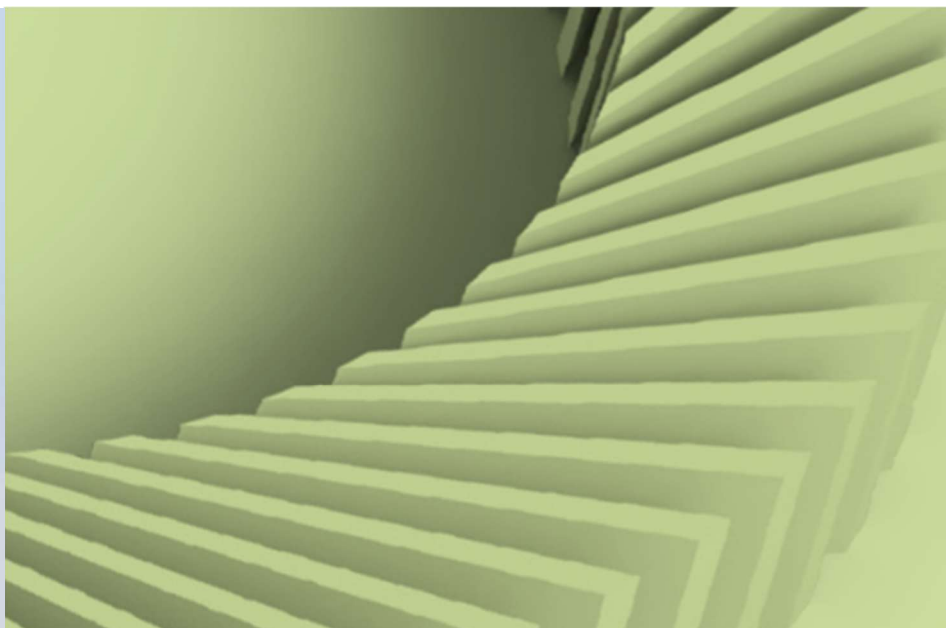


Reading Borough Council

John Lewis Customer Collection Point,
Crossland Road

Independent Energy Statement Review

September 2025



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1.0 Introduction

1.1 Purpose of the Report

Focus Consultants 2010 LLP were instructed by Anthony Scholes of Reading Borough Council to conduct an independent assessment review of the energy statement submitted as part of the planning application amendments in reference to the proposed development at John Lewis Customer Collection Point, Crossland Road.

1.2 Report Summary

Overall, the report provides a comprehensive review and justification of the policy requirements detailed in the Reading Borough Local Plan and the associated SPD document. The design specification strategy demonstrates a favourable performance against the building regulation targets, especially due to the dwellings fabric first approach, incorporation of exhaust ASHP design for heating purposes, and further inclusion of Solar PV

The development looks to incorporate passive design principles that reflect a reduced energy consumption in respect to heating, in line with Policy CC3's requirements. The build specification is also favourable when comparing to the minimum requirements of Part L 2021, which is reflective of a quoted total 71.8% reduction in carbon emissions is forecasted on site for the scheme

The remainder carbon emissions are intended to be offset via financial contribution, achieving net zero carbon requirements. The resulting carbon offset payment figure quoted is also an accurate reflection of the design performance at this stage. It is advised however that the calculation be re-completed at as-built stage in order to get a final, accurate payment contribution, based on the as built performance of each individual property.

2.0 Policy Assessment

Policy CC2: Sustainable Design and Construction

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.

To meet these requirements:

- *All major non-residential developments or conversions to residential are required to meet the most up-to-date BREEAM 'Excellent' standards, where possible;*
- *All minor non-residential developments or conversions to residential are required to meet the most up-to-date BREEAM 'Very Good' standard as a minimum;*
- *All non-residential development or conversions to residential should incorporate water conservation measures so that predicted per capita consumption does not exceed the appropriate levels set out in the applicable BREEAM standard. Both residential and non-residential development should include recycling greywater and rainwater harvesting where systems are energy and cost effective.*

The development is proposed to be of residential nature, as such it is deemed Policy CC2 is not applicable as this only applies to non-residential building types. Despite this, the sustainability statement indicates that the development is targeting Home Quality Mark '4 Stars', which is the residential assessment methodology equivalent of the BREEAM non-residential methodology. A detailed summary sheet provides the initial strategy for the scheme, which demonstrates going beyond the required policy requirements.

This policy can be deemed to be met at this stage.

Policy CC3: Adaptation to Climate Change

All developments will demonstrate how they have been designed to incorporate measures to adapt to climate change. The following measures shall be incorporated into development:

- *Wherever possible, new buildings shall be orientated to maximise the opportunities for both natural heating and ventilation and reducing exposure to wind and other elements;*
- *Proposals involving both new and existing buildings shall demonstrate how they have been designed to maximise resistance and resilience to climate change for example by including measures such as solar shading, thermal mass, heating and ventilation of the building and appropriately coloured materials in areas exposed to direct sunlight, green and brown roofs, green walls, etc;*

The sustainability statement references the acoustic assessment completed on the scheme indicates that it is advised windows not be opened due to noise issues, as such, there is limited availability to utilise natural ventilation and wind to assist with passive measures.

The energy statement details the be lean measures adopted into the design. It is confirmed that the glazing specification has been tailored to utilise solar gain for passive heating, but limiting this in summer to reduce overheating and glare, in accordance with Part O. Utilising the proposed G value for the window specification will help to moderate this.

Given the constraints applied to the site, this is considered a measured approach to help combat overheating and the effects of climate change, whilst helping properties to acquire passive gains from heating.

- *Use of trees and other planting, where appropriate as part of a landscape scheme, to provide shading of amenity areas, buildings and streets and to help to connect habitat, designed with native plants that are carefully selected, managed and adaptable to meet the predicted changed climatic conditions;*

It is understood that this criterion is not relevant to the energy statement.

- *All development shall minimise the impact of surface water runoff from the development in the design of the drainage system, and where possible incorporate mitigation and resilience measures for any increases in river flooding levels as a result of climate change.*

It is understood that this criterion is not relevant to the energy statement.

Policy CC4: Decentralised Energy

In meeting the sustainability requirements of this plan, developments of the sizes set out below shall demonstrate how consideration has been given to securing energy for the development from a decentralised energy source.

Any development of more than 20 dwellings and/ or non-residential development of over 1,000 sq m shall consider the inclusion of decentralised energy provision, within the site, unless it can be demonstrated that the scheme is not suitable, feasible or viable for this form of energy provision.

Where there is existing decentralised energy provision present within the vicinity of an application site, further developments of 10 dwellings or more or non-residential development of 1,000 sq m or more will be expected to link into the existing decentralised energy network or demonstrate why this is not feasible.

The energy statement confirms that the potential for decentralised energy has been explored, with communication with RBC sustainability officer. It has however proved unviable for the proposed development, as there are no district heat networks available to connect to, and the timeline for the Reading Heat Network does not align with the build programme for the proposed development

It is agreeable that due to the extended distance, this would be prohibitive not only from a financial point of view, but also would cause large scale disruption to the local areas.

It can be deemed that this policy is met.

Policy H5: Standards for New Housing

New build housing should be built to the following standards, unless it can be clearly demonstrated that this would render a development unviable:

- a. All new build housing outside the Central Area as defined on the Proposals Map will comply with the nationally-described space standard.*
- b. All new build housing will be built to the higher water efficiency standard under Regulation 36(3) of the Building Regulations.*

Item a. is understood to be covered in a separate submission.

Item b. is confirmed to be achieved via the incorporation of low flow water fittings, targeting 8 of 11 credits in HQM issue '1 Water Efficiency'. This requires all water fitting categories to meet a prescribed flow rate, and for the modelled water consumption to not exceed 110 l/p/d (modelled in line with Appendix A of Approved Document G).

Policy H5: Standards for New Housing

- c. All major new-build residential development should be designed to achieve zero carbon homes.*

The energy statement confirms in Section 7.1 that the projected reduction for the development is approximately 71.8% in carbon emissions when compared against Part L 2021.

The proposed build specification of the main building elements as highlighted does demonstrate a favourable uplift against the minimum requirements of Part L 2021. Combined with the introduction of exhaust ASHP use for heating purposes, it can be estimated that the overall improvements may be in line with what is suggested in the final write up.

An offset figure is presented, supporting calculations confirm the figure is accurate based on the information entered. Using the spreadsheet provided it is confirmed to be £89,280 following residual 49.6 tonnes of CO₂.

It may be necessary that as-built calculations be completed in order to confirm the exact offset payment required, once final construction and performance have been confirmed.

- d. All other new build housing will achieve at a minimum a 19% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations.*

If assessing the development against the 2013 building regulations requirements, simply now meeting the introduced 2021 Part L Building Regulations requirements is sufficient to meet this requirement. This development is proposing a 71.8% improvement, therefore is far surpassing the requirements here.

- e. All new build housing will be accessible and adaptable in line with M4(2) of the Building Regulations, unless it is built in line with M4(3) (see below).*

It is understood that this criterion is not relevant to the energy statement.

- f. On developments of 20 or more new build dwellings, at least 5% of dwellings will be wheelchair user dwellings in line with M4(3) of the Building Regulations. Any market homes provided to meet this requirement will be 'wheelchair adaptable' as defined in part M, whilst homes where the Council is responsible for allocating or nominating an individual may be 'wheelchair accessible'.*

It is understood that this criterion is not relevant to the energy statement.

... where homes are not designed to be carbon neutral, this will mean as a minimum a 35% improvement in the dwelling emission rate over the 2013 Building Regulations plus a contribution of £1,800 per tonne towards carbon offsetting within Reading (calculated as £60 per tonne over a 30-year period). Where it is proposed to meet the zero carbon homes requirement in another way, clear evidence should be provided to demonstrate how it will be achieved at planning application stage.

As highlighted in HS5 item C, the development is not zero carbon, as such an offset payment of total £89,280 has been quoted to be paid to achieve the policy requirement. The calculation procedures in obtaining the figure against the residual emissions are correct, as it is confirmed to be this amount.

3.0 Conclusion

This statement has provided an independent review of the proposed development at John Lewis Customer Collection Point, Crossland Road, which consists of the construction of new 7 storey buildings, with amenity space to provide 170 residential dwellings consisting of 1, 2 and 3-bedroom apartments.

It has been concluded that based on the nature of the submission, all requirements appear to be met. The development intends to adopt a highly efficient building construction and service specification to achieve improvements over Part L 2021 of circa 71.8%. There is emphasis on striking a good balance with passive design principles which encourage passive heating, however still appears to be in-keeping with the requirements of Part O's requirements of overheating.

Calculations in relation to the offset payment confirm the scheme is proposing to contribute a total £89,280 in order to achieve zero carbon. As the resulting carbon offset payment figure quoted is only a reflection of the design performance at this stage, it is advised that the calculation be re-completed at as-built stage in order to get a final, accurate payment contribution, based on the as built performance of each individual property.