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Shropshire Council Local Plan Examination
HEARING STATEMENT

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On behalf of P Chapman
In relation to site:
WHT035

20th September 2024

RTPI
Chartered Town Planners

## 1.0. HEARING STATEMENT

1.1. Concept Town Planning Limited have been instructed by a Mr P Chapman to promote a parcel of land located off Tarporley Road Whitchurch (WHT035), as an alternative to the Council's proposed housing allocation sites in the forthcoming Local Plan. Despite previous representations demonstrating the inaccuracies and inconsistencies of the Council's approach in terms of favouring other sites over that which we have promoted, no changes to the Council's preferred housing allocation have been made and the subject site remains an omission.

1.2. It is noted that the purpose of the Hearing Sessions is to examine the soundness of the submitted plan and not to discuss the merits of omission sites. Our proposed attendance at the forthcoming hearing sessions and the purpose of this statement is to simply identify how the plan is not sound because of the fact that the evidence base used to inform the allocation process has been flawed throughout. These reasons have been set out in detail in our earlier representations which we will not repeat here. However, I would wish to draw reference to the Council's document GC4o, which provides the Council's summary of all representations made to the plan and their response.

1.3. Specifically the Council's response provided at S18.1, subsection 6 relates to the representations made by Concept Town Planning and presents a clear demonstration of their unsubstantiated approach. Essentially, the Council's response states that they believe their approach remains correct and that the plan remains sound. There is no evidence, cross examination or counter evidence to that which has been provided by us and instead the Council simply provide a statement to the effect that they are right and everyone else representing non preferred sites are wrong. This gives no credence to the consultation process or indeed the validity of the general approach to arriving at the preferred allocations.

1.4. Ultimately, we have made our position clear in our previous representations and this has not changed – the Council's housing allocations are based on a flawed Sustainability

Appraisal and they continue to ignore inaccuracies in their own evidence and approach, when presented to them. The Council's response is that they consider their assessment to be appropriate and robust but under scrutiny it is far from this and to simply 'consider' that they are correct, without evidence, is a demonstration on its own that the plan is not justified and thus, is unsound.

1.5. On other matters, the Inspector will be fully aware of the legislation requiring all new development sites to deliver a biodiversity net gain. This legislation was not in force or indeed considered at the time the preferred sites were identified and carried through for examination. Taking on board this new legislation, the anticipated housing numbers to be delivered on each of the preferred sites will inevitably be affected, if on site biodiversity improvements are to be realised. Furthermore, since the baseline habitat conditions of land is now a determining factor as to the extent of biodiversity net gain required, each of the allocated housing sites will need to be appropriately assessed in this context, to ensure they can still be developed and to what extent. The consequent result of this legislation and further scrutiny will likely see an under delivery of housing and alternative sites will need to be considered or the local plan re-assessed.

1.6. Since this is a matter of meeting legislation, which all future housing sites will need to consider, we feel it should be taken on board at the current time and under the current plan review, otherwise, the proposed housing allocations will not be able to deliver the housing numbers required by the plan.