

## 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:	Steven Butler, Bidwells
------------------------	-------------------------

#### 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:	Schedule S14.2(i)	Policy:	KCK009 – Land north of Church Lane, Knockin	Site:	KCK009	Policies Map:	KCK009
------------	-------------------	---------	---	-------	--------	---------------	--------

#### 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 type="checkbox"/> |
| B. Sound                                 | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/>            | No: | <input 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 refer to covering letter attached.

(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.*

None proposed.

(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:**

Office Use Only	Part A Reference:
	Part B Reference:

**To help support the proposed allocation of the site, if the appointed Inspector considers it 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: Steven Butler (Associate, Planning – Bidwells)

Date: 23/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Your ref: KCK009  
 Our ref: -  
 DD: 07769 687142  
 E: [Steven.butler@bidwells.co.uk](mailto:Steven.butler@bidwells.co.uk)  
 Date: 23-02-2021

Shropshire Council  
 Planning Policy Team  
 Shirehall  
 Abbey Foregate  
 Shrewsbury  
 Shropshire, SY2 6ND

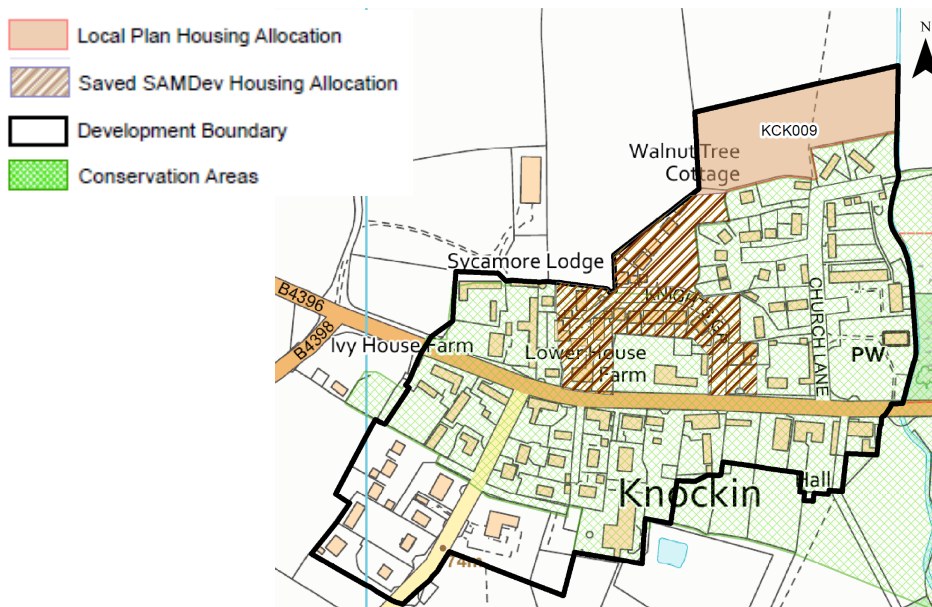
Dear Sir or Madam,

**REGULATION 19 PRE-SUBMISSION DRAFT LOCAL PLAN CONSULTATION**

We write in response to the above Local Plan consultation on behalf of Bradford Estates. We **support** the proposed allocation of *Land north of Church Lane, Knockin* – site reference KCK009 for 25 dwellings.

**KCK009 is sustainable**

We consider that the proposed development of site KCK009 would enable the sustainable development of Knockin for the emerging Plan period. As a site adjacent to the existing built edge of Knockin, with limited site-specific constraints, it represents a wholly logical location for the village’s future expansion that would be proportionate to Knockin’s position in the Oswestry Place Plan Area as a Community Hub. This is in line with the comments we submitted in support of the identification of Knockin as a Community Hub for the previous consultations in 2019 and 2020. An extract from the site allocation map is shown below.



*Above – Extract from Reg19 Proposals Map with relevant annotations*

Bidwells, Bidwell House, Trumpington Road, Cambridge CB2 9LD  
 T: 01223 841841 E: [info@bidwells.co.uk](mailto:info@bidwells.co.uk) W: [bidwells.co.uk](http://bidwells.co.uk)

### **KCK009 detailed policy requirements can be met**

We support the Regulation 19 Local Plan's policy requirements for KCK009, which in summary specify the following:

- *Access to be provided through SAMDev allocation KK001;*
- *A proportionate Heritage Impact Assessment should be carried out and its recommendations taken into account with respect to the impact of development on the significance of the Conservation Area and its setting.*
- *Existing mature trees onsite should be maintained. Public rights of way through the site should be retained, buffered and appropriately enhanced; and*
- *Incorporation of sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water risk will be managed by excluding development from the affected areas of the site – these areas will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere.*

There should be no in-principle reasons why development of the site could not meet these detailed policy requirements. The scheme would be accessed through SAMDev allocation KK001, the development of which is nearing completion. Bradford Estates is in negotiations with developers for the delivery of the KCK009 and a good urban design strategy should mean that the heritage, arboricultural and drainage constraints could be mitigated as part of a masterplan.

### **KCK009 is deliverable**

Bidwells on behalf of Bradford Estates has held pre-application discussions with Shropshire Council under reference *PREAPP/19/00137* and we are keen to facilitate delivery as soon as the planning process allows it. To demonstrate the deliverability of the site we enclose an extract of the masterplan scheme submitted at the pre-application stage below. It accommodates 27 dwellings.



*Above – extract from our pre-application Masterplan & Delivery Study*

In respect of the above it should also be noted that the masterplan demonstrates that it could address the detailed KCK009 policy requirements as part of a future planning application.

This confirms that Bradford Estates has the appetite, experience and the means to help Shropshire Council deliver the KCK009 site allocation in accordance with its expectations.

**The Delivery Forecast is conservative but deliverable**

We note the forecast delivery timetables at Appendix 7 of the Local Plan, which for KCK009 identifies delivery within the medium term i.e. between 2025/26 and 2029/30. Having regard to the above, and to Bradford Estates' track record of timely delivery of residential sites, we can confirm that delivery of development on site KCK009 could occur comfortably before the start of this estimated timetable, should the planning process allow it to.

In summary we support the proposed KCK009 allocation and we look forward to liaising further with Shropshire Council as both the emerging Local Plan review and pre-application scheme are taken further through the planning process.

Yours faithfully

**Steven Butler**  
Associate, Planning

**Enc. Part A & B Consultation Forms**

## 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:	Steven Butler, Bidwells
------------------------	-------------------------

#### 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:	Schedule S14.2(i)	Policy:	LYH007 – Land East of Barley Meadows, Llanymynech	Site:	LYH007	Policies Map:	LYH007
------------	-------------------	---------	---	-------	--------	---------------	--------

#### 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 type="checkbox"/> |
| B. Sound                                 | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/>            | No: | <input 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 refer to covering letter attached.

*(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.*

None proposed.

*(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:

Office Use Only	Part A Reference:
	Part B Reference:



To help support the proposed allocation of the site, if the appointed Inspector considers it 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: Steven Butler (Associate, Planning – Bidwells)

Date: 23/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Your ref: LYH007  
Our ref: -  
DD: 07769 687142  
E: [Steven.butler@bidwells.co.uk](mailto:Steven.butler@bidwells.co.uk)  
Date: 23-02-2021

Shropshire Council  
Planning Policy Team  
Shirehall  
Abbey Foregate  
Shrewsbury  
Shropshire, SY2 6ND

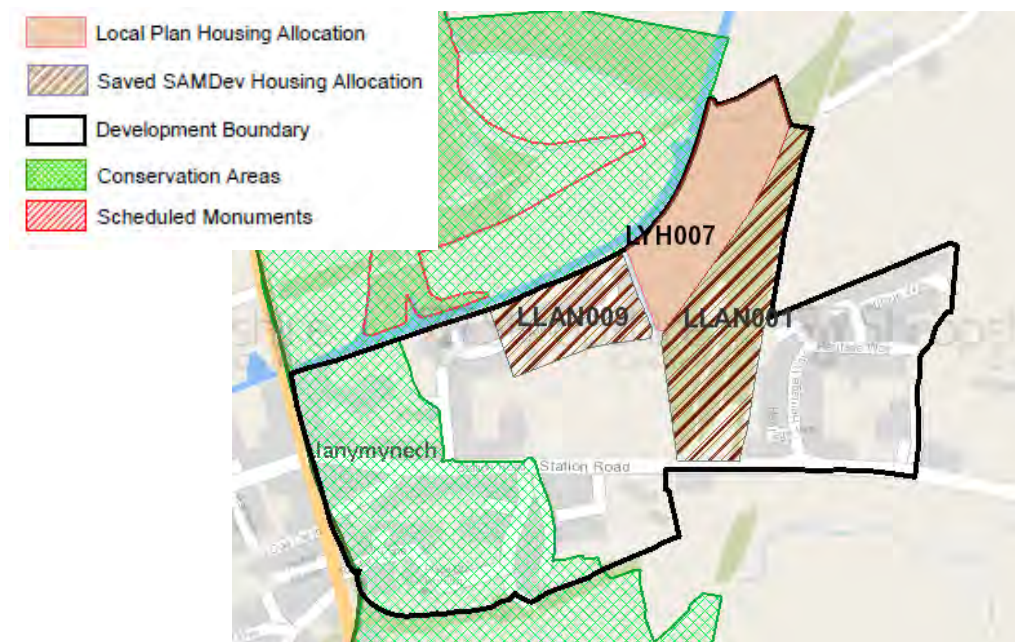
Dear Sir or Madam,

## REGULATION 19 PRE-SUBMISSION DRAFT LOCAL PLAN CONSULTATION

We write in response to the above Local Plan consultation on behalf of Bradford Estates. We **support** the proposed allocation of *Land East of Barley Meadows, Llanymynech* – site reference LYH007 for 50 dwellings.

### LYH007 is sustainable

We consider that the proposed development of site LYH007 would enable the sustainable development of Llanymynech for the emerging Plan period. As a site adjacent to the existing built edge of Llanymynech, with limited site-specific constraints, it represents a wholly logical location for the village's future expansion that would be proportionate to Llanymynech's position in the Oswestry Place Plan Area as a Community Hub. An extract from the site allocation map is shown below.



Above – Extract from Reg19 Proposals Map with relevant annotations

Bidwells, Bidwell House, Trumpington Road, Cambridge CB2 9LD  
T: 01223 841841 E: [info@bidwells.co.uk](mailto:info@bidwells.co.uk) W: [bidwells.co.uk](http://bidwells.co.uk)

### **LYH007 detailed policy requirements can be met**

We support the Regulation 19 Local Plan's policy requirements for LYH007, which in summary contain the following requirements:

- Access to be provided through Barley Meadows;
- Proportionate Heritage Impact Assessment to address any impact upon the significance of Llanymynech Conservation Area and its setting;
- Public right of way on the site to be retained and enhanced. Development must enhance footpaths to the nearby recreation space, village hall and village centre;
- Suitable buffer to hedgerows and watercourses on and adjacent to the site;
- Incorporation of sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water risk will be managed by excluding development from the affected areas of the site – these areas will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere;
- Development should not adversely affect the canal corridor and should respond positively to it, seeking to optimise the benefits such a location could provide for local communities; and
- Development will need to demonstrate that no discharges from the site during or post-construction will adversely affect the culvert under the canal.

### **LYH007 is deliverable**

To demonstrate deliverability of the allocation in accordance with the above policy requirements, we have engaged in pre-application discussions with Shropshire Council under reference PREAPP/20/00355 on behalf of Bradford Estates for the residential development of the site in accordance with the LYH007 policy requirements stipulated above. It proposes 53 new homes of mixed size and tenure, with 10% affordable housing in accordance with emerging policy DP3 (Affordable Housing Provision). The scheme would be accessed through the recently implemented residential development at Barley Meadows, which until its development was also owned by Bradford Estates.

The pre-app scheme is accompanied by evidence appropriate to this stage of the process and the emerging design would account for any further evidence that would need to be commissioned in support of a future planning application.

This demonstrates that Bradford Estates has the appetite, experience and the means to help Shropshire Council deliver the LYH007 site allocation in accordance with its expectations.

### **The Delivery Forecast is reasonable**

We note the forecast delivery timetables at Appendix 7 of the Local Plan, which for LYH007 identifies delivery within the short to medium term i.e. between 2020/21 and 2029/30. Having regard to the above, and to Bradford Estates' track record of timely delivery of residential sites, we can confirm that delivery of development on site LYH007 could occur comfortably within this estimated timetable.

In summary we support the proposed LYH007 allocation and we look forward to liaising further with

Representations on behalf of Bradford Estates  
Shropshire Regulation 19 Local Plan  
LYH007 – Land east of Barley Meadows, Llanymynech

Shropshire Council as both the emerging Local Plan review and pre-application scheme are taken further through the planning process.

Yours faithfully

**Steven Butler**  
Associate, Planning

**Enc. Part A & B Consultation Forms**