PV ECOLOGY

Our ref: 7236

05th June 2014

Mike Jeffrey
Senior Design Coordinator
Buckingham Group Contracting Ltd

Dear Mike,

RE: BREEAM Brighton Stadium

LE03 in BREEAM[1] New Construction has two credits available for this section. Out of the two credits available for LE03, the first credit is mandatory for achieving a rating of 'Very Good'. The numbers of species on site prior to it being developed, coupled with the area of the site mean that the site had a high pre-development value in terms of a BREEAM rating. Achieving even a 'small negative change'[2] in terms of the BREEAM assessment, by increasing plant species richness post development, is not workable within the current proposals as they stand. This is due to the relatively small areas for planting available on site.

The post development planting scheme has a combined species number of 59 different types of plant and even if this could be increased to 200 or more there would still be a large negative change in plant species richness. Increasing the number of plants on site to an unsustainably high figure would not be good practice or relevant to the project.

The BREEAM assessment does not take account of the importance of some important habitats that are present within the proposals, most notably the varied tree planting and the reed bed. Both of these features provide excellent ecological opportunities and cannot be ignored - these can be managed well on site into the future. There are additional opportunities to incorporate and retro-fit some features into the proposals and design that would benefit wildlife in ways not possible prior to the development, these could include bat roosting and bird nesting opportunities for species such as swift and house sparrows, both declining locally and nationally. These species are unlikely to have nested or roosted on site prior to the development and therefore inclusion of such features would be an enhancement at the site scale. There are other opportunities through changes to the site management and lighting scheme that would also benefit wildlife and although BREEAM New Construction does not take account of these, there is no doubt that they would be beneficial to wildlife locally.

We would support the development of some additional features and management practices for biodiversity at the site that would be in line with local and national planning policies. Additional documents could be provided to show how these have been implemented if that is deemed a suitable way to proceed in relation to ecology.

I would be happy to discuss these if necessary.

Yours sincerely,

Davog McCloskey
DIRECTOR OF ECOLOGY

ADUR & WORTHING PLANNING SERVICES	
PLAN	AWDM/0896/14
DATE VALID	15 JUL 2014

[1] BREEAM is the Building Research Establishment Environmental Assessment Method
[2] BRE define a 'small negative change' as no worse than -9 species via the calculations

DMH Stallard

ADUR & WORTHING PLANNING SERVICES	
PLAN	AWDM/0896/14
DATE VALID	15 JUL 2014

Planning and Development Control
Adur & Worthing Councils
44 Portland Road
Worthing
West Sussex
BN11 1LF

Date 1 July 2014
Your ref
Our ref 0808/BRI464-51

Dear Sir or Madam

American Express Elite Football Performance Centre, 60 Mash Barn Lane, Lancing, BN15 9FP
Application to vary Condition 27 of Planning Permission AWDM/0205/12

This letter is submitted on behalf of The Community Stadium Limited in support of a planning application to vary Condition 27 of Planning Permission AWDM/0205/12 relating to the American Express Elite Football Performance Centre, 60 Mash Barn Lane, Lancing, BN15 9FP.

Condition 27 currently reads as follows:

"The development hereby approved shall incorporate renewable energy technology in accordance with details to be submitted to and approved in writing by the local planning authority and the development hereby permitted shall not be occupied unless and until a BREEAM Design State Certificate and a BRE-issued Post-Construction Review Certificate confirming that the development has achieved a BREEAM rating of 'Very Good' has been submitted to the Local Planning Authority."

It is proposed to be varied as follows:

"Within 6 months of first opening the training ground, the following details shall be submitted:

(a) Details of the renewable energy technologies that have been incorporated within the development;
(b) A post construction assessment, conducted by an accredited BREEAM Assessor and supported by all relevant evidence, demonstrating that the development meets "Very Good" in all relevant credits other than LE03; and

Gainsborough House Pegler Way Crawley West Sussex RH11 7FZ **DX** 57102 Crawley **Website** www.dmhstallard.com
Main line 01293 605000 **Direct line** 01293 605160 **Fax** 01293 663520 **Email** peter.rainier@dmhstallard.com

Offices in London, Gatwick, Guildford, Farnham and Brighton.

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(c) A post-completion certificate achieving BREEAM level "Good"."

The submitted letter from the applicant's BREEAM consultant confirms that the proposed development will achieve above the threshold for "Very Good" (55%), however, because it is not possible to meet one of the two credits for LE03, which is mandatory, only a certification of "Good" can be achieved.

This credit relates to plant species richness. As the submitted letter from PV Ecology describes, achieving this credit would require increasing the different types of plant to an unsustainably high figure which would not be good practice or relevant to the development.

It should also be noted that Condition 27 would not have been achievable notwithstanding the above. In order to allow time for an assessment of the building following construction, it is estimated to take approximately 6 months before a BREEAM Post Construction Certificate can be issued. It would not have been possible to comply with this condition as currently drafted.

Whilst the development will not be able to deliver the number of plant species required to meet this credit, it should be noted that the training ground has incorporated a number of ecological enhancement measures including the provision of a reed bed and varied tree planting. In due course ecological enhancement details will be submitted, which will include the following:

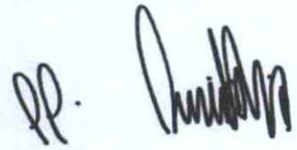
- Reed bed planted with a wildlife seed mix
- Installation of 3 bat boxes on telegraphs poles adjacent to Mash Barn Lane
- Installation of 20 bird boxes on stakes around site perimeter
- Installation of 10 hedgehog boxes around site perimeter
- Development of an Ecological Management Plan setting out programme of implementation, monitoring and management.

The proposed varied wording of the condition would provide confidence to the Local Planning Authority that the development would achieve over 55% and meet "Very Good" in all other aspects (including over a 56% reduction in energy and water use in comparison to a traditional building).

I look forward to receiving confirmation that this application has been registered and trust that you will find the submitted details acceptable.

DMH Stallard

Yours faithfully



Peter Rainier MRTPI
Director of Planning
For and on behalf of DMH Stallard LLP