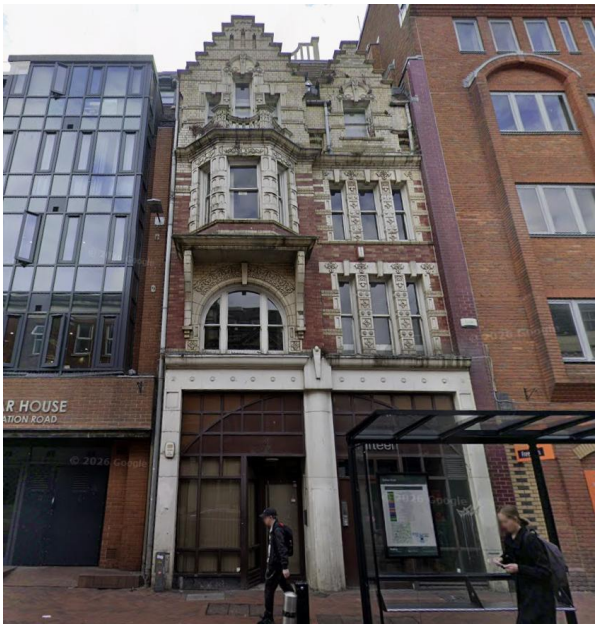
ENERGY AND SUSTAINABILITY STATEMENT

13-15 STATION ROAD, READING, RG1 1LG.

APPLICATION FOR REMOVAL OF CONDITIONS 12 + 13 FOLLOWING CONSENT 230202 (CHANGE OF USE FROM OFFICE (CLASS E) TO 7 RESIDENTIAL UNITS (CLASS C3) AT PART-BASEMENT FLOOR, PART-GROUND FLOOR AND FIRST TO FOURTH FLOOR LEVELS, CYCLE STORAGE FACILITIES AT REAR GROUND FLOOR LEVEL AND REPLACEMENT ROOFTOP MECHANICAL PLANT).



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1. Introduction

1.1 This Energy and Sustainability Statement has been prepared by Ian Sullivan Architecture Ltd on behalf of the applicant, in respect of the site known as 13-15 Station Road, Reading, RG1 1LG.

1.2 The site benefits Planning Consent (Ref: 230202) proposing the 'Change of use from office (Class E) to 7 residential units (Class C3) at part-basement floor, part-ground floor and first to fourth floor levels, cycle storage facilities at rear ground floor level and replacement rooftop mechanical plant' (granted 16th December 2024).

1.3 This Energy and Sustainability Statement is submitted in support of a S.73 Application which seeks to remove planning conditions 12 + 13 associated with Consent 230202.

Condition 12 states:
[Pre-commencement] No development shall commence on site until a copy of an Interim BREEAM Certificate in accordance with the BREEAM Sustainability Standard demonstrating compliance with a minimum standard of BREEAM Very Good rating has been submitted to and approved in writing by the Local Planning Authority.

REASON: These details are required due to insufficient information being contained within this submission and in order to ensure that the development is carried out in accordance with sustainable building standards in accordance with Policy CC2 of the Reading Borough Local Plan 2019.

Condition 13 states:
Prior to first occupation of the development hereby approved, a copy of a Final BREEAM Certificate in accordance with the BREEAM Sustainability Standard 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 referred to in condition 12.

REASON: To ensure that the development is carried out in accordance with sustainable building standards in accordance with Policy CC2 of the Reading Borough Local Plan 2019.

1.4 A Sustainability Appraisal for an indicative BREEAM Pre-Assessment was submitted with an indicative score of 62.10% and an indicative rating of BREEAM Very Good under application ref: 230202. It is now proposed to remove condition 12, and condition 13. However, the listed status of the building presents additional considerations in relation to the implementation of sustainability measures. The need to preserve the building's special architectural and historic interest can restrict the extent to which certain improvements to its fabric, construction and energy performance can reasonably be undertaken without adversely affecting its significance.

1.5 SAP energy calculations – Prepared by EPC Ltd are also submitted to accompany this S.73 Application. The proposed conversion achieves a DER of 25% increase over the Target Emission Rate (TER), demonstrating improved energy performance and

reduced carbon dioxide emissions. EPC Ltd is satisfied that the Flat 1 SAP assessment is representative of all seven flats for the purposes of this application.

1.6 The report is in response to Reading Borough Council's adopted Supplementary Planning Document (SPD) and the National Planning Policy Framework (NPPF).

1.7 The report discusses areas of renewable use as well as recycling and more sustainable practices.

2. Planning Framework

The strategy for the proposed development has been considered with the following policies in mind: -

2.1 The NPPF has relevant paragraphs with regards to meeting the challenge of climate change and flooding and places a reliance on the use of renewable infrastructure where viable.

2.2 There is also a desire to encourage design features which will reduce the requirement for mechanical heating and ventilation solutions.

2.3 For full planning applications, the Sustainability Statement need not provide full details, but should set out an explanation in broad terms how the proposed development will meet the requirements of policy framework.

2.4 To reduce carbon emissions and secure sustainable energy solutions, all new developments over 100 square metres gross or one or more dwellings should incorporate the generation of energy from renewable or low carbon sources equivalent to at least 10% of predicted energy requirements, unless it has been demonstrated that this would make the development unviable.

2.5 The Supplementary Planning Document (SPD) explains planning requirements with regard to energy, climate change, water management and waste reduction. It is intended to supplement the policies of the Local Plan, particularly: -

- CC2: Sustainable Design and Construction
- CC3: Adaptation to Climate Change
- CC4: Decentralised Energy
- CC5: Waste Minimisation and Storage
- EN18: Flooding and Drainage
- H5: Housing Standards

3. Building Regulations

3.1 The 2022 (with subsequent amendments in 2023 and 2026) changes to Approved Document L of the Building Regulations were introduced with similar aims of improving energy efficiency and reducing carbon dioxide emissions.

3.2 This document takes into account the buildings orientation, fabric, layout, design and energy use and assesses the building on a pass/fail model.

3.3 Given the rigorous nature of the approved document of the Building Regulations standards, this is relevant with regards to this proposal.

4. Design Solution

The evaluation of our proposal will be in several stages:

- Design of the fabric
- Thermal bridging
- Passage of air / ventilation
- Energy requirement
- Energy mitigation
- Water conservation
- Energy efficient appliances
- Landscaping
- Sustainable drainage systems (SuDS)
- Waste reduction

5. Fabric Design

5.1 Walls – front elevation

Existing external historic wall treatment will consist of the existing plaster finish being retained. Inner face of external solid wall lined with 40mm Actis HControl Hybrid thin multifoil insulation using 25 x 50mm timber battens with 12.5mm plasterboard and plaster skim finish with the intention to better the current u value requirement at around 0.37W/m^2K.

Walls – rear elevation

Existing external modern cavity wall treatment will consist of the existing plaster finish being retained. Inner face of external solid wall lined with 40mm Actis HControl Hybrid thin multifoil insulation using 25 x 50mm timber battens with 12.5mm plasterboard and plaster skim finish with the intention to better the current u value requirement at around 0.37W/m^2K.

5.2 Floors

The basement + ground floor construction is being retained in its current form serving commercial office accommodation and associated ancillary areas.

The first and second floor construction is to be upgraded serving the residential flat accommodation to incorporate a 6mm resilient layer, 200mm mineral quilt between the intermediate floor construction and an acoustic suspended ceiling between commercial and residential floor level and between residential floor levels.

5.3 Roof

The existing roof will be retained introducing traditional methods using quilt insulation and therefore the insulation value will relate to the thickness of product used. A

400mm layer will better the current value for a pitched roof at 0.11W/m^{2}K (100mm laid within joists and 300mm laid over).

5.4 Windows – Natural Day Lighting

The existing timber frame glazed units to the front elevation are all retained with the introduction of a 100mm air gap and new secondary 6mm internal glazing, rated at around 1.4W/m^{2}K.

The existing aluminium frame glazed units to the rear elevation are sealed double-glazed argon filled sealed units (4/16/4mm) with Pilkington Low-E glass to meet overall performance (windows 1.2W/m2/K).

Coupled with solar gain, natural day lighting can reduce the energy demand for new buildings through the controlled entry of natural light through windows, skylights and other building envelope components. The day lighting benefits of large areas of glazing need to be considered against the thermal and other properties of glazing.

As a conversion the window sizes will not be altered, nevertheless, the layout and zoning of the residential flats aim to provide adequate daylight levels to the habitable areas. Not only to insure visual comfort to the occupants, but also to reduce the reliance on artificial lighting.
External doors are to be composite frame, rated at around 1.5W/m^{2}K.

5.5 Ventilation

Maximising natural ventilation is appropriate in the design and construction and is considered a more sustainable option than air conditioning systems, albeit that the building will be able to be made airtight to reduce energy demand for heating or cooling in extreme weather. The method is to create opportunities for cross ventilation. Openings on opposing (or even adjacent) walls can draw air through a space. Windows/doors are to be openable with trickle vents to habitable rooms with a minimum equivalent area of 8,000 mm² per room, or as otherwise required to satisfy the current requirements of Approved Document F.

6. Passage of Air

6.1 Detailing

The project will be constructed using the 'Robust Standard Detail' suite of details ensuring a good level of design and workmanship.

6.2 The building will require a high standard of air-testing and the above details will ensure that the design meets the air leakage requirements. This is controlled through a SAP assessment.

7. Energy Requirement

7.1 Heating. This will be via Electric Storage Heating System Dimplex Economy 7 Electric storage heater with hot water tank and hot water immersion heater with thermostat, all to sub-contractor's details. Installation to comply with Part J of the Building

Regulations and the SAP energy ratings. Hot water pipes to be insulated in unheated spaces to accord fully with Part L of the Building Regulations. Electric storage heater positioned in each room.

7.2 Heating controls to be timed and temperature zoned with delayed start thermostat. Weather or load compensator required.

8. Energy Mitigation

8.1 The building has very good access to natural light and the building is well within the width at which natural light becomes less effective. This means that the building can, when possible, use natural light in lieu of artificial light.

8.2 When artificial light is required, the building will rely on led fittings which use up to 70% less energy than normal fittings. It is our standard policy to design for all fittings to be low energy, which exceeds the current building control requirement of four in ten being low energy.

8.3 The building will primarily rely on natural ventilation through openable windows to provide adequate ventilation to the internal spaces. Mechanical extract ventilation will be provided to the kitchens, WCs and bathrooms, as required by the Building Regulations. Ventilation systems will be specified to operate efficiently, with consideration given to minimising auxiliary energy consumption.

9. Water Recycling

9.1 This is addressed within the Building Regulations.

9.2 Water use per person per day not to exceed 110 litres.

9.3 Hot water heating – 150 litre cylinder. Maximum storage losses of 1.88kWh per person per day. This will be achieved by:

- Dual flush WCs
- Spray and aerating taps
- Water efficient appliances
- Low flow showers

10. Energy Efficient Appliances

10.1 Appliances providing heat, light and other essential services are major consumers of energy. The careful choice of appliances will reduce energy demand and therefore costs, significantly. The building proposed should as far as possible use the most energy efficient appliances, in particular energy and water efficient white goods.

10.2 High Performance Lighting - It is imperative that the lighting design philosophy provides the correct quality of lighting with minimum energy input and hence reduce internal heat gains. The latest low energy lighting technology will be employed throughout, including LED's, where appropriate. External lighting will be designed with

consideration for security requirements and minimising nuisance, glare and light pollution to the surrounding area.

11. Sustainable Drainage Systems (SuDS)

11.1 Surface water to discharge to existing mains drainage system.

12. Waste Reduction

12.1 Policy CC5 of the Local Plan requires that development will demonstrate measures to minimise the generation of waste in the construction, use and life of buildings. The proposals are to promote a more sustainable approach to waste management, including re-use and recycling of construction waste and promotion of layouts and designs that provide adequate space to facilitate waste storage, re-use, recycling and composting.

12.2 Low-impact building materials include timber, earth, straw, secondary aggregates and recycled products. Plastic, steel and aluminium, for example, are higher-impact materials. Where possible, materials should be produced locally and from sustainable or certified sources.

Waste hierarchy

12.3 There are three basic strategies for dealing with waste: reduce (i.e. avoid or prevent), re-use, recycle and only as a last resort, dispose.

13. Relevant Planning Precedents

13.1 Application reference PL/25/1051 at 43 London Street, Reading, was approved by Reading Borough Council on 15 August 2025. The application sought the removal of Condition 11, relating to Interim BREEAM certification, and amendment of Condition 12, relating to Final BREEAM certification, attached to the original planning permission. The Council subsequently approved the application, demonstrating that the requirement for formal BREEAM certification can be reconsidered where appropriate. This provides a relevant local precedent in support of the current application, which similarly seeks the removal of BREEAM-related conditions attached to an existing planning permission.

13.2 Application reference 151725 relating to the Grade I listed Abbey Gateway, The Forbury, Reading. In considering the proposed conversion, Reading Borough Council acknowledged that BREEAM Very Good would normally be required but concluded that installing insulation and other sustainability measures to achieve this standard would be harmful to the building's historic fabric and special architectural and historic interest. The Council therefore considered formal BREEAM compliance wholly inappropriate in this instance. This demonstrates that Reading Borough Council recognises the need to balance sustainability requirements against the conservation of heritage assets, supporting the case for removing Conditions 12 and 13 in respect of the current listed-building conversion.

13.3 Application reference PL/24/0956 at Northcourt Lodge, 65 Northcourt Avenue, Reading, was approved by Reading Borough Council on 20 September 2024. The application sought the removal of Conditions 15 and 16, relating to BREEAM certification and energy sustainability, attached to planning permission reference 220218 for the construction of a 13-bedroom care building (Class C2), with ancillary accommodation and associated works. This demonstrates that Reading Borough Council has previously been asked to reconsider and remove BREEAM and associated energy sustainability requirements attached to an approved development, providing a relevant local precedent in support of the current application.

14. Conclusion

14.1 The application seeks the removal of Conditions 12 and 13 attached to planning permission reference 230202, relating to the requirement for Interim and Final BREEAM certification to demonstrate compliance with a minimum Very Good rating.

14.2 The original planning permission relates to the change of use of an existing listed building from office accommodation (Class E) to seven residential units (Class C3), together with associated cycle storage facilities and replacement rooftop mechanical plant. The development principally involves the conversion and adaptation of an existing building, rather than the construction of a new building. Furthermore, the listed status of the building presents additional considerations in relation to the implementation of sustainability measures. The need to preserve the building's special architectural and historic interest can restrict the extent to which certain improvements to its fabric, construction and energy performance can reasonably be undertaken without adversely affecting its significance.

14.3 This approach is consistent with Reading Borough Council's Sustainable Design and Construction Supplementary Planning Document (December 2019), which recognises that listed buildings may experience difficulties in achieving prescribed sustainability standards and that, where compliance would unacceptably affect their character and appearance, requirements beyond Building Regulations may be inappropriate. The guidance also confirms that change-of-use applications should be considered on a case-by-case basis, having regard to the extent of refurbishment proposed.

14.4 Where energy is used, it is minimised by the layout and design of the building and the use of technologies designed to use less energy.

14.5 Water use to be minimised, heat is localised and provided efficiently, and lighting is of a low energy type.

14.6 Above all, the requirements enforced by building control will insist on good building fabric, good technology and renewable energy sources, which we fully embrace.

14.7 The proposed conversion achieves a DER of 25% increase over the Target Emission Rate (TER), demonstrating improved energy performance and reduced carbon dioxide emissions.

14.8 To be read in conjunction with SAP energy calculation – Compliance Part L (2022 edition, with 2023 and 2026 amendments). Prepared by EPC Ltd.

14.9 The development is to be carried out with sustainable building standards in accordance with the Building Regulations document and compliance with the SAP energy calculation – Prepared by EPC Ltd.

14.10 Having regard to the nature and extent of the approved development, the existing building's listed status and the constraints associated with its conversion, formal BREEAM certification is not considered a proportionate means of demonstrating sustainable design and construction. This Energy and Sustainability Statement and SAP energy calculation instead identify the measures incorporated into the development to improve energy efficiency and reduce environmental impact

14.11 A Construction Method Statement (CMS) will be provided to the contractor prior to works commencing to include elements below: -

a) A scheme for recycling waste resulting from the construction works.
b) Measures for controlling the use of site lighting whether required for safe working or for security purposes;
c) Required measures to control the emission of dust, dirt and other airborne pollutants during demolition and construction;
d) Provisions to be made for the control of noise coming from the site during demolition and construction;
e) Full details of pest control measures following any demolition required. Where necessary, capping of drains/sewers and baiting arrangements.

14.12 As demonstrated by the planning precedents outlined in Section 13 of this Energy and Sustainability Statement, Reading Borough Council has previously approved the removal of BREEAM-related conditions from both listed building and standard planning permissions. These decisions establish relevant local precedents which support the case for removing the equivalent conditions associated with the current application.

14.13 In conclusion, the requirement for formal BREEAM certification to demonstrate a Very Good rating is considered disproportionate to the nature and scope of the approved development, particularly having regard to the constraints associated with the building's listed status. The removal of Conditions 12 and 13 is therefore considered reasonable and justified, without altering the approved development or its associated planning merits.

Ian Sullivan

November 2026