

To: Kerry Trueman

From: Ian Mason



1<sup>st</sup> June 2022

Subject: Shropshire Council Regulation 19 submission Invalid in respect to the village of Ford

Dear Ms Trueman

I am writing to you because the processes used to develop the Plan in relation to the village of Ford were invalid and the outcome is unsound.

There are several issues and I have summarised the main components in the attached pages. I trust that the Inspectors will find time to consider them.

Yours Sincerely

Ian Mason

## Summary

1. Residents comments and objections were not made available to the decision-makers on the Council
2. Incorrect Classification of Ford Village as a Community Hub.
3. Environmental impact not assessed and is counter to Government policy
4. Proposal is based on an invalid assessment that demand exists for more low cost housing in Ford
5. The Plan does not mandate essential infrastructure improvements

### 1. Residents comments and objections were not made available to the decision-makers on the Council

The comments and reservations raised by residents during the consultation process should have been, but were not, presented to the Council when it discussed and agreed the draft Plan.

What was presented to the decision-making body was a précis of the objections that, in many cases, removed the factual justification for the objection and reduced it to an anodyne comment that would be easy to ignore and dismiss. Here is just one example relating to the village school.

The objection stated.....

*“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 no free places*

*It has no room for expansion*

*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.”*

What was presented to the Council .....

*“Concern that there are insufficient school places at Ford Primary school to accommodate increase in pupils from the new housing being proposed”*

It is not a “concern”, it is a fact. To go ahead with the proposal without addressing the schooling requirement is, I believe, illegal and renders the process unsound.

Furthermore, I questioned the justification and the Council replied .....

*“It was simply not pragmatic or appropriate to provide Cabinet with each ... response in full at this stage”*

The Council was unable to explain with what authority, or process, it fillets residents’ objections prior to their consideration by the legislative body. On the contrary, the Council’s own published processes mandate that sufficient time should be given to allow full consideration of all submissions.

This is one of many examples where the Council was not presented with the factual basis of objections and comments and was therefore unable to properly consider the issue. On this fundamental basis, the process was unsound. And, it has been suggested, amounts to maladministration.

## **2. Incorrect Classification of Ford Village as a Community Hub.**

At a late stage in the Plan development process, The Council re-evaluated Ford as a Community Hub. This allowed it to designate Ford as a location for a 25% increase in the housing stock.

Notwithstanding that the term “Community Hub” is ill-defined and calculated through an algorithm that the Council does not make available the residents, by comparison with existing Hubs in Shropshire, and by any reasonable definition of the term, Ford Village does not have the characteristics and facilities of a Hub.

For example, Ford does NOT have.....

- A shop in the village where you could send a child
- A Post Office
- A medical centre
- A pharmacy
- A bus service after 17:50
- Any bus service at all on a Sunday
- Safe crossing of the busy A458
- Adequate parking, especially for the 'school run'
- Sufficient capacity in the School for 125 new families
- A nursing home
- A railway station
- A car repair garage
- A pub
- A café or other meeting place

By any nationally published definition of a community hub, however, and in comparison with existing Hubs in Shropshire, Ford cannot possibly be considered to meet the definition a Community Hub.

Furthermore it appears that, following a late re-scoring exercise, Ford scraped over the line with 51 points. This novel scoring, however, included a non-existent pub (5 points) and a school which is completely full (5 points). This takes the score well below the threshold for Hub status.

If a further 125 properties are built in the village it will simply move it further towards being an out-of-town housing estate with no community facilities and all the attendant social ills. Its character will be lost.

I believe that the Council has sought justification for further building, without commensurate infrastructure improvements, through manipulation of its own arcane and hidden process and 'mistakes' in its calculation of the score.

This renders the process unsound and a full re-examination of the designation of Ford as a Hub is essential before this part of the Plan can be considered.

### **3. Environmental impact not assessed and is counter to Government policy**

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

In May 2019, the Council declared a "Climate Emergency" in Shropshire. In contrast to that bold and electorally attractive declaration, the Council is recommending a 25% increase in the housing stock for a village where public transport comprises

- a. No regular bus service
- b. No weekday bus service to Shrewsbury after 17:27
- c. No service at all on Sundays.
- d. No railway station

Furthermore, Ford is situated off a very busy A road (note, there is only one way in and out of Ford – the A458) which already enjoys traffic jams of over 2 miles in summer and from which it is sometimes impossible to exit without several minutes waiting or risking an accident.

Because Ford has no local industry or other employment opportunities (other than a PFS, a chip shop and a curry house half a mile away across the busy A458, with no pedestrian crossing), people of working age have no option but to use cars for work/shopping/visiting, typically 2 per family.

ONS statistics show an average of 1.3 vehicles per household. 125 new dwellings will yield **162 new vehicles** in the village. This will be an underestimate because all working age people who move to Ford have to drive.

On this basis, new development must be sited close to transport hubs and places of work in order to meet the Council's stated aims and the Government's green agenda.

To add 162+ additional cars to an already overcrowded village and A458 not only runs directly counter to the stated aims of Central and Local Government, it also demonstrates the cynical vacuity of these "pledges" at a time when concern for the environment has never been higher and media and public eyes are very much focussed on the accountability and probity of our policy-makers.

The Council has not undertaken a proper environmental impact assessment of the planned growth and I believe that this renders the Council in breach of its, and the Government's, stated aims on Climate Change.

The part of the Plan relating to Ford should be re-addressed to conform to those intentions and meet the Council's environmental obligations

#### **4. Proposal is based on an invalid assessment that demand exists for more low cost housing in Ford**

The latest estate in Ford, comprising of 32 mainly low cost houses in Cross Gates Meadow, has taken over 2 years to sell/rent

It not surprising that young people looking for affordable housing do not choose to live in Ford with its lack of infrastructure and facilities.

All the evidence is clear that further building in Ford, without significant infrastructure improvements, will simply not be taken up.

A 2021 survey of Ford residents found that 2 households were in favour of expansion with the current infrastructure and 241 against. The published outcome of the summary states, inter alia....

*"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. Concerned that if identified as a Community Hub, this status will be permanent and lead to development beyond the development boundary in the medium to long term."*

The proposals for development in Ford run directly against the wishes of over 99% of the residents. This is not blind resistance to change – it is an intense feeling that the Council is mismanaging its own processes.

The Council has a duty to act on behalf of its electorate and residents. It is clearly in breach of this duty and this, too, renders the process unsound.

#### **5. The Plan does not mandate essential infrastructure improvements**

The draft Plan mentions issues such as traffic and the environment, only as items that ought to be considered.

The only firm proposal is for more building. I'd like you to be aware that similar promises of consideration of infrastructure improvements were present in the plans to build the Manor Crest, Quail Ridge and Cross Gates Meadow estates. After the houses were built the council and developers melted away and Ford was left with double the population and even less adequate infrastructure.

Any additional house building must be preceded by the funding and implementation of the infrastructure changes needed to support previous and proposed expansion before any more house building begins.

The Council has not developed a plan that protects the living conditions and environment for existing and new residents, which is its obligation; as a consequence I believe it to be in breach of its obligations and that the process used was, therefore, unsound.