



38 QUEENS ROAD, READING, RG1 4AU

CHANGE OF USE FROM B1 OFFICES TO 6 SELF CONTAINED FLATS, C3 AND ASSOCIATED WORKS

DISCHARGE OF PLANNING CONDITION 9 – BREEAM “VERY GOOD” RATING REQUIREMENT

This discharge of condition statement relates to 38 Queens Road, Reading and the previously approved applications listed below;

Application Number: 170164, address- 38 Queens Road, Reading, RG1 4AU

Condition:

“Prior to the first occupation of any residential unit hereby approved, a final BREEAM Domestic Refurbishment certificate shall be submitted to and approved, in writing, by the Local Planning Authority, demonstrating that the dwellings achieve at least a ‘Very Good’ rating. Reason: To ensure that the development is carried out in accordance with sustainable building standards, in accordance with Core Strategy Policy CS1 and the Sustainable Design and Construction SPD, adopted July 2011.

Proposal:

This statement outlines the intentions of the applicant, Aspire 38 Ltd, under the recently approved application listed above to remove planning condition No. 9 relating to achieving BREEAM “very good” rating for this conversion to a Grade II listed building.

The property consists of three storey office building with basement and rear single storey modern extension.

The applicant has procured the services of a BREEAM consultant from the commencement of the detailed design stage of the project. The project has been designed and construction has begun around the criteria required to achieve “very good” BREEAM rating as a minimum.

Appendix B displays the design stage BREEAM assessment. This assessment shows that the development is currently meeting an “Excellent” rating apart from the Ventilation item- Hea05. Despite several submissions to BRE by Proport Eco Services and drafting of a Ventilation Summary (Appendix C) BRE are still unwilling to acknowledge compliance with this area and therefore this development is unable to officially achieve a “Very Good” rating. As the ventilation

item- Hea05 is a mandatory criteria the application will remain unclassified unless one point is achieved for this item.

Appendix D highlights the Ventilation criteria for credits. The two criteria elements highlight that development should be constructed to meet with Building Regulations Approved Document F. This project is being monitored by Complete Building Control Services who continue to undertake regular site inspections and have provided full plans certificate for the detailed design proposals, therefore it is confirmed that this development will meet Building Regulation Requirements.

Justification:

The existing fabric showed no signs of lack of ventilation or moisture ingress issues before the works commenced.

BRE are suggesting that an intrusive moisture test is undertaken to the external fabric of the property. If this was to be undertaken this would cause damage to the external elevations of the Grade II listed building and require specialist render and stonework repairs to the façade with no guarantee that the aesthetic of the front façade won't suffer long term damage due to these intrusive works.

It is understood that the BREEM planning condition is based upon to following planning policies;

Core Strategy Policy CS1 (adopted 2008, altered 2015) says that all new housing should meet the most up to date Eco-Homes Very Good as a minimum standard. At the time this was written Eco-Homes no longer existed and BREEAM Domestic Refurbishment was already in its second (2014) version.

Sustainable Design and Construction SPD (adopted in 2011 before BREEAM Domestic Refurbishment existed) states the minor developments involving the creation of new residential units through conversion and/or major refurbishment of residential buildings should meet BREEAM (EcoHomes) level 'Very Good'

With this project being a housing project this Policy states that it should meet Eco-Homes- Very good standard. The Eco Homes scheme was replaced by the Code for Sustainable Homes in April 2008 which has now been dismissed and amalgamated into the most recent revision of Building Regulations. Therefore to meet the requirements of Policy CS1 it could be argued that the development only needs to meet the Building Regulation requirements.

Looking through the previous planning permissions granted on other listed buildings over the past couple of years and since the BREEAM related policies there appears to be little or no consistency with the BREEAM conditions on applications. The below table shows the relevant planning applications which are related to;

Application No.	Address	Decision date*	BREEAM requirement
120725	42-43 West Street, RG1 1TZ	14/07/14	Energy needed to meet BREEAM 'Good' Level
120939	48 Queens Street, RG1 4BD	08/04/13	None
130384	32 Russell Street, RG1 7XF	08/08/13	None

170291	Red Cow PH, 50 Crown Street, RG1 2SE	30/08/17	Sustainability Statement only. No BREEAM assessment
150730	London Road, RG1 5AQ	09/10/15	None
161611	40 Queens Road, RG1 4AU	14/11/16	BREEAM 'Very Good'
170164	38 Queens Road, RG1 4AU	10/05/17	BREEAM 'Very Good'

*BREEAM Domestic Refurbishment has existed since 2012 when it took over from EcoHomes for refurbishment projects.

As the above table demonstrates only two out of the seven applications have an official BREEAM related condition. Although the application relating to 38 Queens Road, Reading is one of the most recent applications, Application no. 170291 has been more recently submitted and approved with requirement for a sustainability statement only.

Conclusion:

BREEAM is essentially a tool which is used on commercial developments and is difficult to relate the criteria to a listed building residential conversion project.

In order for the BREEAM "very good" rating to be accomplished intrusive and detrimental works will need to be undertaken and damage the external fabric of the building. This development will achieve a theoretical "excellent" rating for all criteria except the ventilation element therefore build quality is no concern.

The property was examined at pre-works stage and there were no signs of any ventilation issues or moisture ingress to the structure. Therefore the conversion will be undertaken to comply with building regulations and this would be deemed as sufficient due to the age, style and construction of the property.

Based upon all the above points I would be grateful on behalf of the applicant if you could consider removal of Condition No. 9 of the planning consent to Application No. 170164 in relation to the BREEAM "very good" requirement.

APPENDIX A

READING PLANNING CONSENT- APP. NO. 170164

APPENDIX B

BREEAM PRE-ASSESSMENT / DESIGN STAGE APRAISAL & RESULTS SUMMARY

APPENDIX C

PROPORT ECO-SERVICES VENTILATION STRATEGY

APPENDIX D

BREEAM REFURBISHMENT- DOMESTIC BUILDINGS

VENTILATION REQUIREMENT CRITERIA