

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:	
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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"/>	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: 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.

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 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 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:

Office Use Only

Part A Reference:

Part B Reference:

Shropshire Local Plan Representation Form Part B. Why the pre-submission draft of the Shropshire Local Plan is not legally compliant, sound or does not comply with the duty to co-operate

Not legally compliant. Proposals to designate Greenfield BKL008a as a preferred site is contrary to government National Planning Policy Framework where Para 118c reads as follows *'Give weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land'*. The NPPF and use of brownfield sites is supported by Shropshire Council's own Local Development Framework. The Council reinforces these policies by including BUCK001 on its Brownfield Land Register. Furthermore Shropshire Council has in this instance totally disregarded Para 4.66 and 4.70 of its own framework which talks of a 'bottom up' approach and following a 'community engagement' process

Unsound. As a result of previous preferred sites consultations in 2017 and in 2018/9, Site BKL008a was removed as a preferred site following discussions with Bucknell Parish Council and comments by residents of the village. This was on the basis that any extra housing could be accommodated on site BUCK001. The site was reinstated unilaterally by Shropshire Council at the Regulation 18 consultation of 2020 indicating in Par 5.38 that this site should allow new housing to be delivered quicker than on BUCK001. This implies that precedence could be given to development of BKL008a in advance of BUCK001. Apart from being against the wishes of Bucknell residents, this paragraph is at variance with appendix 7 that only forecasts development of BKL008a long term in 2035-2038. This part of the draft plan is therefore unsound.

Fails to comply with the duty to co-operate

In 2017 (or maybe earlier), Bucknell reluctantly agreed to become a 'hub' on the understanding that better infrastructure would be provided (eg schools, road improvements, doctors, shops etc) and that the village could control the location, number and type of dwellings in the village. The 'bottom up' and 'community engagement' process referred to above appears to reinforce this promise, as did Mr. Peter Nutting, Leader of Shropshire Council, when he addressed a meeting of residents in Bucknell in September 2019 in which he spoke of the views of the village being paramount. As indicated above BKL008a was removed from the SamDev plan and it appeared that previous promises were being kept. Bucknell residents were therefore appalled when Greenfield site BKL008a was unilaterally reinstated in the Regulation 18 consultation in 2020. Bucknell Parish Council categorically stated their objection to this as did the extensive comments made by Bucknell residents backed by a petition signed by 112 residents. Documentation listed in the 'summary of responses to Q4 comments' submitted from Bucknell clearly show overwhelming rejection of BKL008 as a preferred site and these comments appear to have been totally ignored by Council members and officers, possibly due to insufficient planning experts able to read and understand the implications. All this can only be construed as a failure to comply with the duty to cooperate with Bucknell residents.

Shropshire Local Plan Representation Form Part B. Modifications necessary to make the plan legally compliant, sound and comply with the duty to co-operate

In view of the comments by Bucknell Parish Council against inclusion of Greenfield site BKL008a, together with the extensive comments by Bucknell residents backed by a petition signed by 112 residents, which appear not to have been taken into account in the Regulation 18 consultation, myself and other Bucknell residents are seeking the following amendments before the plan is submitted to government for final approval:-

1. All reference to BKL008a and extending the village to the east into countryside must be removed as a preferred/allocated site. The following sentence in Para 5.38 should be deleted:- *'The release of part of this larger Greenfield land parcel at BKL008a, adjoining the contemporary Redlake Meadow Development, will permit new housing to be quickly delivered when issues affecting development in the River Clun catchment are resolved'*. All references to BKL008a in appendix 7 Forecast of Delivery Timescales then also need to be deleted.
2. Alternatively, as a less satisfactory alternative, a legally binding commitment be given that BKL008a will not be designated as a site until at least 2035-2038 as per appendix 7, or until BUCK001 has been completely developed. Paragraph 5.38 to include wording to that effect.

Brian Willson