



Your Ref: 230953 - Brunel Retail Park
Date: 24th November 2023

Alison Amoah
Principle Planner
Planning, Directorate for Economic Growth and Neighbourhood Services
Reading Borough Council
Civic Centre
Bridge Street
Reading RG1 2LU

Dear Alison,

Brunel Retail Park - Clarifications to Sustainability and Energy Statement incorporating a BREEAM Scoping Review, Brunel Retail Park

Further to our telephone conversation earlier today I am pleased to provide clarification to the sustainability and energy commitments for the proposed development.

The report sets out to demonstrate that from a technical standpoint, BREEAM standards should not be formally applied. The report explains that none of the 4 parts of the BREEAM Refurbishment and Fit Out (RFO) standards should be applied. Whilst this is the case, we felt it important to stress that from an energy, the scheme would be commensurate with the mandatory BREEAM Excellent standards for energy efficiency, which is a principal policy consideration for RBC when considering the sustainability credential of planning applications (Policy CC2). Unlike new buildings where improvements can be demonstrated against Building regulations standards, BREEAM RFO measures improvements from the existing building. The energy calculations presented in Table 4.8 of the Statement demonstrate how the scheme would emit 42.99% less CO₂ than the existing building. The analysis has been run through the BREEAM calculator (Page 30), which demonstrates how 12 credits would be achievable which meet the mandatory levels for Excellent under credit Ene 01 of BREEAM RFO.

Whilst a formal BREEAM Assessment is not proposed, Appendix 1 of the Statement provides an explanation of the measures which are proposed and which would form the basis of a further planning condition. The table was set out against the relevant BREEAM credits which are in scope for a Part 1 assessment and explains how far the scheme aligns with this. Whilst not presented in the statement, these measure would align with a **BREEAM Very Good rating** as shown below.

BREEAM Rating

	Credits available	Credits achieved	Credits targeted	% Credits achieved	Weighting	Category score
Man	15.0	10.0	10.0	66.67%	17.58%	11.71%
Hea	13.0	4.0	4.0	30.77%	18.17%	5.59%
Ene	5.0	0.0	3.0	0.00%	5.90%	0.00%
Tra	4.0	3.0	3.0	75.00%	5.47%	4.10%
Wat	0.0	0.0	0.0	0.00%	0.00%	0.00%
Mat	8.0	7.0	6.0	87.50%	15.77%	13.80%
Wst	10.0	6.0	6.0	60.00%	12.82%	7.68%
Le	4.0	4.0	4.0	100.00%	16.40%	16.40%
Pol	5.0	3.0	3.0	60.00%	7.89%	4.73%
Inn	10.0	0.0	0.0	0.00%	10.00%	0.00%
Total	74.0	37.0	39.0	50.00%	-	64.03%
Rating	-	-	-	-	-	Unclassified

You have requested further clarification on the measures proposed. The following measures are recommended from Table A1 which are proposed to form the basis of a future monitoring condition:

- Commission a sustainability specialist through the further stages of project design to establish targets and monitor progress in line with the requirements of the BREEAM Framework Man 01.
- Require the main contractor to adopt environmental management principles as recognised by BREEAM Man 03, including monitoring energy and water usage throughout the build and compare the results monthly against targets.
- Register the site with the considerate constructor's scheme and achieve good practice standards, ensuring a minimum overall score of 37 out of 45.
- Undertake a thermographic survey to assess insulation continuity and repair any significant defects in the existing fabric before handing the building over to the future operator.
- Design all lighting within the scope of the applicants works in line with the relevant CIBSE SSL design codes for LUX and uniformity. Ensure that all lighting is LED and energy efficient in line with current best practices in the non-domestic compliance guide.
- Conduct a durability review and explore options to protect the building from physical damage.
- Conducting a pre refurbishment audit to consider what materials of the existing unit can be removed and recycled, with the objective to promote resource efficiency.
- Ensure that any external lighting which requires repositioning, or replacement is fitted with energy efficient lamps which is controlled via time clock and / or daylight sensors.
- Install a 28.9 KWP PV array on the roof of the building in accordance with the Energy Statement Table 4.7.
- Procure all timber legally and sustainably, in accordance with a sustainable procurement plan.
- Procure materials which have verified Environmental Product Declarations and achieve 36% of the points available in the Mat 03 calculation.

On this basis, we recommend a similar planning condition to that used for the House of Fraser Application quoted in the E&S report (ref: 191841) would seem appropriate for your consideration:

Prior to the first occupation of the development hereby approved, a report detailing the sustainability / energy measures installed and achieved at the site (in accordance with the measures contained within Table A1 of the Sustainability and Energy Statement incorporating a BREEAM Scoping by Envision Rev. B dated 20th June 2023 shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be installed no later than first occupation and maintained in accordance with such thereafter.

I trust the above is helpful clarification, but please do call me if you require further information.

Yours Sincerely

A handwritten signature in black ink, appearing to read "Simon Rainsford".

Simon Rainsford
Director
Envision Sustainability Ltd