

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:	JONATHAN KEMP, CHAIR, BEDSTONE AND BUCKNELL PARISH COUNCIL
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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:	BKL001	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: | <input type="checkbox"/> | No: | <input 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 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.

1. Site Assessment – Stage 2b – Surrounding Character: Incorrect site description; Fields **are described as 'very gently undulating'** – they are to all intents and purposes flat.
2. Site Assessment – Stage 3 – Surface flood risk: Incorrect assessment: Recent flood incidents and heavy rains have turned the fields into ponds.
3. Site Assessment – Stage 3 – Highway Comments – Access: Correction required; **'Lane' is 'Chapel Lawn Road'**
4. Site Assessment – Stage 3 – Recommendation – Reasoning: Final sentence is disputed; children walk to school from Ladywell without complaint; residents of BKL001 would walk easily to the services to the east.

(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.

1, 2, 3 & 4:

- a. Review, correct and store/save corrected version.
- b. Resubmission not considered necessary in this case.

(Please continue on a separate sheet if necessary)

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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:

Jonathan Kemp

Date:

20/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	JONATHAN KEMP, CHAIR, BEDSTONE AND BUCKNELL PARISH COUNCIL
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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:	BKL002	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: | <input type="checkbox"/> | No: | <input 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 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.

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1. **Site Assessment – 2b – Surrounding Character: TYPO – Delete ‘buy’ Insert ‘by’**
2. Site Assessment – Stage 3 – Surface flood risks: Recent events have resulted in significant flooding in the south of the site
3. Site Assessment – Stage 3 – Recommendation Reasoning:
 - a. References to the site making a gateway into the village are irrelevant;
 - b. **Comment that development of the site would ‘...consolidate the current open form...’ is completely wrong – it would take away from the open form.**

- c. Final sentence reference to services to the west is incorrect – services are to the east of the site.

(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.

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1, 2, 3 & 4:

- a. Review the sections and points as as identified
- b. Correct and upate as necessary
- c. Save and file corrected version for future reference.

(Please continue on a separate sheet if necessary)

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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:

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(Please continue on a separate sheet if necessary)

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Signature:

Jonathan Kemp

Date:

20/02/2021

Office Use Only	Part A Reference:
	Part B Reference:



Representation Form

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Part B: Representation

Name and Organisation:	JONATHAN KEMP, CHAIR, BEDSTONE AND BUCKNELL PARISH COUNCIL
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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:	BKL004	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: | <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 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.

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1. Site Assessment – Stage 3 – Recommendation Reasoning:
 - a. References made to BKL002 are wrong; this is BKL004!
 - b. **Comment that development of the site would ‘...consolidate the current open form...’ is completely wrong** – it would take away from the open form.
 - c. Final sentence reference to services to the west is incorrect – services are to the east of the site, there are none to the west!

(Please continue on a separate sheet if necessary)

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1: a. Review the sections and points as as identified b. Correct and upate as necessary c. Save and file corrected version for future reference.

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Signature:

Jonathan Kemp

 Date:

20/02/2021

Office Use Only	Part A Reference:
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Representation Form

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Name and Organisation:	JONATHAN KEMP, CHAIR, BEDSTONE AND BUCKNELL PARISH COUNCIL
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- 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:	BKL008	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: | <input type="checkbox"/> | No: | <input 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).*

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PLEASE SEE SEPARATE SHEET

(Please continue on a separate sheet if necessary)

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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:

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Signature: Jonathan Kemp

Date: 21/02/2021

Office Use Only

Part A Reference:

Part B Reference:

ATTACHMENT TO SHROPSHIRE COUNCIL: SHROPSHIRE LOCAL PLAN – REPRESENTATION FORM

PART B: NAME AND ORGANISATION: JONATHAN KEMP, CHAIR, BEDSTONE AND BUCKNELL PARISH COUNCIL

Q1. See original form

Q2. To which part of the document does this representation relate?

Paragraph:		Policy:		Site:	BKLO08	Policies Map:	
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Q3. See original form

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.

1. **(a) Site Assessment – Stage 2b – Surrounding Character:** No mention is made of the Shropshire Hills AONB immediately to the north of the site on the other side of the adjacent B4367 road
(b) Site Assessment – Stage 3 – Landscape and Visual Impact Considerations:
 It is noticeable that much play is made in the assessments of other sites (e.g. WBR010, WBR005, CLU001 and BKLO10) that development will affect views from and of the AONB. Any development on BKLO08 will be immediately visible from the AONB. This must be reflected in the Site Assessment.
2. **Site Assessment – Stage 3 – Surface Water flood risk:** The site regularly becomes waterlogged – two swans were recently seen swimming in the field! It is the natural drainage ‘sponge’ from the AONB hills just across the road to the north heading south into the Redlake valley.
3. **Site Assessment – Stage 3 – Conclusion – Strategic Considerations:** In making reference to the potential access provisions via B4367 there is significant underrepresentation of the issues relevant to the site. In considering BKLO10, the following rationale for not promoting the site is put forward: *The development of BKLO10 would extend the current built form and layout of the village into a location that already receives considerable peak traffic flows on a significant blind corner on the local highway network. It is also considered that the distance from other services located to the east may deter pedestrians from walking into the village even though the development may provide footways linking to the existing village network.* Those exact same arguments apply to site BKLO08, the sites being immediately opposite to each other and accessing B4367 at the same point.
4. **Site Assessment – Recommendation Reasoning:** With apologies, but this is very poor.
(a) Proximity to some key local services and pedestrian viability. To argue that BKLO08 is a poorer option than BKLO08a on the basis of what would at the maximum be an additional 100m walk (i.e. from the southern edge of BKLO08 to the southern edge of BKLO08a is highly questionable. However, this point is completely negated when the ‘Reasoning’ includes this: *the development should provide footways linking to the existing village network although a footway into the Redlake Meadow development would address this matter.*
(b) In the assessment of this site, the argument is put forward that the site will ‘over-house’ Bucknell. However, in the assessment of BKLO08a the point is made that the parcel *must facilitate development of the remaining land at some future time.* The village’s view has been strongly expressed that it is firmly opposed to development of the BKLO08 site. It is not opposed to development *per se*, it is just this greenfield site, with the deleterious effect on the AONB, the difficult access to B4367, its surface water flooding and the blot on the essential Shropshire patchwork of agricultural land and small developments that they are opposed to. The village feels especially aggrieved that this site is even considered when there is a brownfield site crying out for development.

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.

1. Insert reference to AONB being directly opposite to and overlooking the site and noting the impact any development on the site will have on the AONB. Reassess Visual Impact to ‘High’.

2. Surface Water Flood Risk percentages should be reviewed and significantly increased. They don't reflect the current situation, let alone the recent increased rainfall patterns being experienced.
3. Include the traffic and pedestrian arguments used against BKL010 within the assessment of BKL008 and re-evaluate to further 'down-assess' the site.
4. (a) Make a cogent case for pedestrian access.
(b) Ensure no greenfield sites are developed before the brownfield site development commences.

Signature:	Jonathan Kemp	Date:	21 st February 2021
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Part B: Representation

Name and Organisation:	JONATHAN KEMP, CHAIR, BEDSTONE AND BUCKNELL PARISH COUNCIL
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Q1. To which document does this representation relate?

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- 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:	5.35-5.38	Policy:	S2.2(i) Bucknell	Site:	BKL008a	Policies Map:	
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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 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.

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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:

Arguments need to be put in person in order to fully represent the concerns of residents and to give the opportunity of clarifying or challenging issues as they arise.

(Please continue on a separate sheet if necessary)

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Signature: Jonathan Kemp

Date: 21/02/2021

Office Use Only

Part A Reference:

Part B Reference:

ATTACHMENT TO SHROPSHIRE COUNCIL: SHROPSHIRE LOCAL PLAN – REPRESENTATION FORM

PART B: NAME AND ORGANISATION: JONATHAN KEMP, CHAIR, BEDSTONE AND BUCKNELL PARISH COUNCIL

Q1. See original form

Q2. To which part of the document does this representation relate?

Paragraph:	5.35 - 5.38	Schedule:	S2.2(i)	Site:	BKL008a	Policies Map:	
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Q3. See original form

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.

1. **Site Assessment – Stage 2a – Criteria assessment:** Children’s Playground incorrectly rated ‘Green’. There is no playground, as acknowledged in the ‘Yellow’ assessment of this criteria for site BKL008.
2. **(a) Site Assessment – Stage 2b – Surrounding Character:** No mention is made of the Shropshire Hills AONB immediately to the north of the site on the other side of the adjacent B4367 road
(b) Site Assessment – Stage 3 – Landscape and Visual Impact Considerations:
 It is noticeable that much play is made in the assessments of other sites (e.g. WBR010, WBR005, CLU001 and BKL010) that development will affect views from, and of, the Shropshire Hills AONB. Any development on BKL008a will be immediately visible from the AONB – confirmed by the LVSS: *The parcel is adjacent to the Shropshire Hills AONB and views north and towards Parcel A take in special qualities of the AONB. ... Views are generally open in the north of the parcel where hedgerows are maintain (SIC) to a low height...* Proximity to and effect on and from AONB must be reflected in the Site Assessment.
3. **Site Assessment – Stage 3 – Surface Water flood risk:** The site regularly becomes waterlogged – two swans were recently seen swimming in the field! It is the natural drainage ‘sponge’ from the AONB hills just across the road to the north heading south into the Redlake valley.
4. **Site Assessment – Stage 3 – Highway Comments:** The comments made seriously underestimate the issues surrounding this site. BKL010 attracted the following: *The development of BKL010 would extend the current built form and layout of the village into a location that already receives considerable peak traffic flows on a significant blind corner on the local highway network. It is also considered that the distance from other services located to the east may deter pedestrians from walking into the village even though the development may provide footways linking to the existing village network.* Those exact same arguments apply to site BKL008a, the sites being immediately opposite to each other and accessing B4367 at the same point.
5. **Site Assessment – Stage 3 – Tree Comments Other Constraints:** Linked to the above, it is interesting to note that there is likely to be a need for a *large visibility splay*. As well as the hedgerow ‘stepping stones’ point, this issue highlights the fact that access will be more complex than assessed by Highways.
6. **Site Assessment – Stage 3 – Conclusion – Strategic Considerations:**
(a) To reiterate, the issue of access from B4367 to the site BKL008a is misleadingly under-assessed. For the record Shropshire Council’s own assessment of site BKL010 stated [the site] *would extend the current built form and layout of the village into a location that already receives considerable peak traffic flows on a significant blind corner on the local highway network.* Whether approached from north or south, will deliberately introduce a dangerous junction bringing significant additional traffic into an already busy and potentially dangerous section of roadway. This issue has not been given enough weight in assessing the site as proposed under BKL008a.
(b) But even worse would be the impact of the required additional building mandated within this scheme to allow in due course for the realisation of the full BKL008 site. Additionally, there will be increased pedestrian issues – walkers, families with buggies and mobility scooters. These issues have received only a cursory reference.

(c) Reference in the final sentence of this section refers to the possibility of providing a footpath into adjacent Redlake Meadow. Any such path would have to commence at the end of the cul-de-sac by Nos 25 and 26 Redlake Meadow. However, that would lead directly into the lower portion of BKLO08 making a path north toward the BKLO08a development. How is that expected to work with grazing livestock? If however grazing ceases, what arrangements will be made to ensure the lower section of BKLO08 is maintained suitably?

7. Site Assessment – Stage 3 – Recommendation Reasoning

Site Assessment – Stage 3 – Recommendation Design Requirements

Draft Local Plan Regulation 19, Schedule S2.2(i) – Bucknell Community Hub

Draft Local Plan Regulation 19, Paras 5.35 – 5.38

(a) UNSOUND

(1) Reference is made to ‘the housing guideline for Bucknell’. It is unclear how the guideline has been arrived at. It is not understood how it can be ‘sound’ to plan for increased development in Bucknell (now up to 110 dwellings) when the October 2019 ‘Right Homes, Right Place’ survey revealed just 14 respondents looking to move in up to the next 5 years. To plan on encouraging the build of 8 times the 5-year demand seems odd and unsound.

(2) Encouraging the build of 110 dwellings in Bucknell when 500 homes are planned within a 7-mile radius at Craven Arms – where there will be employment ‘on the doorstep’ – (not to mention developments at Bishops Castle (150) and Ludlow (1000)), must surely stretch to breaking what ‘sound’ can be asked to bear.

(3) To deliberately plan to build on a greenfield site because it ‘will permit new housing to be delivered quickly’ whilst there is a brownfield site in the village with many years’ capacity yet to be tapped into is to unsoundly set SC policy of ‘Brownfield First’ on its head.

(4) It is also disingenuous to, as just quoted, promote a greenfield site that ‘will permit new housing to be delivered quickly’ when it is allocated a ‘Long Term 2035/36-2037/38’ window. Is that sound?

(b) DUTY TO CO-OPERATE

(1) Others have recorded – and the Parish Council has commented in the Regulation 18 consultation – that the village is prepared to accept substantial development but not at the unjustified expense of losing important agricultural greenfield – especially when immediately adjacent to the Shropshire Hills AONB. Frustratingly, there has been no substantive cooperation from Shropshire Council Officers. Meetings have been held, both in the village and at Shirehall – and with the Leader – but nevertheless the Regulation 18 Consultation reinstated BKLO08a against our reasoned wishes. And now, despite our rational points, many letters written and a petition, yet again BKLO08a is promoted.

(2) It is galling to read – with the most spurious of supportive arguments – that BKLO08a ‘is the preferred site for development in the village.’ It simply is NOT. No attempt to engage with the points made by the residents is forthcoming from Shropshire Council.

(3) The blandishments offered in support of BKLO08a – that development must ‘respect the historic character of the settlement’, that it must ‘enhance the character of the AONB’, that it must ‘contribute to the countryside setting to the east’ are sadly laughable. A development on the flat rectangular site (shaped by the enclosures), with the B road running alongside the site as a hard border, will do nothing for the AONB – nor for ‘the historic character’.

(4) If Shropshire Council really cares about the AONB and the village’s historic character, it will do all it can to ensure the development is well out of sight of the AONB, and that the now redundant, worn-out, eye-sore, historic buildings on BUCK001 (which includes BKL011) are cleared away and the site developed, enabling Bucknell to look positively to the emerging future as a Community Hub. But that of course would require co-operation – a duty seemingly sadly lacking in our dealings with Shropshire Council.

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.

1. Re-assess Playground to 'Yellow' and re-score the site
2. Insert reference to AONB being directly opposite to and overlooking the site and noting the impact any development on the site will have on the AONB. Reassess Visual Impact to 'High'.
3. Surface Water Flood Risk percentages should be reviewed and significantly increased. They don't reflect the current situation, let alone the recent increased rainfall patterns being experienced.
4. Include the traffic and pedestrian arguments used against BKL010 within the assessment of BKL008a and re-evaluate the site's viability.
5. Reassess issues around the splay/access and reflect in the site's overall rating.
6. (a) Redraft to reflect the highlighted traffic control issues
 (b) Note particularly the pedestrian/buggy/mobility scooter aspects
 (c) Address the footpath issue through southern section of BKL008.
 (d) Amend overall site assessment to reflect the complications and linked increased risks.
7. (a) Review Bucknell's housing guideline collaboratively and provide a reasoned rationale for the allocation.
 (b) Actively support options for BUCK001 (incorporating BKL011) to allow it to be developed as a mixed site as flexibly and creatively as possible allowing for alternative employment and housing possibilities in addition to previous assumptions – including possibility of extending the site eastwards.
 (c) Undertake to allow no greenfield sites to be promoted until it is clear that market demand would justify such action.

Signature:	Jonathan Kemp	Date:	23 rd February 2021
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Representation Form

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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:	JONATHAN KEMP, CHAIR, BEDSTONE AND BUCKNELL PARISH COUNCIL
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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:	BKL009	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: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| B. Sound | Yes: | <input 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.

- Site Assessment Stage 2b – Site Address: Site should be described as “Land south of Chapel Lawn Road at junction with Daffodil Lane, Bucknell”**

(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.

1. **Correct address, update and store as necessary.**

(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: Jonathan Kemp

Date: 20/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	JONATHAN KEMP, CHAIR, BEDSTONE AND BUCKNELL PARISH COUNCIL
------------------------	--

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:	BKL010	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: | <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 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.

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- Site Assessment – Stage 2b - General Description:**
 - Site described as ‘gently undulating’ - in fact it is steeply sloped.
 - No reference to the site lying entirely in the Shropshire Hills AONB
- Site Assessment – Stage 3 – Strategic Considerations: description is of another site.
- Site Assessment – Stage 3 – Surface flood risk assessments: 0% assessments are incorrect; site becomes very wet indeed

(Please continue on a separate sheet if necessary)

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1 and 2: Provide correct description of the site – including significant AONB issue
3. Reassess surface water flood risk

(Please continue on a separate sheet if necessary)

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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:

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(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:

Jonathan Kemp

 Date:

20/02/2021

Office Use Only	Part A Reference:
	Part B Reference:



Representation Form

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Part B: Representation

Name and Organisation:	JONATHAN KEMP, CHAIR, BEDSTONE AND BUCKNELL PARISH COUNCIL
------------------------	--

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: Policy: Site: Policies Map:

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.

1. Site Assessment-Stage 2b:
 - a. Indicative dwelling capacity: recorded as 34, yet the site id programmed for at least 70
 - b. percentage brownfield: 50% looks low; suggest 70%
2. Site Assessment-Stage 3:
 - a. Heritage – management of constraints: TYPO, **Delete 'good shed' Insert 'goods shed'**
 - b. Conclusion – Strategic Considerations: The description provided is not of this site!

(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.

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1a, 1b, 2a: Review, correct/update as necessary.

2b: In view of this serious error linked to this key site, it is suggested that the consultation period should be restarted, to allow for submission by Shropshire Council of the correct description and assessment of this site and the subsequent review by consultees.

(Please continue on a separate sheet if necessary)

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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:

The case for this site's potential innovative development, and the imperative

actively to support its promotion, should be made in person to ensure the hearing is made fully aware of **residents' keen wish to see the eyesore site developed** for the benefit of the village and for Shropshire.

(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: Jonathan Kemp

Date: 22/02/2021

Office Use Only

Part A Reference:

Part B Reference:



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Part B: Representation

Name and Organisation:	JONATHAN KEMP, CHAIR, BEDSTONE AND BUCKNELL PARISH COUNCIL
------------------------	--

Q1. To which document does this representation relate?

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- 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:	Click or tap here to enter text.	Policy:	DP13	Site:		Policies Map:	
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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 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).

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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.

- The draft Local Plan's allocation, within the river Clun SAC, of significant pockets of development (totalling over 500 dwellings) is patently unsound given the lack of any commitment within DP13 as to how the goals of nutrient neutrality or betterment shall be achieved. Without such a commitment, development proposals within the river Clun SAC are, un-cooperatively, being set up to fail, developers are wasting money and residents' lives are being needlessly upset.**
- Shropshire Council's 'Development within the River Clun Catchment: Guidance Note 12 (Revision A) February 2020' charts a way forward via production of a revised nutrient management plan (at para 2.5 of the Note), which 'must be produced' but DP13 includes no commitment to carrying out that work – the key to unlock the Gaudian knot of Clun SAC development.**
- There is a mis-match between DP13 and the above mentioned Guidance Note as to the standards to be achieved: one refers to 'neutrality' the other to 'reduction'.**

(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.

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1. INSERT ADDITIONAL sub-para 3:

DP13.

3. Recognising the the urgent need to improve and guarantee water quality as key to the Freswater Mussels' viability – and thence for the proposed growth in housing, businesses and employment in the river Clun catchment – the Planning Authority, in association with statutory agencies and other stakeholders, will, as a priority, produce a revised nutrient management plan (NMP).

(Please continue on a separate sheet if necessary)

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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)

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Office Use Only	Part A Reference:
	Part B Reference:

Signature:

Jonathan Kemp

Date:

25/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	JONATHAN KEMP, CHAIR, BEDSTONE AND BUCKNELL PARISH COUNCIL
------------------------	--

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" value="4.136"/>	Policy:	<input type="text" value="Click or tap here to enter 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: | <input type="checkbox"/> | No: | <input 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.

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- The draft Local Plan's allocation, within the river Clun SAC, of significant pockets of development (totalling over 500 dwellings) is patently unsound given the lack of any commitment within DP13 as to how the goals of nutrient neutrality or betterment shall be achieved. Without such a commitment, development proposals within the river Clun SAC are, un-cooperatively, being set up to fail, developers are wasting money and residents' lives are being needlessly upset.**
- Shropshire Council's 'Development within the River Clun Catchment: Guidance Note 12 (Revision A) February 2020' charts a way forward via production of a revised nutrient management plan (at para 2.5 of the Note), which 'must be produced' but DP13 includes no commitment to carrying out that work – the key to unlock the gaudian knot of Clun SAC development.

(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.

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REDRAFT PARA 4.136 as follows:

4.136. Notwithstanding these improvements, the Habitat Regulations Assessment (HRA) for this Plan (in the light of the 'Dutch Nitrogen Case') shows that much development in the river Clun catchment is likely to have an adverse effect on the river Clun SAC. The urgent need for practical mitigation measures, which would remove this effect for larger applications, have yet to be proposed. Accordingly, to comply with the requirements of the Conservation of Habitats and Species Regulations 2017, this policy currently restricts development to that which is either nutrient neutral in terms of its effect on the SAC or results in a betterment. This is in anticipation of measures to achieve either of these criteria being found in the future for the majority of development in the catchment. Such measures will include work to produce a revised Nutrient Management Plan in association with statutory agencies and other stakeholders. The revised NMP, along with a robust Mitigation Action Plan, will provide the level of certainty required by the Habitats Regulations that the SAC restoration targets can be achieved in an appropriate timescale. These actions will additionally clarify the standards to be achieved by developers encouraged within this Plan to bring forward schemes in the SAC, but currently frustrated in their wish to unlock economic and housing development.

(Please continue on a separate sheet if necessary)

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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:

(Please continue on a separate sheet if necessary)

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Signature:

Jonathan Kemp

Date:

25/02/2021

Office Use Only	Part A Reference:
	Part B Reference:



Representation Form

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Part B: Representation

Name and Organisation:	JONATHAN KEMP, CHAIR, BEDSTONE AND BUCKNELL PARISH COUNCIL
------------------------	--

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" value="5.35"/>	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: | <input type="checkbox"/> | No: | <input 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 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.

Final sentence under-values Bucknell's railway connections.

(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.

Redraft final sentence of para 5.35 as follows:

Bucknell's significance is also enhanced by its operational rail station, linking with the main line to Manchester, Birmingham and Cardiff and, via Knighton, to Swansea.

(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: Jonathan Kemp

Date: 24/02/2021

Office Use Only

Part A Reference:

Part B Reference:

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:	JONATHAN KEMP, CHAIR, BEDSTONE AND BUCKNELL PARISH COUNCIL
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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" value="5.36"/>	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: | <input type="checkbox"/> | No: | <input 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 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.

Geographic placing description of AONB's relationship with Bucknell is incorrect.

(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.

Redraft para 5.36 as follows:

The provision of land for development in Bucknell is affected by the centre, north and west of the village being within

(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.

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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: Jonathan Kemp

Date: 24/02/2021

Office Use Only

Part A Reference:

Part B Reference:



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:	JONATHAN KEMP, CHAIR, BEDSTONE AND BUCKNELL PARISH COUNCIL
------------------------	--

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" value="5.37"/>	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: | <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 checked="" 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.

- The brownfield, eyesore, Coal and Timber yards (BUCK001 and BKL011) are – and have remained for upwards of 30 years – Bucknell’s **preferred development site**. This has been strongly and regularly expressed by the community.
- Siting Bucknell’s development at this location will respect the historic character of the village, replacing redundant buildings with a mixed gateway development – with easy access to village facilities east and west as well as to B4367 and A4113.
- The site’s topography, along with its established hedges and trees, mean that development will be characterful and benefit from mature screening, ensuring no impact on the AONB. If increased numbers are required the site can expand eastward.
- To ring-fence development to this site (extended if necessary) would demonstrate Shropshire’s duty to cooperate and its commitment to the county’s improvement as Bucknell looks to develop as a Community Hub.

(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.

After "...at the southern edge of the village." INSERT ADDITIONAL SENTENCE as follows:

The village is keenly supportive of moves to clear and redevelop this eyesore site (incorporating BKL011) as a gateway addition to the village, melding into the topography of the site, avoiding any impact on the AONB and if necessary extending eastward to accept the requirement for any additional housing capacity.

(Please continue on a separate sheet if necessary)

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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:

The importance of this site to the village's development aspirations must be in no doubt.

(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: Jonathan Kemp

Date: 26/02/2021

Office Use Only

Part A Reference:

Part B Reference:



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:	JONATHAN KEMP, CHAIR, BEDSTONE AND BUCKNELL PARISH COUNCIL
------------------------	--

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" value="5.38"/>	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: | <input type="checkbox"/> | No: | <input 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 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.

Site relationship with the AONB is described wrongly. Proposed extension of the village eastwards will not move development away from the AONB.

(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.

Redraft first sentence of para 5.38 as follows:

The strategy for Bucknell is to meet the needs of the local communities, whilst recognising its landscape and historic significance, by extending the village to the east into countryside. This will move development away from the Conservation Area. It will however place additional development adjacent to the AONB, which lies directly to the north of the B4367.

(Please continue on a separate sheet if necessary)

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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)

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Signature: Jonathan Kemp

Date: 24/02/2021

Office Use Only

Part A Reference:

Part B Reference: