably an underestimate because all working age people who move to Ford will need to drive.

If environmental protection and tackling climate change were to be taken at all seriously by the Council, it would site new development near transport hubs and places of work.

The addition of 162+ additional cars into an already overcrowded village, and A458, contradicts both the Government's and the Council's pledges to pursue a Green agenda. By any reasonable measure, additional housing should be centred in areas where public transport and local employment opportunities are available.

4. Local demand for affordable housing does not exist

The Council's proposal is for the new building in Ford to target affordable homes for purchase and rent.

This decision is, presumably, based on an assessment that there is local demand for such housing, though no facts have been presented to support this view.

On the contrary, and to quote from a recent survey of Ford residents (where 93.4% of respondents were against the Council's proposals) –

"A Local Housing Survey undertaken in 2019/20 showed scale of demand for new housing was low. This highlighted that it has been particularly difficult to find tenants for the recently completed affordable housing at Cross Gates Meadow (32 dwellings). Officer observed the results of this survey did not provide much evidence for a big increase in development.- Ford is a rural village that lacks infrastructure to support the level of extensive development resulting from Community Hub status"

Shropshire Council is misleading the Inspector as it has no published justification for the building of further properties in Ford, unless there is a substantial and material improvement in the local amenities and services. Such improvements are not part of its plans.

The current proposal appears to be no more than a justification for meeting a house-building target, away from real Community hubs and with no apparent regard for the quality of life of those who live there.

5. The plan is deficient as it does not cover several essential services

There is no mention, in the Plan, of how the levels of the following services will be maintained

- Broadband/Internet (this service is already deteriorating during lockdown)
- Electricity supply
- Sewerage
- Existing bus services
- Oxon Park & Ride
- Free movement of traffic on the A458

6. The Council failed to follow correct process when considering objections from the public The LGA guidelines in respect to consultations mandate....

"If you do decide to go ahead with a consultation exercise, You also need to make sure that you have allowed sufficient time to analyse the results, evaluate the process and consider their views before you make any decisions about the next steps."

In the case of Shropshire Council, the consultees' comments were never presented to the decision-making body.

What was presented instead was a 'summary' of the comments. These summaries were so short, and so general in nature that the thrust and importance of the issues raised was lost. I can provide examples where needed.

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When asked why this has been done, the Council replied on 18th January 2021 -

" It was simply not pragmatic or appropriate to provide Cabinet with each ... response in full at this stage, and instead the detailed summary did provide clearly the key issues raised."

Apart from this patently not being the case, the Council has not been able to provide an explanation as to why they decided that proper consideration of public comments was not 'pragmatic' or 'appropriate', nor been able to explain with what authority they edit comments before they are presented – without reference back to their originator.

They are also unable to produce any guidelines or processes to cover the editing of public comments before consideration.

This appears to be a clear case of maladministration by Shropshire Council.

I am more than happy to discuss all of these issues with the Government appointed Inspector.

(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.

1. The Plan is re-issued with Ford no longer designated as a Community Hub because it does not meet the accepted definition or the plan is reissued with the development of the facilities and amenities appropriate to a Community Hub mandated before any new house building in Ford is approved.
2. The Plan is amended to defines how an upgrade to the primary schooling capacity in Ford will be delivered before any new house building in Ford is approved.
3. The plan is amended to reconcile the climate and environmental impact of additional house building in Ford with national and local requirements and aspirations, before any new house building in Ford is approved.
4. The Plan details the evidence that there is local demand for 125 new homes in Ford before any new house building in Ford is approved.
5. The Plan mandates a full assessment of the capability of all local services to cope with 125 new homes and that changes required as a result of that review are implemented before any new house building in Ford is approved.
6. The Council re-runs the review of the public comments with the FULL text of the comments, un-edited by Council office workers, and re-issues the Plan following that review.

(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.

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	Part B Reference:

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:

Because I do not, on the basis of the Council's performance to date, believe that it will make a fair representation of public comments to the Departmental Inspector.

(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:

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	Part B Reference: