

Variation of Condition 5 attached to Planning Permission Ref: 191557 for Change of Use of Part of Building from Class B8 Storage and Distribution to Class D2 Leisure Use at 4 Acre Road Reading.

SUPPORTING STATEMENT

1.0 Introduction

- 1.1 Planning permission was granted on 6th December 2019 for the change of use of part of the above building so that it could be used by the applicants as an indoor climbing centre (Ref: 191557). Condition 5 attached to that permission requires compliance with a BREEAM Sustainability Standard prior to the occupation of the building. In practice, this particular approach is not really achievable, practical or reasonable and this application seeks to vary that condition so that the use can be introduced to the building incorporating more appropriate measures relating to energy efficiency.

2.0 The Condition

- 2.1 The relevant condition that this application relates to is as follows:

Prior to first occupation of the development hereby approved, a copy of a Final BREEAM Certificate in accordance with the BREEAM Sustainability Standard and carried out by a licensed assessor, demonstrating that the development has complied with a minimum standard of BREEAM 'Good' rating, shall have been submitted to and approved in writing by the Local Planning Authority.

REASON: These details are required due to insufficient information being contained within this submission and in order to ensure that the development is carried out in accordance with sustainable building standards in accordance with Policy CC2 of the Reading Borough Local Plan 2019.

3.0 Relevant Considerations

- 3.1 In seeking to implement the planning permission that has been granted the applicants have been looking into what would be required to meet the BREEAM Good standard as required by Condition 5. They have found that the condition presents considerable difficulties, such that in its current form it would prevent the project going forward. They need to have the condition amended. In simple terms, this is an existing building that was not constructed to current BREEAM standards and the relatively minor scope of works required to allow the new use to be introduced are very unlikely to result in a BREEAM certificate being issued. In practice, significant parts of the building would virtually have to be largely re-constructed, and that is not a practical proposition, and not what planning permission has been granted for.
- 3.2 A wide range of new works to the building would be needed to achieve the sorts of enhancements required to meet current BREEAM standards. They would include further insulation to the building, grey water storage and distribution systems, upgraded toilet areas, PV installed on the roof which in turn would require major works to the roof structure to take the additional weight, FRA assessment, ecological assessment, water and energy meters, and a number of other works. In practice however, even if all of these measures were undertaken it is still unlikely to result in a BREEAM certificate being achieved because the original building was not built in the context of BREEAM.
- 3.3 The work required to the building to enable the new use to be introduced is actually much more limited. The intention is to install a kitchen, offices, reception and party areas within existing internal space without modifying any of the building envelope or structure. There would also be redecoration internally, replacement of toilet cubicles as well as installing a disabled toilet that the building currently lacks.
- 3.4 It is recognised that Building Research Establishment's Environmental Assessment Method (BREEAM) is one of the world's leading environmental assessment method for buildings. The objectives for BREEAM include:
- To ensure best environmental practice is incorporated in the planning, design, construction and operation of buildings and the wider built environment.

- To define a robust, cost effective performance standard surpassing that required by regulations.
- To challenge the market to provide innovative, cost effective solutions that minimise the environmental impact of buildings.

3.5 BREEAM refurbishment is for domestic and non-domestic building fit-outs and refurbishments. The BRE says that, *"The primary aim of BREEAM UK Refurbishment and Fit-out is to promote the delivery of sustainable refurbishment and fit-out, in order to mitigate the life cycle impacts of existing buildings on the environment in a robust and cost-effective manner. This is achieved through integration and use of the scheme by clients and their project teams at key stages in the design and refurbishment/fit-out works process"*.

3.6 This application for change the use of 900 sqm, of an existing 2,890 sqm B8 warehouse to a D2 climbing centre was validated without any submissions relating to BREEAM. Indeed BREEAM was first mentioned late in the planning process, just before the application was determined. Condition 2 of the consent requires compliance with the drawings and information submitted with the application, none of which reflect any BREEAM credit requirements.

3.7 The introduction of the BREEAM requirements so late in the process and shortly before determination means that BREEAM was not used to guide and inform the design and fit-out of the 900 sqm part of the existing unit. It is important to recognise that there is also guidance within some BREEAM documentation suggesting that where interior fit out is limited to an area less than 50% of the existing floor space the requirements do not apply.

3.8 The building was never originally designed and constructed with BREEAM in mind and it is simply not practical or viable to change the original plans, meaning that the BREEAM credits linked to RIBA stage 1 and 2 are highly unlikely to be able to be targeted at the current RIBA stage 3. Examples of this include:

- Project brief and design - the building itself is not being changed.
- Life cycle cost and service life planning - it would seem fundamentally unsustainable to remove and throw away perfectly good roof sheeting and insulation over a part of the building and replace it with slightly better roof sheeting
- Indoor air quality - the intended use does not require any air conditioning

- Acoustic performance - the intended new use is likely to be quieter than the existing use and once again it would be wholly unsustainable to replace the existing wall cladding for example just for this reason.
- Safety and security - no changes are intended as the building is safe and secure
- Reduction of energy use and carbon emissions energy monitoring - there will be no change to the heating system.
- External lighting - there will be no change to the external lighting
- Low carbon design - insofar as the intended works require.
- Drying space - there is no requirement for such a space.
- Compliant cyclist facilities - this will be achieved.
- Hard landscaping and boundary protection - no changes are proposed as it is a very mature landscape and the boundary protection is robust.
- Designing for durability and resilience - insofar as works are being carried out.
- Adaptation to climate change - we see little opportunity to adapt the building within the intended scope of works
- Functional adaptability - this will be implemented
- Early identification and design for protection of ecological features - we cannot have any influence on this as it already exists.
- Enhancing site ecology - there is no opportunity for this.
- Long term impact on biodiversity - there is no opportunity for this.
- Flood risk management and reducing surface water run-off - the building is already constructed so we can't influence this.
- Reduction of night time light pollution - existing lighting will remain which is already at a minimum
- Reduction of noise - the new use will be less noisy than the existing

3.9 In this context, the reuse of an existing building and site to extend its useful life in order to increase the use of the embedded materials represents the best environmental practice. In addition, the creation of employment and facilities for the local community represent good sustainable practices. While the re-use of an existing building in this way is clearly a sustainable approach, it is not something that can realistically be measured in terms of a BREEAM rating. A similar analogy would be that of a motor vehicle where over half the vehicles lifetime CO2 footprint is in its manufacture so the best route forward is to use your existing car until it wears out rather than replace it with a new electric car.

3.10 Although seeking to achieve a BREEAM good standard is not a reasonable or practical proposition in this particular case, it is recognised that it is the

Council's policy to seek to ensure that all development is carried out in an energy efficient manner and result in premises that would limit impact on the environment in their future use. With this in mind, the applicants are intending to incorporate the following measures in the conversion scheme:

- Additional water and electrical meters as required by BREEAM to monitor the D2 area independently.
- Trip generation recording during construction.
- Lighting switching controls for absence / occupancy conditions.
- Light fittings have an efficacy of at least 65 luminaire lumens/watts or greater.
- Mechanical ventilation to have variable speed controls.
- BREEAM type cycle racks.

3.11 It is important to recognise that Local Plan Policy CC2, which this condition refers to, does not apply an absolute requirement for BREEAM standards to be met in all cases. The policy actually seeks to ensure that *"the design of buildings and site layouts use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change"*. In this case the design and construction of the building is something that took place in the past, well before this policy was adopted. The development that the applicants wish to implement is simply the change of use of part of the building. No new-build, reconstruction or redevelopment is proposed, as was shown on the drawings that have been approved.

3.12 As stated above, some refurbishment of part of the building would be carried out, and as far as possible this will be implemented in a way that complies with the intentions of the policy to make buildings more energy efficient and limit their impact on climate change. This will enable the continued use of this existing building in an efficient way for the general public good, and all of the energy and resources that have gone into creating it will continue to be taken advantage of and not wasted.

3.13 It is notable that the first bullet point in the policy recognises that the relevant BREEAM standards cannot always be met, but should only be met "where possible". This demonstrates that it is recognised that BREEAM is not always the best or most appropriate approach. This particular case is one where it is not possible. Furthermore, as noted above, to meet BREEAM standards certain parts of the building would be likely to need virtual reconstruction, and such works are likely to need planning permission in their own right. The permission that has been granted

indicates that the Council accepts that part of the building can be converted to the new use without the need for new construction works. In this context the condition in its current form is not reasonable if it implies that extensive physical works to the building are required.

4.0 Summary and Conclusions

- 4.1 The applicants feel very strongly that a more acceptable and practical approach would be to amend this Condition such that it ensures that the measures listed in paragraph 3.10 above are implemented as part of the conversion scheme and in the operation of the new use, but that full compliance with the BREEAM standards is not required in this particular case. This will enable the development to go forward, which would not otherwise be a realistic proposition.
- 4.2 We would be happy to discuss this matter further, including the measures introduced to the building, however we hope that you will support this alternative approach.