



SUSTAINABILITY PLANNING REVIEW

Fat Face, 3 The Ridgway. Havant

CBRE Global Investors

October 2012



CBRE

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CONTENTS

1. EXECUTIVE SUMMARY	4
Objectives	4
Key Points - BREEAM	4
Key Points – Sustainability	4
2. INTRODUCTION	6
1.1 Background	6
1.2 Site and Surrounds	6
1.3 Scope of Works	7
3. BREEAM COMPLIANCE	9
2.0 General	9
2.1 Applying BREEAM to the Project	9
2.2 Technical Barriers	10
2.3 Financial Barriers	10
4. SUSTAINABILITY CREDENTIALS	13
3.0 Warehouse Extension	13
3.1 Operational Issues	13
3.2 Energy	13
3.3 Water	13
3.4 Waste	14
3.5 Transport	14
3.6 Pollution	14

APPENDICES

A. Appendix A – Conditional Approval	16
B. Appendix B – CBRE BREEAM Letter	17
C. Appendix C – Planning Officer Response	18
D. Appendix D – Report Qualifications	19

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Date Of Issue: 25 Oct 2012	File Name: 326049 3 The Ridgeway, Havant Sustainability	Version: - Status: FINAL

EXECUTIVE SUMMARY

Objectives

The purpose of the report is to provide the detailed supporting information requested by the planning officer to enable the application for the removal of condition 7 of the grant of planning permission to be submitted.

For clarity the planning office has requested two discreet elements:

- The difficulties in achieving the BREEAM Very Good rating
- The measures that will be employed to ensure that the building and its operation will be as sustainable as possible.

This report aims to clearly outline both of the above issues to demonstrate that condition 7 cannot be reasonably applied to a small warehouse extension project on this site.

Key Points - BREEAM

- The extension represents only a small increase (circa 10%) in the total floor of the property yet many of the BREEAM credits would need to be applied to the whole facility.
- The nature of the warehouse extension means that the scope of works limit the availability of a number of credits.
- The timing of the introduction of the BREEAM requirement within the process limits the number of credits (circa 12.5%) that can be achieved.
- The location of the site prevents a number of credits (circa 7.5%) from being achieved.
- The cost premium of applying BREEAM to such a small project is in the region of 10-13% of the current cost plan.
- If a BREEAM rating were to be pursued then extensive remedial works to the existing building and site would be required to upgrade the amenities to meet some credit requirements.
- The cost premium of upgrading facilities within the existing building to achieve mandatory credits is in the region of 15% of the current cost plan.

Based upon the above issues we do not believe that a BREEAM assessment can be justified for this project and if required it would affect the viability of the project.

Key Points – Sustainability

- The current scope of work the extension will deliver a sustainable solution without the need for an expensive BREEAM assessment which cannot be justified for a project of this size and scope.
- The fabric and services to be installed within the warehouse area will be modern efficient options to minimise the impact of the extension.
- The controls associated with the heating, ventilation and lighting will help minimise the energy consumed by the extension.

- The operation of the extension will adopt the current best practices carried out by the occupiers with regards energy, water and waste management.
- The operational practices with regards cycling and car parking will be reviewed to ensure that they remain appropriate for the extended facility without the need to comply with the strict requirements of BREEAM.

INTRODUCTION

1.1 Background

Fat face and BBC Pension Trust Ltd submitted a planning application to extend the warehouse facility at 3 The Ridgeway, Havant to provided additional storage capacity.

The application was given conditional approval on 25 July 2012 (see appendix A) and included a condition (no.7) stating:

"The development hereby permitted shall not be commenced until a BREEAM Pre-Assessment has been submitted to and approved in writing by the Local Planning Authority. The assessment shall demonstrate that the development will attain a minimum standard of "very good" BREEAM rating. The development shall be carried out only in accordance with the details the subject of the assessment."

Upon review of this condition CBRE Building Consultancy wrote to the Planning Officer on 13 August 2012 (see Appendix B) to highlight the issues relating to this particular condition which make it impractical both financially and technically, for the extension to discharge this requirement. The letter concluded by requesting that this condition be removed.

The Planning Officer subsequently responded on 14 September (see Appendix C) stating the following:

"It is noted from your comments that it is not considered to be possible to achieve the requirements of this condition. In the light of your comments, the appropriate way forward would be to submit an application to remove the condition. This application should include your detailed reasons explaining the difficulties in achieving the conditions BREEAM 'very good' rating. It should also provide details of what measures will be employed to ensure that the building and its operation will be as sustainable as possible."

1.2 Site and Surrounds

The development site is situated at the west end of the property known as Units 1, 2 and 3 The Ridgway, which is to the west of The Ridgeway, Havant.

The site measures approximately 0.4 Hectares and is bound by open fields to the north and west, by the A27 to the south and by Kingscroft Court to the east. It forms part of a larger development of light industrial buildings. Access to the site is via the distribution road leading from The Ridgway.



Fig 1: Aerial view of building.



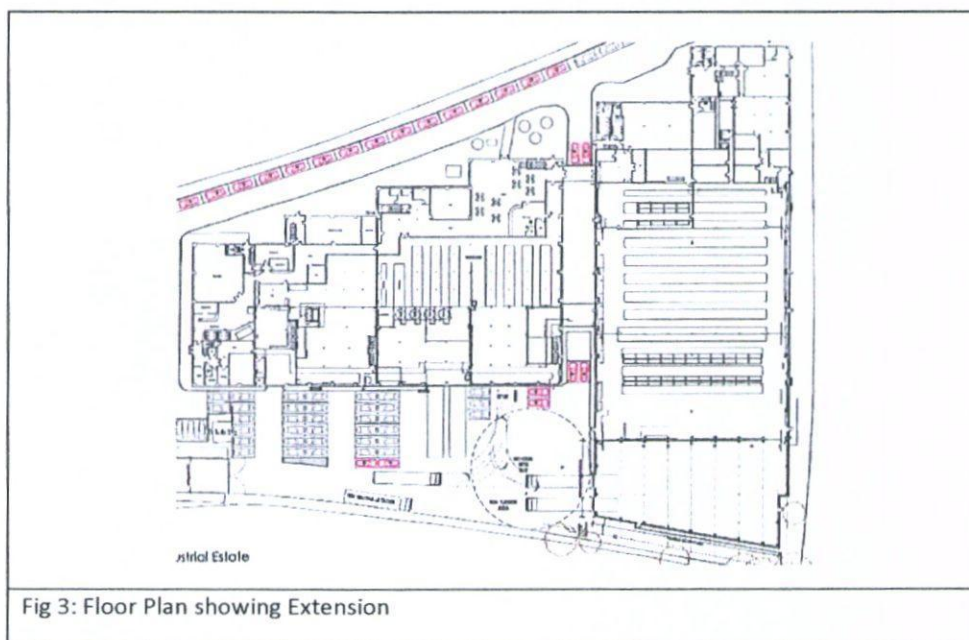
Fig 2: External View of the building.

The building is utilised as the Headquarters for clothes retailer Fat Face and contains the corporate and administration functions, design office and a distribution facility.

1.3 Scope of Works

The proposed development will comprise of an extension to the existing light industrial unit / storage unit along with associated alterations to the yard, path and parking areas.

The floor area of the warehouse extension is 783sqm which will increase the total floor area of the property by approximately 10% to 8,029sqm.



With regards the aspects of the project which affect sustainability the following summaries the provision:

Fabric

The extension will be constructed to meet current Building Regulation Approved Document L2B 2010 and finished to match the existing warehouse.

Roof lights are to be triple skin translucent non-fragile roof lights, with a minimum 10% coverage to provide daylight into the space.

Loading Doors are to locations to the east elevation and constructed to achieve a U value of 1.5W/m²K

Heating & Ventilation

High level gas fired warm air heating units to provide low grade heating (circa 16degC) suitable for storage / racking environment.

New controllers shall be installed for the new heaters and have on/off timed controls plus temperature control with night setback function and frost protection. The controls shall also allow 'fan only' operation for summer ventilation.

Due to the height of the new warehouse and the fact that no processes utilise this space; de-stratification fans shall be supplied and installed throughout the extension area to push heat back down from high level to aid energy conservation and temperature control.

Hot & Cold Water

There is no requirement within the extension for any hot or cold water services

Lighting Installation

New internal lighting will be installed to achieve a minimum 300 lux level throughout the new extension. The lighting will be high efficiency T5 Linear fluorescent 'high bay' luminaries controlled by Passive Infra Red (PIR) sensors to minimise energy consumption.

2no. new external lights will be provided adjacent to the proposed vehicular doors. The external lighting will be controlled by time switch and photocell.

BREEAM COMPLIANCE

2.0 General

The purpose of the Building Research Establishment Environmental Assessment Method (BREEAM) is to set the standard for best practice in sustainable building design, construction and operation. A BREEAM assessment uses recognised measures of performance, which are set against established benchmarks, to evaluate a building's specification, design, construction and use.

The warehouse extension works as covered by this planning application would need to be assessed using the BREEAM 2011 New Construction rating tool which covers industrial buildings. This tool encompasses a number of different criteria relevant to sustainable construction and the building would be required to meet a significant number to achieve a score of 55% to achieve this rating which would place it in the top 25% of all new non-domestic buildings.

The assessment criteria include elements associated with Management, Health & Wellbeing, Energy, Transport, Water, Materials, Waste, Land Use and Ecology, and Pollution.

Under the BREEAM 2011 tool the warehouse extension would also need to achieve certain minimum BREEAM standards in order to achieve a rating of very good. These minimum standards include:

- Sustainable Procurement
- Visual Comfort
- Water Quality
- Energy Monitoring
- Water Consumption
- Water Monitoring
- Responsible Sourcing of Materials
- Mitigating Ecological Impact

2.1 Applying BREEAM to the Project

It is the intention of the applicant for the development to be carried out in a sustainable manner however, the specific requirements of BREEAM and the approach adopted make it impractical for it to be applied to this small warehouse extension.

BREEAM by its very nature is a structured process which makes assumptions about the nature of the project and then requires the development team to target a certain level of performance and provide evidence to demonstrate compliance.

If a credit cannot be achieved due to a limitation of the extent of the works the credit may be technically unachievable or alternatively require extensive improvements to the provisions within the remainder of the site which would be financially prohibitive to the viability of the scheme.

The following section outlines the technical and financial reasoning for the project not being able to achieve compliance with this condition.

2.2 Technical Barriers

Due to the limited scope of the project a significant number of the credits are not achievable for technical reasons due to site constraints or due to the fact that they needed to be addressed prior to RIBA stage C.

These credits that are not achievable are listed below:

Credit	Description	Issue	Credit Value
Man 01	Project brief and design	RIBA stage B/ C involvement required	4 credit
Man 04	Stakeholder participation	RIBA stage B involvement required	1 credit
Man 05	Life cycle cost and service life planning	RIBA stage C involvement required	3 credits
Hea 06	Safety & Security	RIBA stage C involvement required	1 credit
Ene 04	Low or Zero Carbon Technologies	RIBA stage C involvement required	5 credits
Tra 01	Public Transport	Nearest train station over 1km away from site and only limited bus service within 650m	3 credits
Tra 02	Proximity of Amenities	Insufficient Amenities within 500m of site	1 credit
Tra 04	Car Parking	Current parking provision does not comply with strict credit requirements	2 credits
LE 04	Enhancing Site Ecology	RIBA stage B involvement required	3 credits
Total			23 credits

The credits listed above, when converted into their percentage impact upon the BREEAM rating would equate to approximately 20% not being technically available to the project due to technical issues.

2.3 Financial Barriers

It is noted that the requirement of Policy CS14 (upon which the council's condition is based) only comes into effect on non-domestic properties over 500sqm. While this size of property could be deemed financially suitable for carrying out a BREEAM rating on an office development it is significantly smaller than would normally be assessed for an industrial building due to the limited scope of such projects.

BREEAM Cost Premium

It is acknowledged in the construction industry that a BREEAM Very Good rating can add up to 3 to 5% onto the project costs to account for the additional provisions that need to be made both in terms of design and construction processes. These percentages assume a certain size and type of project which enables some of the overhead costs that come with a BREEAM assessment to be diluted. The limited size and scope of this project do not enable this dilution to take place.

These additional costs, over and above the current cost plan include the following activities:

- Man 01 – Thermographic Study
- Man 01 – Commissioning Manager
- Man 01 – Building Users Guide
- Man 01 – Seasonal Commissioning
- Man 02 – Considerate Contractors Scheme
- Man 03 – Construction Site Impact Monitoring
- Hea 05 – Acoustic Assessment
- Mat 03 – Responsible Sourcing of Materials
- Wst 02 – Recycled aggregates
- LE 02 – Ecological Assessment
- LE 05 – Ecological Assessment

The net impact of the above on the cost plan is estimated to represent a BREEAM premium of this project of between 7.5 to 10%.

BREEAM Assessment

In addition to the above the economies of scale make a BREEAM assessment economically unviable when compared to the budget for the warehouse extension.

The cost of preparing the BREEAM assessment (i.e. the project briefing, the collection of evidence and submission of design and construction stage submissions) would normally equate to 0.5% of the total project cost.

If BREEAM were to be applied on this extension project, the assessment cost would be an additional 2.5-3.0% of the total project cost.

Site Wide Impacts

The extension represents less than a 10% increase in gross floor area while a number of the credits would need to be applied to the whole site and are outside of the project scope.

The nature of the extension means that the majority of the amenities and services associated with achieving a number of BREEAM credits lies outside of the scope of the project. If a BREEAM rating were to be pursued then extensive remedial works to the

existing building and site would be required to upgrade the amenities to meet some credit requirements.

The cost of these upgrades is outside of the project scope and may make the extension financially unviable. The credits affected by this are outlined below (those credits highlighted in red are mandatory credits for all BREEAM projects).

Credit	Description	Issue	Credit Value
Ene 02	Energy Monitoring	Electricity and gas metering on site would need to be upgraded and submetering introduced	2 credits
Tra 03	Cyclists Facilities	Current facilities while sufficient for occupants do not comply with strict requirements of credit	2 credits
Wat 01	Water Consumption	All existing toilet, shower and kitchen facilities would need to be upgraded	5 credit
Wat 02	Water Monitoring	Water metering on site would need to be upgraded	1 credit
Wat 03	Water leak detection and prevention	Leak detection would need to be installed on mains water supply and automatic flow control devices added to toilet cores.	2 credits
Wat 04	Water Efficient Equipment	Any irrigation and vehicle washing facilities would need to be upgrades	1 credit
Wst 03	Operational Waste	Current facilities while sufficient for occupants do not comply with strict requirements of credit	1 credit
Total			14 credits

The cost of these additional works could be in the region of 10 to 15% of the total project cost and would raise questions over the financial viability of the scheme.

SUSTAINABILITY CREDENTIALS

3.0 Warehouse Extension.

Due to the limited nature of the works covered by the planning application it is difficult to discuss at length the sustainability credentials of the work. The key sustainability aspects of the project are as follows:

- Insulated cladding panels to ensure high thermal performance of fabric,
- 10% skylight provision to ensure good day lighting to the warehouse space,
- Efficient gas fired heating (limited to 16degC) to the warehouse space complete with zoned controls,
- Downdraft ventilation system to ensure heating to warehouse is limited to the occupied zone,
- High efficiency lighting and occupancy sensor controls to minimise energy consumption.

3.1 Operational Issues.

While the extension works covered by the application have limited scope with regards sustainability, Fat Face as an organisation have adopted a number of measures across the property which help improve the overall sustainability credentials of the site and will be introduced where practical within the operation of the extension. These measures are summarised below:

3.2 Energy

- Energy Consumption within the property is actively managed by the tenant with regular reporting carried out and displayed within the property to raise staff awareness.
- Fat Face have signed an Electricity Supply contract with Scottish & Southern Energy to provide renewable energy to the facility
- Energy Efficient Lighting and occupancy controls are installed within the office areas.

3.3 Water

- There are no water consuming elements within the scope of the extension or associated works.
- The management team at the building actively monitor the water consumption and publish data to allow the occupants to understand their impact upon the environment.
- The management team is currently trialling "flow-saver" devices on their water fittings to help manage consumption. If this trial is successful it will be rolled out across the facility as a whole.

3.4 Waste

- Waste management policies are in place of the facility with the recycling performance of different waste streams being monitored and reported to all staff.



Fig 4: Waste Management Reporting



Fig 5: Waste Management Reporting

- Waste compactors are utilised to help manage the packaging material on site.
- Recycling points are provided throughout the site

3.5 Transport

- Due to the nature and location of the property the car parking provision is extensive on site.
- Fat Face provides cyclist facilities for staff including bike storage, showers and lockers.
- The provision of car parking and cycling facilities is reviewed on a regular basis by the management of the property to ensure it is appropriate for the needs of the staff.
- Public transport in the form of 2 mainline train stations (Havant & Bedhampton) and 3 bus routes (700, 75, 36) are within a mile of the facility.

3.6 Pollution

- The boiler plant serving the office component of the facility is fitted with a flue dilution system to minimise any local impact.
- The management team are currently implementing a R22 Phase Out programme to replace any air conditioning plant which currently utilises the high GWP refrigerant.

APPENDICES

Appendix A – Conditional Approval



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BOROUGH COUNCIL

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Mr Wheway
Luken Beck Ltd
30 Carlton Crescent
Southampton
SO15 2EW

For: BBC Pension Trust Limited/Fat Face Ltd

**The Town and Country Planning (Development Management Procedure) (England)
Order 2010
Grant of Planning Permission**

Application Number: APP/12/00206

Site Address: 3 Ridgway, Havant, PO9 1JS

Proposal: Extension to existing warehouse and associated parking.

Further to your application received on 24 February 2012, which was valid from 01 March 2012, Havant Borough Council, as Local Planning Authority **Grants Planning Permission** for the above proposal in accordance with the submitted plans and particulars as detailed below.

This permission is subject to compliance with:

- (i) The plans and other documents submitted with regards to your application, and
- (ii) The following conditions:

Conditions:

- 1 The development hereby permitted shall be begun before the expiration of 3 years from the date on which this planning permission was granted.
Reason: To comply with Section 51 of the Planning and Compulsory Purchase Act 2004.
- 2 The external materials to be used shall match in type, colour and texture those on the existing building, unless agreed otherwise in writing by the Local Planning Authority.
Reason: In the interests of the amenities of the area and having due regard to policy CS16 of the Havant Borough Local Plan (Core Strategy) 2011 which forms part of the Local Development Framework and National Planning Policy Framework, March 2012.
- 3 The development hereby permitted shall not be commenced unless and until details of measures which will be undertaken to protect the public sewers which cross the site have been submitted to and approved in writing by the Local Planning Authority in consultation with Southern Water. The development shall thereafter be carried out in accordance with the approved details.
Reason: To ensure the protection of drainage infrastructure having due regard to policy CS19 of Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

Our Ref: APP/12/00206

- 4 The development hereby permitted shall not be carried out otherwise than in accordance with the following requirements:
1. Ensure that best practice is in place for operating machinery to reduce unnecessary noise;
 2. No Percussive piling or works with heavy machinery shall take place within the waterfowl over-wintering period, 1st October to the 31st March inclusive unless otherwise agreed in writing by the Local Planning Authority. Heavy machinery constitutes, for example, use of pneumatic drills, diggers, dumper trucks and lorries.
 3. Any cutting back of trees, hedges or scrub should avoid the bird breeding season, March to August inclusive, to reduce the likelihood of harm to breeding birds.
- Reason:** Given the bird sensitivities in the area, the proposed construction is required to be timed and undertaken in a suitable way to minimise disturbance to over wintering and nesting birds having due regard to policy CS11 of Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework 2012.
- 5 No development hereby permitted nor any related site clearance shall commence until a specification of measures to be undertaken to prevent damage to existing trees and hedgerows on the site throughout implementation of the same has been submitted to and approved in writing by the Local Planning Authority. All measures forming part of such approved specification shall be undertaken and fully adhered to at all times which such implementation is in progress. Any such tree or hedgerow which is nevertheless seriously damaged during that implementation shall be replaced within 6 months of the occurrence of such damage by another of the same species in the same position and of not less than 1.6 metres height when planted.
- Reason:** To safeguard the continued health and presence of such existing vegetation and protect the amenities of the locality and having due regard to policies CS11 and CS16 of the Havant Borough Local Plan (Core Strategy) 2011 which form part of the Local Development Framework and National Planning Policy Framework, March 2012.
- 6 The development shall not be brought into use until space for the loading, unloading and parking of vehicles has been provided within the site, surfaced and marked out in accordance with the approved details. Such areas shall thereafter be retained and used solely for those purposes.
- Reason:** In the interests of highway safety and having due regard to policy DM14 of the Havant Borough Local Plan (Core Strategy) 2011 which forms part of the Local Development Framework and National Planning Policy Framework, March 2012.
- 7 The development hereby permitted shall not be commenced until a BREEAM Pre-Assessment has been submitted to and approved in writing by the Local Planning Authority. The assessment shall demonstrate that the development will attain a minimum standard of 'very good' BREEAM rating. The development shall be carried out only in accordance with the details the subject of the assessment.
- Reason:** To ensure that the development is carried out in accordance with Policy CS14 of the Havant Borough Local Plan (Core Strategy) 2011 which form part of the Local Development Framework and National Planning Policy Framework, March 2012.

- 8 The development hereby permitted shall be carried out in accordance with the following approved plans:

Design and Access Statement
Location Plan - Plan 1
Site Location Plan Drawing Number 11695/11
Existing ground floor plan and part first floor plan Drawing Number 01
Existing Elevations Drawing Number 02
Proposed ground floor plan and block plan Drawing Number 03 Rev B
Proposed elevations Drawing Number 04 Rev B
Proposed car space allocation Drawing Number 05 Rev B

Reason: - To ensure provision of a satisfactory development.

Other Important Information:

In reaching its decision the Council has had regard to policies of the Havant Borough Core Strategy 2011 which forms part of the Local Development Framework: and The National Planning Policy Framework, March 2012.

Havant Borough Core Strategy 2011

CS11	Protecting and Enhancing the Special Environment and Heritage of Havant Borough
CS14	Efficient Use of Resources
CS16	High Quality Design
CS17	Concentration and Distribution of Development within the Urban Areas
CS19	Effective Provision of Infrastructure
CS2	Employment
CS20	Transport and Access Strategy
CS21	Developer Requirements
DM10	Pollution
DM11	Planning for More Sustainable Travel
DM12	Mitigating the Impacts of Travel
DM14	Car and Cycle Parking on Development (excluding residential)
DM8	Conservation, Protection and Enhancement of Existing Natural Features

The Council considers, having regard to the objectives of these policies and The National Planning Policy Framework, March 2012, that the principle of the development is acceptable in this case, and also that the impact of the development is acceptable in terms of economic development, the effect on the character and appearance of the area, the effect on protected sites/species, highway matters, and developer contributions. Having taken into account the requirements of Section 38 (6) of the Planning and Compulsory Purchase Act 2004 and all other material considerations, the Council has determined that planning permission should be granted for the development.

- (1) This notice only relates to the decision of Havant Borough Council as Local Planning Authority under the Town and Country Planning Acts. It does not relate to any other application that may be required under the Building Regulations or under any other Act, Regulation, Byelaw or Order where the Council's approval may be needed. For further guidance as to the need for consent under the Building Regulations please phone 023 9244 6573.
- (2) Your attention is drawn to the attached information regarding firstly your right to appeal to the Planning Inspectorate, if you are aggrieved by the Council's decision, and secondly the rights of an owner to, in certain circumstances serve a purchase notice on the Council. See www.planningportal.gov.uk/pcs.

Our Ref: APP/12/00206

- (3) Any failure to adhere to the details of the approved plans, and other documents or to comply with any conditions listed above may lead to enforcement action being taken by the Council. If you wish to depart from the approved details or conditions in any way you should contact the Planning and Development service at the Civic Offices or by telephoning 023 9244 6015.
- (4) The applicant is advised that a formal application for connection to the public sewerage system is required in order to service this development. please contact Atkins Ltd, Anglo St James House, 39A Southgate Street, Winchester. S023 9EH (Tel 01962 858688), or www.southernwater.co.uk.
- (5) This permission was granted subject to a planning obligation agreement made under Section 106 of the Town & Country Planning Act 1990 dated 5th July 2012 which requires a contribution of £16,928 towards the Hampshire County Council Transport Contribution.



Mr Chris Murray
Service Manager (Planning Development)

25 July 2012

Appendix B – CBRE BREEAM Letter

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David Eaves
Public Service Plaza
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13 August 2012

By Email

Dear David,

APPLICATION NUMBER: APP/12/00206
SITE ADDRESS: 3 RIDGWAY, HAVANT PO9 1JS
PROPOSAL: EXTENSION TO EXISTING WAREHOUSE AND ASSOCIATED PARKING

We write with regard to the above planning application and in particular condition no 7 – relating to the requirement the warehouse extension to achieve a BREEAM Very Good rating - that has been attached to the Grant of Planning Permission document.

CBRE Building Consultancy have been instructed by our client BBC Pension Trust/ Fat Face Ltd to review this issue in relation to the specific obligation of the condition and the nature of the extension works to the existing warehouse.

The condition also gives the reason for this requirement as *"To ensure that the development is carried out in accordance with Policy CS12 of the Havant Borough Local Plan (Core Strategy) 2011 which form part of the Local Development Framework and National Planning Policy Framework, March 2012."*

Policy CS14 Efficient Use of Resources specifically requires that on completion, unless proven to be financially or technically unviable, the development meets one of the following standards:

- Residential development – Level 3 of the Code for Sustainable Homes;
- Multi occupation homes
- non-residential development over 500sqm - BREEAM standard 'very good'.

As the warehouse extension measures 706sqm the non-residential requirement of CS14 has been applied.

The works as covered by this planning application would need to be assessed using the BREEAM 2011 New Construction rating tool which covers industrial buildings. This tool encompasses a number of different criteria relevant to sustainable construction and the building would be required to meet a significant proportion of these in order to achieve the rating of Very Good. It should be noted that the scheme would need to achieve a score of 55% to achieve this rating which would place it in the top 25% of all new non-

domestic buildings. The assessment criteria include elements associated with Management, Health & Wellbeing, Energy, Transport, Water, Materials, Waste, Land Use and Ecology, and Pollution.

Under the BREEAM 2011 tool the warehouse extension would also need to achieve certain minimum BREEAM standards in order to achieve a rating of very good. These minimum standards include:

- Sustainable Procurement
- Visual Comfort
- Water Quality
- Energy Monitoring
- Water Consumption
- Water Monitoring
- Responsible Sourcing of Materials
- Mitigating Ecological Impact

While it is acknowledged that the extension of the warehouse will have an impact upon the local environment and as such will need to be carried out in a sustainable manner it is unlikely that it will be capable of achieving the minimum level of BREEAM rating required due to a combination of technical and financial issues. The reasons for this are outlined below.

1. The relatively small size of the warehouse extension (circa 706sqm) does not lend itself to be able to achieve a number of the credit requirements. The extension represents less than a 10% increase in gross floor area while a number of the credits will be applied to the whole site.
2. The economies of scale make the assessment economically unviable when compared to the budget for the warehouse extension. The cost of preparing the BREEAM assessment and the collection of evidence would equate to approximately 2.5% of the total project cost. On normal BREEAM projects this figure is closer to 0.5% of the total project cost.
3. It is noted that the requirement of Policy CS14 only comes into effect on non-domestic properties over 500sqm. While this size of property would be deemed suitable for carrying out a BREEAM rating on an office or retail property it is significantly smaller than would normally be assessed for an industrial building.
4. The nature of the extension means that the majority of the amenities and services associated with achieving a number of BREEAM credits lies outside of the scope of the project. For example the toilet provision and all associated wet services do not form part of the project scope and as such any compliance with these BREEAM credits would be reliant upon the amenities within the existing building. It is unlikely that that these facilities would achieve the level of performance to necessary to meet the minimum standard required for these credits.
5. If a BREEAM rating were to be pursued then extensive remedial works to the existing building may be required to upgrade the amenities to meet the credit requirements. The cost of these additional works could be in the region of 10 to 15% of the total project cost and would make the scheme financially unviable.

Given the above issues identified we feel that it is unreasonable for condition no 7 to be applied in this instance and would request that it be set aside. The client is committed to ensuring that the

extension minimises its impact upon the environment and will ensure that the works within the project scope are carried out to the highest standard thereby meeting the intent of the NPPF and Policy CS14 with regards the efficient use of resources.

Yours faithfully



GRAEME MURRAY
ASSOCIATE DIRECTOR
C.ENG. | M.CIBSE | BREEAM AP | LEED AP
ENERGY MANAGEMENT & ENGINEERING



Appendix C – Planning Officer Response



Havant
BOROUGH COUNCIL

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Our Ref: APP/12/00206
Direct Line: (023) 9244 6549
Ask For: Mr D Eaves
Email: planning.development@havant.gov.uk
14 September 2012

Dear Mr Murray

The Town and Country Planning Act 1990 (as amended)
Town and Country Planning (Development Management Procedure) (England) Order 2010

Site Address: 3 Ridgway, Havant, PO9 1JS

Proposed Development: Extension to existing warehouse and associated parking.

I refer to your letter of the 13th August 2012 in relation to the above property and in particular Condition No. 7 imposed on planning permission reference APP/12/00206 which states:

The development hereby permitted shall not be commenced until a BREEAM Pre-Assessment has been submitted to and approved in writing by the Local Planning Authority. The assessment shall demonstrate that the development will attain a minimum standard of 'very good' BREEAM rating. The development shall be carried out only in accordance with the details the subject of the assessment.

Reason: To ensure that the development is carried out in accordance with Policy CS14 of the Havant Borough Local Plan (Core Strategy) 2011 which form part of the Local Development Framework and National Planning Policy Framework, March 2012.

It is noted from your comments that it is not considered to be possible to achieve the requirements of this condition. In the light of your comments, the appropriate way forward would be to submit an application to remove the condition. This application should include your detailed reasons explaining the difficulties in achieving the conditions BREEAM 'very good' rating. It should also provide details of what measures will be employed to ensure that the building and its operation will be as sustainable as possible.

I attach below a link to the Council's website which provides the relevant forms and guidance notes in relation to the removal or variation of a condition, the relevant part is No.12.

<http://www.havant.gov.uk/havant-9204#appforms>

I trust that the above sets out the appropriate way forward in relation to this matter.

Yours sincerely

Mr Chris Murray
Service Manager (Planning Development)

Appendix D – Report Qualifications

1. This document has been prepared for the titled project (or named part thereof) and should not be relied upon or used for any other project without an independent check being carried out as to its suitability and prior written authorization being obtained from CBRE. CBRE accepts no responsibility or liability for the consequences of the use of this document, wholly or in part, for any other purpose than that for which it was commissioned. Any persons using or relying upon this document for such other purpose do so at their own risk.
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3. The findings and opinions provided in this document are given in good faith and are subject to the limitations imposed by employing site assessment methods and techniques, appropriate to the time of investigation and within the limitations and constraints defined within this document. The findings and opinions are relevant to the dates when the assessment was undertaken, but should not necessarily be relied upon to represent conditions at a substantially later date.
4. The findings and opinions conveyed, via this report, are based on information obtained from a variety of sources as detailed in this report. The information reviewed should not be considered as exhaustive and has been accepted in good faith as providing true and representative data pertaining to the site conditions. Therefore, CBRE cannot and does not guarantee the authenticity or reliability of the third party information it has relied upon. CBRE reserve the right to alter the conclusions and recommendations presented in this report in the light of further information that may become available.
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6. The limitations of liability of CBRE for the contents of this document have been agreed with the Client, as set out in the terms and conditions of offer and related contract documentation.
7. Where no/limited site inspections are undertaken (for example due to limited site access) CBRE cannot comment on the potential for environmental concerns associated with the current use or structure including the presence of Asbestos and Invasive Species. It should also be noted that any risks identified in this report are perceived risks based on the information reviewed; actual risks can only be assessed following a physical investigation of the site.