

# 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).

Part B: Represei	ntation
Name and Organisation:	JONATHAN KEMP, CHAIR, BEDSTONE AND BUCKNELL PARISH COUNCIL
Q1. To which document	t does this representation relate?
Regulation 19: Pre-Su	ubmission Draft of the Shropshire Local Plan
Sustainability Appraisa Local Plan	al of the Regulation 19: Pre-Submission Draft of the Shropshire
Habitats Regulations A Shropshire Local Plan (Please tick one box)	Assessment of the Regulation 19: Pre-Submission Draft of the
Q2. To which part of the	e document does this representation relate?
Paragraph:	Policy: Site: BKL001 Policies Map:
Q3. Do you consider the Shropshire Local Plan is	e Regulation 19: Pre-Submission Draft of the s:
A. Legally compliant	Yes: No:
B. Sound	Yes: No: 🗸
C. Compliant with the Dut	<u> </u>
Draft of the Shropshire fails to comply with the If you wish to support the legal of the Shropshire Local Plan of set out your comments.	of why you consider the Regulation 19: Pre-Submission Local Plan is not legally compliant or is unsound or eduty to co-operate. Please be as precise as possible. all compliance or soundness of the Regulation 19: Pre-Submission Draft or its compliance with the duty to co-operate, please also use this box to
	ge 2b - Surrounding Character: Incorrect site description; Fields gently undulating' - they are to all intents and purposes flat.
	ge 3 - Surface flood risk: Incorrect assessment: Recent flood ns have turned the fields into ponds.
3. Site Assessment – Stag 'Chapel Lawn Road'	ge 3 - Highway Comments - Access: Correction required; 'Lane' is
	ge 3 - Recommendation - Reasoning: Final sentence is disputed; from Ladywell without complaint; residents of BKL001 would walk of the east.

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.

forward your suggested revised wording of any policy or tex	t. 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	e.
(Dlagge cou	atinus on a congrata choot if necessary)
	ntinue on a separate sheet if necessary)
Please note: In your representation you should provide supporting information necessary to support your represe modification(s). You should not assume that you will hav submissions.	entation and your suggested
After this stage, further submissions may only be m based on the matters and issues he or she identifie.	
Q6. If your representation is seeking a modific Submission Draft of the Shropshire Local Plan, participate in examination hearing session(s)? Please note that while this will provide an initial indication session(s), you may be asked at a later point to confirm y	do you consider it necessary to
No, I do not wish to participate in hearing session	, ,
Yes, I wish to participate in hearing session(s)	
(Please tick one box)	
Q7. If you wish to participate in the hearing se you consider this to be necessary:	ssion(s), please outline why
l	
	tinue on a separate sheet if necessary)
Please note: The Inspector will determine the most applithose who have indicated that they wish to participate in to confirm your wish to participate when the Inspector has examination.	hearing session(s). You may be asked
Signature: Jonathan Kemp	Date: 20/02/2021
Signature: Jonathan Kemp	Date. 20/02/2021
	Part A Reference

Office Use Only



# 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).

Part B: Represer	ntation			
Name and Organisation:	JONATHAN KEMP, C COUNCIL	HAIR, BEDSTONE A	ND BUC	KNELL PARISH
Q1. To which document	does this represe	ntation relate?		
Regulation 19: Pre-Sul	bmission Draft of the	Shropshire Local Pla	n	
Sustainability Appraisa Local Plan	al of the Regulation 19	: Pre-Submission Di	aft of th	ne Shropshire
Habitats Regulations A Shropshire Local Plan (Please tick one box)	ssessment of the Reg	ulation 19: Pre-Subi	mission	Draft of the
Q2. To which part of the	e document does t	his representati	on rela	ite?
Paragraph:	Policy:	Site: BKL002		licies Map:
Q3. Do you consider the Shropshire Local Plan is		re-Submission D	raft of	the
A. Legally compliant		Yes:	No:	
B. Sound		Yes:	No:	$\overline{\checkmark}$
C. Compliant with the Duty	•	Yes:	No:	
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 – 2b – S	Surrounding Character:	TYPO – Delete 'buy	'Insert	'by'
2. Site Assessment – S resulted in significar	9		nt ever	nts have
3. Site Assessment – Stage 3 – Recommendation Reasoning: a. References to the site making a gateway into the village are irrelevant;				
b. Comment that de open form' is c	evelopment of the completely wrong -			

c. Final sentence referer are to the east of the		he west is incorrect – services
Q5. Please set out the modif Regulation 19: Pre-Submissi compliant and sound, in resp you have identified at Q4 abo	ication(s) you con on Draft of the Sh pect of any legal co	
Please note that non-compliance with examination. You will need to say wh	h the duty to co-operate ny each modification wil gally compliant or sound	ll make the Regulation 19: Pre-Submission d. It will be helpful if you are able to put
1, 2, 3 & 4:		
a. Review the sections and poi	nts as as identified	
b. Correct and upate as necessar	ary	
c. Save and file corrected version	on for future reference	`
	(Please co.	ntinue on a separate sheet if necessary)
Please note: In your representation supporting information necessary to modification(s). You should not as submissions.	o support your represe	entation and your suggested
After this stage, further submis based on the matters and issue	2 2	nade if invited by the Inspector, es for examination.
Submission Draft of the Shroparticipate in examination he	opshire Local Plan, earing session(s)?	
session(s), you may be asked at a		n of your wish to participate in hearing your request to participate.
No, I do not wish to partici	pate in hearing session	n(s)
Yes, I wish to participate in (Please tick one box)	n hearing session(s)	
Q7. If you wish to participate you consider this to be necess		ession(s), please outline why
	Office Hee Only	Part A Reference:
	Office Use Only	

those who h	e: The Inspector will determine the most appropo nave indicated that they wish to participate in hea your wish to participate when the Inspector has ic	riate procedure aring session(s).	You may be asked
Signature:	Jonathan Kemp	Date:	20/02/2021

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).

Part B: Represer	ntation					
Name and Organisation:	JONATHAN KEMP, C COUNCIL	HAIR, E	BEDSTONE AN	ID BU	CKNELL	. PARISH
Q1. To which document	does this represe	ntatio	n relate?			
Regulation 19: Pre-Sul	omission Draft of the S	Shropsh	nire Local Plar			
Sustainability Appraisa Local Plan	l of the Regulation 19	: Pre-S	ubmission Dra	aft of t	he Shr	opshire
Habitats Regulations A Shropshire Local Plan (Please tick one box)	ssessment of the Reg	ulation	19: Pre-Subm	nission	Draft (	of the
Q2. To which part of the	document does t	his re	presentatio	n rela	ate?	
Paragraph:	Policy:	Site:	BKL004	Po	olicies Map:	
Q3. Do you consider the Shropshire Local Plan is		re-Sub	omission Dr	aft of	f the	
A. Legally compliant		Yes:		No:	$\overline{\checkmark}$	
B. Sound		Yes:		No:	$\overline{\checkmark}$	
C. Compliant with the Duty	•	Yes:		No:		
Q4. Please give details of Draft of the Shropshire fails to comply with the If you wish to support the legal of the Shropshire Local Plan or set out your comments.	of why you conside Local Plan is not le duty to co-operat I compliance or soundr	egally e. Plea ness of t	compliant ase be as p the Regulation	or is recise <i>19: Pr</i>	unsot e as p e-Subn	ind or ossible. Dission Draft
Site Assessment - 3     a. References made	_			_		
b. Comment that de open form' is c	evelopment of the ompletely wrong -					
c. Final sentence re are to the east of	ference to services f the site, there are				ect - s	ervices

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.

ioi wai u you	i suggested revised word	illig of arry policy of tex	i. Thease be as preci	ise as possible.
1: a. Revi	ew the sections and poir	nts as as identified		
b. Corre	ct and upate as necessa	ary		
	and file corrected version			
c. Save	and the corrected version	on for future reference		
		(Please co	ntinue on a separat	te sheet if necessary)
	e: In your representation	on you should provide	succinctly all the e	vidence and
	information necessary t n(s). You should not as s.			
	stage, further submis he matters and issue			
Submissi participat	ur representation is on Draft of the Shro ce in examination he	ppshire Local Plan, earing session(s)?	do you conside	r it necessary to
	e that while this will prov you may be asked at a			
<b>√</b> No,	I do not wish to partici	pate in hearing sessior	n(s)	
Yes	, I wish to participate in	hearing session(s)		
(Ple	ease tick one box)			
	u wish to participate der this to be neces		ession(s), please	e outline why
_		· ·	•	sheet if necessary)
those who	te: The Inspector will de have indicated that they your wish to participate n.	wish to participate in	hearing session(s)	. You may be asked
Signature:	Jonathan Kemp		Date:	20/02/2021
			Part A Reference	ce:
		Office Use Only		



# 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).

Paragraph:  Policy:  Site: BKL008  Policies Map:  A. Legally compliant  Pere-Submission Draft of the Sound  Pere-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 Support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft Pre-Submis	making effective representations.
O1. 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)  O2. To which part of the document does this representation relate?  Paragraph: Policy: Site: BKL008 Policies Map:  O3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:  A. Legally compliant Yes: No: ✓  C. Compliant with the Duty to Co-operate Yes: No: ✓  (Please tick as appropriate).  O4. 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.	Part B: Representation
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:  BKL008  Policies Map:  Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:  A. Legally compliant  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.	I Namo and Organication' I
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)  O2. To which part of the document does this representation relate?  Paragraph:  Policy:  Site:  BKL008  Policies Map:  O3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:  A. Legally compliant  Yes:  No:  C. Compliant with the Duty to Co-operate (Please tick as appropriate).  O4. 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.	Q1. To which document does this representation relate?
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:  BKL008  Policies Map:  Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:  A. Legally compliant  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 the set out your comments.	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
Shropshire Local Plan (Please tick one box)  Q2. To which part of the document does this representation relate?  Paragraph:  Policy:  Site:  BKL008  Policies Map:  Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:  A. Legally compliant  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 t set out your comments.	
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Shropshire Local Plan is:  A. Legally compliant  Yes:  No:  No:  B. Sound  Yes:  No:  No:  Yes:  No:  No:  Yes:  No:  Yes:  No:  Yes:  No:  Yes:  No:	Paradrann' I Policy I I Site I BKI 008 I I I
B. Sound  Yes:  No:  (Please tick as appropriate).  No:  (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 t set out your comments.	
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 t set out your comments.	A. Legally compliant  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.	B. Sound Yes: No: V
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.	
	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.

Regulatio compliant	e set out the modif n 19: Pre-Submissi and sound, in resp identified at Q4 abo	on Draft of the Sh bect of any legal co	ropshire Local F	Plan legally
Please note examination Draft of the forward you	that non-compliance with . You will need to say wh Shropshire Local Plan leg r suggested revised word	h the duty to co-operate ny each modification wil gally compliant or sound	I make the Regulation d. It will be helpful it	on 19: Pre-Submission you are able to put
PLEASE SE	E SEPARATE SHEET			
		(Please co	ntinue on a separat	te sheet if necessary)
supporting i	e: In your representation information necessary t n(s). You should not as s.	on you should provide to support your represe	succinctly all the e entation and your s	vidence and uggested
	stage, further submis he matters and issue			
Submission participate <i>Please note</i>	or representation is on Draft of the Shroe in examination he that while this will provious may be asked at a	opshire Local Plan, earing session(s)? vide an initial indication	do you conside	er it necessary to
	I do not wish to partici	,		,
Yes	, I wish to participate ir	hearing session(s)		
·	ase tick one box)			
	uwish to participate der this to be neces		ession(s), please	e outline why
		J		
those who h	e: The Inspector will denave indicated that they your wish to participate	etermine the most app v wish to participate in	ropriate procedure hearing session(s)	. You may be asked
Signature:	Jonathan Kemp		Date:	21/02/2021
		0.55	Part A Reference	ce:
		Office Use Only	Part B Reference	ce:

#### 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:	BKL008	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 BKL010) that development will affect views from and of the AONB. Any development on BKL008 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 BKL010, the following rationale for not promoting the site is put forward: 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 BKL008, 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 BKL008 is a poorer option than BKL008a on the basis of what would at the maximum be an additional 100m walk (i.e. from the southern edge of BKL008 to the southern edge of BKL008a is highly questionable. However, this point is completed 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 BKL008a 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 BKL008 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 reevaluate 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.

Jonathan Kemp	Date:	21st February 2021
	Jonathan Kemp	Jonathan Kemp Date:



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Part B: Represer	ntation	
Name and Organisation:	JONATHAN KEMP, CHAIR, BEDSTONE AND BUCKNELL PAR COUNCIL	ISH
Q1. To which document	t does this representation relate?	
Regulation 19: Pre-Sul	ubmission Draft of the Shropshire Local Plan	
Sustainability Appraisa Local Plan	al of the Regulation 19: Pre-Submission Draft of the Shropshi	re
Habitats Regulations A Shropshire Local Plan (Please tick one box)		ž
Q2. To which part of the	e document does this representation relate?	
Paragraph: 5.35-5.38	Policy: S2.2(i) Site: BKL008a Policies Map:	
Q3. Do you consider the Shropshire Local Plan is	e Regulation 19: Pre-Submission Draft of the s:	
A. Legally compliant	Yes: No:	
B. Sound	Yes: No: 🗸	
C. Compliant with the Duty (Please tick as appropriate		
Draft of the Shropshire fails to comply with the If you wish to support the legal	of why you consider the Regulation 19: Pre-Subme Local Plan is not legally compliant or is unsound of duty to co-operate. Please be as precise as possible all compliance or soundness of the Regulation 19: Pre-Submission its compliance with the duty to co-operate, please also use this	or ble. n <i>Draft</i>
PLEASE SEE SEPARATE S	SHEET	

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Office Use Only

#### 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 - 5.38Schedule:S2.2(i)Site:BKL008aPolicies 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 BKL008making a path north toward the BKL008a 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 BKL008 is maintained suitably?
- 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 BKL008a against our reasoned wishes. And now, despite our rational points, many letters written and a petition, yet again BKL008a is promoted.
- (2) It is galling to read with the most spurious of supportive arguments that BKL008a '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 BKL008a 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 reevaluate 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 <sup>rd</sup> February 2021



# 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).

Part B: Represer	Part B: Representation					
Name and Organisation:	JONATHAN KEMP, COUNCIL	CHAIR,	BEDSTONE /	AND BUCKN	ELL PARISH	
Q1. To which document	does this represe	entatio	n relate?			
Regulation 19: Pre-Suk	omission Draft of the	Shropsh	hire Local Pla	an		
Sustainability Appraisa Local Plan	l of the Regulation 1	9: Pre-S	Submission [	Oraft of the	Shropshire	
Habitats Regulations As Shropshire Local Plan (Please tick one box)	ssessment of the Req	gulation	19: Pre-Sub	omission Dra	aft of the	
Q2. To which part of the	document does	this re	presentat	ion relate	?	
Paragraph:	Policy:	Site:	BKL009	Polici Ma		
Q3. Do you consider the Shropshire Local Plan is		re-Suk	omission [	Oraft of th	e	
A. Legally compliant		Yes:		No:		
B. Sound		Yes:		No:	]	
C. Compliant with the Duty (Please tick as appropriate	·	Yes:		No:	]	
Q4. Please give details of Draft of the Shropshire I fails to comply with the If you wish to support the legal of the Shropshire Local Plan or set out your comments.  1. Site Assessment Stage 21 Lawn Road at junction w	Local Plan is not duty to co-operal compliance or sound its compliance with the Double Site Address: Site	legally te. Plea Iness of the ne duty to should be	complian ase be as the Regulation to co-operate	t or is uns precise as on 19: Pre-Si e, please also	sound or s possible. ubmission Draft o use this box to	

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. I√I 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. 20/02/2021 Signature: Jonathan Kemp Date:

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Part A 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-Sul	bmission Draft of the Shropshire Local Plan				
Sustainability Appraisa Local Plan	al of the Regulation 19: Pre-Submission Draft of the Shropshire				
Shropshire Local Plan	Assessment of the Regulation 19: Pre-Submission Draft of the				
(Please tick one box)	e document does this representation relate?				
Q2. TO WITICIT Part OF the					
Paragraph:	Policy: Site: BKL010 Policies Map:				
Q3. Do you consider the Shropshire Local Plan is	e Regulation 19: Pre-Submission Draft of the				
A. Legally compliant	Yes: No: 🗹				
B. Sound	Yes: No: 🗸				
C. Compliant with the Duty	<u> </u>				
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.					
	age 2b - General Description:  'gently undulating' - in fact it is steeply sloped.				
b. No reference to the site lying entirely in the Shropshire Hills AONB					
2. Site Assessment - Stage 3 - Strategic Considerations: description is of another site.					
3. 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)

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.

forward your suggested revised word	ding of any policy or tex	t. Please be as preci	ise as possible.
1 and 2: Provide correct description of the	e site – including signifi	cant AONB issue	
3. Reassess surface water flood ri			
		*	te sheet if necessary)
Please note: In your representation supporting information necessary to modification(s). You should not as submissions.	to support your represe	entation and your s	uggested
After this stage, further submis based on the matters and issue			
Q6. If your representation is Submission Draft of the Shro participate in examination h	opshire Local Plan,	do you conside	
Please note that while this will prov session(s), you may be asked at a	vide an initial indicatior	n of your wish to pa	
No, I do not wish to partici	pate in hearing sessior	n(s)	
Yes, I wish to participate in	n hearing session(s)		
(Please tick one box)			
Q7. If you wish to participate you consider this to be neces		ssion(s), please	e outline why
	(Please cont	 tinue on a separate	sheet if necessary)
Please note: The Inspector will de those who have indicated that they to confirm your wish to participate examination.	etermine the most appi wish to participate in	ropriate procedure hearing session(s).	to adopt to hear . You may be asked
Signature: Jonathan Kemp		Date:	20/02/2021
	Office Use Only	Part A Reference	ce:
	Office Ode Office		



#### Representation Form

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Part B: Representation					
Name and Organisation:	JONATHAN KEMP, CHAIR, BEDSTONE AND BUCKNELL PARISH COUNCIL				
Q1. To which document	t does this representation relate?				
Regulation 19: Pre-Su	ubmission Draft of the Shropshire Local Plan				
Sustainability Appraisa Local Plan	al of the Regulation 19: Pre-Submission Draft of the Shropshire				
Habitats Regulations A Shropshire Local Plan (Please tick one box)	Assessment of the Regulation 19: Pre-Submission Draft of the				
	e document does this representation relate?				
	Policy: Site: BKL011 Policies Map:				
Q3. Do you consider the Shropshire Local Plan is	e Regulation 19: Pre-Submission Draft of the s:				
A. Legally compliant	Yes: No: V				
B. Sound	Yes: No: 🗹				
C. Compliant with the Dut	· — — —				
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.					
least 70	age 2b: ing capacity: recorded as 34, yet the site id programmed for at infield: 50% looks low; suggest 70%				
Site Assessment-Stage 3:     a. Heritage - management of constraints: TYPO, Delete 'good shed' Insert 'goods shed'					
b. Conclusion – Strate	egic Considerations: The description provided is not of this site!				

(Please continue on a separate sheet if necessary)

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 r suggested revised wording of any policy or text. Pi	will be helpful if	you are able to put
1a, 1b, 2a	Review, correct/update as necessary.		
period sho	v of this serious error linked to this key site, it is a uld be restarted, to allow for submission by Shrop and assessment of this site and the subsequent	oshire Council o	f the correct
	(Please contin	ue on a separat	e sheet if necessary)
supporting	re: In your representation you should provide suc information necessary to support your representa n(s). You should not assume that you will have a s.	ation and your s	uggested
	stage, further submissions may only be mad the matters and issues he or she identifies fo		
Submission	ur representation is seeking a modification on Draft of the Shropshire Local Plan, do se in examination hearing session(s)?	_	•
	that while this will provide an initial indication of you may be asked at a later point to confirm you.		
No,	I do not wish to participate in hearing session(s)		
	, I wish to participate in hearing session(s) ase tick one box)		
	u wish to participate in the hearing sessi der this to be necessary:	on(s), please	e outline why
actively to made full	for this site's potential innovative developmed support its promotion, should be made in pay aware of residents' keen wish to see the east the village and for Shropshire.	person to ensu	re the hearing is
those who l	e: The Inspector will determine the most appropr have indicated that they wish to participate in hea your wish to participate when the Inspector has ic	riate procedure aring session(s).	You may be asked
Signature:	Jonathan Kemp	Date:	22/02/2021

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Part A Reference:



#### Representation Form

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Part B: Represe	ntation
Name and Organisation:	JONATHAN KEMP, CHAIR, BEDSTONE AND BUCKNELL PARISH COUNCIL
Q1. To which documen	t does this representation relate?
Regulation 19: Pre-Su	ubmission Draft of the Shropshire Local Plan
Sustainability Apprais Local Plan	al of the Regulation 19: Pre-Submission Draft of the Shropshire
Habitats Regulations A Shropshire Local Plan (Please tick one box)	Assessment of the Regulation 19: Pre-Submission Draft of the
Q2. To which part of th	e document does this representation relate?
Paragraph: Click or tap here to enter text.	Policy: DP13 Site: Policies Map:
Q3. Do you consider the Shropshire Local Plan i	e Regulation 19: Pre-Submission Draft of the s:
A. Legally compliant	Yes: No:
B. Sound	Yes: No: 🗸
C. Compliant with the Du	ry to Co-operate Yes: No: 🗹
(Please tick as appropriat	<u>—</u> e).
Draft of the Shropshire fails to comply with the If you wish to support the leg	of why you consider the Regulation 19: Pre-Submission Local Plan is not legally compliant or is unsound or eduty to co-operate. Please be as precise as possible. all compliance or soundness of the Regulation 19: Pre-Submission Draft in its compliance with the duty to co-operate, please also use this box to
development (totalling commitment within I achieved. Without stars, un-cooperatively lives are being needle 2. Shropshire Council's (Revision A) Februal management plan (a	'Development within the River Clun Catchment: Guidance Note 12 by 2020' charts a way forward via production of a revised nutrient at para 2.5 of the Note), which 'must be produced' but DP13 ment to carrying out that work - the key to unlock the Gaudian

3. 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 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. INSERT ADDITIONAL sub-para 3:
1. INSERT ADDITIONAL SUD-PAIA S.
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)
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

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.

Office Use Only	Part A Reference:
	Part B Reference:

Signature: Jonathan Kemp	Date:	25/02/2021
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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).

	Donne		00					
Part B: Representation								
Name ar	nd Organisatio	on: JONA COUN	THAN KEMP, CIL	CHAIR, B	EDSTO	NE AND B	UCKNELI	_ PARISH
Q1. To wh	nich docum	ent does	this repres	entatio	n rela	te?		
<b>✓</b> Regu	lation 19: Pre	-Submissio	n Draft of the	e Shropsh	nire Loc	al Plan		
Susta Local	ainability Appr Plan	aisal of the	Regulation 1	9: Pre-S	ubmiss	ion Draft (	of the Sh	ropshire
☐ Shrop	rats Regulatio oshire Local P ase tick one bo	lan	ent of the Re	egulation	19: Pre	e-Submiss	ion Draft	of the
Q2. To wh	nich part of	the docu	ment does	this rep	preser	ntation r	elate?	
Paragraph:	4.136	Policy:	Click or tap here to enter text.	Site:			Policies Map:	
	u consider e Local Pla		lation 19:	Pre-Sub	missi	on Draft	of the	
A. Legally	y compliant			Yes:		No	):	
B. Sound				Yes:		No	): <b>✓</b>	
•	iant with the	•	-operate	Yes:		No	): <b>V</b>	
Q4. Please Draft of the fails to co	e give detane Shropshomply with to support the shire Local Pla	ils of why ire Local the duty t legal compl	Plan is not to co-opera iance or sound	legally ate. Plea dness of t	comp ase be the Regu	liant or as preculation 19:	is unso ise as p <i>Pre-Subi</i>	oossible. mission Draft
1. The dev com ach are, live 2. Shr (Re mai incl	e draft Local Felopment (total mitment with ieved. Without un-cooperatives are being neropshire Councision A) Februagement plaudes no commut of Clun SAC	alling over 5 in DP13 as at such a convely, being sedlessly upscrift's 'Develoruary 2020' n (at para 2 mitment to continue to	00 dwellings) to how the go mmitment, de et up to fail, out.  pment within charts a way 2.5 of the Nocarrying out	is patent als of nut velopmen developers the Rive forward te), which	rient ne at propos s are wa er Clun via pro n'must	und given utrality or sals within asting mon Catchmen oduction of be produc	the lack of betterem the river ey and re t: Guidant f a revise ced' but I	of any ent shall be Clun SAC esidents' ance Note 12 ed nutrient DP13

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 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)

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.

sessior	n(s), you may be asked at a later point to confirm your request to participate.
$\overline{\mathbf{V}}$	No, I do not wish to participate in hearing session(s)
	Yes, I wish to participate in hearing session(s) (Please tick one box)
	you wish to participate in the hearing session(s), please outline why onsider this to be necessary:

Office Use Only	Part A Reference:
	Part B Reference:

(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:	25/02/2021

Office Use Only

Part A Reference:

Part B Reference:



# Representation Form

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making effective representatio	n 13.				
Part B: Represent	tation				
Name and Organisation:	JONATHAN KEMP, CI COUNCIL	HAIR, E	BEDSTONE AN	ID BUCKNE	ELL PARISH
Q1. To which document d	loes this represer	ntatio	n relate?		
Regulation 19: Pre-Subn	mission Draft of the S	Shropsh	nire Local Plan		
Sustainability Appraisal (Local Plan	of the Regulation 19:	Pre-S	ubmission Dra	aft of the S	hropshire
Habitats Regulations Ass Shropshire Local Plan (Please tick one box)	sessment of the Regu	ılation	19: Pre-Subm	ission Dra	ft of the
Q2. To which part of the	document does th	nis rep	oresentatio	n relate?	)
Paragraph: 5.35 Pc	blicy:	Site:		Policie Map	
Q3. Do you consider the F Shropshire Local Plan is:	Regulation 19: Pr	e-Sub	mission Dr	aft of the	Э
A. Legally compliant		Yes:		No:	
B. Sound		Yes:		No:	
C. Compliant with the Duty to (Please tick as appropriate).	•	Yes:		No:	
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)

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.

forward your suggested revised wording of any policy or tex	t. Please be as precise as possible.
Redraft final sentence of para 5.35 as follows:	
Bucknell's significance is also enhanced by its operational line to Manchester, Birmingham and Cardiff and, via Knig	
(Please see	-time on a concrete cheet if possessory)
·	ntinue on a separate sheet if necessary)
Please note: In your representation you should provide supporting information necessary to support your represe modification(s). You should not assume that you will hav submissions.	entation and your suggested
After this stage, further submissions may only be m based on the matters and issues he or she identifie.	
Q6. If your representation is seeking a modific Submission Draft of the Shropshire Local Plan, participate in examination hearing session(s)? Please note that while this will provide an initial indication session(s), you may be asked at a later point to confirm y	do you consider it necessary to
No, I do not wish to participate in hearing session	n(s)
Yes, I wish to participate in hearing session(s) (Please tick one box)	
Q7. If you wish to participate in the hearing se you consider this to be necessary:	ssion(s), please outline why
(Please cont Please note: The Inspector will determine the most appoint those who have indicated that they wish to participate in to confirm your wish to participate when the Inspector ha examination.	hearing session(s). You may be asked
Signature: Jonathan Kemp	Date: 24/02/2021
	Part A Reference

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# 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.

making enective representations.				
Part B: Representation	٦			
Name and Organisation: JONATH, COUNCIL	AN KEMP, CHAIR, BEDSTONE AND BUCKNELL PARISH -			
Q1. To which document does thi	s representation relate?			
Regulation 19: Pre-Submission D	Praft of the Shropshire Local Plan			
Sustainability Appraisal of the ReLocal Plan	egulation 19: Pre-Submission Draft of the Shropshire			
Habitats Regulations Assessment Shropshire Local Plan (Please tick one box)	t of the Regulation 19: Pre-Submission Draft of the			
Q2. To which part of the docume	ent does this representation relate?			
Paragraph: 5.36 Policy:	Site: Policies Map:			
Q3. Do you consider the Regulat Shropshire Local Plan is:	tion 19: Pre-Submission Draft of the			
A. Legally compliant	Yes: No:			
B. Sound	Yes: No: 🗹			
C. Compliant with the Duty to Co-ope (Please tick as appropriate).	erate Yes: No:			
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

	Shropshire Local Plan leg or suggested revised word	,	•	
	ra 5.36 as follows:		,	,
· ·	ion of land for developn being within	nent in Bucknell is affe	cted by the centre,	north and west of
		(Please cor	ntinue on a separat	e sheet if necessary)
supporting	te: In your representation information necessary t n(s). You should not as s.	on you should provide to support your represe	succinctly all the eventation and your s	vidence and uggested
	stage, further submis the matters and issue			
Submission participate Please note	ur representation is on Draft of the Shro te in examination ha that while this will prov you may be asked at a	opshire Local Plan, earing session(s)? vide an initial indication	do you conside	r it necessary to articipate in hearing
	I do not wish to partici	,		пораго.
<del></del>	s, I wish to participate in ease tick one box)	n hearing session(s)		
	u wish to participate ider this to be neces		ssion(s), please	e outline why
those who i	te: The Inspector will de have indicated that they your wish to participate n.	etermine the most appi v wish to participate in	ropriate procedure hearing session(s).	You may be asked
Signature:	Jonathan Kemp		Date:	24/02/2021
			Part A Reference	ce:

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#### 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).

Par	t B: Represer	tation		
Nar	me and Organisation:	JONATHAN KEMP, CHAIR, BEDSTONE COUNCIL	E AND BUCKNELL PARISH	
Q1. T	o which document	does this representation relate	??	
$\overline{\checkmark}$	Regulation 19: Pre-Suk	mission 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. T	o which part of the	document does this representa	ation relate?	
Paragr	raph: 5.37 F	Policy: Site:	Policies Map:	
	o you consider the oshire Local Plan is	Regulation 19: Pre-Submission	n Draft of the	
A. L	egally compliant	Yes:	No:	
B. S	Sound	Yes: 🗹	No:	
	Compliant with the Duty ease tick as appropriate	· —	No:	
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.				
<ol> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> </ol>				

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.

	Shropshire Local Plan legally compliant or sound. It Ir suggested revised wording of any policy or text. Pl	,	7
	the southern edge of the village." INSERT ADDI		
(incorpora site, avoid	e is keenly supportive of moves to clear and redeving BKL011) as a gateway addition to the village ing any impact on the AONB and if necessary extent for any additional housing capacity.	, melding into tl	ne topgraphy of the
	(Please contin	ue on a separat	e sheet if necessary)
supporting	te: In your representation you should provide suc information necessary to support your representa n(s). You should not assume that you will have a	cinctly all the evation and your s	vidence and uggested
	stage, further submissions may only be made the matters and issues he or she identifies fo		
Submission participat	ur representation is seeking a modification on Draft of the Shropshire Local Plan, do te in examination hearing session(s)?	you conside	r it necessary to
	e that while this will provide an initial indication of you may be asked at a later point to confirm you		
No,	I do not wish to participate in hearing session(s)		
<b>√</b> Yes	, I wish to participate in hearing session(s)		
(Ple	ease tick one box)		
	u wish to participate in the hearing sessi der this to be necessary:	on(s), please	e outline why
The impo doubt.	rtance of this site to the village's developme	ent aspirations	must be in no
	(Please continu	e on a separate	sheet if necessary)
those who l	te: The Inspector will determine the most appropr have indicated that they wish to participate in hea your wish to participate when the Inspector has ic	riate procedure aring session(s).	to adopt to hear You may be asked
Signature:	Jonathan Kemp	Date:	26/02/2021

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Part A 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).

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: 5.38 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.					
Site relationship with the AONB is described wrongly. Proposed extension of the village					
eastwards will not move development away from the AONB.					

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.

forward your suggested revised wording of any policy	or text. Pl	ease be as preci	se as possible.
Redraft first sentence of para 5.38 as follows:			
The strategy for Bucknell is to meet the needs of the landscape and historic significance, by extending the will move development away from the Conservation development adjacent to the AONB, which lies directly development adjacent to the AONB, which lies	he village on Area. I	to the east into	countryside. This blace additional
(Plea	ise continu	ue on a separat	e sheet if necessary)
Please note: In your representation you should prosupporting information necessary to support your remodification(s). You should not assume that you wasubmissions.	ovide suc epresenta	cinctly all the ev tion and your so	vidence and uggested
After this stage, further submissions may only based on the matters and issues he or she ide			
Q6. If your representation is seeking a mo Submission Draft of the Shropshire Local F participate in examination hearing sessior	Plan, do n(s)?	you conside	r it necessary to
Please note that while this will provide an initial indesession(s), you may be asked at a later point to cor			
No, I do not wish to participate in hearing s	ession(s)		
Yes, I wish to participate in hearing session (Please tick one box)	(s)		
Q7. If you wish to participate in the hearing you consider this to be necessary:	ng sessi	on(s), please	e outline why
(Please Please note: The Inspector will determine the mos		•	sheet if necessary) to adopt to hear
those who have indicated that they wish to participate to confirm your wish to participate when the Inspector examination.	ate in hea	ring session(s).	You may be asked
Signature: Jonathan Kemp		Date:	24/02/2021
		Part A Reference	e:

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