

Environmental and Social Guidance for Sustainable Construction within European Regional Development Fund Investments.

Purpose:

The purpose of this paper is to detail the approach, adopted by the South West RDA and endorsed by the Cross Programme Environment and Equality Advisory Groups¹, for delivering enhanced levels of sustainable (social and environmental) construction within south west England's Convergence and Competitiveness & Employment Programmes.

While the BREEAM² 'Excellent' standard is a key output of Programme delivery this paper aims to detail an approach whereby the South West RDA will determine reasonableness and value for money against BREEAM accreditation and the core objective of delivering enhanced environmental outcomes.

The paper also details the processes for demonstrating and evidencing BREEAM accreditation to the South West RDA as secretariat for the regions European Programmes.

Environmental Sustainability

Background:

Both Programmes require, as a minimum standard, between 80 – 90% (dependant upon Programme Priority) of all capital build investments to be built to BREEAM 'Excellent' or equivalent standards. The purpose of such a requirement is to develop a standardised and accredited 'level playing field,' whereby European Regional Development Fund (ERDF) funded investments can demonstrate delivery of improved levels of sustainability to a comparable standard.

It should be noted that BREEAM accreditation is a 'means to an end.' BREEAM is seen a tool to delivering high standards of environmental sustainability in an equitable way. The output is seen as stretching yet also a minimum standard that should be 'built-upon' where possible and reasonable. The Programmes require all investments to give a high regard to environmental sustainability in project commissioning, delivery and operation, with due consideration to on-going monitoring, evaluation and improvements.

Additionally investments should consider environmental enhancements and interventions that fall-outside of the BREEAM process that can help stimulate

¹ The Environmental Advisory Group is chaired by the Environment Agency and has membership from key environmental partners and stakeholder across the region, with a remit to advise and support the delivery of the Programmes strategic environmental objectives. The Equality Advisory Group supports the delivery of the Programmes' strategic equality objectives and is chaired by Equality South West. It has membership from voluntary and community sector organisations, alongside various statutory bodies and stakeholders.

² BREEAM – Building Research Establishment Environmental Accreditation Method

new innovations in sustainable construction, technology, EGS³ sector development, project delivery and on-going building operation (i.e. green leasing). South West RDA positively encourages Programme applicants to explore opportunities around the delivery of Exemplary⁴ and Innovation⁵ Credits within the BREEAM process and is keen to help applicants explore opportunities in more depth.

Consideration should also be given to potential changing standards and legislation throughout the Programmes' life and developments within the BREEAM accreditation process.

Why deliver high standards of sustainable construction?

- Set new best practice and demonstrate new technologies, construction methods and designs
- Improve efficiency of building stock. Help build economic resilience for the longer-term
- Develop and build upon the 'carbon literacy' and environmental awareness skills and training within the construction and development sectors
- Reduce reliance on fossil fuels and finite resource
- Stimulate demand for new technologies and EGS service providers – developing the sector
- Help the construction sector deliver against changes in building regulations and legislation
- Stimulate a change in tenant aspiration as to what they want and require from a new building or premise

Delivery Principles:

Programme Targets:

1. For the purpose of Programme Outputs BREEAM⁶ 'Excellent' ratings shall apply to all permanently occupied new builds (defined as Projects within the Operational Programme)
2. There is no financial threshold whereby the requirement applies
3. Refurbishments, whilst encouraged to meet the 'excellent' rating, are required to deliver a high-quality 'very good' rating (60 – 69%)
4. Refurbishments are defined as an intervention that materially impacts on the structural fabric of a building, being more intrusive than cosmetic

³ EGS – Environmental Goods and Services Sector businesses including Low Carbon Businesses

⁴ Exemplary Credits are available in certain BREEAM modules for delivery beyond minimum standards

⁵ Innovation Credits are available under BREEAM Scheme for construction methods and the use of technologies and/or designs that haven't been used elsewhere. BRE approves such innovation credits.

⁶ Other accreditation standards can be applied, however, they must demonstrate comparative alignment with BREEAM 'Excellent' ratings

alterations. Cosmetic alterations should still demonstrate environmental sustainability added-value.

5. Non-building infrastructure developments (i.e. public realm, transport etc) are positively encouraged to deliver against an appropriate accreditation scheme i.e. CEEQUAL⁷ at a demonstrable standard equivalent to BREEAM 'Excellent.' This is an advisory requirement. As a minimum requirement all schemes should detail all environmental risks/opportunities and supporting/mitigating interventions using the Environmental Reporting Form⁸
6. Targets apply to all relevant capital building projects whether directly funded through an ERDF investment and/or indirectly funded through an ERDF funded programme i.e. Grants for Business Investment Programme

Delivery Requirements:

1. Any development or investments seeking to attract ERDF funding is encouraged to engage with sustainable construction practices and BREEAM accreditation standards as early as possible in the build and design process, (RIBA⁹ Stage A)
2. Projects must be registered with the most current version of the accreditation scheme (BREEAM 2008), and complete a design-stage and post-construction assessment
3. In relation to (2) copies of both assessments and certificates must be submitted to South West RDA as part of ERDF monitoring procedures
4. A BRE approved 'design stage' certificate must be submitted to the South West RDA prior to issue of any ERDF Contract or Offer Letter
5. Assessments must be undertaken by a BREEAM accredited assessor and organisation
6. Projects must be registered under the most appropriate BREEAM Scheme i.e. Offices, Industrial, Healthcare etc. Site based assessment and accreditation will be acceptable where appropriate BREEAM registration has taken place. This is especially important where certain interventions maybe shared across multiple buildings i.e. renewable energy installations
7. If a project has been registered with a non-concurrent BREEAM Scheme evidence of earlier registration must be submitted to South West RDA
8. All projects should submit a brief, non-technical summary report detailing the project key sustainability features and interventions and the environmental outcomes and benefits they deliver
9. Projects should inform South West RDA as early as possible in any planning process whereby any possible Development Control Planning Obligation and/or planning condition imposed by any other Statutory Body may impede the delivery of any one or more BREEAM credit
10. Projects should detail how they have incorporate any relevant social sustainability outcomes into building design through utilising and

⁷ CEEQUAL = Civil Engineering Environmental Quality Assessment and Award Scheme

⁸ We blink

⁹ Royal Institute of British Architects

applying South West RDA's Social Sustainability Toolkit, through the design and construction stages of any development.

Assessment of Reasonableness:

The South West RDA and Programme Endorsement Advisory Group(s) will not normally accept a new-build project that doesn't meet BREEAM 'Excellent' or equivalent standards. However, both the Programme and South West RDA acknowledge that there maybe some circumstances whereby it may not be possible to achieve the required standards of accreditation. In such cases the process below will be used to determine reasonableness; endeavouring to determine a qualitative value for money assessment against the delivery of environmental outcomes.

1. The applicant should submit a detailed breakdown of BREEAM credit areas (at the design stage) detailing all credits under the relevant scheme, and
 - a. the number of credits available
 - b. the number of credits forecasted to be scored
 - c. credits deemed unachievable – with clear justification statement
 - d. credits deemed unviable i.e. where the maximum number of credits cannot be scored for any particular criteria – with clear justification statement
 - e. Overall BREEAM score
2. Additionally the applicant should submit a costed breakdown as to what additional / ameliorating work (inc. possible re-design/ revised planning submission, additional capital works etc) would be required, in the most cost effective package of credits (please justify), to achieve a BREEAM score of 70+% and what this will deliver in terms of environmental outcomes

The above information will help South West RDA (with guidance from the Programmes Environmental Advisory Group) to assess the anticipated additional cost of moving from a BREEAM 'Very Good,' to an 'Excellent' rating when compared to the environmental outcomes delivered. An appropriate recommendation will then be put to the Endorsement Advisory Group as to the reasonableness of enforcing a BREEAM 'Excellent' rating.

Irrespective of a developments ability achieve BREEAM 'Excellent' or not, the project will still be required to demonstrate high levels of environmental sustainability into building design and score as 'high' as reasonably possible within the BREEAM 'Very Good' rating (i.e. 60+%).

Consideration will also be given to environmental sustainability interventions and measures that fall-outside of the BREEAM accreditation process, in addition to any commitment to exemplary and innovative performance in any particular area.

Further Information:

For further information in the first instance please contact Environmental Sustainability Manager Alex Huke: 07725826422 or alex.huke@southwestrda.org.uk

Making buildings accessible and available to all

Please note: the links to all documents and templates referred to in this section are available at <http://www.convergencecornwall.com/what-is-convergence/advice-and-guidance.php>

Equality and diversity is a core theme for the Programme. This means that all investments, whether they have a direct and obvious focus on equality or not, must effectively embed equality. Appropriate consideration must be given to equality throughout the investment process, from initial ideas through to implementation and delivery. It is very important for the Programme that capital developments are fully accessible, incorporating best practice standards of inclusive design, irrespective of what that capital build will deliver from it (e.g. business support, industrial workspace etc.). Proposed workspace investments are therefore required to demonstrate that they have embedded equality throughout their business plan proposal (whether this is for bespoke or speculative workspace) taking into consideration the physical design and the services that will be delivered from the building. Stating that the organisation has an equality policy in place and that its services will be available to all is simply no longer adequate.

A Social Sustainability Toolkit has been developed in order to provide best practice inclusive design guidance for capital investments throughout the planning process, to ensure that designs are fully inclusive. This toolkit incorporates:

1. a practical inclusive design checklist relating to the different stages of commissioning, evaluation, design and construction
2. advice on completion of access statements required by the statutory planning process to demonstrate how equality has been considered and implemented within building design

The use of this toolkit is recommended to ensure that proposed investments have fully considered and can evidence their commitment to equality specifically within their proposal.

Importance of embedding equality into workspace investments

- results in a building that meets legal requirements, is fully accessible and of high quality which can appeal to a wider market
- cost versus benefit – more effective use of resources and less wastage from temporary measures or “retro-fitting”

- all tenants / customers / staff who use the building have should have their particular needs catered for
- positive organisational reputation which leads to increased customer numbers from new audiences and increased repeat customers – organisation is recognised for its commitment to delivering quality service and respecting the needs of tenants / customers and staff
- greater diversity of people employed – attracts range of people with new and fresh ideas who can bring innovation to the organisation
- improved tenants / customers / staff satisfaction – better quality of experience, loyalty of staff and improved service delivery for all

Access audits

The Disability Discrimination Act (DDA) has serious and expensive penalties for non-compliance. Therefore it is advisable to ensure that an access audit on any capital build is carried out to avoid expensive corrective costs which may be required later. Projects are encouraged to ensure that they have fully embedded inclusive design into initial plans and also, after the construction period when all inclusive design principles have been embedded, to carry out an access audit to verify that the building functions as it should in terms of access. Such costs are eligible for ERDF funding so to ensure that you will receive funding to contribute to this, it is important to build these costs into the business plan.

Installation of lifts

- Typical speculative workspace comprises mixed use office space and industrial space whereby the industrial space is ground floor only (height of the building) and the office space is also initially ground floor only. However, in most such developments a load bearing floor has been put in for future flexibility to use the first floor for office space if required. As this floor is not initially fitted out in any way and may never be used, while we would consider it best practice to do so, the developer will not be required to install a lift. If upper floors are developed in the future, Building Control will require an Access Statement which explains how the development is intended to be used and therefore a decision will have to be reached about whether a lift is required (i.e. further justification around accessibility will be required)
- Bespoke developments, however, will be required to install lifts where it is intended to use the first floor and developers will be required to build lifts into their plans and costs at business plan stage.

Hearing or induction loops

The ERDF programme has a specific requirement around hearing or induction loops:

- **Speculative** workspace projects delivering a number of different units will be required to provide one portable hearing loop as a minimum for every 3 units built. Speculative workspace units are often flexible and

may be combined or altered once tenants are in place, allowing merger or further division of units. “Built-in” loops could be rendered useless through flexible use of premises therefore portable loops are a practical alternative.

- **Bespoke** workspace projects, i.e. designed for an identified occupier, will be expected to install permanent or “built-in” loops within communal areas such as reception and meeting rooms.

Tenant Information Packs

Projects will be expected to provide tenant information packs which should contain sample policies (equality policy, flexible working, family-friendly policies etc), signposting to childcare facilities in the area, signposting to further equality guidance and the business case for equality.

Information that must be submitted when applying for ERDF funding

When applying for ERDF funding certain documents must be submitted with the business plan for appraisal. If these are not submitted satisfactorily and prior to appraisal, it is likely that a decision on the investment may be deferred until this has been completed. Therefore:

- ✓ A screening stage equality impact assessment (for a workspace project this assessment must relate only to the non-design issues of the investment e.g. employment, procurement, marketing to under-represented groups, consultation, monitoring) must be submitted as an annex to the business plan
- ✓ The completed Social Sustainability Toolkit must also be provided as evidence - we would expect proposals to complete and submit as much of the Toolkit as possible given the stage they are at when the business plan is submitted for appraisal
- ✓ The equality indicators that the project will report on must be selected and stated

Further information, advice and guidance

At <http://www.convergencecornwall.com/what-is-convergence/advice-and-guidance.php> you will find:

- ✓ Equality project guidelines
- ✓ Social Sustainability Toolkit
- ✓ Screening Stage Equality Impact Assessment form
- ✓ Equality Impact Assessment guidance notes
- ✓ Equality indicators for the programme including selection of those appropriate to your project

For further advice and guidance please contact the Equality Adviser, Lisa Sandercock on 01872 243778 or 07500 330445, lisa.sandercock@southwestrda.org.uk