Shropshire Council: Shropshire Local Plan

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:	Jim Bunce

Q1. To which document does this representation relate?

- [x] 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:	SP2.1, SP2.2, SP2.3	Policy:	SP2	Site:		Policies Map:	

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

	Yes:	No:
A. Legally compliant	✔	
B. Sound		✔
C. Compliant with the Duty to Co-operate	✔	

(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.

In SP2 the allocation of Key Centres - SP2.1, Community Hubs - SP2.2 and Community Clusters - SP2.3 does not take into account whether these settlements are part of the Shropshire Hills AONB or not. For example, Church Stretton is one of 11 Key Centres but the only one within the AONB. Clun and Clee Hill (Community Hubs) are both within the AONB but part of the Bishops Castle and Ludlow Place Plan Areas respectively, where the majority of settlements are not covered by the AONB designation. Community Clusters containing small communities within the AONB are scattered within the Bishops Castle, Cleobury Mortimer and Craven Arms Place Plan Areas. In some Community Clusters the absurdity exists of some members of the Community Cluster being part of the AONB and others not. Many other communities in the Shropshire Hills AONB have deliberately chosen not to put themselves forward as Community Hubs or Community Clusters, believing that being designated as such will lessen environmental and landscape protections.

The AONB designation should matter in planning and protection terms. However, Shropshire Council continues to 'shoe horn' AONB communities into Shropshire-wide categories of settlements and is determined to apply Shropshire-wide policies to the AONB. This approach is not 'fit for purpose', dilutes the protections that should exist for the AONB environment and landscape and is not sound.

(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.

Communities within the Shropshire Hills AONB should be withdrawn from the settlement categories of Key Centres, Community Hubs and Community Clusters.

Shropshire Council, the Shropshire Hills AONB Partnership and interested community groups should work together to draw up a dedicated Development Plan Document (DPD) for the Shropshire Hills AONB. The precedent exists for doing so - the Arnside and Silverdale AONB Development Plan Document.

(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:

Shropshire residents within the Shropshire Hills AONB have lobbied Shropshire Council and individual Shropshire County Councillors regarding the possibility of a Shropshire Hills AONB DPD. However, no feedback (either for or against) has been received. As such, I wish to pursue at Regulation 19 and the examination in public.

(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: Jim Bunce

Date: 24/02/2021

Office Use Only	Part A Reference:
	Part B Reference: