MLM

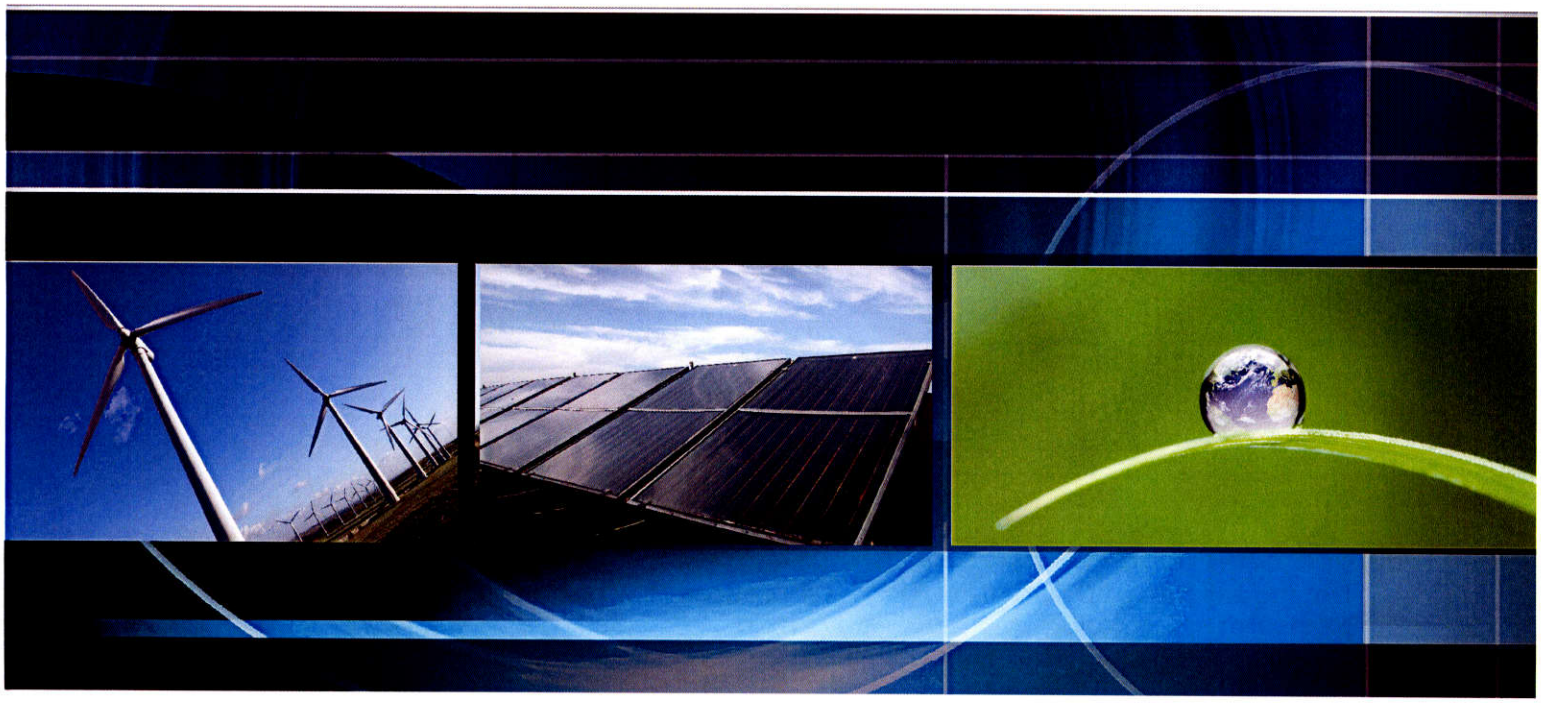
Sustainability Statement

Westcliff Rugby Club Relocation

Southend

Produced for

Henry Boot Developments Ltd



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1 Introduction

MLM Consulting Ltd Sustainability Group have been appointed by Henry Boot Developments Ltd, to prepare a Sustainability Statement in support of a planning application for the proposed re-provision of the Westcliff Football Rugby Club in Southend.

The proposed development is located within the area that is allocated in the recently adopted London Southend and Environs Joint Area Action Plan (2014) (hereafter "the JAAP") and is to be used for the newly re-located rugby club, associated pitches, facilities, parking and cycle provision.

The purpose of this report is to assess the sustainability performance of the proposed development against relevant local, regional and national policy requirements and demonstrate how these are addressed through the implementation of appropriate design and construction practices.

The following planning policy and construction guidance documentation have been considered in detail in the preparation of this Sustainability Statement:

- The National Planning Policy Framework (NPPF), Department of Communities and Local Government (CLG), 2012;
- Rochford District Core Strategy, 2011;
- Development Management Document, Rochford District Council, 2014;
- London Southend and Environs Joint Area Action Plan (JAAP), 2014;

This Sustainability Statement has been prepared using information included in a number of documents that either form part of or are submitted in support of the planning application for the proposed development. The sustainability measures described herein have been developed in consultation with members of the project's design and consultant teams.

This report takes into account the special character of the proposed development and defines the broad approach that will be implemented in order for the development to meet the required policy criteria. The specific details and assumptions set out within this Sustainability Statement will be tested and reviewed throughout the detailed design, build and operational phases of the proposed development.

The remainder of this document is structured as follows:

- Section 2 provides an overview of the site's context and the Proposed Development;
- Section 3 outlines the planning policy context;
- Section 4 sets out the assessment methodology;
- Section 5 presents the sustainability assessment and details the sustainability features of the Proposed Development; and
- Section 6 presents the conclusions.

2 Overview of the Proposed Development

The proposed development is located within the area of the London Southend and Environs Joint Area Action Plan (JAAP) to the East of Cherry Orchard Way and immediately north-west of London Southend Airport.

The proposal includes a two storey rugby club, 1 dwelling and associated facilities, associated pitches, 81 parking bays which includes 3 disabled parking bays and cycle provision of 40 spaces.

Figure below shows the proposed site plan as per drawing 0688_A_8106_K by Jefferson Sheard Architects.

3 Planning Policy Context

Rising international and national aspirations on sustainability have led to the strengthening of national planning policies and building control processes that contribute to the Government's long-term commitment to support sustainable development. To ensure compliance with relevant sustainability and wider targets and requirements, the following key policies and documents have been reviewed within the context of the proposed development.

3.1 National Planning Policy Framework (CLG, 2012)

The National Planning Policy Framework, 2012, sets out the Government's planning policies for England and how these are expected to be applied. It must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions. The document presents a series of policies that constitute the Government's view of what sustainable development in England means in practice for the planning system. At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development. Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay.

3.2 Regional Planning Policy

3.2.1 Rochford District Core Strategy (2011)

Rochford's Core Strategy is the main overarching document of a collection of documents which form the Rochford District Local Development Framework. This framework sets out a strategy which will determine how Rochford will develop until 2025.

Part of the Rochford District Core Strategy are the Council's policies to protect and maintain the existing natural habitat and archaeological sites, and to encourage the implementation of best practice sustainability standards through the application of BREEAM.

Specifically *Policy ENV1 – Protection and Enhancement of the Natural Landscape and Habitats and the Protection of Historical and Archaeological Sites* states that the Council will maintain, restore and enhance sites of international, national and local nature conservation importance. These will include Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar Sites, Sites of Special Scientific Interest (SSSIs), Ancient Woodlands, Local Nature Reserves (LNRs) and Local Wildlife Sites (LoWSs). In particular, the Council will support the implementation of the Crouch and Roach Management Plan, and the Council will also protect landscapes of historical and archaeological interest.

Policy ENV10 – BREEAM states that new non-residential buildings, as a minimum, to meet the BREEAM rating of 'Very Good', unless such requirements would render a particular development economically unviable. In cases where it is considered appropriate to relax the requirement to meet the BREEAM rating of 'Very Good' due to viability issues, the Council will still expect development to meet as high a BREEAM rating as is economically viable.

3.2.2 Development Management Document, Rochford District Council (2014)

The Development Management forms part of the Development Plan for Rochford District. It is one of the documents that will promote and achieve the vision and objectives set out in Rochford's Core Strategy. The Development Management Plan sets out the detailed day-to-day planning policies through which development within the District will be delivered.

Part of the Development Management Plan are the Council's policies to direct developments to consider the conservation, and enhancement of the local habitat, the impact on surrounding natural landscape, the protection of local species and habitat and the impact on local air quality.

The *Policy DM25 – Trees and Woodlands* states development should seek to conserve and enhance existing trees and woodlands, particularly Ancient Woodland. This policy further states that development which would adversely affect, directly or indirectly, existing trees and/or woodlands must demonstrate that the reasons for the development outweigh the need to retain the feature and that mitigating measures can be provided for, which would reinstate the nature conservation value of the features.

Policy DM26 – Other Important Landscape Features states when considering proposals for development, it must be shown that consideration has been given to the landscape character of the area and the findings of the Rochford District Historic Environment Characterisation Project (2006).

The Council will protect the following landscape features when considering proposals, where they are of importance for fauna and flora, from loss or damage: Hedgerows; Semi-natural grasslands; Marshes; Watercourses; Reservoirs; Lakes; Ponds; and Networks or patterns of other locally important habitats.

Development which would adversely affect, directly or indirectly, any of these landscape features must demonstrate that how reasons for the development outweigh the need to retain the feature and that mitigating measures can be provided, which would reinstate the nature conservation value of the features.

Policy DM27 – Species and Habitat Protection states proposals should not cause harm to priority species and habitats identified under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. The policy continues to states that the development must provide the reasons for why the proposal clearly outweighs the need to safeguard the nature conservation value of the priority habitat, and/or the priority species or its habitat. In such cases the Local Planning Authority will impose conditions and/or seek the completion of a legal agreement in order to: secure the protection of individual members of the priority species and/or habitats; minimise the disturbance to the priority species and/or habitats; and provide adequate alternative habitats to sustain at least the current levels of population for protected species and/or provide a compensatory habitat to offset potential loss or disturbance of a priority habitat.

In addition to the UK Biodiversity Action Plan, proposals for development should have regard to Local Biodiversity Action Plans, including those produced at District and County level.

The Policy DM29 – Air Quality states that alongside the provision of transport assessments, major developments will be required to submit an air quality assessment with their planning application to determine the potential cumulative impact of additional transport movements on potentially significant road junctions. This assessment should be produced having regard to the guidance developed by Environmental Protection UK.

3.2.3 London Southend and Environs Joint Area Action Plan (2014)

The London Southend and Environs Joint Area Action Plan (JAAP) forms part of the Development Plan for the Rochford District and has been prepared by Rochford District Council and Southend-on-Sea Borough Council in response to the challenges and opportunities offered by London Southend Airport together with an airport related employment cluster.

The JAAP addresses issues pertaining to the sustainability performance of developments and specifically in *Policy ENV7 – Environmental Sustainability,* where it is stated all new development must meet at least the BREEAM rating of 'Excellent'. Both Councils will expect to see active use of rainwater harvesting and water recycling systems and SUDS through the JAAP area as well as the use of renewable technologies, where appropriate and the application of other techniques such as green roofs and walls to further contribute to sustainability.

3.3 Other Documents

3.3.1 Outline Planning Permission Conditions App. No. 15/00776/OUT, Rochford District Council

Rochford District Council has given outline planning permission for the proposed Westcliff Rugby Club Relocation subject to the development meeting the planning conditions stated in the document. This report addresses the Reserve Matters issued following the outline planning application.

A number of the Conditions have been set for the protection of the local wildlife habitat and ecology, and are briefly summarised as follows:

- *Condition 13* states removal of any vegetation must to take place outside of the bird breeding seasons;
- *Condition 14* states a survey for breeding birds shall be carried out at the site and the results submitted to the Local Planning Authority (LPA);
- *Condition 15* states fencing requirements for the protection of the badger sett;
- *Condition 16* states the application of any floodlighting must follow guidelines from the Bat Conservation Trust as set out at 6.1.2 of the Ecological Appraisal and Protected Species Surveys October 2015.
- *Condition 17* states only the senior pitch 1 and training pitch as shown on the approved layout Drawing Number A_8113 Revision A shall be floodlit.
- *Condition 18* states 8 No. bat roosting boxes shall be installed on mature trees along the northern river corridor and retained in perpetuity
- *Condition 19* states a tree protection plan and method statement in accordance with BS5837:2012 has been submitted must be carried out.

- Condition 21 states scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

- Condition 22 states a Dust Management Plan must submitted and agreed with the LPA;

- *Condition 23* states Cycle storage must be provided for a minimum of 19 spaces;

- *Condition 24* states a BREEAM rating of 'Very Good' as a minimum must be met in order to meet Policy ENV10 of the Rochford District Core Strategy.

4 Assessment Methodology

This Sustainability Statement has been structured around the sustainability categories that form the Building Research Establishment Environmental Assessment Methodology (BREEAM). Within these categories the Policy *ENV7 – Environmental Sustainability* of the London Southend and Environs Joint Area Action Plan are addressed and demonstrate the sustainability features included into the Proposed Development.

Specifically, the Proposed Development has been assessed against the following topics, as these are listed in the Building Research Establishment Environmental Assessment Methodology (BREEAM):

- Management
- Health & Wellbeing
- Energy
- Transport
- Water
- Materials
- Waste
- Ecology
- Pollution

The sustainability measures described in this Sustainability Statement were developed in consultation with members of the project team.

5 Sustainability Assessment

5.1 Management

The proposed site is predominantly agricultural land, and currently utilised for silage. The archaeological background was assessed in detail within the Historic Environment Assessment and the proposed development framework for Westbarrow Hall Farm, Rochford (Place Services 2012) and furthermore in the Historic Environment Settings Assessment. The latter study has identified no overriding cultural heritage constraints which are likely to prohibit development. Accordingly, the proposed development seeks to utilise the site for the re-location of the Westcliff Rugby Club.

5.2 Health and Wellbeing

The proposed development will incorporate measures to ensure safe and secure access for the building users and visitors.

Daylighting, artificial lighting and occupant controls will considered throughout the design stage to ensure best practice visual performance and comfort for building occupants. All fluorescent and compact fluorescent lamps will be fitted with high frequency ballasts.

The proposed development will minimise the risk of water contamination in building services and ensure the provision of clean, fresh sources of water for building users.

All water systems in the building will be designed in compliance with the measures outlined in the Health and Safety Executive's 'Legionnaires' disease, the control of legionella bacteria in water systems". Approved Code of Practice and Guidance, 200054 and, where relevant, other industry/sector best practice guidance.

5.3 Energy, Carbon Dioxide Emissions and Renewable Energy

The Energy Strategy for the Proposed Development (Energy Statement for Southend Rugby Club, November 2016, MLM) has identified and assessed the feasible carbon emissions reductions through the implementation of efficient energy measures, the use of an on-site Combined Heat and Power (CHP) and the use of zero carbon technologies.

The energy and carbon data for the proposed development have been estimated using SAP and SBEM modelling data which are approved software compliant with the Building Regulations Approved Document L1A 2013.

In line with the requirements of the national, regional and local planning policies, ADL of the Building Regulations and current best practice, the following energy strategy was proposed:

- The incorporation of energy efficiency and passive design measures ('Be Lean'), which could bring savings in regulated CO_2 emissions of approximately 7.10% over the baseline. The key passive design and energy efficiency measures integrated in the proposed development will include:
    - Improved U-values of the thermal elements (wall, floor and roof) and controlled fittings (windows) compliant with the Building Regulations Part L1A 2013 requirements;
    - Careful design and construction monitoring to create a reasonably air tight building;
    - Mitigate cold bridges and eliminate the potential for surface condensation;
    - Improved Specific Fan Power (SFP) for decentralised extract ventilation systems;
    - Low energy lighting including LED technology lighting systems where viable;
    - High efficiency natural gas fired condensing 'Combi' boiler with underfloor heating for space heating and hot water generation.

- The potential for connection to an existing communal heating network was also investigated and was not considered viable at this time as no heating network exists nearby. It is also not possible to incorporate an onsite CHP (energy centre) into the scheme as the proposed development's heat demand is not suitable for such technology. The 'Be Clean' carbon emission results are therefore identical to carbon emissions obtained at the 'Be Lean' stage.

The installation of on-site renewable technologies, such as Air Source Heat Pump (ASHP), have been identified as feasible for the Rugby Club.

The energy hierarchy indicates a projected carbon reduction of greater than 7.10% will be achieved by efficient building design and construction with the use of renewable energy generation. This is in line with the requirements of the Building Regulations (2013), London Southend and Environs Joint Area Action Plan (2014) and the Rochford District Council Strategy and Philosophy.

5.4 Transport

A Transport Assessment has been carried out for the proposed development (Transport Assessment, Airport Business Park, Southend, October 2015) and has provided a sustainable transport strategy detailing specific guidance on how sustainable transport to and from the site can be encouraged and maximised.

Specifically, the development layout will promote cycle and walk trips to/from the site and also internally within the development. Additionally a robust site wide Travel Plan will be implemented with the aim of reducing single occupancy car trips to the site and encourage sustainable modes of travel to the site. Where feasible, car sharing will be encouraged through the implementation of a car share database.

5.5 Water

The design of all areas of the proposed development will aim to minimise internal potable water consumption for sanitary uses. This will entail installing water efficient sanitary ware (such as low-water, dual flush toilet cisterns and low-pressure spray taps in kitchens and bathrooms), and showers with flow regulators.

Water meters will be specified that provide a visible display of mains potable water consumption to occupants will be provided in each residence. Implementation of these measures could provide significant reductions in the water use from the proposed development and will reduce the short-term impact on water supply resources in the area.

Where demonstrably effective, rainwater harvesting and water recycling systems will be employed on the scheme, in accordance with ENV7 (JAAP).

5.6 Materials

The selection and application of the materials comprising the proposed development will respect the scale and setting of the surroundings. On that basis, the materials will be suitable and robust, with durable long-life properties. Suitable durability and protection measures or design features/solutions will be incorporated to prevent damage to the vulnerable parts or exposed elements of the building and surrounding streetscape, therefore minimising the frequency of replacement and maximising materials optimisation.

Wherever feasible, materials employed in key building elements (roof, external walls, internal walls, etc.) and hard landscaping will be selected in line with the Green Guide to Specification with a low

environmental impact (including embodied carbon) over the full life cycle of the building. In addition, the contractor will opt for products with Environmental Product Declaration.

The proposal will aim at sourcing materials from responsible sources, for example through suppliers who participate in responsible sourcing schemes such as the BRE BES 6001:2008 Responsible Sourcing Standard, ISO 14001. Where timber products are used, they will be obtained from sustainable sources, either Forest Stewardship Council or Programme for the Enforcement of Forestry Certification approved sources.

All thermal insulation products used in the building (i.e. external walls, ground floor, roof and building services insulation which includes any insulation required for any water pipes and storage systems) will have a low embodied impact relative to their thermal properties, as determined by the Green Guide to Specification ratings. Furthermore, where feasible, thermal insulation products used in the building will be responsibly sourced.

5.7 Waste

The proposed development will provide easily accessible waste and recycling facilities during the construction and operational phases.

A Site Waste Management Plan (SWMP) will be developed for the proposed scheme to identify the types and quantities of waste produced during every stage of demolition and construction. The SWMP will be produced before on-site works begin and will look into the opportunities to minimise and reduce waste generation, such as:

- Agreements with material suppliers to reduce the amount of packaging or to participate in a packaging take back scheme;
- Implementation of a 'just in time' material delivery system to avoid materials being stockpiled on-site for long periods of time, increasing the risk of their damage and disposal as waste;
- Attention to material quantity requirements to avoid over ordering and generation of wasted materials;
- Reuse of materials on-site wherever feasible,
- Segregation of waste at source where practical; and
- Reuse and recycling of materials off-site where reuse on-site is not practical (e.g. through use of an off-site waste segregation facility and re-sale for direct reuse or reprocessing).

Where possible, materials needed for the construction process will be obtained firstly from re-use and recycling schemes before seeking fresh material.

Throughout the design and construction phases of the proposed development emphasis will be on pre-assembly and pre-fabrication of elements, wherever practicable, to minimise on-site waste and improve quality.

Once the proposed development is operational, recycling and composting opportunities will be maximised for the good management of waste through the provision of sufficient internal and external space. Specifically a dedicated external area will be provided for recycling and composting.

5.8 Ecology

The proposed development will apply necessary measures to protect and minimise impacts to the species and habitat value of the site and will not cause a net loss in the quality and quantity of biodiversity.

A Tree Survey, Arboricultural Impact Assessment and Arboricultural Method Statement have been produced for the site (Tree Survey, Arboricultural Impact Assessment and Arboricultural Method Statement, The Landscape Partnership, October 2015). The statement concludes that the loss of

some trees resulting from the proposed development of the site will be relatively minor losses in terms of the tree cover across the wider site and may be easily mitigated by the planting of new trees as part of the landscape scheme for the site. The proposed development will also enable neglected recent and mature planting along the site's boundaries to be brought back into management and incorporated into the wider landscape proposals for the site.

Site vegetation clearance and hedge removal will be carried out prior to the erection of the tree protection barrier. Soil stripping will be restricted to the area of the site which is outside the areas protected by the tree protection barrier.

An ecological appraisal was undertaken for the site (Westcliff Rugby Football Club, Ecological Appraisal and Protected Species Surveys, October 2015, The Landscape Partnership ltd). The report has described the site as being comprised of arable land in active management with associated boundary hedgerows and linear scrub habitats including the River Roach corridor. The overall value of the site to wildlife is provisionally assessed as lower value, subject to completion of further bat and bird surveys, and the overall impact of the scheme is provisionally assessed as minor adverse. The development will mitigate all negative measures to the wildlife and habitat and implement measures that are demonstrably most effect effective for the enhancement of and mitigation for the ecological value of the site.

5.9 Pollution of Land, Water and Light

The site of the proposed development has and is currently being used as arable land and is unlikely to be contaminated.

The Site is identified to lie within the Flood Zone 1 as detailed in the flood risk assessment ('Flood Risk Assessment', October 2015, MLM). It is therefore within an area of low risk of flooding from all sources. The surface water drainage strategy for the site includes the use of piped systems and SuDS measures and meets the 'treatment train' and 'discharge rates' criteria set out within the Essex SuDS Guide dated December 2014. It is proposed that the surface water run-off from the new club house and formal car park areas is collected, attenuated, treated and then discharged to the proposed surface water drainage system for the business park.

As detailed in the Surface & Foul Water Drainage Strategy ('Surface & Foul Water Drainage Strategy', October 2015, MLM), surface water run-off from the site will be discharged into the River Roach via the proposed drainage system for the Airport Business Park at a controlled rate of not more than the 1 in 1 year greenfield run-off rate of 24.2 l/s, in accordance with Essex County Council SuDS Guidance, for all events up to and including the 1 in 100 year return period rainfall event inclusive of 30 % climate change. Discharge from the rugby club to the Airport Business Park will be limited to 1.5 l/s in all events up to and including the 100 year return period inclusive of 30 % climate change. Land drainage from the pitch and surrounding area will discharge to the swale without restriction as this will not be a change to the existing drainage regime.

The proposed development will aim to ensure that external lighting and floodlighting (including security lighting, where necessary) is concentrated in the appropriate areas and that upward lighting is minimised, reducing unnecessary light pollution, energy consumption and nuisance to neighbouring properties. The lighting will be energy efficient and 'Dark Sky' compliant, thereby not causing obtrusive light pollution, glare or spillage.

6 Conclusion

This Sustainability Statement assesses the proposed development against relevant sustainability standards as well as sustainability policies aims and objectives listed in the Reserve Matters. The key beneficial impacts of the scheme in relation to sustainability can be summarised as follows:

- A projected carbon reduction of greater than 7.10% in comparison with the baseline is predicted. This will be achieved by efficient building design and construction with the use of renewable energy generation;
- Provision of water efficient sanitary ware;
- Minimisation of impact on biodiversity and provision of ecological enhancements;
- Maximisation of recycling and implementation of the best practicable environmental options for non-recyclable residual waste;
- Safe and abundant cycle provision; and
- Adherence to sustainable construction site management practices including:
    - Sourcing timber from reclaimed, reused or responsible sources;
    - Developing and implementing a Site Waste Management Plan (SWMP); and
    - Reducing environmental impacts of the construction site.

The sustainability strategy described in this report sets out the proposed measures and commitments that have been and will continue to be incorporated into the design development process, the construction and operation of the buildings in order to optimise its environmental performance and result to a scheme that can be designed, constructed and operated in a sustainable way.