

Our Ref: ETR-ESS0449-HR01

Alison Amoah
Reading Borough Council
Civic Centre
Bridge Street
Reading RG1 2LU

17 December 2025

Dear Alison,

Units 1-4 Reading Logistics Park

Thank you for your comments in relation to Condition 19 and the timing of submission of the Final Post Construction BREEAM Certificate. We welcome the opportunity to clarify the reasons why submission of the Final BREEAM Certificate prior to occupation is not feasible in this instance and why a period of up to six months following Practical Completion has been requested.

BREEAM certification is a two-stage process comprising a Design Stage (Interim) assessment and a Post-Construction Stage (Final) assessment. While the Interim BREEAM Certificate confirms that the building has been designed to achieve the required rating, the Final BREEAM Certificate is based on verified as-built information and formal evidence of construction completion.

While the planning condition requires the development to achieve a minimum BREEAM rating of **Very Good**, the project team has exceeded this requirement by voluntarily targeting a higher rating of **Excellent**. As the BREEAM Assessor, I can confirm that the Interim Design Stage assessment achieved the Excellent rating with a score of 74.7%.

The Final BREEAM assessment cannot be completed prior to Practical Completion and initial occupation, as it relies on information and documentation that is not available until the building is fully constructed and operational. This includes, but is not limited to:

- As-built drawings and specifications.
- Commissioning records and test certificates.
- Final airtightness testing and building performance data.
- Building user guides and handover documentation.
- Waste transfer notes and construction stage evidence.
- Confirmation of installed systems and materials.
- Photographic evidence of completed works.



In practice, much of this information is only collated and issued in the weeks following Practical Completion as part of the formal handover and close-out process. It is therefore not possible for the BREEAM Assessor to complete, submit, and obtain certification in advance of occupation.

In addition to the availability of evidence, the BREEAM certification process itself has inherent timescales. Once the Final assessment is submitted by the Assessor, it must undergo independent Quality Assurance (QA) by BRE Global. This QA process typically takes several weeks and may require clarifications or further information to be provided before certification can be issued. These timescales are outside the control of either the applicant or the Assessor.

Whilst BRE does offer a fast-track QA service which can reduce these timescales, this option is subject to additional cost and is dependent on the assessment being fully complete and free from outstanding queries at the point of submission.

The requested period of up to six months following first occupation provides a realistic and reasonable allowance in order to:

- Finalise post-completion documentation.
- Complete the Post-Construction BREEAM assessment.
- Respond to BRE QA queries; and
- Secure the Final BREEAM Certificate in accordance with BRE procedures.

With regard to the question of what happens if the Final BREEAM assessment does not achieve the same rating as the Interim (Design Stage) Certificate, it should be noted that the Final rating is determined solely on the basis of verified as-built evidence. Where design commitments are not fully implemented on site, this may affect the final score. The extended submission period does not reduce this risk but ensures that the Final assessment is robust, accurate, and based on complete information.

In summary, the request to submit the Final BREEAM Certificate within six months of first occupation reflects the practical requirements of the BREEAM process, the availability of as-built evidence, and BRE's certification timescales. It is not related to assessor availability, but rather to ensuring that the final certification is properly completed and independently verified in accordance with BRE standards.

We trust this clarifies the reasoning behind the proposed amendment to Condition 19. Please do not hesitate to contact us should any further clarification be required.

Yours sincerely,



Elin Thomas-Rowe BSc (Hons) | MSc | PIEMA

Principal Sustainability Consultant

DDI: **0121 824 3346**

Email: **elin.thomas-rowe@escuk.com**

