
MEMORANDUM

From:	Úna Haran, Lead Sustainability Planning Officer		
Service	WBC Sustainability	App No:	251260
Address:	Heathlands Farm, Honey Hill, Wokingham, RG40 3BG.		
Proposal:	Full application for erection of extension to existing pack house following demolition of existing structures.		
Type of Development:	Major Heavy industry/storage/warehouse		
Site Visit Made:	No		

Summary Of Recommendations

- ☐ No comment
- ☐ No objection
- ☒ No objection subject to conditions (and reasons) **stated below**
- ☐ Request further information before determination as **stated below**
- ☐ Objection due to the reason(s) **stated below**

Comments On Proposal

1. Response to evidence submitted.

1.1. Since application 251260 deals with development of a net gain of 2712m² of non-residential floor area, a detailed Sustainability Statement is required to demonstrate how the scheme will comply with WBC planning policy on sustainability and energy.

1.1.1. This requirement is set out in the WBC Sustainable Design and Construction Supplementary Planning Document (SPD).¹

1.1.2. The South East Plan was withdrawn in 2013² and its policies covering Sustainability and Energy superseded by those contained in the WBC Managing Development Delivery (MDD) Local Plan which was adopted in 2014. Consequently, applications must now show how they will comply with WBC's policies on sustainable design and construction. This means that in addition to outlining how the scheme will comply with the sustainability requirements of Policy CP1 of the WBC Core

¹ Wokingham Borough Council. 'Sustainable Design and Construction Supplementary Planning Document'. 2010. P.11

² Excluding saved policies not affecting sustainability planning issues.

Strategy 2010, the Design and Access or Sustainability & Energy Statement must show how the scheme will comply with:

1.1.2.1. MDD CC04 part 2, (a) (as clarified by the WBC Climate Change Interim Policy Position Statement, 2022 (CCIPPS)). This policy requires non-residential schemes over 100m² G.I.A. to achieve BREEAM “Excellent” certification.

1.1.2.2. MDD CC04 part 3 – requires incorporation of suitable waste management facilities on-site, including recycling.

1.1.2.3. MDD CC05 part 2 (b) (as clarified by the CCIPPS) - requires demonstration through modelled Building Emission Rate of a minimum 10% carbon reduction relative to Target Emission Rate/s (TER/s) arising from the version of the Building Regulations extant at time of full planning or reserved matters application.

1.2. The following comments are based on the information provided in the Planning, Design and Access Statement prepared by consultants de Courcy alongside the Sustainability & Energy Statement authored by Bluesky and other application materials.

1.3. This note specifically examines the application’s approach to LDF policies on sustainable development, energy including any provision of renewables on site, and water use.

2. Response to WBC Core Strategy Policy CP1

2.1. *“12) Contribute towards the goal of reaching zero-carbon developments as soon as possible by:”*

2.1.1. *“a) Including appropriate on-site renewable energy features; and”*

2.1.2. *“b) Minimising energy and water consumption by measures including the use of appropriate layout and orientation, building form, design and construction, and design to take account of microclimate so as to minimise carbon dioxide emissions through giving careful consideration to how all aspects of development form.”*

2.2. Renewable energy and low carbon technology. The Planning, Design and Access Statement states that the development will be sustainable due to its contribution to domestic food production reducing import emissions, and that a solar array adjacent to the development site will supply the operational energy required by the new development.³

2.2.1. The Sustainability & Energy statement refers to the TER for the extension as 4,413 kg CO₂ per year.⁴

³ De Courcy, Planning, Design and Access Statement, Heathlands Farm, 2025. P.12

⁴ Bluesky Unlimited, Sustainability & Energy Statement, Heathlands Farm, Honey Hill, Wokingham, 2025. P.3

- 2.2.2. It is noted that no new solar panels will be installed onto the roof due to maximum connection capacity for the site having been reached due to the recent development of a standalone solar array on the site. It is proposed that 83kW of the 724kW capacity of the array is allocated to buildings at Heathlands Farm.
- 2.2.3. Due to the allocated generation capacity exceeding the modelled regulated operational energy demand of the extension, the extension is predicted to achieve a reduction relative to the TER of 121%.
- 2.2.4. Energy storage is not proposed for the scheme.
- 2.2.5. It is not clear whether the pack house will consist of only unheated floor area. As such it is not clear whether Approved Document L of the Building Regulations will apply to the new structure.
- 2.2.6. If the development is exempt from AD L due to low energy demand from fixed heating and lighting systems, it will also be exempt from the requirements of MDD CC04 to achieve BREEAM Certification (however, a Planning Condition requiring a specification achieving BREEAM WAT-01 Level 3 for water efficiency may be applied in some circumstances).
- 2.2.7. Further information is required to determine whether the proposed development will be fitted with any W.C. / kitchen facilities which may require water efficient fixtures.
- 2.2.8. Plans indicate that the development will include board rooms, cloak rooms, offices, lobbies, a kitchen and WCs which are likely to be treated floor area, subject to the requirements of AD L.
- 2.3. The development includes demolition of an existing structure. No information is provided to illustrate the need for demolition, or the degree to which any structures or materials will be reclaimed or retained from the existing building.
- 2.4. Passive design measures
 - 2.4.1. Glazing
 - 2.4.1.1. Due to the nature of the development, minimal glazing is proposed.
 - 2.4.1.2. No CIBSE TM52 analysis is provided therefore the design will be appraised for potential overheating risk through Part O of the Building Regulations only. These regulations provide limits on the amount of hours during which a space is permitted to exceed maximum temperatures for indoor thermal comfort. The comments on potential risks and mitigating factors for overheating provided in this note do not seek to anticipate the outcome of Part O analysis but rather to identify the degree to which passive design measures have been implemented as part of the overall approach to operational energy demand reduction.
 - 2.4.1.3. No calculated glazing ratios are provided.
 - 2.4.2. The Sustainability & Energy Statement sets out a ventilation strategy based on natural ventilation complemented by mechanical extract ventilation in WCs and at Tea Points. This is an acceptable strategy consistent with the design of the building.
 - 2.4.3. Details of fabric performance targets are provided in the Sustainability & Energy Statement. The following table is provided as a guide to best

practice values for fabric performance. It shows that the proposed specification makes positive improvements on the minimum allowable performance values.

Building element	Unit	Part L2 2021 limiting value	Proposed value	Best practice value
External wall	W/m2.K	0.26	0.18	0.12
Roof (pitched)	W/m2.K	0.16	0.15	0.10
Floor	W/m2.K	0.18	0.12	0.10
Vertical windows	W/m2.K	1.60	1.20	0.80
Doors	W/m2.K	1.60	1.20	0.80
Air permeability	m3/h.m3 @ 50 Pa	8.0	5.0	<1.0
G value of glass	absolute	none	n/a	0.4 – 0.3

3. Response to WBC MDD Local Plan Policy CC04 and CC05

3.1. The commitment to achieve 121% carbon reduction relative to the TERs is more than sufficient to comply with MDD Policy CC05 and represents a significant benefit to the scheme.

3.2. The Sustainability and Energy Statement notes that water fitting specification is yet to be carried out but will include efficient fittings. No proposed flow rates for water appliances are included in the application materials at this stage. The below table is provided for information on best practice.

Fitting type	Non low-flow consumption	Best practice consumption
WC	5 - 9 L	< 4 L
Shower	13 L / minute	6 L / minute
Handwash basin taps	8 L / minute	2 L / minute
Sink taps	10 L / minute	4 L / minute
Dishwasher	1.25 L / place setting	< 0.7 L / place setting
Washing machine	14 L / kg	6 L / kg

3.2.1. Application of the standard condition ensuring water efficiency measures are specified at detailed design stage in accordance with the requirements of MDD CC04 is recommended.

3.3. Electric vehicle charging is not covered in the Planning, Design and Access Statement.

3.4. The Planning Design and Access Statement notes that *“Waste from the operations on the site would continue to be handled in the same way as currently. Any recyclable cardboard and plastics would be mimized for collection by a commercial waste operator. Other waste is collected in skips which are collected by the waste operator. Waste blueberries are also collected and transported to an anaerobic digester”*⁵. This approach is suitable.

4. Conclusion

- 4.1. In summary, the benefit of the solar array adjacent to the extension is significant and allows the development to operate at net zero regulated emissions. This is very positively viewed.
- 4.2. There is no information in relation to a target level of BREEAM certification as required by MDD CC04 Part 2 (as clarified by the Climate Change Interim Policy Position Statement).
- 4.3. Further information is required in relation to water efficiency measures, however this can be secured through planning condition (see below).

Conditions & Reasons (if required)

Non-domestic water consumption

Prior to the commencement of development, a specification achieving BREEAM WAT-01 Level 3 for water efficiency shall be submitted to and approved in writing by the local planning authority. The approved scheme shall be implemented before the development is first occupied and shall remain operational for the lifetime of the development.

Reason: To ensure developments contribute to sustainable development. Relevant policy: NPPF Section 14 (Meeting the Challenge of Climate Change, Flooding and Coastal Change), WBC Climate Emergency Action Plan, Core Strategy policy CP1, Managing Development Delivery Local Plan policy CC04 & the Sustainable Design and Construction Supplementary Planning Document.

Date:

19.09.2025

Signed:



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Officer

⁵ De Courcey, Planning, Design and Access Statement, Heathlands Farm, 2025. P.12