

Sustainability Statement

Reading Link Retail Park



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Document Information

Document prepared for

Des McGuckin
Sorbon Estates

Date of issue

19/10/2023

Issue no.

1

Our reference

10651 - Reading Link Retail Park- Sustainability Statement - 2310-12pgQAar

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Executive Summary

Overview

The proposed project consists of the erection of a new building of 1780 m², which will be used as a gym with mezzanine level. The proposal is within the existing curtilage of Reading Link Retail Park. The gymnasium falls under the same use class as retail, which is Use Class E. Associated refuse and bicycle stores are also included within the proposed development. Moreover, the development will enhance the ecological value of the site through measures such as planting of ornamental shrubs.

This Sustainability Statement will be provided as evidence to the Reading Borough to demonstrate the development's holistic approach to sustainable design and construction. It summarises the contribution that the design will make to create a more sustainable development, drawing on information provided by specialist consultants and design reports, and identifying key features intrinsic to achieving low carbon developments.

Key sustainability features within the development will include:

- Low water consumption through the implementation of water efficiency measures;
- The inclusion of sustainable transport options such as secure cycle storage;
- A sustainable materials procurement policy and an efficient waste strategy on site;
- The implementation of health and wellbeing measures through design and operational procedures, including daylight, optimum indoor air quality and thermal comfort; and
- Protection of ecology on site during construction and biodiversity enhancement measures, such as ornamental shrub planting.

Key Sustainability Measures

In summary, the key measures incorporated to meet planning requirements and to achieve a low carbon development address the following key areas of sustainable design and construction:

- Adaptation to climate change
- Flood risk mitigation and SuDS
- Waste
- Water efficiency
- Transport and connectivity
- Materials
- Health and wellbeing
- Land use and ecology

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Introduction

Sustainability Introduction

The design team has significant experience in delivering schemes that are considered highly sustainable, either through application of formal green building rating systems, such as BREEAM and Home Quality Mark, as well as applying benchmarks from standards such as Passivhaus Design and adopting precedents from industry exemplary sustainable developments.

The scheme will reflect the holistic nature of sustainable development in the Reading Borough. The development will provide much needed high-quality commercial space and will use local labour to boost employment. Health and wellbeing will be incorporated in the design by maximising daylighting and utilising healthy. The ecological value of the site will be maintained and protected. The development will enhance the ecological value of the site through measures such as planting of ornamental shrubs.

Although the proposed development will not be BREEAM assessed, various issues raised in BREEAM such as sustainability, ecology, landscaping, pollution, transportation, construction management plans, environment management plans, flood management and biodiversity have been taken into consideration for the project and covered in this report.

Description of Development

The proposed development is located at Reading Link Retail Park, Reading, RG2 0SN, in the Reading Borough. The site is approximately 0.158 ha and is located within a surplus car parking area of the Reading Link Retail Park. It is currently occupied by 6 retail units and a Starbucks drive thru.

The proposed project consists of an erection of a new class E gym unit of approximately 1780 sqm. It is split across ground floor (929.37sqm) and mezzanine floor (830.37sqm). Associated refuse and bicycle stores and landscaping are also included within the proposed development. **Figure 1** illustrates the proposed front elevation of the gym. **Figure 2** illustrates the proposed site plan. The gym will operate 24 hours a day, 7 days a week.

The aspiration for the scheme is to significantly improve the existing site and its immediate environment by providing an efficient and inclusive development, which meets the policy recommendations of the Reading Borough.

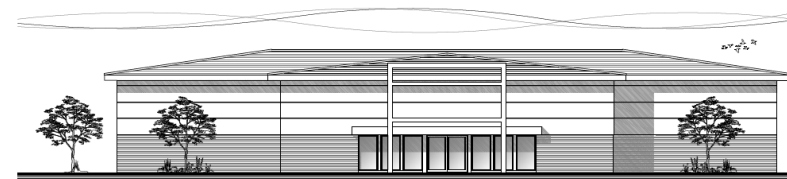


Figure 1: Proposed front elevation of the gym at Reading Link Retail Park.



Figure 2: Proposed site plan of the gym at Reading Link Retail Park.

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Policy Context

National Context: The 2008 Climate Change Act

The UK Government is committed to reducing the UK's carbon emissions by 100% over 1990 levels through the Climate Change Act 2008. Achieving truly sustainable design and construction and forwarding the green agenda within the construction industry across the UK is inherent to meeting these emission targets. This development aims to do both of these.

To help monitor carbon reductions and to plot progress being made for future plans and investments in the UK's low-carbon economy, intermediary targets have been established to ensure that the UK remains on course for meeting the 100% reduction by 2050.

Concurrent with reducing CO₂ emissions by 100% by 2050 is the European Climate Change Policy targets. It sets the objective of ensuring 20% of energy consumption is generated from renewable sources by 2020 whilst also reducing Europe's carbon footprint by 20%. Ensuring a fabric first approach with consideration to renewable energy production fits both the climate change act and the European Commission's 2020 targets for reducing greenhouse gas (GHG) emissions.

National Context: National Planning Policy Framework 2021

The National Planning Policy Framework (NPPF) published in 2021 sets out the UK Government's planning policies for England. Planning law requires that applications for planning permission must be determined in accordance with the local development plan unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.

Regional Context: Reading Borough Local Plan 2019

The Local Plan for Reading (adopted in November 2019) is the document that contains the policies for how Reading will develop up to 2036. The plan has a 'development plan' status, which means that it is the main consideration in deciding planning applications in Reading. The document, therefore, plays a key role in the planning process in the Reading Borough.

This plan has been prepared in accordance with the National Planning Policy Framework (NPPF), which sets out the overall national approach to planning. Local plans should be consistent with the principles and policies in the NPPF, including the presumption in favour of sustainable development.

By 2050, the Local Plan (2019) envisages that Reading will be a smart and sustainable city that:

- Shares success to support and enable thriving communities;
- Delivers a real sense of place and identity;

- Thrives on cultural and cross-generational diversity;
- Is recognised for its heritage and natural assets;
- Embeds technology to deliver innovation and low carbon living for all; and
- Welcomes ethical and sustainable businesses who support Reading. Minimising pollution (including noise, air and urban runoff);

Of particular relevance to this report are the following policies required by the Plan:

- Policy CC1: Presumption in Favour of Sustainable Development
- Policy CC2: Sustainable Design and Construction
- Policy CC3: Adaption to Climate Change
- Policy CC6: Accessibility and the Intensity of Development
- Policy CC7: Design and the Public Realm
- Policy CC8: Safeguarding Amenity
- Policy EN2: Areas of Archaeological Significance
- Policy EN15: Air Quality
- Policy EN18: Flooding and Drainage
- Policy EM1: Provision of Employment
- Policy EM2: Location of New Employment Development
- Policy EM4: Maintaining a Variety of Premises
- Policy TR5: Car and Cycle Parking and Electric Vehicle Charging
- Policy RL2: Scale and Location of Retail, Leisure and Culture Development

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Energy and CO₂

Energy Efficiency Strategies

Energy efficiency measures that will be applied to the gym at Reading Link Retail Park include:

- High insulation standards to reduce transfer of heat through the building fabric.
- Double glazed windows with thermally broken aluminium framing to reduce heat loss.
- Daylighting and well-planned floor layouts to reduce the need for artificial lighting; and
- High efficacy lighting has been specified for the scheme.

Thermal Comfort and Overheating Risk

To minimise energy loss, the building fabric performance will be designed to achieve a balance between retaining heat during winter and allowing the building to dissipate heat during the summer months. Further measures to reduce overheating and the need for cooling include:

- Energy efficient lighting and appliances have been recommended to reduce internal heat gains.
- The building fabric will be insulated over and above the standards set out by Building Regulations and reduced solar gains from double glazed windows will help to keep heat out of the building.
- Reduced air permeability rate and maximised insulation levels.

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Adaption to Climate Change

Climate Change Mitigation

Passive design measures, including openable windows and night-time cooling could be integrated into the design of the development. Mechanical ventilation using fans will remove heat from the building during summer months.

Flood Risk and Sustainable Drainage

Reading Link Retail Park is located within Flood Zone 2 of the Environment Agency's Flood Map for Planning, as shown in **Figure 3**. This is defined as an area that comprises land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding (1% – 0.1%), or between a 1 in 200 and 1 in 1,000 annual probability of sea flooding (0.5% – 0.1%) in any year.

Since the site is located in Flood Zone 2, a Flood Risk Assessment is carried out by Price Myers in March 2023, in accordance with Local plan policy EN18. Additionally, most of the 0.16 ha of the site is currently impermeable area. Landscaping and soft scaping were proposed around the site to manage this. In accordance with Policy EN18, the development will incorporate sustainable drainage systems (SuDS), including attenuation measures to manage the risk of surface water runoff. These measures will ensure surface water run-off will not be detrimental to the environment, public wellbeing and the economy.

Flood Map



Figure 3: Flood map showing the approximate location of the development within Flood Zone 2.

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Waste

Construction Waste Management

Resource efficiency will be promoted through effective and appropriate management of demolition and construction site waste.

In line with the waste hierarchy, during the construction phase, the approach will be the following:

- Use reclaimed materials;
- Use materials with higher levels of recycled content; and,
- Use new materials.

For any demolition, the following approach will be adopted:

- Prioritise the on-site reuse of demolition materials;
- Adopt on site recycling and, where required, use off site recycling; and,
- The least preferred option – disposal to landfill.

A site waste management plan will be developed which adopts best practice benchmarks for resource efficiency, details procedures and commitments to minimise non-hazardous and hazardous waste at the design stage and monitors/measures waste production on site. The plan will apply to the location of the building.

The site waste management plan will also include procedures and commitments to sort and divert waste from landfill through the following:

- Re-use on site;
- Salvage/ reclaim for re-use off-site;
- Return to supplier via a 'take-back' scheme;
- Recovery and recycling using an approved waste management contractor; and
- Compost.

Operational Waste

A communal refuse store providing safe and convenient access to the building should be built in accordance with Policy CC5 and the Reading Waste management guidelines.

Reading Council provides a weekly collection service for recycling which is sorted post-collection at Materials Recovery Facility. The council also provides a collection for food waste which is collected weekly from the kerbside.

The neighbourhood has access to convenient and comprehensive recycling facilities at a number of community centres and on-street recycling points on high streets and around transport hubs. Freecycle Reading and Freegle Reading are examples of groups that accept a wide range of items not covered by the regular collection service.

A collection service for bulky domestic waste is also available in the area, which can be booked for a collection fee as required.

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Construction Management

Construction Environmental Management

Environmental impacts of the construction works will be mitigated as far as possible. This will include the incorporation of the following:

- Contractor following environmental management system processes (under ISO14001), including the development of a construction environmental management plan (CEMP) specific to the sites;
- Training and site induction of all site operatives;
- Monitoring of energy, water and transport to and from site during construction;
- Management of waste on site;
- Following best practice pollution guidance from the Environment Agency;
- Ensuring all site timber is responsibly sourced in line with the UK Government's Timber Procurement Policy;
- Minimising vehicle emissions through the use of catalytic converters and the regular maintenance of vehicle engines;
- Damping down of brick walls etc. during any building demolition;
- Regularly inspecting and wet suppressing materials/soil stockpiles where necessary (including wind shielding or completely enclosing, storing away from site boundaries, and restricted height of stockpiles);
- Appropriate orientating of material stockpiles;
- Providing wheel washing and wet suppressing during the loading of wagons vehicles;
- Covering vehicles carrying dry soil and other wastes;
- Shielding of dust-generating construction activities;
- Providing suitable site hoarding;
- Restricting vehicle speeds on haul roads and other unsurfaced areas of the site; and,
- Inspecting unsurfaced haulage routes, and wet suppressing should this be necessary (in times of prolonged dry periods).

Considerate Constructors

The scheme will adopt the principles of the Considerate Constructors Scheme (CCS). The CCS scheme aims to recognise and encourage construction sites that are managed in an environmentally and socially considerate, responsible and accountable manner.

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Water Efficiency

Water Conservation

The development proposal recognises the need to create a scheme that is efficient and adaptable to future climatic scenarios.

The design team is committed to achieve a significant reduction in internal water use for the development over typical performance, in accordance with the relevant standards.

Water consumption will be reduced through the use of water efficient components for all specified domestic water-consuming components (including low-flow showerheads and taps, dual flush toilets and low water consuming washing machines and dishwashers), water meters for the building, water recycling systems where appropriate and flow control devices that regulate the supply of water to each facility according to demand.

A permanent automated water leak detection system that alerts the building occupants to a major water leak on the mains water supply within the building and between the building and the utilities water meter will be installed.

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Transport and Connectivity

A Transport Statement for Reading Link Retail Park has been produced in February 2023 by Motion on behalf of Sorbon Estates for the scheme as required by Policy TR5.

Public Transport

The development is located 1km away from the town centre that provides connectivity to main bus interchange and the railway station. The nearest bus stop to the application site is located approximately 650 metres to the north on the A4 Berkeley Avenue accessible in an average walk time of 8 minutes. The bus stops are served by Route 11 (Bronze). The route operates between Coley Park and Reading town centre on a 20-minute frequency Monday – Saturday and half hourly on Sunday. Reading West and Reading Rail Station are the closest train stations, which are a 30 min walk from the site. Reading Rail station is served by Great Western Railway to Guildford, Oxford, Newbury, Wokingham and Bracknell.

Cycling and Car Provision

Cycle parking will be provided in accordance with the Reading Borough Local Plan Policy TR 5. A total of 8 dedicated secure and covered cycle spaces are proposed next to the Starbucks in the retail park.

No dedicated parking will be provided for building users, but the gym will use the existing main car parking in line with the Reading Borough Local Plan recommendations and Policy TR5. There are on going discussions with EV charging providers to install up to 18 EV charging points on site. There are few 'pay and display' car parking available within 20 minutes' walk from the gym.

Accessibility and Security

Creating a secure but fully accessible development is a key part of the proposed development. To ensure this is achieved, the design team will adopt, where feasible, the key principles of "Secured by Design" within all elements of the scheme. A Designing Out Crime Officer (DOCO) will be consulted at an early stage to provide a set of bespoke security recommendations for the development. The recommendations of the DOCO will be implemented within the development's design and layout.

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Materials

Materials and Waste Introduction

Sustainable material sourcing and waste management will be considered throughout the life of the building to ensure the scheme's environmental footprint is minimised as far as possible. The scheme will also ensure low embodied carbon is employed throughout the procurement, transport and construction of building materials, together with end-of-life emissions.

Materials Selection and Sourcing

The design team has confirmed that efforts will be made to reuse materials where feasible and that where required, new materials will be responsibly sourced. New construction materials will be selected, where feasible, with a low environmental impact. In addition, the project will aim for new materials to come from a recycled or reused source, including a high-recycled content in steel. Minimum standards apply to new timber, which must be sourced in accordance with the UK Government's Timber Procurement Policy.

In addition, all timber will be FSC/ PEFC certified, all concrete will be BES 6001 certified, and any other material will be ISO 14001 certified for both key processes and supply chain/ extraction processes where feasible to do so.

The Green Guide for Specification is a reference tool, providing guidance on the relative environmental impacts for a range of different building elemental specifications, based on Life Cycle Assessment and the Environmental Profile Methodology. The design team will reference the Green Guide to Specification to help specify materials with a low environmental impact, where feasible. The design will incorporate at least 5 build-up elements that will be A-C rated on the Green Guide.

Insulation specifications will eliminate hydrochlorofluorocarbons (HCFCs) and ozone depleting materials, wherever possible. All insulation specified will have a Global Warming Potential (GWP) of less than 5 and be responsibly sourced to have a low embodied impact.

Embodied Carbon Analysis

The development will utilise a number of opportunities to cut embodied carbon, as follows:

- A materials efficiency strategy will be followed throughout the design, procurement and construction stages of the development, to ensure the scheme produces less waste on site. For example, adjustment of some sizes will be made to minimise offcuts of materials, and some bespoke materials will be developed off-site;
- Materials will be procured from the local area where possible, to reduce carbon through transportation;
- Materials and products with a higher recycled content will be preferentially procured where feasible, as these have a low embodied carbon; and,
- Consideration has been made to use timber as a low embodied carbon alternative to steel and concrete where possible.

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Health and Wellbeing

Occupant Wellbeing

The development has been designed to ensure the wellbeing of occupants in terms of levels of fresh air, thermal comfort and reduction of overheating, access to natural light, good lighting levels internally and externally, acoustic performance and access to safe drinking water.

The building services strategy has been carefully considered in order to balance the need for energy-smart, low carbon technologies with the need for adequate and controllable ventilation, heating and cooling.

Internal Air Quality

The design team will specify only low volatile organic compounds (VOC) finishing products, including sealants and paints. All composite wood products will contain no added urea formaldehyde.

External Air Quality

An Air Quality Assessment report was produced by Redmore Environmental Ltd in March 2023. From the assessment, it can be concluded that air quality impacts because of traffic generated by the development were not predicted to be significant at any sensitive location in the vicinity of the site. The development site is located in an Air Quality Management Area (AQMA), which has been declared due to continued exceedances of National Air Quality Objectives (NAQOs) for NO₂ and PM₁₀.

Construction Impacts

The unmitigated risk to local sensitive receptors from emissions of dust and pollution from construction is deemed to be low. With the mitigation measures in place, the residual effects arising from the construction phase of the proposed development would be deemed 'not significant'.

Air Quality Neutral (AQN)

The scheme has been assessed for both the impacts of transport and building operation against the AQN guidance and they were found to meet the requirements for AQN.

Daylight

The design has been developed to allow the use of daylight within the building to be maximised as far as practical, in accordance with the relevant local policies.

Inclusive Design

The guidance in the Approved Document M (March 2016) will be incorporated to achieve an inclusive built environment that enables users to maximise their individual abilities and enjoy a safe and independent participation. All units have been designed to demonstrate compliance to Part M4(1): Visitable dwellings and Part M4(2): Accessible and adaptable dwellings

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Land Use and Ecology

Protection of Biodiversity

The development has proposed some landscaping in the form of hedge and tree planting to enhance its setting and improve the existing situation.

The design team is committed to protecting biodiversity on site and will implement the following measures:

- Confirm that all relevant UK and EU legislation relating to protection and enhancement of ecology has been complied with during the design and construction process;
- Ensure that a suitably qualified ecologist has checked for the presence of active nests prior to the commencement of works;
- Implement working methods in line with best practice to manage dust and water runoff;

Ecological Enhancements

The design team is also committed to enhance biodiversity on site in line with Policy EN 2.

The proposed development will aim to incur no negative change in ecological value and a suitably qualified ecologist will provide early design stage advice on:

- How to improve the ecological value of the site;
- Confirm that all relevant UK and EU legislation relating to protection and enhancement of ecology has been complied with during the design and construction process; and,
- Produce a landscape and habitat management plan to cover at least the first five years after project completion, if applicable.

Opportunities for ecological enhancements are limited based on the site layouts. However, the design team are including landscaping, which will incorporate ornamental shrubs and tree planting.

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Conclusions

Conclusions

This Sustainability Statement has responded to the Reading Borough local planning policy requirements. It is robust in its assessment, recommendations and controls and will negate the requirements for a BREEAM planning condition.

In summary the scheme will adopt the following sustainable features:

- Low energy lighting will be specified.
- Implement a site waste management plan and stringent resource efficiency benchmarks.
- Follow best practice policies in terms of air, water and ground pollution and appoint a contractor who will register for the Considerate Constructors Scheme.
- Low water consumption through the implementation of low water-consuming fittings.
- Utilise sustainable transport, including access to public transport and inclusion of cycle storage facilities.
- Minimise embodied carbon through efficient design, procurement of materials from a local source, or with a high-recycled content.
- Ensure all materials are responsibly sourced and of low environmental impact where feasible.
- Consider health and wellbeing through design and operational procedures, including daylight, optimum indoor air quality and thermal comfort.
- Enhance the ecological value of the site by introducing ornamental shrubs and planting.