

Evidence used to select SES30 Bramley Common is contradicted by the Council's documents

EXAM 130 (May 2025) contains the evidence that underpins the selection of this site. Seven of its scores are unreliable when checked against the Council's evidence base and Government data sets.

The key 5 are detailed below:

1 AGRICULTURAL LAND

The appraisal says

"Likely to be Grade 3 land but site-specific survey required" - scored neutral, survey deferred to application stage.

Defra's Predictive Agricultural Land Classification Map (April 2026) predicts significant Grade 2 land with the remainder 3a: best and most versatile farmland across nearly the whole site. SES30 and SES29 hold about 92 ha between them. National policy prefers poorer land where farmland must be lost. The survey belongs before allocation, while the choice between sites can still be made.

EXAM 130 pp. 41, 43; Defra Predictive ALC Map, April 2026, as mapped to the release sites by SGBA

2 ARCHAEOLOGY

The appraisal says

"Little or no archaeological constraints."

The same four pages also say "potential archaeological constraints" (p. 42) and "a known archaeological interest" (p. 43). The Council's Heritage Impact Assessment records buried remains of the Myrtle Bank farmstead and cropmarks "suggestive of Iron Age to Romano-British activity", with "a high probability" of a larger settlement, of "up to moderate significance", requiring "areas of archaeological importance excluded from development". Yet the same assessment gives SWS19 (Parkers Lane) the identical summary sentence, word for word; EXAM 130 scored SWS19 "N" and SES30 "Y". The assessment covers parcel S03020 only.

EXAM 130 pp. 41–43; EXAM 127A §3 pp. 5–6, §5 p. 10

3 ECOLOGY

The appraisal says

"Likely to have a significant ecological value. Requires further ecology assessment." Buffer required to "the adjacent 3 Local Wildlife Sites".

The Preliminary Ecological Assessment was only completed after the site was selected and confirms the "significant ecological value" of the site. It records nine veteran trees as irreplaceable habitat - national policy says development causing its loss should be refused absent wholly exceptional reasons, which mitigation at application stage cannot resolve. It also records lowland mixed deciduous woodland of county-level importance, thirteen native hedgerow sections (nine species-rich) as habitats of principal importance, and "High" suitability for foraging and commuting bats. Four Local Wildlife Sites directly bound the site, not three as the appraisal states: Lower Shirtcliffe Valley is not named nor considered. The Biodiversity Net Gain Assessment states its purpose was to inform the Green Belt decision - **but the decision was already taken.**

EXAM 153 §§3.2.4, 3.3.6, 3.4.12 and EXAM 175 §4.1.1, Aug–Sept 2025; EXAM 130 pp. 41–42

4 OPEN SPACE

The appraisal says

On-site open space is "surplus"; the surrounding area is "more than 20% above policy standard".

The Council's 2022 Open Space Study finds **"there are no open space facilities that are surplus to requirement" in the South East.** The "20% above" description does not align with the recognised 34.55 hectare shortfall in allotments, parks, and children's and youth play space. Further, that supply was tested against 1,841 homes in the original plan for the South East to 2039; SES30 and SES29 are not included meaning the deficit and requirement is far greater than that reported. See additional paper.

EXAM 130 pp. 41–42; Open Space Study 2022, Main Report §8.2 and policy directions OS1–OS2, SE Profile pp. 6, 20; EXAM 183

5 GREEN BELT

The appraisal says

Released from the Green Belt, having scored 4 out of 5 for checking sprawl - "a strong role".

The Green Belt Review sets the test for **"lower performing" land: a score of 12 points or less out of 20, or 2 or less against purposes 1 and 2. SES30's parcels score 14 and 15, at and above the median of all 230 Green Belt assessments.**

EXAM 95A §§1.4, 2.9–2.13, App. A; EXAM 130 p. 42

Why this matters to the decision

These are not incidental errors. The appraisal scores every candidate site on the same indicators, and the shortlist was drawn from the results. On school places, 71 site assessments record "no current surplus capacity" and 45 record a surplus - SES30 is incorrectly among them. On archaeology, two sites with word-for-word identical evidence received opposite scores.

SES30 was chosen from findings that the evidence base does not support, while other sites were protected.