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