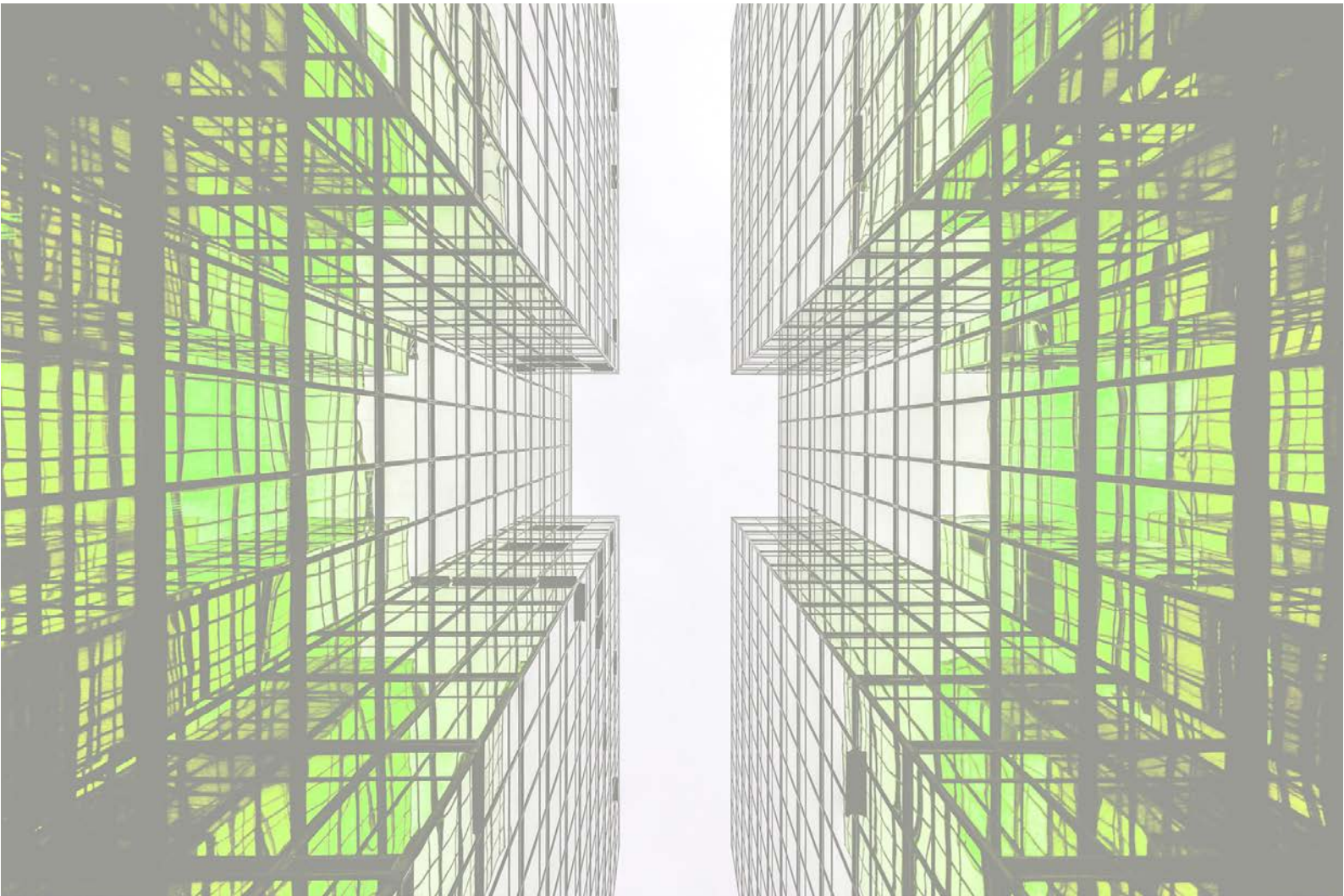


Technical Note in support of Condition 12 (BREEAM) of planning permission reference 180823

Former Argos, 47 Oxford Road, Broad Street Mall

Prepared for Inception (Reading) S.à.r.l
September 2018



envision

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1 SUMMARY OVERVIEW

- 1.1 This technical report has been prepared by Envision to discharge Condition 12 (BREEAM) of planning permission reference 180823 in relation to the former Argos Unit, The Broad Street Shopping Mall, 47 Oxford Road. The planning permission grants consent for the following development:

Subdivision of a three-storey retail unit (Class A1) and change of use to form: 1x retail unit (Class A1) at part basement / part ground floor; 2x flexible retail or restaurant units (Class A1/A3) at ground floor level; and 2x assembly & leisure units (Class D2) - 1 at part basement / part ground floor & 1 at part ground, part first floor level, together with shared access and means of escape; associated replacement shopfront works and associated external alterations..

- 1.2 The planning approval includes Condition 12 which relates to BREEAM. This states:

(i) No development shall take place until a copy of an Interim BREEAM Certificate in accordance with the BREEAM Sustainability Standard demonstrating compliance with a minimum standard of BREEAM 50% Very Good, 50% Excellent ratings has been submitted to and receipt acknowledged in writing by the Local Planning Authority.

(ii) No development shall be occupied until a copy of a Final BREEAM Certificate in accordance with the BREEAM Sustainability Standard following a post-construction stage review carried out by a licensed assessor has been submitted to and receipt acknowledged in writing by the Local Planning Authority, demonstrating that the development has attained as a minimum the standard set out in the Interim BREEAM Certificate referred to in part (i) of this condition.

Reason: To ensure that the development contributes adequately towards environmental sustainability and that the development is carried out in accordance with sustainable building standards, in accordance with Policy CS1 of the Reading Borough LDF Core Strategy 2008 (Altered 2015) and SPD Sustainable Design and Construction (2011).

- 1.3 Envision is an independent sustainability consultancy licenced by the BRE to provide BREEAM assessments for a range of project types, including retail and leisure uses. Envision has reviewed the scheme proposals against planning condition 12.
- 1.4 For the reasons outlined within this report, it is considered that the requirement to formally certify a BREEAM 'Excellent' rating for 50% of the development, and 50% for the remainder to achieve 'Very Good' to be onerous in this specific case.
- 1.5 This report provides a review of the proposals against the relevant BREEAM criteria. With reference to the BREEAM standard, this report explains the sustainability benefits integral to the scheme demonstrating full compliance with local policy objectives for sustainable development maintained by Reading Borough Council, and provides justification as to why formal certification to BREEAM is considered of limited benefit. Indeed, the formal certification to any BREEAM rating is considered to have limited benefit in this specific instance due the very limited scale of works proposed by the developer which are able to be assessed against BREEAM.

2 BACKGROUND

- 2.1 The consented scheme involves the change of use of a 1970s retail building from A1 to enable a mix of uses. The scheme proposed the re-purposing of a currently vacant part of the Broad Street Shopping Mall to create a more vibrant development within the heart of the town centre. It is material to note that the change of use does not permit any new floor area, and the extent of the external works are fairly modest in scale and nature, being limited to replacing the shopfronts at ground level.
- 2.2 The proposals are being taken forward on a speculative basis, and whilst there have been initial interest from some high street chains, the commencement of the development works is necessary to attract interest from prospective tenants.
- 2.3 The requirements for BREEAM as a planning condition was assigned by officers to address Policy CS1 Sustainable Construction and Design of the adopted Core Strategy (2008, altered 2015) and requirements laid out in the adopted SPD of Sustainable Design and Construction (2011). Policy CS1 stipulates that proposals for new development, including the construction of new buildings and the redevelopment and refurbishment of existing building stock, will be acceptable where 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. Policy CS1 requires that for larger developments of more than 10 dwellings or 1,000 m² of floorspace, proposals should ensure that 50% of the provision meets the most up to date Eco-Homes and BREEAM 'Excellent' standards.
- 2.4 The successful application of Policy CS1 is monitored and reported by Reading Borough Council in its annual monitoring report. The latest report was published in December 2017 for the period 2016 – 2017. Within this period, 33 major applications were permitted, of which 17 did not have planning conditions requiring sustainability standards. Of the 17 major applications without formal BREEAM conditions, two were for change of use applications and one was for development without new floorspace. The monitoring report recognises that although policy CS1 applies to all development, including refurbishments and change of use, each case is considered on its merits and the level of alteration to the fabric of the building taken into account. This implies that planning conditions imposing BREEAM standards have not been set in cases where a major development is for change of use and involved no new floor area or significant amendments to the façade. This indicates that some flexibility should be afforded in special circumstances. Indeed during the determination process, officers acknowledged within the committee report that there may be inherent difficulties incorporating substantial sustainability improvements within schemes such as this, primarily owing to it predominantly involving the change of use of an existing building. As such, it was recognised that should there be shortfalls in the subsequent discharge of condition submissions, mitigating factors will be taken into account by officers when subsequently assessing such matters.

3 APPLICATION OF BREEAM AND PREDICTED SCORING

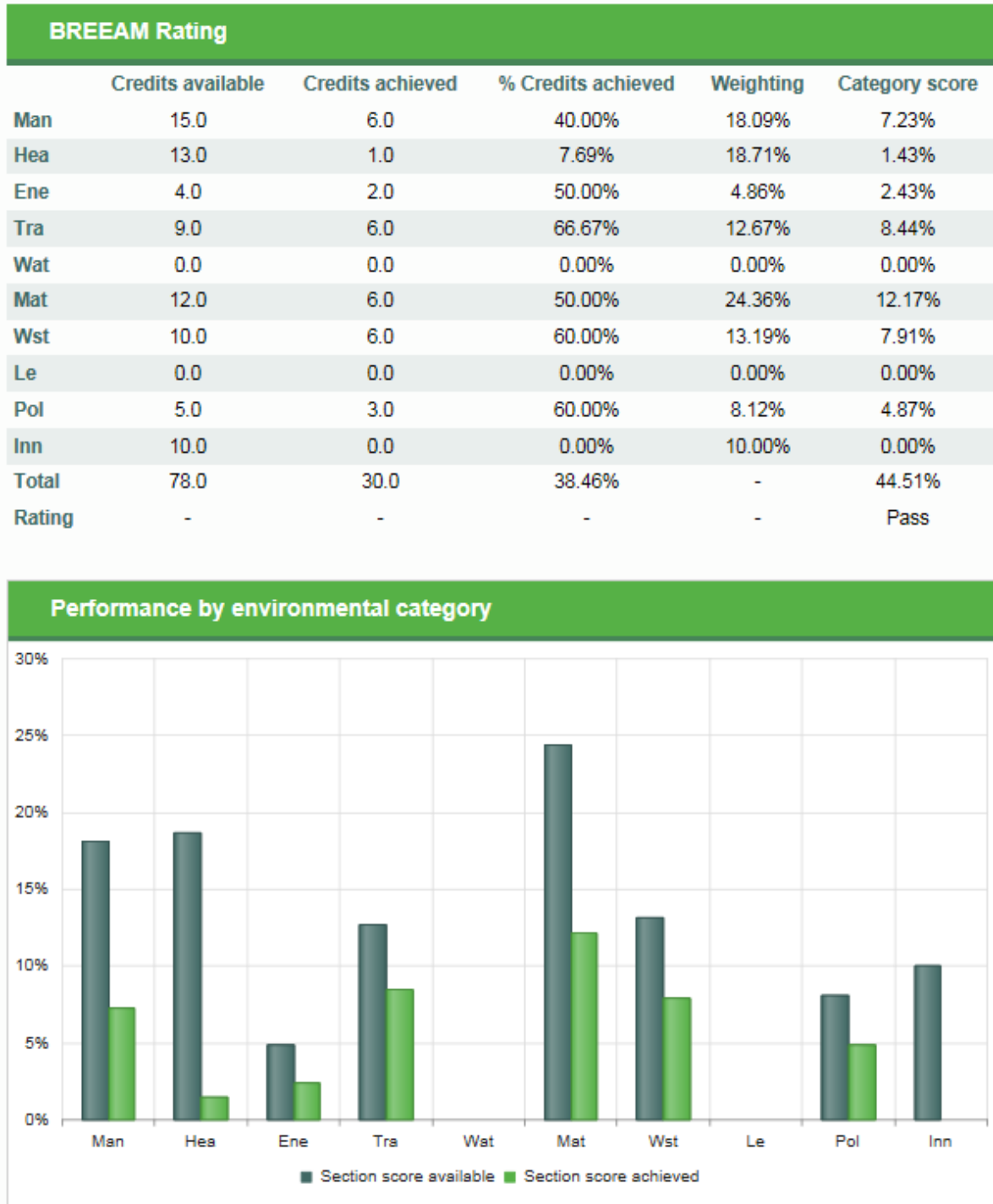
3.1 BREEAM assessments provide a sustainability rating of non-domestic building by assessing performance against a range of criteria. The BREEAM standards that are technically applicable to the scheme proposals are the BREEAM UK Non-domestic Refurbishment and Fit-out 2014 standards, which provide a modular set of criteria that can be applied depending upon the scope of works for a particular project type. There are four parts to a BREEAM refurbishment assessment as shown in the table below. The relevance to Condition 12 is also considered.

Section	Comment	Relevance to Condition 12
Part 1 – Fabric & Structure	This part applies where major alterations to the building façade, roof or windows are being undertaken and where the area to be renovated is greater than 50% of the surface of the individual element or 25% of the total building envelope.	The change of use substantially reuses the building envelope, however Part 1 is technically applicable as over 50% of the existing windows within the assessed area are being replaced. Part 1 is applicable.
Part 2 – Core Services	BREEAM considers ‘core services’ as services that supply multiple areas and will generally be centralised plant. Part 2 is relevant for the assessment of fully fitted buildings, where at least two M&E systems are to be installed or upgraded.	Core services will be a responsibility of the tenant, and therefore do not fall within the scope of the works undertaken by the developer. Subsequently these cannot be included in a BREEAM assessment to discharge Condition 12. Whilst it is envisaged that the tenant will install highly efficient equipment, such systems cannot be taken into account in a BREEAM assessment due to a multi let building. Part 2 is not applicable.
Part 3 – Local Services	Part 3 applies to fully fitted assessments, where at least two fixed building services are to be installed or upgraded within the assessed building.	As above, local services will be the responsibility of the future tenants and cannot form part of the assessment. Part 3 is not applicable.
Part 4 – Interiors Design	Part 4 applies where the refurbishment or fit-out works involve changes to the layout and/or redecoration of the refurbishment or fit-out area. This is only applicable to fully fitted buildings.	Interior design will be the responsibility of the future tenants and cannot form part of the BREEAM assessment for the shell works. Part 4 is not applicable.

3.2 As can be seen in the table above, the only applicable part of BREEAM that is relevant to the developer’s works is Part 1. The scope of the developer’s works to facilitate the change of use involves some minor internal alterations and the replacement of shop front glazing. All works would comply with current building regulations for thermal efficiency and air tightness. There will be no centralised landlord equipment within the building, and all buildings services and interior fit out will be the responsibility of future tenants who will installed efficient equipment expected to far exceed the efficiency of the previous 1970s’ unit, which has reached the end of its serviceable life.

3.3

A BREEAM Pre assessment against Part 1 has been undertaken by Envision to consider potential performance. The full pre assessment is provide in Annex 1. The predictive assessment identifies that a BREEAM 'Pass' rating may be technically achievable based on the developer's scope of works alone.



4 MITIGATING FACTORS

- 4.1 The scheme involves the refurbishment and regeneration of a currently vacant and underutilised part of the Broad Street Mall. The site is within a prominent location and it is of vital importance to fill vacant units to maintain a healthy and viable town centre.
- 4.2 The BREEAM Predictive Assessment made against Part 1 identifies that the development of this type and nature would align with a BREEAM 'Pass' rating only. This does not detract from the sustainability of the building, but demonstrates the limitations BREEAM certification has in this particular case.
- 4.3 The proposals will facilitate the upgrade of the existing building by delivering thermal improvements through modern and efficient glazing. The reuse of the structure and majority of building envelope accords with principles of Policy CS1 which is to use energy, minerals, materials and other natural resources appropriately. The reuse of the existing building would typically have a lower life cycle impact than demolition and new build from the perspective of embodied carbon, waste minimisation and resource depletion. Furthermore, the operational efficiency of the building is also expected to improve by attracting new tenants who will be required to install efficient building services which will at least be in line with Part L2b of Building Regulations 2013 (thus conserving energy) and equivalent standards for water conservation. This will clearly lead to efficiencies from the current 1970s building.
- 4.4 Considering the low rating which would be demonstrable against BREEAM, and the additional cost of certification, it is suggested that formal BREEAM certification is not applied in this case. The main reasons which prevent BREEAM from being applied formally are:
- The scale and nature of the works are very limited and generally do not align with BREEAM, which is better suited to new build development or for the refurbishment of a building owned and fitted out by the same party.
 - It is important to reflect that the high street retail market is heavily stretched, with increased pressure from online markets and out of town sites. The additional investment costs to achieve BREEAM certification on the development would not be recoverable as it is not practical to impose higher rents in the building.
 - The timing to certify the shell works with an interim certificate is thought impractical. The BRE are currently taking between 8 – 10 weeks to issue certification following initial submission of BREEAM assessments. Imposing a formal BREEAM pre commencement condition whereby an interim certificate is provided prior to commencement would delay works for approximately 16 weeks, prolonging the period the site remains vacant. This delay may prevent prospective tenants from taking space within the site.
 - Whilst the change of use allows D2 uses on part basement ground and first floors, it is material to note that a substantial part of the existing floorspace already lawfully used for A1 purposes is proposed to continue to remain in A1/ A3 uses. This could be taken forward without the need for planning approval and hence could be undertaken without consideration to Policy CS1.

5 CONCLUSIONS

- 5.1 The Proposed Development is being taken forward on a speculative basis to accommodate multiple future tenants. Condition 12 can only be practically applied and discharged for the developer works, which is consistent with other shell only BREEAM approaches consented by RBC.
- 5.2 The Development proposals has been subject to a scoping exercise, which indicates that the project can be assessed against Part 1 (Fabric and Structure). The thresholds for this are met due to the extent of the glazing replacement proposed, which exceeds 50% of the glazing on the part of the building subject to change of use / refurbishment.
- 5.3 A Part 1 BREEAM assessment limits the number of credits available, and excludes categories such as water and other fit out aspects relevant to Part 2, 3 and 4 of BREEAM. Under a Part 1 the development is expected to reach a score of BREEAM 'Pass'. The report also identifies practical restrictions from formally certifying to any BREEAM standard in this particular case.
- 5.4 The development does however align with a number of sustainability objectives and which aligns with Policy CS1 of the RBC Core Strategy 2011, amended 2015):
- The project will be registered with the Considerate Constructors Scheme and the contractor will be required to follow best practices for environmental management, responsible product sourcing and labour.
 - A pre refurbishment audit will be undertaken to consider opportunities to recover and recycle elements of the existing building's strip out. Targets will be set for resource efficiency and diversion from landfill.
 - The new glazing will be of a robust standard and will be thermally efficient, improving the EPC rating from the current property.
 - The development will be operated under a travel plan to promote sustainable travel and manage / minimise private travel from tenants and their goods deliveries.
 - Tenants will be issued with a green building guide, which encourages the installation of efficient systems in line with best practices and criteria recognised by BREEAM.
 - The site is within a low flood risk area and the development does not further contribute to flood risk as there will be no increase in impermeable surfacing from the existing situation.
 - Each tenant will have their own energy and water meters.
 - The limited external works will be robust and durable.
- 5.5 Based on the above, officers are requested to discharge pre commencement condition 12 on this basis, factoring in the mitigating circumstances in this particular case.

Prepared by Envision, BREEAM Assessment Organisation and Accredited Professionals

Simon Rainsford, licenced BREEAM assessor.

Annex 1 – BREEAM Pre Assessment

BREEAM UK Refurbishment & Fit-out 2014 - Pre-assessment

TBC

Pre-assessment

Argos Corner, Former Broad Street Shopping Mall

04 September 2018 Assessment Report



PwC's BREEAM Outstanding rated One Embankment Place in London. Image: Hofton + Crow.

Assessment details

Assessment references

Registration number:	TBC	Date created:	31/8/2018
Created by:	Simon Rainsford		
Architect name:	C&W		
Developer name:	Moorgarth		
Property owner	Moorgarth		

Site details

Site name:	Argos Corner, Former Broad Street Shopping Mall
Address:	47 Oxford Road, Broad Street Shopping Centre
Town:	Reading
County:	
Post code:	RG1 7QG
Country:	United Kingdom

Certificate details

The certificate will have the name of the architect (if entered above) and the name of the developer (from above).

Any other names to appear on the certificate are listed below:

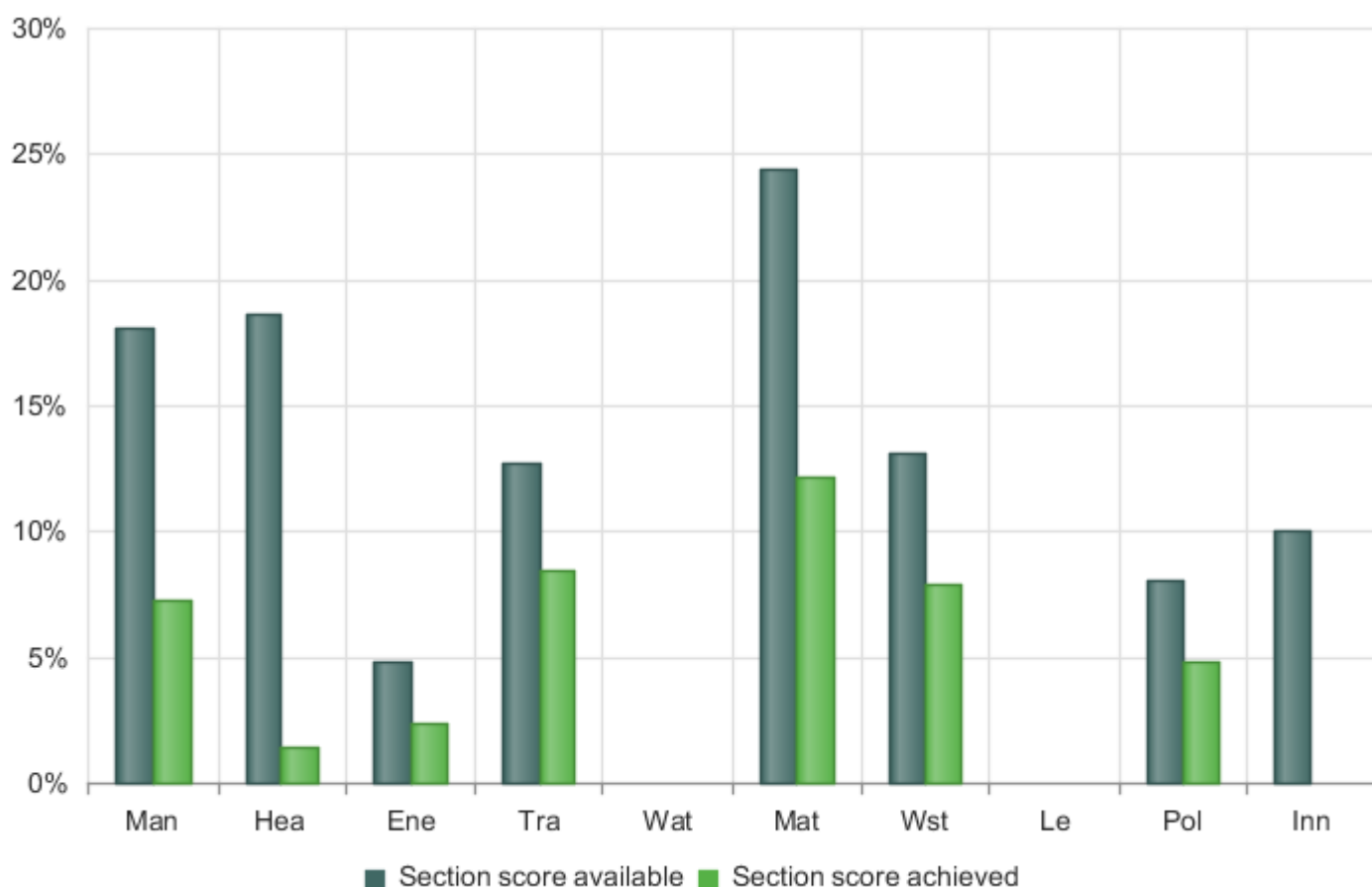
Name	Label
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BREEAM rating

BREEAM Rating

	Credits available	Credits achieved	% Credits achieved	Weighting	Category score
Man	15.0	6.0	40.00%	18.09%	7.23%
Hea	13.0	1.0	7.69%	18.71%	1.43%
Ene	4.0	2.0	50.00%	4.86%	2.43%
Tra	9.0	6.0	66.67%	12.67%	8.44%
Wat	0.0	0.0	0.00%	0.00%	0.00%
Mat	12.0	6.0	50.00%	24.36%	12.17%
Wst	10.0	6.0	60.00%	13.19%	7.91%
Le	0.0	0.0	0.00%	0.00%	0.00%
Pol	5.0	3.0	60.00%	8.12%	4.87%
Inn	10.0	0.0	0.00%	10.00%	0.00%
Total	78.0	30.0	38.46%	-	44.51%
Rating	-	-	-	-	Pass

Performance by environmental category



Issue scores

Please Note: X means the exemplary credit for the relevant issue

Management

Man 01	Man 02	Man 03	Man 03X	Man 04	Man 05
1	1	4	0	0	N/A

Health and Wellbeing

Hea 01	Hea 01X	Hea 02	Hea 03	Hea 04	Hea 05	Hea 06
0	0	0	N/A	0	0	1

Energy

Ene 01	Ene 01X	Ene 03	Ene 04	Ene 05	Ene 06	Ene 07	Ene 08	Ene 09
2	0	N/A	0	N/A	N/A	N/A	N/A	N/A

Transport

Tra 01	Tra 02	Tra 03	Tra 05
3	1	1	1

Water

Wat 01	Wat 02	Wat 04
N/A	N/A	N/A

Materials

Mat 01	Mat 01X	Mat 03	Mat 03X	Mat 04	Mat 05	Mat 06
3	0	2	0	N/A	1	0

Waste

Wst 01	Wst 01X	Wst 02	Wst 03	Wst 04	Wst 05	Wst 06
5	0	N/A	1	N/A	0	0

Land use and ecology

Le 2	Le 4	Le 5
N/A	N/A	N/A

Pollution

Pol 01	Pol 02	Pol 03	Pol 03X	Pol 04	Pol 05
N/A	N/A	3	0	N/A	N/A
Innovation					
Inn 01	Inn 01X				
	N/A			0	

Initial details

47 Oxford Road,

Stage 1 filtering: Scope of the assessment

Part 1 : Fabric and structure : Yes

Part 2 : Core services : No

Part 3 : Local services : No

Part 4 : Interior design : No

Stage 2 filtering: Project specific filtering

Is the project a change of use? (e.g. change from office to a hotel) : Yes

Are transportation systems specified or present within the refurbishment or fit-out zone? (lifts, escalators, moving walks) : No

Are there laboratories present and if so what % of total building area do they represent : No laboratories present

Project Type : Change of use

Laboratory containment area : No laboratories present

Is cold storage specified or present within the refurbishment or fit-out zone? : No

Are there new or existing landscaping areas within the refurbishment or fit-out zone and within developer control? : No

Are there any external areas within the refurbishment or fit-out zone and within developer control that can feasibly be enhanced in line with LE 04 : No

If the asset undergoing refurbishment or fit-out is part of a larger building, is the cooling generation plant centralised or localised? : N/A

If the asset undergoing refurbishment or fit-out is part of a larger building, is the heating generation plant centralised or localised? : N/A

Is Wat01 within the scope of the assessment in accordance with Table 42? : No

What is the building type? : Retail

Is this a speculative refurbishment? : Yes

If Industrial, does the building have office areas? : N/A

Does the building have or mitigate any unregulated water demand? e.g. irrigation or soft-landscaped areas requiring no irrigation, car washing, other significant process related : No

Does the building have unregulated energy demands from significantly contributing systems? : No

Is the project a simple building? : No

Does the building have external lighting within the scope of works? : No

Does the building have any existing or newly specified externally mounted plant? : No

If undertaking a Part 4 assessment, is there any equipment specified that requires commissioning (see Man04 CN13) : N/A

Historic building (listed building or building in a conservation area) : No

Is any new insulation specified? : No

Are high grade aggregates to be used in the refurbishment scheme? : No

Category assessment

Management | Man

Man Management

Site : 47 Oxford Road,

MAN 01 PROJECT BRIEF AND DESIGN

Stakeholder consultation (project delivery) :	0
Stakeholder consultation (third party) :	0
Sustainability champion (design) :	0
Sustainability champion (monitoring progress) :	1

MAN 02 LIFECYCLE COST AND SERVICE LIFE PLANNING

Elemental lifecycle cost :	0
Component level LCC plan :	0
Capital cost reporting :	1

MAN 03 RESPONSIBLE CONSTRUCTION PRACTICES

Is all timber used in the project 'legally harvested and traded timber'? :	Yes
Environmental management :	1
Construction stage sustainability champion :	1
Considerate construction :	1
Exemplary level criteria :	
Has the project achieve the minimum standard for an Excellent or Outstanding rating? :	No
Monitoring of refurbishment or fit-out site impacts :	1
Utility consumption :	Yes
Transport of construction materials and waste :	Yes

MAN 04 COMMISSIONING AND HANDOVER

Testing and inspecting building fabric :	0
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MAN 05 AFTERCARE - NA

Credits awarded : 6.0

Health and Wellbeing | Hea

Hea Health & Wellbeing

Site : 47 Oxford Road,

HEA 01 VISUAL COMFORT

Daylighting :	0
Exemplary level criteria :	
View out :	0

HEA 02 INDOOR AIR QUALITY

Indoor air quality plan :	0
Ventilation :	0
Potential for natural ventilation :	0

HEA 03 SAFE CONTAINMENT IN LABORATORIES - NA

HEA 04 THERMAL COMFORT

Thermal modelling :	0
Adaptation - for a projected climate change scenario :	0

HEA 05 ACOUSTIC PERFORMANCE

Acoustic performance :	0
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HEA 06 SAFETY AND SECURITY

Security of site and building :	1
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Credits awarded : 1.0

Energy | Ene

Ene Energy

Site : 47 Oxford Road,

SHOWENE07

ENE 01 ASSESSMENT OPTION

Which option is being followed :

Option 2a simple estimate
(elemental)

ENE 01 - OPTION 2A

Credits :

2

Exemplary credits :

0

ENE 03 EXTERNAL LIGHTING

ENE 04 LOW CARBON DESIGN

Passive design analysis :

0

Free cooling :

0

ENE 05 ENERGY EFFICIENT COLD STORAGE - NA

ENE 06 ENERGY EFFICIENT TRANSPORTATION SYSTEMS - NA

ENE 07 ENERGY EFFICIENT LABORATORY SYSTEMS - NOTAPPLICABLE

ENE 08 ENERGY EFFICIENT EQUIPMENT - NA

ENE 09 DRYING SPACE

Credits awarded : 2.0

Transport | Tra

Tra Transport

Site : 47 Oxford Road,

TRA 01 SUSTAINABLE TRANSPORT SOLUTIONS

Sustainable transport options : 3

TRA 02 PROXIMITY TO AMENITIES

Proximity to amenities : 1

TRA 03 CYCLIST FACILITIES

Cycle storage : 1

Cyclist facilities : 0

TRA 04 MAXIMUM CAR PARKING CAPACITY

TRA 05 TRAVEL PLAN

Travel plan : 1

Credits awarded : 6.0

Water | Wat

Wat Water

Site : 47 Oxford Road,

WAT 01 WATER CONSUMPTION - NA
WAT 02 WATER MONITORING - NA
WAT 04 WATER EFFICIENT EQUIPMENT - NA
Credits awarded : 0.0

Materials | Mat

Mat Materials

Site : 47 Oxford Road,

MAT 01 ENVIRONMENTAL IMPACT OF MATERIALS

Options :	Option 2
Environmental impact of materials :	3
Exemplary level criteria :	

MAT 03 RESPONSIBLE SOURCING OF MATERIALS

Sustainable procurement plan :	1
Has criterion 1 been met? :	Yes
Responsible sourcing of materials :	1
Exemplary level criteria :	

MAT 04 INSULATION

MAT 05 DESIGNING FOR DURABILITY AND RESILIENCE

Designing for durability and resilience :	1
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MAT 06 MATERIAL EFFICIENCY

Material efficiency :	0
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Credits awarded : 6.0

Waste | Wst

Wst Waste

Site : 47 Oxford Road,

WST 01 CONSTRUCTION WASTE MANAGEMENT

Pre-refurbishment audit :	1
Re-use and direct recycling of materials :	1
Resource efficiency :	2
Diversion of waste from landfill :	1
Exemplary level criteria :	

WST 02 RECYCLED AGGREGATES - NA

WST 03 OPERATIONAL WASTE

Operational waste :	1
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WST 04 SPECULATIVE FINISHES

WST 05 ADAPTATION TO CLIMATE CHANGE

Adaptation to climate change - structural and fabric resilience :	0
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WST 06 FUNCTIONAL ADAPTABILITY

Functional adaptability :	0
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Credits awarded : 6.0

Land use and ecology | Le

Le Land use and ecology

Site : 47 Oxford Road,

LE 02 PROTECTION OF ECOLOGICAL FEATURES - NA

LE 04 ECOLOGICAL ENHANCEMENT - NA

LE 05 LONG TERM IMPACT ON BIODIVERSITY - NA

Credits awarded : 0.0

Pollution | Pol

Pol Pollution

Site : 47 Oxford Road,

POL 01 IMPACT OF REFRIGERANTS - NA

POL 02 NOX EMISSIONS - NA

POL 03 FLOOD RISK AND REDUCING SURFACE WATER RUN-OFF

Flood risk management :	2
Exemplary level criteria :	
Surface water run-off :	1
Minimising watercourse pollution :	0

POL 04 REDUCTION OF NIGHT TIME LIGHT POLLUTION - NA

POL 05 NOISE ATTENUATION

Credits awarded : 3.0

Innovation | Inn

Inn Innovation

Site : 47 Oxford Road,

INN 01 APPROVED INNOVATIONS

Approved innovations :

0

Credits awarded : 0.0