
MEMORANDUM

From:	Úna Haran, Lead Sustainability Planning Officer		
Service	WBC Sustainability	App No:	251086
Address:	Land At Stanbury House, Basingstoke Road, Spencers Wood, RG7 1AJ.		
Proposal:	Outline application for the proposed development of up to 63 dwellings with 50% delivered as affordable homes. (All matters reserved except for means of access.)		
Type of Development:	Major Dwellings (10+)		
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 outline application 251086 deals with development of up to 63 new homes, information 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 It should be noted however that It should be noted that the SPD dates from 2010 and makes reference to the South East Plan: *"Design and Access Statement to set out framework to show how the proposal will achieve the requirements of Policy NRM11 of the South East Plan. Best estimates of energy use at outline application stage will be acceptable."*
- 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 The South East Plan was withdrawn in 2013² and its policies covering Sustainability and Energy superseded by those contained in the WBC Managing Development Delivery (MDD) Local Plan which was adopted in 2014.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 at outline stage for a major residential scheme, in addition to outlining how the scheme will comply with the sustainability requirements of Policy CP1 of the WBC Core 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 1, (a) (as clarified by the WBC Climate Change Interim Policy Position Statement, 2022 (CCIPPS)). This policy encourages schemes to aim for the expected carbon reduction levels of the full future homes standard prior to the standard taking effect (expected in 2025).
 - 1.1.2.2. MDD CC04 part 1 (b) (as clarified by the CCIPPS) - requires water consumption of 110L per person per day including a 5L external water allowance.
 - 1.1.2.3. MDD CC05 part 2 (as clarified by the CCIPPS) - requires 10% carbon reduction relative to Target Emission Rates (TERs) 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 Sustainability Statement prepared by consultants Phillips Planning Services alongside 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 Sustainability & Energy Statement states that *“the detailed design of the proposed dwellings is not in such an advanced stage that it is possible to be definitive as to the final proposals it is possible to consider how sustainable objectives can be embedded into the scheme including delivery of 10% of energy needs from renewable sources.”*³

2.2.1. No target is provided for the quantum of carbon reduction the development will achieve.

2.2.2. In reference to the viability of photovoltaic panels (PVPs) the Sustainability Statement notes that *“Although the system can be costly it is considered worthy of further investigation at the Stanbury House site.”*⁴

2.2.3. No details are provided about a targeted capacity for the photovoltaic array, and there is no information regarding the array design or specification in terms of number of panels, panel type and placement.

2.2.4. No reference is made to any energy proposed storage capacity.

2.2.5. The potential for ground and air source heat pumps (GSHP and ASHP respectively) to be incorporated is noted as worthy of further consideration.⁵

2.2.6. The Sustainability Statement states that *“High efficiency combination gas boilers will be utilised in all of the houses reducing significantly the energy usage compared to average boiler specifications”*.⁶ Since no baseline or improved energy demand for space heating is provided, this statement cannot confer any significant weight.

2.2.7. Sample DER worksheets showing the likely regulated energy demand and related emissions baselines for the homes are not provided.

2.2.8. It is not possible to assess the suitability or feasibility of any proposed measures to introduce low and zero carbon technologies for the purpose to the scheme in the absence of defined targets and basic details of the scheme to be implemented. Statements that the scheme will comply with WBC policy requirements for renewable energy and carbon reduction cannot be evaluated without information about how compliance will be achieved and any targets that have been applied.

2.3. Passive design measures

2.3.1. Glazing

2.3.1.1.1. 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.

2.3.1.1.2. No calculated glazing ratios are provided, however the

¹ Wokingham Borough Council 'Sustainable Design and Construction Supplementary Planning Document'. 2019, p.11

² Excluding saved policies not affecting sustainability planning issues.

in mind.⁷ As overheating is one of the key climate hazards facing the South East of England, it is important that solar gains are balanced rather than being maximised.

2.3.1.1.3. The indicative masterplan shows a primary axis oriented northeast to southwest, with the secondary axis roughly perpendicular to this. East and West oriented glazing can cause issues with morning or evening overheating from low-angle light, depending on room size. This should be carefully balanced, by using horizontal glazing at appropriate rations in combination with natural ventilation.

2.3.1.2. No details of proposed G-values for glazing are provided however the Sustainability Statement notes that “*Excessive areas of glazing will therefore be avoided.*”⁸

2.3.1.3. At Outline stage, an illustrative masterplan is provided. Plans, elevations and sun path diagrammes created at detailed design stage should consider the above to ensure internal comfort and passive reduction of energy demand.

2.3.2. Passive ventilation is not covered in the Sustainability statement, and without floorplans, opportunities for natural ventilation cannot be assessed.

2.3.3. It is not known whether MVHR is proposed.

2.3.4. At detailed design stage, opportunities for passive ventilation should be prioritised. Double aspect homes with double aspect internal spaces provide opportunities for effective cross-ventilation. The risk of overheating is a key climate hazard in Wokingham and must be addressed through design measures to ensure that new buildings are adapted to cope with current and future conditions including more frequent heatwaves.

2.3.5. Adequate ventilation is particularly important since the Sustainability Statement notes that drying areas are to be provided in all homes to limit the use of tumble dryers.⁹

2.3.6. Passive cooling from landscape measures appears to be a potential benefit of the masterplan and illustrative planting as shown. Dwellings are arranged in short streets with soft landscaping and gardens surrounding. Properties are spaced with hardstanding parking areas between. The relatively low density of the scheme, along with the proportion of green space surrounding and between the homes will contribute to reducing the risk of summer overheating.

2.3.7. Heat loss form factor (HLFF). From examination of the masterplan only, most of the proposed buildings appear relatively simple in form

³ Phillips Planning Services, Sustainability Statement, Stanbury House, 2025. P.1

⁴ Ibid. P.4

⁵ Ibid. P.4

⁶ Ibid. P.3

⁷ Phillips Planning Services, Sustainability Statement, Stanbury House, 2025. P.6

⁸ Ibid. P.1

⁹ Ibid. P.3

however some more complex roof forms are shown. Simple building forms are beneficial to the building performance and help to mitigate the risk of an energy performance gap caused by heat loss through cold bridges in a complex architectural form. At detailed design stage, unnecessary junctions (particularly in roofs) should be avoided to ensure a thermally efficient building envelope.

2.3.8. The Energy & Sustainability Statement notes that “*all properties will be constructed using enhanced sound and heat insulation techniques.*”¹⁰

2.3.9. No details are provided of fabric performance targets, meaning that improvements to building fabric performance relative to the legally allowable minimum performance standards in the Building Regulations cannot be assessed and weight cannot be given to the statement that performance will exceed Part L limits.

2.3.10. The following table is provided as a guide to best practice values for fabric performance.

Building element	Unit	Part L 2021 limiting value	Best practice value
External wall	W/m2.K	0.26	0.12
Roof	W/m2.K	0.16	0.10
Floor	W/m2.K	0.18	0.10
Vertical windows	W/m2.K	1.60	0.80
Air permeability	m3/h.m3 @ 50 Pa	8.0	<1y.0

2.4. Active building systems.

2.4.1. The proposal to install gas combination boilers means that the homes will not be “net zero ready” and will require retrofit at the end of the life of the combination boilers. Space heating provision using heat pumps or wastewater heat recovery are recommended alternatives to this approach.

2.4.2. MVHR is not mentioned in the Sustainability Statement but it is recommended that it should be included alongside enhanced airtightness detailing to provide homes with low energy demand which are also healthy and well ventilated.

2.4.3. Without further details of the low and zero carbon strategy such as capacity of any proposed solar array, fabric performance goals, energy efficiency of proposed lighting and modelled indications of the levels of emissions reduction expected, the statements confer limited benefit to the assessed sustainability of the proposed scheme.

2.5. Whole life impacts. The Design and Access Statement notes that “*wherever practical building materials will be obtained from sustainable sources.*”¹¹

2.5.1. This statement lacks any detail or defined, verifiable goals. For example, a commitment to undertake Whole Life Carbon Assessment and/or prioritise sourcing materials with Environmental Product Declarations (EPDs), and/or to commit to select insulants with a Global

¹⁰ Ibid. P.4

¹¹ Phillips Planning Services, Sustainability Statement, Stanbury House, 2025. P.3

Warming Potential < 5 or to procure timber with a defined certification standard.

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

3.1. No commitment to achieve a defined level of carbon reduction against the TERs for the new homes is made in the application materials reviewed. As such there is insufficient evidence to determine whether a credible strategy to comply with Part 1 of Policy CC04 (as clarified per the WBC Climate Change Interim Policy Position Statement) and CC05 exists.

3.1.1. Details of the level of carbon reduction targeted are required as part of the Energy & Sustainability Statement.

3.1.2. Application of the standard condition ensuring that the provision for onsite renewable energy is delivered at a policy compliant level is recommended.

3.2. The Design and Access Statement states that *“Water flow restrictors will be fitted to taps and shower heads to reduce flow and pressure*

- *Low flush WC’s will be fitted to reduce the level of water consumption during flushing*

- *Rainwater harvesting will be employed at the site where possible to ensure that run off from hard surfaces is trapped and re-used.*

- *Water butts will be provided at each property for use in gardens.*

Such measures will ensure that a target of 105 litres use per person per day is met..”¹²

3.2.1. No proposed flow rates for water appliances are included in the statement. 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

3.2.2. The inclusion of defined targets for water efficiency and flow rates of fixtures would have lent weight to the statements made.

3.2.3. A commitment to rainwater harvesting is noted as beneficial to the sustainability of the development.

3.2.4. Application of the standard condition ensuring water efficiency measures are specified at detailed design stage in accordance with the details supplied in the Energy & Sustainability Statement is

¹² Ibid. Pp.6-7

recommended.

- 3.3. The Energy & Sustainability Statement confirms that *“All residents will be provided with a Home User Guide. This will include information regarding the features of the home including the energy efficient white goods, sustainable elements such as the low water use WC’s, showers, water butts etc. and advice on how new sustainable goods can be purchased.”*¹³ The provision of dweller information is noted as beneficial to the sustainability of the development.

4. Conclusion

- 4.1. In summary, the application materials lack detail and defined targets showing how planning policies relating to sustainability will be complied with. While it is acknowledged that at outline stage, aspects of the design have yet to be fixed, it is appropriate for indicative targets on key performance areas such as carbon reduction to be set. It is also expected that an indication of the proposed LZC technology strategy is provided to allow for the assessment of the suitability of the approach. Indications of these key areas should be provided with outline applications to ensure that subsequent detailed design work is on track and allow for comment and feedback.
- 4.2. As a minimum, an indication of the targeted level of carbon reduction relative to baseline emissions should be provided in support of the outline application, along with details of how this is expected to be achieved.
- 4.3. No objection is raised to approval of this application subject to the provision of the evidence as stated and application of the below conditions.

Conditions & Reasons (if required)

Domestic water consumption

Prior to the commencement of development, a scheme achieving a maximum domestic water consumption of 110L per capita per day (including 5L allowance for external water) 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.

Low and zero-carbon technology

Prior to the commencement of development, a scheme for achieving a 10% reduction in the predicted carbon emissions arising from operation of the

¹³ Ibid. P. 8

development through the use of decentralised renewable and/or low carbon sources (as defined in the glossary of Planning Policy Statement: Planning and Climate Change (December 2007) or any subsequent version) shall be submitted to and approved in writing by the local planning authority. The minimum 10% reduction shall be achieved in addition to the levels of reduction in carbon emissions required through the Building Regulations in force at the time of the submission of planning application. 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 in accordance with NPPF Section 14 (Meeting the Challenge of Climate Change, Flooding and Coastal Change), WBC Climate Emergency Action Plan, Core Strategy policy CP1, MDDL policy CC05 & the Sustainable Design and Construction Supplementary Planning Document.

Date:	21.05.2025	Signed:	
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Officer