

BRIGHTON AND HOVE'S WILDLIFE FORUM

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www.BHWF.org.uk

To: planning.applications@brighton-hove.gov.uk

Date: 13 May 2014

Dear Councillor MacCafferty and Mr Hawkes,

Re: Planning Application BH2014/00697

Dorothy Stringer High School, Loder Road, Brighton.

Installation of artificial turf pitch with associated fencing, floodlighting, incorporating landscaping works.

One of the key principles of Planning Law is to ensure communities impacted by a Planning Application have the opportunity to raise representations. In the case of 'Dorothy Stringer High School', applying for 'Installation of an artificial turf pitch with associated fencing and floodlighting, incorporating landscaping works' (Application number: BH2014/00697), it appears documents have been added to council's web-site with insufficient time allowed for them to be considered by the community or stakeholders, as follows:

1. The documents entitled 'Arboricultural Report' (parts 1-3) were added on 25 March 2014, which provided only three working days for Brighton & Hove's Wildlife Forum (BHWF) to prepare our response (dated: 31 March 2014).
2. The Design & Access statement, (by Surfacing Standard Ltd, dated 28 February 2014) which is clearly a key document, was not available for us to examine until 6th May 2014.

Clearly objectors need a reasonable period in which to consider additional documents which are material to the Application.

The 'Target decision date' is formally published as: 9 June 2014. Yet we understand the Planning Committee meeting will be held this Wednesday (14 May 2014). Please explain the position. Do objectors have until the 9th June, or not? The June date still appears on the council web site.

It is, of course, unacceptable to:-

1. Suddenly bring forward this Application by nearly four weeks without any notice, and
2. Not to allow proper time for objectors to study any newly submitted documents.

We hereby raise a REPRESENTATION based on breaches in implementation of PLANNING LEGISLATION and BEST PRACTICE.

Re: Planning Application BH2014/00697 OBJECTION , continued...

In practical terms we wish to bring the following issues to the Planning Committee's attention:

- A plastic pitch will prevent rainwater reaching the elm trees near the pitch. This carries H&S risks as they may lose branches responding to the lower water regime.
- There are five (5) 'Butterfly Banks' indicated on one diagram, yet only three (3) shown on the report to the committee.
- Does the applicant have formal control over the land of these proposed 'Butterfly Banks', which will require maintenance? If not, then this Planning Condition (proposed) will not be enforceable, and in any event the areas will rapidly revert to scrub habitat of only marginal biodiversity value within less than a decade.

We trust these points will be presented to the Planning Committee for full consideration, in addition to those raised in our 31 March 2014 objections which have still not been addressed.

Please contact us if you require any additional information in respect of our Objection to this Application.

Brighton and Hove's Wildlife Forum.
13 May 2014