

Technical Note

43 London Street, Reading, RG1 4PS

Prepared for Argey-One Limited.
ESL 25-0733

23 July 2025

Purpose

- 1.1 This note has been prepared by Envision on behalf of Argey-One Limited in relation to 43 London Road, application reference 191043, which was granted consent on 16th June 2020.

Condition 11 of the planning consent requires that within 3 months of development commencing on site, a copy of an Interim BREEAM Certificate in accordance with the BREEAM UK Non-Domestic Refurbishment 2014 Assessment Methodology demonstrating compliance with a minimum standard of BREEAM Very Good rating has been submitted to and approved in writing by the Local Planning Authority.

Condition 12 further requires that within 6 months of first occupation of the development hereby approved, a copy of a Final BREEAM Certificate in accordance with the BREEAM UK Non Domestic Refurbishment 2014 Assessment Methodology following a post-construction stage review carried out by a licensed assessor has been submitted to and approved 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.

- 1.2 Since the time of the consent, the development was sold to another party who commenced work on site, before going into administration and ceasing site activities. The original applicant has now regained control of the site and intends to deliver the scheme. Due to a number of constraints set out in this note, the applicant wishes to vary the planning conditions in relation to BREEAM through a S96A application.

Consented Development

- 1.3 The consented development relates to the Part-demolition of existing London Street facade and internal works to building alongside demolition of two storey building to rear to enable residential-led mixed-use development comprising 48 sqm community use (Class D1) and 21no residential units (2 x studio, 7 x 1 bed, 10 x 2 two bed and 2 x 3 bed units) together with associated services enclosures, parking and landscaping.
- 1.4 The BREEAM requirements that are secured by Conditions 11 and 12 relate to the D1 community use (figure 1), which is being taken forward speculatively by the applicant for a potential future user. The D1 use relates to a very small part of the development (48 sq m). Given the constraints on the development, it is now considered that formal BREEAM standards are overly onerous for this small portion of the site.

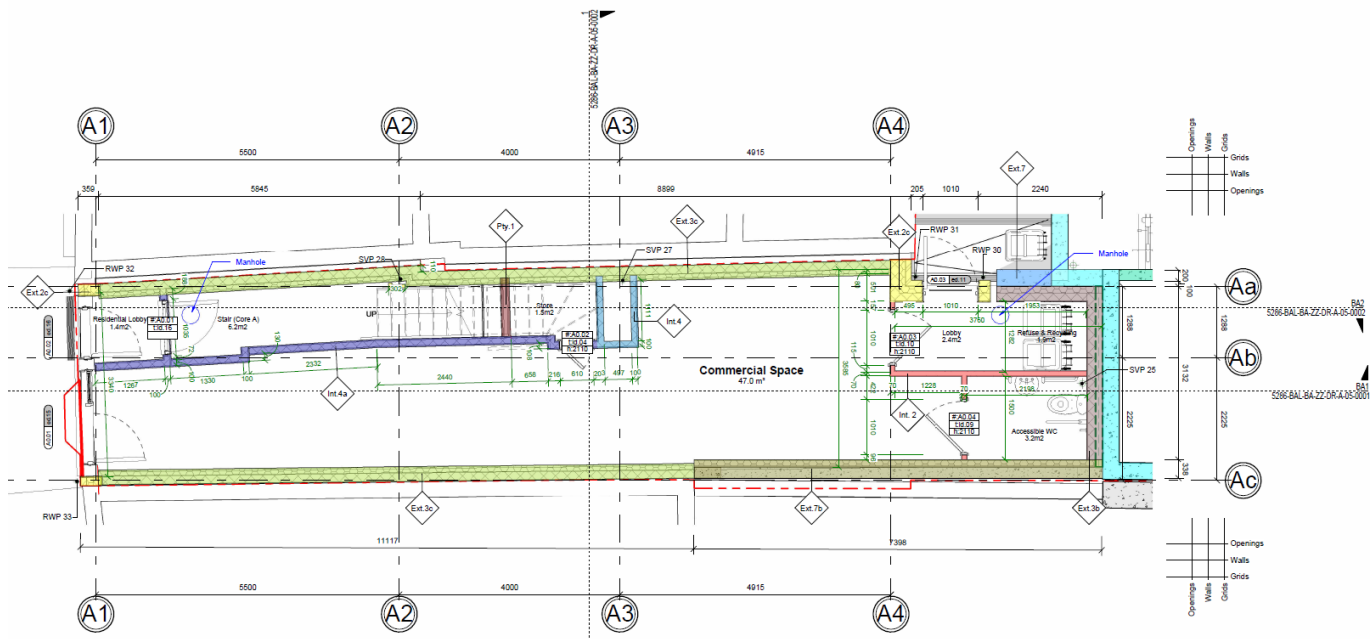


Figure 1 - Ground Floor Community Use

General Constraints for Applying BREEAM to small projects

- 1.5 Envision is a BREEAM accredited organisation and has certified 350 buildings against BREEAM standards, this includes 30 buildings using the BREEAM Refurbishment and Fit Out criteria. It is our experience that BREEAM standards are more complex and become relatively more costly to apply for smaller scale projects. The BRE, who administer the scheme and provide the assessment framework, previously recommend size thresholds for small developments, suggesting that BREEAM should not be applied to buildings below 500 m². This threshold has since been removed from their technical advice, recognising it is still possible to apply BREEAM to small buildings. Notwithstanding this, the benefits of BREEAM are less relevant for smaller scale projects and the additional administration costs, on a per m² basis, become relatively higher. For this reason, BREEAM standards are often not required for projects through planning for buildings less than 500 m². Examples of this include the London Borough of Hounslow, which establishes requirements for BREEAM for developments over 500 m². Most local authorities only require BREEAM for 'Major development', which is classified as development over 1000 m².
- 1.6 Reading Borough Council (RBC) does not provide clear differentiation for what is considered a 'minor development', however, note that buildings of less than 1000 m² are required to achieve Very Good, rather than Excellent. There is clearly a difference however between a building of 999 m² (considered minor) and a building with commercial uses of 48 m², with which this permission relates.
- 1.7 Whilst BRE do offer marginally reduced QA fees for buildings less than 1000 m², the actual assessment work involved in undertaking a BREEAM assessment, and all of the additional technical information that is required to demonstrate it, does not vary significantly with building size. This means that the technical analysis to demonstrate a building of say 5,000 m² will not vary in order of magnitude to a far more modest

build. The capital cost to deliver this would however, making BREEAM requirements relatively more expensive per m².

- 1.8 From a technical standpoint a number of requirements are less easy to accommodate in smaller buildings. thermal comfort, amenity areas, cycle and end of trip facilities all become more challenging with less space with in a building.

Project Specific Constraints

- 1.9 Envision undertook a predictive BREEAM assessment for the project in 2019 against the RFO 2014 criteria to determine how the scheme could reach a score of Very Good rating. This initial pre assessment established how several BREEAM credits cannot be applied to the small building.
- 1.10 The development will not be fully fitted, however core services including the provision of a back of house WC are proposed for the unit. Such restrictions mean that the available pool of credits to target for the building is significantly reduced from a fully fitted building.
- 1.11 This predictive assessment also identified that credits which are applicable to the shell are also restricted. Examples include daylighting provision and View Out, which are not possible based on existing constraints of the building.
- 1.12 The route for achieving BREEAM Very Good under formal assessment conditions was therefore contingent on a combination of the physical measures that are possible and in scope of the development, as well as contractor performance relating to the 'process of construction'. Examples of process related credits include activities required in the run up to construction, as well as ongoing site monitoring for matters of energy, water and waste, whereby complete records need to be maintained.
- 1.13 Since work commenced on site and the original developer went into administration, some of the process related requirements that should have been applied to the development to secure these credits are no longer able to be demonstrated under formal BREEAM assessment conditions. As BREEAM is heavily focused on the process of demonstrating compliance, it is now not expected to be possible to formally demonstrate a 'Very Good' rating through certification to BRE in accordance with the strict evidential requirements.
- 1.14 Whilst it is accepted this is a departure from the original planning conditions, it must be reflected that the scale of commercial development for which BREEAM was to be applied to is very modest.
- 1.15 Notwithstanding the technical constraints for now applying BREEAM, the development would still incorporate a number of the physical design features recognised by BREEAM Very Good, which the applicant continues to be committed to integrate.

Compliance Based Approach

- 1.16 Envision has successfully agreed with RBC for small scale projects elsewhere within the borough that instead of formal BREEAM certification, a compliance-based approach should be taken. Examples of this include on the Oracle Management Centre suite (Planning ref 150998), whereby conditions were adapted to reflect the constraints of a small development.

- 1.17 Consequently, and in accordance with precedent agreed elsewhere, Envision is seeking to remove condition 11 and adapt condition 12 to favour this compliance-based approach, which will still demonstrate to RBC how the sustainability requirements relevant to the scale of development have been satisfied.
- 1.18 This note provides the details of the design measures that are to be incorporated into the scheme which can still be demonstrated, and which align with BREEAM. It is proposed that Condition 12 is then discharged by the applicant through the provision of a final BREEAM based report, including a pack of evidence and letter of conformity, to demonstrate that the measures have been successfully integrated.
- 1.19 The proposed measures which shall be implemented, and which align with those commitments in the original 2019 report, are listed in Annex 1. The evidential requirements are also set out which the council can expect to receive.

Annex 1 – Details of Compliance Monitoring

Credit Title	Available Credits	Targeted Credits	BREEAM Requirements	Monitoring Data to Be provided post PC
Man 03 – (Prerequisite) Legally Harvest and Traded Timber	NA	Y	All timber and timber-based products used on the project is 'Legally harvested and traded timber	A schedule of timber used in the build and supporting FSC certification
Man 03 – Environmental Management	1	1	Principal contractor operates ISO 14001 EMS.	Evidence of contractors EMS 14001
Man 03 – Considerate Contractors Scheme	2	2	Principal contractor achieves score >35 under the Considerate Contractors Scheme (CCS)	Details of final CCS certification
Man 04 – Commissioning Building Services	1	1	Appoint an appropriate project team member provided they are not involved with the general installation works for the building services system.	Final Commissioning Certification for the equipment installed in the D2 use

Hea 01 – Internal and external lighting levels, zoning and control	1	1	All fluorescent and compact fluorescent lights fitted with high frequency ballasts. Internal lighting designed to provide lux levels in accordance with SLL Code for Lighting, CIBSE Lighting Guide 7 and other relevant industry standards; and zoned to allow occupant control. Separate zoning required in retail space for display and counter areas (PIR controls must include manual over-ride). External lighting designed in accordance with BS5489 and BS EN 12464-2:2-14. LED lighting to be specified that meets the SSL lighting standards External lighting details and design calculations
Hea 02 – Indoor air quality (IAQ) plan	1	1	Site specific (IAQ) plan produced and implemented, the plan must be produced and implemented. The objective is to minimise indoor air quality during the design, construction and occupation of the building. Final IAQP for the development
Hea 02 – Volatile Organic Compounds (Products)	1	1	All decorative paints and varnishes specified must meet BREEAM criteria. In addition, at least 5 of the 7 remaining product categories meet testing requirements and emissions levels criteria for Volatile Organic Compound (VOC) Emissions. List of all paints specified and product data sheets and declarations of conformity

Ene 01 – Whole Building Energy Model	15	11	A calculation of the energy score using the BREEAM Refurbishment and Fit-out energy model must be carried out. This must be assessed against a baseline BRUKL	As built energy calculations (As Built BRUKL) and BRE Ene 01 calculations confirming 11 credits
Ene 02 – Sub-Metering of Major Energy consuming Units	1	1	Separate energy metering installed for each fuel type / use for 90% of estimated annual energy consumption , with pulsed output for future connection to energy management system	Final Metering Arrangements and declaration of conformity / site inspection
Tra 03 – Cyclist Facilities	1	1	Compliant cycle storage spaces provided on site (1 per every 10 staff) (spaces must be secure, fixed to permanent structure, covered overhead)	As Built Drawings and Site Inspection confirming installation of cycle storage
Wat 01 – Water consumption	5	3	Use the BREEAM Wat 01 calculator to assess the efficiency of the domestic water-consuming components	Schedule of taps and as built data sheets, plus a Wat 01 calculation demonstrating a 40% improvement in water consumption
Wat 02 – Water monitoring	1	1	Specification of water meter with pulsed output on mains water supply to each building Install water sub-meters for all water consuming systems over 10% of the building demand	Details of the standalone water meter for the D2 use, including site inspection photographs

Mat 01 – Life Cycle Impacts	6	6	Robust environmental performance information has been collected for newly specified materials or where materials are retained in situ.	Mat 01 LCA completed for the development and schedule of materials
Mat 05 – Designing for durability and resilience	1	1	The building incorporates suitable durability and protection measures or designed features/solutions to prevent damage to vulnerable parts of the internal elements. This must include, but is not necessarily limited to: a. Protection from the effects of high pedestrian traffic in main entrances, public areas and thoroughfares (corridors, lifts, stairs, doors etc.). Protection against any internal vehicular/trolley movement within 1m of the internal building fabric in storage, delivery, corridor and kitchen areas.	As Built Specifications
Wst 01 – Resource Efficiency	4	2	Prepare a compliant Resource Management Plan (RMP) and a construction waste resource efficiency benchmark of 4.5m ³ (or 1.2 tonnes) of construction waste generated per 100m ² GIFA.	Final account of waste for the site from records available plus indication of performance against waste intensity benchmarks

Wst 01 – Diversion from Landfill	1	1	Prepare a compliant Resource Management Plan (RMP) and divert at least 85% by volume or 90% of waste from landfill.	Final landfill diversion rate collated from waste tickets
Wst 03 – Operational waste	1	1	A dedicated central space for storage of recyclable waste, clearly labelled and accessible to building occupants/facilities operators.	As Built plans showing appropriate waste storage space for commercial unit
Pol 01 – Impact of refrigerant	3	1	Systems using refrigerants have a DELC of <1000 (1 credit) kgCO ₂ eq/kW cooling and heating capacity.	Final DELC calculation and details of equipment installed