

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:	KATE HOGWOOD
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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="S13.2"/>	Policy:	<input type="text" value="Click or tap here to enter text."/>	Site:	<input type="text" value="CE S006"/>	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.

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CE S006 The Eagles

It is unclear from the document how many dwellings will be allowed on this site as in one place it states 4 , and in another the conversion of the former Eagles into 2 dwellings and up to 3 new dwellings

There has also been strong local interest (and now that it is recently a listed building) in a community project to use part of the original downstairs as a community asset/café/farmshop etc which does not appear logged officially logged so far.

This would seem a sensible and valuable project to consider for an area with so few amenities, even without further any development

(Please continue on a separate sheet if necessary)

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a) That the number of dwellings be clarified

b) That the use of part of one unit (the listed =2 units?) be considered for local amenity/community use as part of any allowed development

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

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(Please continue on a separate sheet if necessary)

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Signature:

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 Date:

25/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

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- (Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text" value="S13.2(1)"/>	Policy:	<input type="text" value="Click or tap here to enter text."/>	Site:	<input type="text" value="CE5005"/>	Policies Map:	<input type="text"/>
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Site CE S005 Land adjoining the Vicarage

1. The status of Cressage as a potential Community Hub has to be proved to allow for housing development
2. Should Hub status be approved it is unclear how many houses are proposed for this site as numbers have varied from 60 – 80 .
3. a) Should Hub status be approved it states that ‘access will be from the A458 providing a footway along the frontage to crossing over A458 to existing footway network east linking into village. A secondary pedestrian and cycling access possible on short frontage to Wood Lane. Speed restrictions positioned south of site with traffic calming measures supporting gateway feature at highway access.’

- b) However this point of access is extremely dangerous as many vehicles , especially lorries and HGVs, exceed the speed limit on this dangerous hill leading south out of the village
- c) Traffic calming via lights &/or a roundabout would be necessary in order to prevent major incidents concerning both pedestrians and drivers.
- d) As the village shop, school, bus stop and surgery are all to the east across the A458 this could be very dangerous with young children, buggies or disability vehicles
- e) Access to Wood Lane will be very difficult due to the steep gradient and existing housing (including a listed building)
- f) Flooding incidence is stated as nil, but there has been a major surface water flash flooding incident in 2020 on to Wood Lane and through a historic building there resulting in land subsidence, a substantial insurance claim and County Council PRS (Property Flood Resilience) potential grant: from the land identified as this site (Glebe field) plus adjoining farmer's field. Should this not be logged. (This also affected a substantial Stable build in Wood Lane, and bridges nearer the main village owned redients in Crwon Lane (off Shore Lane).
- g) There is talk of a 'Special Interest Woodland Site' down Wood Lane(?) (re pollution etc), but not any human inhabitants there (Jasmine Cottage (listed) & Jasmine Lodge)
- h) The Site Assessments (6 considered) are not clear on the reasons as to why they are 'excluded' or 'included' at this stage -eg woolly reasons given in many cases such as 'availability for residential development is unknown'??
(There are 6 x site assessments for this Cressage area)
Why are certain sites 'preferred' compared with others, that many locals seem to prefer? -eg Raby Estates land/proposal off Shore Lane (if a 'choice' between one /mega' development needed? and another)
(Ref: Appendix N -Much Wenlock Place Plan: Area Site Assessments, Dec 2020)

(Please continue on a separate sheet if necessary)

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Office Use Only	Part A Reference:
	Part B Reference:

I ask that

1. The point scoring for allocation Cressage as a Community Hub be looked at again
2. IF Hub status is confirmed , that the safety of the access to the site CE S005 be reviewed
3. The 'Sites'(x6)? soundness of selection be properly examined

(Please continue on a separate sheet if necessary)

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- 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:

To ensure for a fully democratic process

(Please continue on a separate sheet if necessary)

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Signature: [_____]

Date: [25/02/2021]

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Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text" value="S13.4"/>	Policy:	<input type="text" value="5.184"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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5.184. Cressage is presented as the only Community Hub in the Much Wenlock Place Plan Area and appears in documentation to have changed its status from being a 'Countryside' settlement since 2015.

Why and how has the status changed from Countryside to Community Hub as it does not meet the criteria for allocation as a Hub? This was strongly expressed to the Council after the consultation with Claire Wild and the over 300 responses from the village in 2020 -viz: lack of postoffice, no operating church, rudimentary bus service, minimal mobile library visit, loss of public house/meals outlet, no pharmacy etc (- NB services and amenities have reduced steadily concomitantly with the major 1970's housing development onwards).

(Please continue on a separate sheet if necessary)

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We ask that the Independent inspector considers:

1. Previous Responses: to the consultation from Cressage residents. There were many hundreds of objections and it appears these have not been evaluated or assessed fairly, if at all, by Shropshire Council.
2. Shropshire Council's consultation process: especially during Covid19.
3. Points Scoring System: The inspector should look into this as part of the forthcoming Public Enquiry & should come and inspect facilities against this points scoring system: this results in a virtually complete lack of differentiation between Cressage and major towns like Shrewsbury which we suggest at the least might be considered as arbitrary.
4. Cressage Needs Assessment: this is much overdue and has been missed out of the process. We suggest this should be addressed now and before any Hub status consideration & major development.
4. Sustainability, climate change and affordable housing issues: these seem scarcely addressed, but could be much more adequately & satisfactorily so with more limited organic, considered development rather than a sudden big influx commercial development package threatened to be foisted on the area should Hub status be pushed through. Please see Countryside Charity's (CPRE) extensive objections and responses re these matters.

We suggest that all reasonable argument leads to the area remaining as 'Open Countryside' currently.

(This does not equate to a 'no build' stance, but to a considered 'controlled build' scenario with proper sound objectives underpinned by agreed assessment needs and democratic discussion/ authorisation).

(Please continue on a separate sheet if necessary)

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	Part B Reference:

(Please tick one box)

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So that the conclusions are fully democratic

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Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text" value="S13.2"/>	Policy:	<input type="text" value="CONSULTATION process"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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I ask that Inspector evaluate how and if, Shropshire Council evaluated and processed the previous consultation responses. Local reports tell of staff shortages within Shropshire Council due to the Covid-19 outbreak and many believe this consultation process was unable to happen properly or fairly. How can over 500 responses to previous rounds of consultation be ignored? Why was no feedback or acknowledgement given?

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.

As a corollary to this, the aging population demographic of Shropshire showing about 25% over 65 means a sizeable % of potential respondents do not have internet access, and have had no

access to appropriate public resources during Covid19: the consultation process has therefore been compromised and is flawed.

The formal response process is complicated but there has been no evidence of assistance from the County or Councillor to explain the system. This is particularly pertinent since it is patently clear there has been little co-operation from the Parish Council in representing people's views at any stage: they have not even met since this last Regulation 19 has been current.

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May 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 seems these have not been evaluated or assessed fairly by Shropshire Council. I ask the inspector to evaluate the consultation process.

We ask the Independent inspector, too, to review Shropshire Council's consultation process during Covid19 and the obvious impacts that has had on preventing people from replying. There is a common law duty to take the results of a consultation "conscientiously into account".

We submit that Shropshire Council have not met this requirement to date by failing to react sufficiently to Covid19 restrictions which have impeded many people's 'normal' ability to react and respond.

I also ask that the Independent inspector reviews the Countryside Charity;'s (DPRE) objections and responses and considers them in depth.

As evidence for non compliance with consultation, we are using the Draft Statement of Community involvement of the CPRE January 2021 :

- i) The update of the DSCI should have been carried out some time ago, rather than being left to the last minute in order to tie in with the statutory requirements connected with the Regulation 19 consultation on the Draft Plan.
- ii) The general principles of consultation in the Gunning principles and in the seven Criteria within Government's own *Code of Practice on Consultation* should be spelt out within the DSCI.
- iii) The recent Covid-19 related legislation concerning consultation arrangements should be summarised or referenced in the DSCI.
- iv) Consultations should be for a minimum of 12 weeks, as recommended by Government. Some Parish Councils do not meet often enough to be able to give due formal consideration to a consultation that is for only 6 weeks.
- v) Consultations should, as far as possible, avoid holiday periods, or be for a significantly ex-

Office Use Only

Part A Reference:

Part B Reference:

tended period if they do straddle a holiday period.

- vi) Consultation material should be mainly in electronic form but should not be wholly so; traditional methods should still be used until the County has complete fast broadband cover.
- vii) The Council should not rely on hard pressed Parish and Town Councils to disseminate consultation material.
- viii) If a direct choice between multiple options is offered in a consultation the Council should ensure that its policies reflect the results of the poll on those options.
- ix) Reports on consultations should explain how the Council has arrived at its conclusions from those consultations.
- x) Neighbour notifications of planning applications should continue to be issued.

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