

Matter 9

Apus Projects Limited on behalf of Michael Bailey (SLP372)

9.4 Has the comparative assessment of sites resulting in those included for allocation in the plan been undertaken in a proportionate and consistent manner?

We do not consider that a robust comparative assessment of sites has been undertaken and that there is an inconsistent approach to the selection of allocated sites.

Option (ATH 9) Draft Site Allocation Plan Stage / 2017 SHLAA (site Ref PB183)

The site was not taken forward at the Pre Submission Site Allocations stage as it was established following consultation of the Draft Site Allocations, that in March 2012 it had been identified as a Local Wildlife Site (LWS). The Non Statutory designation occurred following the conclusions of survey undertaken in Aug /Sept 2011. Current proposed allocations have been assessed using more robust and up to date information and therefore the reliance on information that is nearly 8 years old, out of date and inaccurate, to continue to justify the sites removal as an allocation is inappropriate.

The site was recently considered in the 2017 SHLAA (site Ref PB183) where an overall AMBER score is given to the site. No impediment to the sites development has been identified and its assessment as a site suitable for development is greater than other sites that are currently allocated.

Updated ecological surveys recently undertaken confirm that whilst the entire site is identified as is part of a larger Non-Statutory designated site (Local Wildlife Site) and since the original assessment 8 years previous, the process of succession has further developed, interventive management has occurred and the majority of the site (tall herb and species poor neutral grassland) is of low to moderate wildlife value.