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Additional Hearing Statement V2

We object to the allocation of SH35 Rattlechain (Duport's Tip, land north of Temple Way, Tividale) for housing development on ecological grounds. The site is a Potential Site of Importance (PSI) for nature conservation supporting the nationally rare and Near Threatened Small Blue butterfly (*Cupido minimus*), a UK priority species, dependent on Kidney Vetch as its sole larval food source. A number of other important species have also been recorded. The site is likely to meet the priority habitat definition of open mosaic on previously developed land. Historic and recent (2025) recording activity by local experts, botanists and lepidopterists, confirmed several Small Blue butterfly breeding locations across the site as well as a significant number of rare and notable botanical species. This is incredibly significant, especially given the threatened status of Small Blue butterfly. We note that 2025 Small Blue butterfly breeding records have been made demonstrating the site's continued importance despite recent disturbance.

We understand that no local site assessment has been carried out in support of this allocation despite evidence that it contains important habitats and species. On the basis of the existing evidence the site would very likely meet the threshold for designation and therefore we would expect a local sites assessment to be carried out and its habitats and species protected accordingly.

Allocation of SH35 is therefore not sound and legally compliant, conflicting particularly with the National Planning Policy Framework's (December 2024, amended February 2025) requirement to safeguard irreplaceable habitats and priority species.

List of references:

- Butterfly Conservation (n.d.). *Small Blue (Cupido minimus)*. Available at: butterfly-conservation.org
- Centre for Biodiversity & Conservation (2019). *Small Blue Species Statement & Quality Criteria*. Available at: cbdc.org.uk
- National Planning Policy Framework (2024).

Yours sincerely,

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