

Energy and Sustainability Statement

Temporary Accommodation, University of
Reading, Whiteknights Campus

March 2016

Turley

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1. Introduction

- 1.1 This Energy and Sustainability Statement has been prepared to support a planning application for the provision of 3638 sq.m. (GEA) of temporary buildings at University of Reading Whiteknights Campus.
- 1.2 The need for temporary accommodation was identified following a feasibility and project management review of a number of capital investment projects planned for Whiteknights Campus. These projects include:
- refurbishment and extension of the Library (planning permission granted in December 2015)
 - extension and refurbishment of the URS building
 - development of a new Health and Life Sciences Building
 - subsequent removal of obsolete buildings from the estate
- 1.3 The establishment of temporary accommodation is a critical first phase to support future proposed development and to enable the decanting of existing teaching and support facilities from those buildings identified for refurbishment and /or redevelopment.
- 1.4 This report has been prepared by Turley to demonstrate how the proposed development will respond to national and local policy taking into account the requirements of the Council's Policy CS1 and the Sustainable Design and Construction SPD (2011).

The Site and Surroundings

- 1.5 The application site is located on the western part of the Whiteknights campus on the site of the former Rural History Centre to the south of Chancellor's Way.
- 1.6 Until very recently the application site was occupied by the Rural History Centre (RHC), the demolition works were of which was completed in autumn 2015.
- 1.7 The site is generally flat and is set within an area surrounded by set landscaping and tree cover. The application site extends to approximately 0.9 hectares.
- 1.8 The application site is well connected to and easily accessible from the main campus road network to the east. The site is also closely related to the central part of the Whiteknights Campus where the proposed development projects such as Library, URS building, and Health and Life Sciences are located.

Proposed Development

- 1.9 The applicant is applying for outline planning permission for :
- “Erection of temporary teaching and office accommodation comprising 3 638 square metres (GEA) floor space over 2 floors on former Rural History Centre site”

2. Sustainability at University of Reading

- 2.1 The University is strongly committed to the sustainable development of its Estate.

Estate Strategy

- 2.2 The University Estate Strategy considers the composition and condition of the estate looking, amongst other things, at scale, functional suitability, space type, condition, location, core/non-core and Carbon Management.

- 2.3 The key issues identified in the Estate Strategy include:

Scale

The university currently operates with an area of 13.5m²/FTE, which in comparison with peer organisations, is an ineffective utilisation of space. The university has targeted a ratio of 10m²/ FTE which will give a significantly improved level of utilisation and financial efficiency.

- 2.4 Capital investment projects should be strategic and of a sufficient scale, as opposed to smaller and tactical in nature, if they are to drive out overall space from the academic portfolio.

Functional Suitability

- 2.5 There are a number of buildings within the academic estate which currently provide functionally unsuitable specialist space (excluding office and teaching space).

- 2.6 Space has been categorised according to its functional suitability according to the following classification.

Grade 1: Excellent – The space is highly suitable for current functions

Grade 2: Good – The space is suitable for current functions

Grade 3: Fair – The space is generally unsuitable for current functions

Grade 4: Poor – The space is very unsuitable for current function

- 2.7 At Whiteknights the buildings which contain functionally unsuitable specialist space are the Library, Engineering, Food Biosciences, AMS, Harborne, Knight, TOBs, Archway Lodge and Elmhurst Barn.

- 2.8 There are also a number of buildings which currently provide functionally unsuitable teaching space these include URS, Engineering, JJ Thompson, Philip Lyle, and Hopkins.

- 2.9 With regards to office space, functionally unsuitable space is located at Whiteknights and includes: the Library, Engineering, Park House, Whiteknights House, URS, Sports Park and Hopkins buildings.

- 2.10 Capital investment is required to reconfigure, refurbish or re-provide space in order to enhance the accommodation, improve student journey and provide space that can flex to meet the future requirements.

Space Type

- 2.11 There is a need to increase the proportion of modern flexible accommodation, such as modern office accommodation, across the academic estate including an increased provision of social and informal spaces. This depends on delivering more efficient and effective design and use of space across the portfolio.

Condition

- 2.12 The most important buildings within the estate with the poorest condition include the Library at Whiteknights and HumSS, which are both category C.

Location

Across Whiteknights campus there are defined areas of Faculty zoning. Certain Schools and Departments are not positioned in the optimal location based on the zoning of the campus.

Carbon Management

- 2.13 Since publishing its original Carbon Management Plan in 2011 the University has made excellent progress in reducing its total CO2 emissions. A 15% reduction in carbon footprint has been achieved to date, with committed projects and known changes to the estate likely to increase the total reduction to c32%. Additional projects will be developed to achieve the 2016 interim target of 35%.

Strategic Response

- 2.14 The Estate Strategy responds to these issues by requiring that all new developments and refurbishment projects will aim to:

- Reduce the overall scale of the academic estate with particular focus on areas of known overprovision
- Increase the efficiency of the portfolio and ensure the balance space within premises is usable. This will consequently drive down the overall requirement for space.
- Create flexible spaces that can be adapted to changing academic programmes and alternative uses.
- Provide more community spaces across all building types, not just within Faculty and School buildings.
- Reflect the changing demand for more facilities that accommodate changing teaching approaches and the greater use of technology within programmes.

Relevance of Temporary Accommodation Project

- 2.15 The proposed temporary accommodation will provide critical decant accommodation to for buildings which are to be refurbished, extended, up-graded or replaced through the University's programme of capital investment. These include the Library, URS engineering and Health and Life Sciences buildings. Delivery of the projects will reduce

the total size of the University's academic portfolio, particularly on the Whiteknights campus, and deliver significant improvements in space efficiency, functional suitability of building and the over-all condition of the estate. The projects will have a significant impact on the University's ability to meet its 2020 Carbon Reduction target.

Carbon

- 2.16 The University is committed to reducing its environmental impacts, underlined by its pledge to reduce carbon emissions by 35% by 2015/16 and 45% by 2019/20, compared with a 2008/09 baseline. The University has achieved the Carbon Trust Standard.

Environmental Management System

- 2.17 The University has implemented an Environmental Management System (EMS) at all three of its campuses; Whiteknights Campus and London Road Campus in Reading and Greenlands Campus in Henley. The EMS aims to reduce the significant environmental impacts of the University activities by using the structured EMS framework based on continual improvement.
- 2.18 The EMS covers all University activities on campus and includes; setting objectives and targets, implementing policy, complying with environmental legislation, pollution prevention procedures, providing training and embedding a commitment to improve environmental performance. The EMS, which is now fully operational, will continue to provide a framework for monitoring and measuring performance, internal auditing and communicating progress.

Energy Consumption

- 2.19 The University has become one of just a handful of universities in the UK to achieve certification to the international ISO50001 Energy Management standard.
- 2.20 The standard sets strict guidelines for how energy consumption is managed throughout the University's operations; providing a framework to ensure energy is effectively managed for the long term.

Eco Campus

- 2.21 The EMS has been awarded the highest standard given by EcoCampus, the Platinum Award. The University has also undergone thorough auditing against the international standard for ISO14001 by the external auditors at NQA.
- 2.22 Accreditation for both of these schemes shows that the University is committed to continually improving its environmental performance by embedding sustainable practices into all aspects of the University's operations.

3. Policy Context

UK Sustainable Development Strategy

- 3.1 In 2005, the Government published an updated strategy for implementing sustainable development across the UK.
- 3.2 This strategy acts as an overarching document from which a range of specific policies and legislation was derived. Although published in 2005, the strategy has taken a recently renewed focus in light of the government's definition of Sustainable Development in the NPPF.
- 3.3 One of the key aims of this strategy is to recognise the threats of climate change and ensure that the UK develops a strategy to mitigate and adapt to this phenomenon.
- 3.4 The document established five key principles that will underpin the national sustainable development strategy:
- Living within Environmental Limits;
 - Ensuring a Strong, Healthy and Just Society;
 - Achieving a Sustainable Economy;
 - Promoting Good Governance; and
 - Using sound science responsibly.
- 3.5 The strategy will be implemented at a national level through the development of more specific strategies at a government department or sector level.
- 3.6 With regards to planning and the built environment, this document set the basis for the development of plans and policies that promote development that mitigates and adapts to climate change.

Climate Change Act

- 3.7 The Climate Change Act (2008) sets a legally binding target for reducing UK CO₂ emissions by least 80% on 1990 levels by 2050.
- 3.8 It established the Committee on Climate Change, which is responsible for setting binding interim carbon budgets for the Government over successive five year periods. The first three carbon budgets were announced in the Budget 2009, resulting in an interim target of a 34% reduction in CO₂ equivalent emissions on 1990 levels by 2020.

UK Carbon Plan

- 3.9 In 2011, the government published an updated Carbon Plan setting out how the UK will achieve decarbonisation and make the transition to a low carbon economy. It sets this objective within a framework of mitigating and adapting to climate change and

maintaining energy security in a way that minimises costs and maximises benefits to the economy.

- 3.10 With regards to development, the Carbon Plan presents the government's approach to promoting the delivery of low carbon, resilient and adaptive buildings and enabling sustainable transportation as positively contributing to these national carbon reduction targets.

Building Regulations

- 3.11 Whilst not planning policy, the Building Regulations and specifically Approved Document Part L: Conservation of Fuel and Power has relevance to the requirements for energy efficiency and carbon emissions of new buildings.
- 3.12 The primary mechanism for reducing carbon emissions in new commercial development is progressive changes to Part L aiming to deliver zero carbon buildings by 2019.
- 3.13 On this basis, a minimum requirement for the reduction in carbon emissions to be delivered by new buildings' is set within the Building Regulations, with each update requiring lower carbon emissions than the previous version to achieve compliance.
- 3.14 This change aims to strike a balance between the commitment to reducing carbon emissions and improving energy efficiency and ensuring that the overall effect of regulation does not stifle growth.
- 3.15 These changing national regulations will drive energy efficiency and carbon reduction improvements in new buildings. The government has stated that developers will continue to have flexibility in how they meet carbon reduction targets; but that the emphasis is on using a fabric first approach.

BREEAM

- 3.16 BREEAM is the most widely used environmental assessment standard for non-domestic buildings within the UK and its use as a 'nationally described standard' is supported at national policy level within the NPPF and the NPPG.
- 3.17 BREEAM is based upon predefined tradable credits split into nine sections relating to sustainable design, procurement and construction:
- Management;
 - Health and Wellbeing;
 - Energy;
 - Transport;
 - Water;
 - Materials;

- Waste;
 - Land Use & Ecology; and
 - Pollution.
- 3.18 The different sections are weighted within the assessment (with Energy and Health and Wellbeing carrying the highest weight) and the final percentage score is translated into an overall rating.
- 3.19 In addition, there are a number of mandatory credits (also referred to as minimum standards) relevant to different ratings in order to prevent a building that does not appropriately address straightforward issues achieving a high BREEAM rating.
- 3.20 There are also credits available for exemplary level performance under the standard credit issues and for innovation within the design and construction process.
- 3.21 In 2011, the Building Research Establishment (BRE) launched the BREEAM New Construction scheme which amalgamated all of the existing, sector specific BREEAM guidance into a single assessment to be applied across a wide range of new buildings.
- 3.22 Since then, a further iteration of the BREEAM New Construction scheme (2014) has been released and is the current scheme against which new developments are assessed.
- 3.23 The methodology remains very prescriptive and has numerous mandatory and voluntary requirements, some of which are not relevant or are less appropriate to specific building types which must be accounted for within the design process.

National Planning Policy Framework

- 3.24 Following its publication in March 2012, national planning policy is now provided by the National Planning Policy Framework (NPPF) which sets out the government's planning policies for England and how these are expected to be applied. It also sets out the requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so.
- 3.25 The government has made clear its expectation that the planning system should positively embrace well-conceived development to deliver the economic growth necessary and the housing we need to create inclusive and mixed communities.
- 3.26 The NPPF states that: 'the purpose of the planning system is to contribute to the achievement of sustainable development'.
- 3.27 It states clearly that in order to deliver sustainable development, the planning system must perform three distinct roles, aligned to the three pillars of sustainability, which must not be taken in isolation and should be pursued jointly:

An economic role contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying

and coordinating development requirements, including the provision of infrastructure;

A social role supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

An environmental role contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

Planning Policy Guidance (The Guidance)

- 3.28 The National Planning Practice Guidance (NPPG) provides further advice on various planning issues associated with development, including those linked to sustainability and renewable energy and underpins the policies within the NPPF.
- 3.29 The guidance states that the distribution and design of new development, and the potential for servicing sites through sustainable transport solutions, are particularly important considerations and that good design is an integral part of sustainable development to deliver a wide range of planning objectives.

Local Development Plan

Development Plan

- 3.30 The Reading Borough Development Plan comprises the Core Strategy (adopted 2008) and the Sites and Detailed Policies Document (adopted 2012). There are also a number of relevant supplementary planning documents related to the implementation of the Development Plan policies.

Core Strategy (2008)

- 3.31 Policy CS1: Sustainable Construction and Design confirms that new development will be acceptable where the design 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. The policy sets out the following requirements:
- Commercial development to meet BREEAM 'Very Good' as a minimum;
 - Developments of over 1,000sqm to ensure that 50% of the provision meets BREEAM 'Excellent' standards;
 - Maximise energy efficiency and energy conservation measures in design, layout and orientation to reduce overall energy demand;
 - Developments of over 1,000sqm to incorporate on-site generation of energy from renewable sources and energy efficiency design measures to off-set at least 20%

of predicted CO2 emissions from the estimated energy usage of the completed and occupied development;

- Reduce mains water use and demonstrate water conservation measures to meet appropriate BREEAM standards; and
- Incorporate sustainable urban drainage facilities and techniques as part of the layout of a development as appropriate and as advised by the EA, including minimising the size of impermeable areas so that peak run-off and annual water run-off is reduced where possible and in any case is no greater than the original conditions of the site.

Reading Sites and Detailed Policies Document

- 3.32 Policy SD1: Presumption in Favour of Sustainable Development confirms that the Council will approve development that accords with the Development Plan without delay, unless material considerations indicate otherwise.
- 3.33 Policy DM1: Adaptation to Climate Change requires applicants to demonstrate how design incorporates measures to adapt to climate change. This includes the use of natural heating and ventilation and minimising surface water runoff.
- 3.34 Policy DM2: Decentralised Energy requires development over 1,000sqm to consider the inclusion of CHP, or biomass-fuelled heating scheme, or other form of decentralised energy provision, within the site, unless it can be demonstrated that the scheme is not suitable or feasible for this form of energy provision. Development of this size will be expected to link to existing CHP or a district heating energy networks if present, subject to feasibility.

Revised Sustainable Design and Construction Supplementary Planning Document (2011)

- 3.35 The SPD seeks to promote high standards of sustainable design and construction, providing detail on development plan policies. It also brings together relevant national guidance.

Summary of Policy Context

- 3.36 Both national and local policy recognises the need to provide sustainable development which responds to the challenges of Climate Change.
- 3.37 Since the adoption of the Council's Core Strategy in 2008, national policy has seen significant change with a number of improvements in relation to energy and sustainability targets:
- The Building Regulations now require commercial developments to achieve a 34% reduction in carbon emissions; and
 - The Housing Standards Review has consolidated many of the standards related to new construction, winding down the Code, and removing Local Authorities ability to set standards such as Lifetime Homes in favour of a Building Regulations only approach which includes a set of new technical standards.

- 3.38 The Core Strategy requires development proposals to be submitted with an Energy and Sustainability Statement setting out how the development incorporates key sustainable design to achieve a high BREEAM rating and delivers a portion of the developments energy through renewable energy sources.
- 3.39 The following section of the report sets out the proposed development's response to the requirements of both national and local sustainability policy in the context of an application for temporary planning permission.

4. Energy and Sustainability in Relation to Modular Temporary Accommodation

Inherent Sustainability of Modular Construction Techniques

- 4.1 Offsite construction, in general, is recognised for the savings it can bring in terms of construction time spent on site, building quality and reduced impacts on the environment. Modular building helps to increase the speed at which construction takes place and reduces the carbon footprint of the overall build by requiring fewer materials to be transported onto a site.
- 4.2 The environmental benefits of offsite construction are related in large part to the benefits generated by the manufacturing process. The time saving on site and the controlled designed quality processes indicate better environmental performance in terms of use of energy, deliveries to site, waste and, as a result, carbon emissions. The most significant impacts are as follows:
- 75% fewer operatives on site (volumetric modular construction)
 - 60% reduced construction time (volumetric modular construction)
 - Up to 90% less waste generated on site (volumetric modular construction)
 - 65% of the waste generated by the manufacturing process is re-cycled or re-used
 - Offsite methods can reduce carbon emissions by 50% and generate 2.5 times less waste than traditional construction
 - Material requirements for equivalent buildings are in average 34% less (offsite construction typologies)

Waste

- 4.3 Studies commissioned by the Waste Reduction Action Programme (WRAP) have considered in more detail the impacts of using offsite construction methods on the amount of waste generated on site. Their study states that: *"volumetric construction eliminates all waste except that generated through excavating foundations and a small amount of off cuts from connecting the services pipe work/cabling to the mains"*.
- 4.4 The report also suggests that the reduction in waste generated on site could be up to 90% compared to traditional methods of construction.
- 4.5 WRAP also looked at the waste generated at the factory settings of exemplar offsite manufacturers and determined that volumetric manufacturers generate less than 1.8% of the total weight processed through the factory, of which 65% is recycled or re-used. These results reflect the lean manufacturing process that is in place in most of the offsite construction factories, which implies that waste is designed out of the process from the very early stages to the delivery on site.

Re-Use of Modules

- 4.6 A key sustainability feature of temporary modular accommodation is the ability to re-use modules, and re-deploy them to alternative sites and projects when they are no longer required for their original purpose. The ability to re-use the modular units is a significant sustainability benefit.

Built-Off-Site modular Construction

- 4.7 The University has appointed Built Off-Site (BOS) to provide the temporary teaching and office accommodation. BOS has over 35 years' experience in off-site construction processes and construction.
- 4.8 Built Off-site's method of construction lends itself to very high levels of fabric efficiency due to the factory based construction methods and rigorous levels of quality control, both within the manufacturing environment and onsite whilst installing the building and undertaking all works to the building envelope and internally.
- 4.9 Built Off-Site appointed independent consultants (Mtech) to undertake a detailed 'life-cycle' assessment of its modular construction product against a comparable (notional) traditional building. The results are summarized in the table below:

Descriptions	Traditional Notional Building	Built Off-Site Standard Product
Impacts on the Environments (Ecopoints)	1.1 to 1.82	0.7103
Improvement compared to traditional (percent)	-	- 35% to -61%
Construction		
Embodied Energy / Carbon (kg CO2 eq. / m2)	134.6	98.8
Improvement in Embodied Energy / Carbon (percent)	-	-28.6%
Overall		
Total carbon emission for construction and maintenance over 35 years (tons CO2)	390.1	210.8
Improvement of carbon emission compared to traditional (notional) construction (percent)	-	-46%

- 4.10 It can be seen that the Built Off-Site standard module offers a reduction of 46% of the global carbon emission over the whole life of the building compared to traditional (notional) construction methods.
- 4.11 High levels of insulation are installed carefully ensuring continuity of insulation with a continuous air and vapour control layer to ensure high levels of air tightness.
- 4.12 Built Offsite have adopted a fabric first approach to building design and the performance of the fabric alone is comparable to Passive House standards. Dynamic Thermal modelling of all buildings is done at design stage and the designs developed to ensure that the buildings surpass all building regulations and the maximum energy efficiency is achieved. As part of the overall design development process, lighting designs are produced and highly energy efficient electrical and mechanical services strategies are developed and installed.
- 4.13 Built Offsite Buildings routinely achieve an A rating on the EPC certificate and more than 70 percent of projects delivered over the last 2 years have achieved a BREEAM rating of Very Good or better.

BRUKL

- 4.14 A BRUKL Output Document has been completed for the proposed temporary accommodation and confirms the high levels of fabric efficiency achieved by Built Off-Site.
- 4.15 The Output Document also demonstrates that building emissions are below the target level and that energy and CO2 emissions are lower than for the notional comparative building.

Site Selection Sustainability Considerations

- 4.16 The site selected for the temporary accommodation has a number of inherent sustainability attributes:
- It is previously developed land having been occupied, until autumn 2015, by the former Rural History Centre;
 - It is predominantly hard surfaced and thus the proposed temporary accommodation will not give rise to a material increase in surface water run-off;
 - In benefits from existing services (including foul and surface water drains) which run through, or very close to, the site
 - It is well-related to the main buildings on campus
 - It is accessible and will benefit from good public transport links

5. Conclusion

5.1 This Energy and Sustainability Statement demonstrates how the proposed development of the temporary teaching and office accommodation at University of Reading's Whiteknights campus responds to the Council's sustainable development objectives as articulated in development plan policy and SPD.

5.2 The temporary nature of the accommodation (permission is sought for a period of five years) was acknowledged by the local planning authority at pre-application stage to represent a material constraint to the achievement of full policy compliance. A copy of the pre-application advice is attached as Appendix 1 and it is noted that the LPA advised:

"It is acknowledged that the temporary nature of the scheme may make it difficult to comply with some aspects of the BREEAM standards. The Council would be open to considering a relaxation of the requirements, provided that these are fully explained and justified in detail. This is on the basis that the buildings would be of a temporary nature and this would mitigate long term environmental harm that may otherwise occur."

5.3 Against the above background, this Energy and Sustainability Statement sets out how the University proposes to meet the objectives of sustainable development through this proposal. Specifically:

- The requirement for the temporary accommodation is intrinsically linked to, the University's proposals for significant capital investment in its Estate at Whiteknights Campus. The temporary accommodation will provide decant space which is necessary to allow other major capital projects to proceed. These capital projects include the Library refurbishment, URS building refurbishment, a new Health and Life Sciences Building and subsequent removal of obsolete buildings from the estate. Provision of the temporary accommodation is therefore a key early phase of work which will allow delivery of significant sustainability improvements and carbon reduction on the campus.
- The site which has been chosen for the temporary accommodation is inherently sustainable. It is well-related to existing facilities on campus including the buildings which are to be refurbished, extended and replaced. It is previously developed land which until very recently been occupied by the Rural History Centre Buildings (which were demolished in autumn 2015). It benefits from convenient access to services (drainage, water supply, etc.) which previously served the Rural History centre Buildings and existing service runs can be used to serve the new development.
- The modular construction of the temporary accommodation offers many sustainability benefits. These include reduced resource consumption in the construction of the modules; reduced construction time-scales; up to 90% less waste generated on site (volumetric modular construction); reduction of carbon emissions.

- The temporary accommodation provider (Built Off Site) has extensive experience and adopts a fabric first approach to the manufacture of its buildings. the performance of the fabric alone is comparable to Passive House standards. Dynamic Thermal modelling of all buildings is done at design stage and the designs developed to ensure that the buildings surpass all building regulations and the maximum energy efficiency is achieved. Built Offsite Buildings routinely achieve an A rating on the EPC certificate and more than 70 percent of projects delivered over the last 2 years have achieved a BREEAM rating of Very Good or better.
- A BRUKL Output Document has been completed for the proposed temporary accommodation and confirms the high levels of fabric efficiency achieved by Built Off-Site.
- The development will include measures to facilitate sustainable travel such as secure cycle storage and provision of showers and changing facilities,

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Appendix 1: Pre-application Advice from LPA

FAO Mr. Perrins
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23 February 2016

Your contact is: **Mr Stephen Vigar, Planning**

Dear Mr. Perrins,

PRE PLANNING APPLICATION ENQUIRY RESPONSE

Enquiry Reference: 151895

Address: Rural History Centre, Whiteknights Campus, University of Reading, Reading, RG6 6UR

Proposal: Temporary Accommodation units comprising 3 400 square metres of floor space provided over 2 floors as an initial phase.

Thank you for your enquiry.

Trees

A tree survey would be needed at application stage. In addition, although it appears that that Phase 1 would have a similar impact on trees to the recently approved demolition works, an Arboricultural Impact Assessment should also be submitted at application stage to confirm this. This AIA would also need to address any conflicts between the new building and tree roots or canopies. If the AIA advises that an Arboricultural Method Statement is required, it is recommended that this should also be provided at application stage to avoid a pre-commencement condition.

Phase 2, as shown on drawing 17003 Rev.02, would lead to a significant loss of trees that currently form a small woodland area that contributes positively to the visual amenity of the area and forms part of the parkland setting of the campus as well as forming part of the setting of the Grade II listed Blandford Lodge. The loss of these trees to make way for a temporary building is not considered to be acceptable and would be harmful in visual terms (as well as the loss of other benefits associated with trees). It is unlikely that Phase 2 would be granted permission for this reason.

Policies CS33 and CS38 of the Adopted Core Strategy (Altered 2015) apply.

Scale and Appearance

The two storey scale referred to in the pre-app submission reflects that of the demolished building on the site and is considered appropriate on that basis, subject to details of its appearance. The lapsed hotel permission 10/01162/EXT involved a building rising to 4 storeys. Given the tree constraints described above, it may be appropriate to increase the height to a maximum of four storeys to compensate for the limited opportunity to extend laterally. It is important to note that the temporary nature of the current proposal means that direct comparison between the hotel and the temporary accommodation is not appropriate. I.e. the scale of the hotel does not necessarily justify a temporary building of the same size.

Transport

It has been stated within the additional information that ‘the first phase of the temporary accommodation is required for a period of 5 years in order to support the implementation of the various development projects across the campus over this time’. On this basis the proposal is unlikely to generate an increase in trips to and from the site however this would need to be clarified within any full planning application.

If the proposal would result in an increase in trips as a result of the additional floor space a provision of car and cycle parking will be required in line with the Council’s Revised Parking Standards and Design SPD.

It is recommended that the Construction Management Plan should be submitted alongside the planning application at application stage as the proposals are likely to affect the adjacent Public Right of Way. The CMS will need to be in accordance with the Council’s ‘Guidance Notes for Activities on The Public Highway’ which sets out the information required.

The CMS should also include details of how noise and dust are to be minimised on site.

Policies CS20, CS24, and Sites and Detailed Policies Document (2012) policies DM4, DM12 and Revised Parking Standards and Design SPD apply.

Archaeology

Berkshire Archaeology advise that the site is located within an area of archaeological potential. Within the Historic Environment Records for the surrounding area there are a number of entries which include prehistoric worked flint ‘findspots’, an excavation approximately 500m to the south recorded part of what is thought to have been quite an extensive Roman settlement complex, a possible Bronze Age barrow located in the grounds of Leighton Park School to the south. A desk based assessment is needed which considers the archaeological potential of the site along with past and proposed impacts. Berkshire Archaeology would be consulted on this and may decide that further trial trenching is required prior to the determination of any future application. You may wish to discuss the detail of this directly with Berkshire Archaeology. Policy CS33 applies.

Environmental Sustainability / Energy

Policy CS1, supported by the Sustainable Design and Construction SPD (2011) would require the buildings to meet BREEAM Very Good standard with a minimum score of 62.5 points (equating to an average of the 50:50 split between Very Good and Excellent referred to in

Policy CS1). It is acknowledged that the temporary nature of the scheme may make it difficult to comply with some aspects of the BREEAM standards. The Council would be open to

considering a relaxation of the requirements, provided that these are fully explained and justified in detail. This is on the basis that the buildings would be of a temporary nature and this would mitigate long term environmental harm that may otherwise occur.

Temporary Period

There is a strong relationship between the quality of architecture proposed, the scale of building and the degree of compliance with Planning policy and the length of time that a temporary consent would be granted. For example, it would not be appropriate for a building of a more functional appearance, rising to several storeys, but with relatively poor environmental performance, to remain for any significant length of time.

A five year period would seem appropriate initially. It may be possible to extend this by a further application in the future. Although it should be noted that government guidance is that “it will rarely be justifiable to grant a second temporary permission - further permissions should normally be granted permanently or refused if there is clear justification for doing so. There is no presumption that a temporary grant of planning of planning permission should be granted permanently”. The circumstances on site and the planning policy context would need to be taken into account at the time of any second application and cannot be accurately predicted at this stage.

Conclusion

In summary, it would appear to be appropriate to provide temporary accommodation up to a maximum of four storeys on the site of the former MERL building, i.e. the footprint of ‘Phase 1’, subject to the final details of its massing and overall appearance.

However it is not considered appropriate for temporary accommodation to extend across the undeveloped land to the east which is currently occupied by woodland trees of amenity value due to the visual harm that would occur.

Please note that the advice contained within this letter is that of an officer of the Borough Council and is provided without prejudice to the decision of the Borough Council in the event of a formal application for planning permission.

Yours sincerely

pp. *A. Amoah*

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Turley