

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:	JEAN ROBERTS
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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:	SECTION 2.2 PARA 5.37 5.38	Policy:	BUILDING ON GREENFIELD SITE	Site:	BUCKNELL	Policies Map:	BKLO08a
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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 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.

PLEASE SEE ATTACHED - INSUFFICIENT SPACE HERE

(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.

PLEASE SEE ATTACHED - INSUFFICIENT SPACE HERE

(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.

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: 26 January 2021

Office Use Only Part A Reference:

Reasons why the Shropshire Local Plan Representation form Part B plan is not Legally Compliant, Sound and Fails to Comply with the Duty to Co-operate

Not Legally Compliant

Proposals to designate BLK008a, a greenfield site, as a preferred site, is opposite to the government's National Planning Policy Framework (NPPF) document where Para 118c says "Give weight to the value of using suitable brownfield land within settlements for homes and other identified needs and support other appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land". The use of brownfield sites, as stated in the NPPF, is supported in Shropshire Council's Local Development Framework paper. Shropshire Council includes these policies by placing BUCK001 on its Brownfield Land Register. Shropshire Council has completely ignored Paras 4.66 and 4.70 of its own Framework document. This document mentions a "bottom up" approach and a "community engagement" process. This is **Not Legally Compliant**.

Unsound

In preferred site consultations in 2017 and 2018/2019, greenfield site BKL008a was removed as a preferred site after talks with Bucknell Parish Council and comments by Bucknell residents. This was on the understanding that additional housing could be placed on BUCK001. Site BKL008a was again included by Shropshire Council at the Regulation 18 consultation in 2020 at Para 5.38 implying that BKL008a would permit new housing to be built earlier than on BUCK001. This suggests that new housing on BKL008a will be granted before BUCK001 is developed. It is also different to Appendix 7 where development for BKL008a is forecast for 2035 to 2038 and makes this part of the Plan completely **unsound**. It is totally against Bucknell residents wishes.

Fails to Comply with the Duty to Co-operate

Around 2017, Bucknell residents unenthusiastically agreed to becoming a 'hub'. By doing so, residents believed that they would get an improved infrastructure and villagers would be able to control the number of dwellings in the village and the location of them, along with new shops, schools etc. Mr Peter Nutting, Shropshire Council's Leader, addressed a residents meeting in Bucknell in September 2019 when he reinforced his promise that the views of the village residents would be of utmost importance. BKL008a was removed from the SamDev Plan and that promises made previously were being adhered to. In Regulation 18 in 2020 the greenfield site BKL008a was reinstated and Bucknell residents were extremely upset by this decision. Bucknell Parish Council stated their objection as did the numerous comments along with a petition signed by 112 Bucknell residents. Documentation contained within the "summary of responses to Q4 comments" plainly shows the rejection of BKL008a as a preferred site. The Bucknell residents' comments seem to have been completely disregarded by Shropshire Council officers. This may be due to insufficient staffing of planning specialists able to read and understand the implications. This I interpret as "**fails to comply with the duty to co-operate**" with the residents of Bucknell".

c Bucknell Parish Council
Nigel Hartin, County Councillor

29 January 2021