

**BRIDGE HOUSE  
UXBRIDGE  
UB8 1HS**

**SUSTAINABILITY REPORT**

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## CONTENTS

|             |                                                           |           |
|-------------|-----------------------------------------------------------|-----------|
| <b>1.0</b>  | <b>EXECUTIVE SUMMARY</b>                                  | <b>1</b>  |
| <b>2.0</b>  | <b>INTRODUCTION</b>                                       | <b>1</b>  |
| <b>3.0</b>  | <b>THE PROJECT</b>                                        | <b>1</b>  |
| <b>4.0</b>  | <b>PLANNING CONTEXT</b>                                   | <b>2</b>  |
| <b>5.0</b>  | <b>SITE CONTEXT</b>                                       | <b>2</b>  |
| <b>6.0</b>  | <b>ASSESSMENT METHODOLOGY</b>                             | <b>3</b>  |
| 6.1         | Sustainability & Sustainable Development                  | 3         |
| 6.2         | Analysis Methodology                                      | 3         |
| <b>7.0</b>  | <b>SUSTAINABLE COMMUNITIES</b>                            | <b>4</b>  |
| 7.1         | Hillingdon's Sustainable Community Strategy 2011          | 4         |
| <b>8.0</b>  | <b>PLANNING POLICY CONTEXT</b>                            | <b>5</b>  |
| 8.1         | National Planning Policy Framework                        | 5         |
| 8.2         | London Planning Policy Framework                          | 5         |
| 8.3         | Local Planning Policy Framework                           | 6         |
| <b>9.0</b>  | <b>Other Policy &amp; Regulatory Considerations</b>       | <b>10</b> |
| 9.1         | National Planning Practice Guidance                       | 10        |
| 9.2         | London Planning Practice Guidance                         | 11        |
| 9.3         | Emerging Local Plan                                       | 11        |
| <b>10.0</b> | <b>SUSTAINABILITY DESIGN PROPOSALS &amp; APPRAISAL</b>    | <b>12</b> |
| 10.1        | Health & Welbeing                                         | 12        |
| 10.2        | Energy                                                    | 13        |
| 10.3        | Water Conservation                                        | 13        |
| 10.4        | Materials                                                 | 14        |
| 10.5        | Operational Waste                                         | 14        |
| 10.6        | Pollution                                                 | 14        |
| 10.7        | Design Appraisal                                          | 15        |
| <b>11.0</b> | <b>SUSTAINABLE CONSTRUCTION PROPOSALS &amp; APPRAISAL</b> | <b>15</b> |
| 11.1        | Responsible Construction Practices                        | 15        |
| 11.2        | Materials Optimisation & Waste                            | 15        |
| 11.3        | Pollution Prevention                                      | 16        |
| 11.4        | Water Pollution                                           | 16        |
| 11.5        | Construction Appraisal                                    | 16        |
| <b>12.0</b> | <b>SUMMARY</b>                                            | <b>17</b> |
| <b>13.0</b> | <b>SITE</b>                                               | <b>18</b> |

## **1.0 EXECUTIVE SUMMARY**

This Sustainability Statement presents the sustainability credentials for a proposed scheme at Bridge house, Uxbridge.

Consideration has primarily been given to the planning policy context and other requirements prior to a review of sustainability in the context of the wider community, design and construction.

The proposed scheme includes the redevelopment of the site to residential flats. At a strategic level, the development of residential will assist with addressing the supply side housing shortages and will improve affordability.

A number of sustainable design features are proposed, and construction will be responsibly managed to ensure minimal impact on the environment and local community.

Overall, the proposals for the scheme are in line with the overarching principles of sustainable development as well as the policy requirements of the planning authority.

## **2.0 INTRODUCTION**

Andrew Reid & Partners have been asked to provide a Sustainability Report for the proposed scheme at Bridge House, Uxbridge, UB8 1HS.

This report provides information on the sustainable design measures proposed at the new development.

This report has been prepared in support of a proposal submitted for full planning permission for Bridge House UB8 1HS. This document should be read in conjunction with the associated drawing package and reports accompanying the application.

The proposal seeks to provide additional residential accommodation on the existing roof level of the building. The building was granted prior approval rights on 27-10-17 (reference: 40050/APP/2017/3358 ) and works to convert the building have begun on site.

## **3.0 THE PROJECT**

This project comprises the conversion of the 6<sup>th</sup> floor of an existing office block to create 16 new dwellings. And a new 7<sup>th</sup> storey will be added on top to create another 9 dwellings.

#### 4.0 PLANNING CONTEXT

A number of applications have been granted for alterations to buildings on and surrounding the site:

REF: 40050/APP/2016/852 - Demolition of existing office building (Use Class B1(a) and multi-storey car park and redevelopment of the site to provide a new office (Use Class B1(a) building, associated multi-storey car park and ancillary cafe unit (Use Class A1/A3).

REF: 40050/APP/2017/2438 - Prior Approval Application for the change of use of Bridge House, Riverview House and Waterside House from office accommodation (Class B1) to 237 residential units (15 x Studio and 224 x 1-Bed) together with ancillary car parking, cycle storage and waste and recycling storage.

#### 5.0 SITE CONTEXT

The address of the site is Bridge House, Uxbridge, UB8 1HS.

The site is located 650 meters from the centre of Uxbridge, a major town centre in West London. The bridge adjacent to the site, on Oxford Road, is officially called Wixan's Bridge, and is where the towns name derives from.

Bridge House is surrounded by water on both sides. To the east is the Grand Union Canal which was completed in 1929 and linked London to Birmingham. To the west flows the River Colne, and beyond that farmland associated with New Denham.

There are a number of office and residential buildings situated adjacent to the site. One worth noting is the 1990's Parexel Building, designed and built in a successful Art-Deco style.

On the opposite side of the canal is Willow Bank House, a relatively new development of commercial use.

Denham Lodge is situated North of the site. It is a nine story block of flats in an unusual triangle shape.

## 6.0 ASSESSMENT METHODOLOGY

### 6.1 Sustainability & Sustainable Development

“Sustainability” is a broad concept generally used to describe the ability to perpetuate a particular state of being. It is widely used in the context of development and where there is potential for changing circumstances to cause an impediment to the perpetuation of a phenomenon.

The term is subjective and the understanding of the concept is influenced by perceptions and aspirations. “Sustainability” is therefore variably defined but normally encapsulates a wide range of issues, often characterised by their relationship with the economy, society and the environment (the “three pillars” of sustainability).

These issues are not necessarily mutually exclusive and whilst they are often presented as such, technically, the economy is a function of society; and society concerns the interrelationships and behaviours of one species within the wider environment. Nevertheless, the identification and characterisation of these issues enables a better understanding of the things that matter in decision making, which enable a balance to be struck when priorities compete.

The term “sustainable development” is often used interchangeable with “sustainability” but it is narrower in scope and seeks to promote the perpetuation of human advancement. The “Brundtland Report” (officially titled “Our Common Future” and written by the United Nations World Commission on Environment and Development, Chaired by Gro Harlem Brundtland in 1987), presents perhaps the most widely cited and understood interpretation of this concept:

“Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs”

The definition introduces the concept of “needs” and the generational timeframe for evaluating whether an action is sustainable or otherwise.

Whilst the Brundtland Report has contributed significantly to understanding the core principles of the subject, the definition has been advanced; and in the context of planning and development in England, the term “sustainable development” is defined very broadly within the National Planning Policy Framework (NPPF).

### 6.2 Analysis Methodology

Given the broad definitions associated with the terminology of “sustainability” and “sustainable development”, understanding how these concepts have been interpreted and incorporated into the local planning regime requires a review of the planning policy as well as the documents upon which the policy is based. The report therefore

commences with an overview of the sustainable communities' strategy, planning policy and other considerations.

An appraisal of the sustainability credentials of the scheme then follows. Structure is important when assessing sustainability due to the breadth of issues being considered; and an approach has been created based upon the phases of the development cycle relevant to the planning decision making processes; with consideration given to the "three pillars" (discussed above) and requirements of policy.

Assessment Matrix:

|              | Economic | Social | Environmental |
|--------------|----------|--------|---------------|
| Strategic    | ✓        | ✓      | ✓             |
| Design       | ✓        | ✓      | ✓             |
| Construction | ✓        | ✓      | ✓             |

It is recognised that the scale and nature of the scheme will affect the relative importance of the matrix dimensions and entries. For example, a single residential unit is unlikely to be viewed as having a major societal impact on the basis of its scale relative to its context. However, the societal implications of an urban extension may be much more significant.

The emphasis is therefore case specific and the assessment sections of this report seek to highlight the relevant factors in a suitably balanced manner.

## 7.0 SUSTAINABLE COMMUNITIES

The status quo should not necessarily be interpreted as representative of a sustainable community on the basis that it ignores a need (or desire) to evolve in the context of change and over the course of time.

The aspirations of and for an area are, perhaps, most clearly represented through the democratic process and whilst conflicts of interests can exist between local, national and international priorities, local considerations are considered of greatest pertinence in this instance and in the context of local decision making.

### 7.1 Hillingdon's Sustainable Community Strategy 2011

Hillingdon's Sustainable Community Strategy sets out 10 key priorities for joint working between the major public services in Hillingdon, focussed on the things that matter most to local people.

Sustainable Community Priorities:

- Help people to lead healthier, independent lives;
- Prevent more young people from undertaking risky behaviour;
- Increase housing supply – with appropriate infrastructure;
- Reduce re-offending;
- Increase participation in sport and physical activity;
- Maintain resident satisfaction levels;
- Promote and invest in town centres;
- Increase access to employment, apprenticeships and skills;
- Maintain parks and green spaces;
- Make it easy for residents to recycle.

## **8.0 PLANNING POLICY CONTEXT**

National and local planning policy relevant to sustainable development is considered in detail below:

### **8.1 National Planning Policy Framework**

The Department for Communities and Local Government determines national policies on different aspects of planning and the rules that govern the operation of the system.

The National Planning Policy Framework (NPPF) defines “sustainable development” in the context of the planning system in England as comprising policies 18 to 219, taken as a whole, of the NPPF. A “presumption” is established in favour of sustainable development.

### **8.2 London Planning Policy Framework**

Key London Plan planning policy is detailed below:

#### **The London Plan as Altered (2016)**

The London Plan is the overall strategic plan for London. Chapter five details London’s Response to Climate Change and include a number of policies that set the overarching principles for reducing carbon emissions in the built environment, predominant of which is Policy 5.3 as follows:

#### **Policy 5.3 – Sustainable Design & Construction Strategic**

- A) The highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime.

### **Planning Decisions**

- B) Development proposals should demonstrate that sustainable design standards are integral to the proposals, including its construction and operation, and ensure that they are considered at the beginning of the design process.
- C) Major development proposals should meet the minimum standards outlined in the Mayor's supplementary planning guidance and this should be clearly demonstrated within a design and access statement. The standards include measures to achieve other policies in this Plan and the following sustainable design principles apply:
- a) Minimising carbon dioxide emissions across the site, including the building and services (such as heating and cooling systems);
  - b) Avoiding internal overheating and contributing to the urban heat island effect;
  - c) Efficient use of natural resources (including water), including making the most of natural systems both within and around buildings;
  - d) Minimising pollution (including noise, air and urban run-off);
  - e) Minimising the generation of waste and maximising reuse or recycling;
  - f) Avoiding impacts from natural hazards (including flooding);
  - g) Ensuring developments are comfortable and secure for users, including avoiding the creation of adverse local climatic conditions;
  - h) Securing sustainable procurement of materials, using local supplies where feasible; and
  - i) Promoting and protecting biodiversity and green infrastructure.
- D) Within LDFs boroughs should consider the need to develop more detailed policies and proposals based on the sustainable design principles outlined above and those which are outlined in the Mayor's supplementary planning guidance that are specific to their local circumstances.

## **8.3 Local Planning Policy Framework**

The relevant planning authority is the London Borough of Hillingdon and planning policy for the area is detailed in several statutory documents.

### **Local Plan Part 1 – Strategic Policies (2012)**

The Hillingdon Local Plan: Part 1- Strategic Policies is the key strategic planning document for Hillingdon and will support the delivery of the spatial elements of the Sustainable Community Strategy. It sets out the long-term vision and objectives for the Borough, where, and how this will be achieved.

The following policies are considered most relevant to this report:

**Policy NPPF 1 – National Planning Policy Framework - Presumption in Favour of Sustainable Development**

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work pro-actively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- Encourage new housing developments in sustainable locations;
- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in that Framework indicate that development should be restricted.

**Policy BE1 – Built Environment**

The Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents. All new developments should:

1. Be designed to include “Lifetime Homes” principles so that they can be readily adapted to meet the needs of those with disabilities and the elderly, 10% of these should be wheelchair accessible or easily adaptable to wheelchair accessibility encouraging places of work and leisure, streets, neighbourhoods, parks and open spaces to be designed to meet the needs of the community at all stages of people’s lives;
2. In the case of 10 dwellings or over, achieve a satisfactory assessment rating in terms of the latest Building for Life standards (as amended or replaced from time to time);
3. Improve areas of poorer environmental quality, including within the areas of relative disadvantage of Hayes, Yiewsley and West Drayton. All regeneration

schemes should ensure that they are appropriate to their historic context, make use of heritage assets and reinforce their significance;

4. Incorporate a clear network of routes that are easy to understand, inclusive, safe, secure and connect positively with interchanges, public transport, community facilities and services;
5. Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity and where appropriate introduce public art;
6. Create safe and secure environments that reduce crime and fear of crime, anti-social behaviour and risks from fire and arson having regard to Secure by Design standards and address resilience to terrorism in major development proposals;
7. Not result in the inappropriate development of gardens and green spaces that erode the character and biodiversity of suburban areas and increase the risk of flooding through the loss of permeable areas;
8. Maximise the opportunities for all new homes to contribute to tackling and adapting to climate change and reducing emissions of local air quality pollutants. The Council will require all new development to achieve reductions in carbon dioxide emission in line with the London Plan targets through energy efficient design and effective use of low and zero carbon technologies. Where the required reduction from on-site renewable energy is not feasible within major developments, contributions off-site will be sought. The Council will seek to merge a suite of sustainable design goals, such as the use of SUDS, water efficiency, lifetime homes, and energy efficiency into a requirement measured against the Code for Sustainable Homes and BREEAM. These will be set out within the Hillingdon Local Plan: Part 2- Development Management Policies Local Development Document (LDD). All developments should be designed to make the most efficient use of natural resources whilst safeguarding historic assets, their settings and local amenity and include sustainable design and construction techniques to increase the re-use and recycling of construction, demolition and excavation waste and reduce the amount disposed to landfill;
9. In the case of tall buildings, not adversely affect their surroundings including the local character, cause harm to the significance of heritage assets or impact on important views. Appropriate locations for tall buildings will be defined on a Character Study and may include parts of Uxbridge and Hayes subject to considering the Obstacle Limitation Surfaces for Heathrow Airport. Outside of Uxbridge and Hayes town centres, tall buildings will not be supported. The height of all buildings should be based upon an understanding of the local character and be appropriate to the positive qualities of the surrounding townscape.

Support will be given for proposals that are consistent with local strategies, guidelines, supplementary planning documents and Hillingdon Local Plan: Part 2- Development Management Policies.

**Policy EM1 – Climate Change Adaptation and Mitigation**

The Council will ensure that climate change mitigation is addressed at every stage of the development process by:

1. Prioritising higher density development in urban and town centres that are well served by sustainable forms of transport.
2. Promoting a modal shift away from private car use and requiring new development to include innovative initiatives to reduce car dependency.
3. Ensuring development meets the highest possible design standards whilst still retaining competitiveness within the market.
4. Working with developers of major schemes to identify the opportunities to help provide efficiency initiatives that can benefit the existing building stock.
5. Promoting the use of decentralised energy within large scale development whilst improving local air quality levels.
6. Targeting areas with high carbon emissions for additional reductions through low carbon strategies. These strategies will also have an objective to minimise other pollutants that impact on local air quality. Targeting areas of poor air quality for additional emissions reductions.
7. Encouraging sustainable techniques to land remediation to reduce the need to transport waste to landfill. In particular developers should consider bioremediation as part of their proposals.
8. Encouraging the installation of renewable energy for all new development in meeting the carbon reduction targets savings set out in the London Plan. Identify opportunities for new sources of electricity generation including anaerobic digestion, hydroelectricity and a greater use of waste as a resource.
9. Promoting new development to contribute to the upgrading of existing housing stock where appropriate.

The Borough will ensure that climate change adaptation is addressed at every stage of the development process by:

10. Locating and designing development to minimise the probability and impacts of flooding.
11. Requiring major development proposals to consider the whole water cycle impact which includes flood risk management, foul and surface water drainage and water consumption.
12. Giving preference to development of previously developed land to avoid the loss of further green areas.
13. Promoting the use of living walls and roofs, alongside sustainable forms of drainage to manage surface water run-off and increase the amount of carbon sinks.
14. Promoting the inclusion of passive design measures to reduce the impacts of urban heat effects.

#### **Unitary Development Plan (1998) Saved Policies**

Whilst saved policies of the Unitary Development Plan remain part of the development framework, the presented policies are not considered of particular relevance to this Statement.

### **9.0 Other Policy & Regulatory Considerations**

This section comprises an overview of other considerations relevant to the Sustainability Statement.

#### **9.1 National Planning Practice Guidance**

##### **Climate Change**

Advises how planning can identify suitable mitigation and adaption measures in plan-making and the application process to address the potential for climate change.

##### **Design**

Design affects how people interact with places and can affect a range of economic, social and environmental objectives. The guidance states that planning policies and decisions should seek to ensure that the physical environment supports these objectives.

##### **Natural Environment**

Explains key issues in implementing policy to protect biodiversity, including local requirements.

### **Renewable and Low Carbon Energy**

The guidance is intended to assist local councils in developing policies for renewable energy in local plans, and identifies the planning considerations for a range of renewable sources.

## **9.2 London Planning Practice Guidance**

### **Sustainable Design and Construction Supplementary Planning Guidance (April 2014)**

The Mayor has published supplementary planning guidance on Sustainable Design and Construction. The document provides guidance on the implementation of London Plan policy 5.3 as well as a range of policies, primarily in Chapters 5 and 7 that deal with matters relating to environmental sustainability.

## **9.3 Emerging Local Plan**

### **Draft Local Plan Part 2 - Development Management Policies (2015)**

The Local Plan Part 2 comprises Development Management Policies, Site Allocations and Designations and Policies Map. Once adopted it will deliver the detail of the strategic policies set out in the Local Plan Part 1: Strategic Policies (2012).

The following draft policies are noted:

#### **Draft Policy DMHB 11 – Design of New Development**

A) All development, including extensions, alterations and new buildings will be required to be designed to the highest quality standards and, incorporating principles of good design including:

iii. Ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;

#### **Draft Policy BMEI 1 – Living Walls and Roofs and On-Site Vegetation**

All development proposals are required to comply with the following:

i. All major development<sup>6</sup> should incorporate living roofs and/or walls into the development. Suitable justification should be provided where living walls and roofs cannot be provided; and

ii. Major development in Air Quality Management Areas must provide onsite provision of living roofs and/or walls. A suitable offsite contribution may be required where onsite provision is not appropriate.

#### **Draft Policy DMEI 2 – Reducing Carbon Emissions**

A) All developments are required to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets.

B) All major development proposals must be accompanied by an energy assessment showing how these reductions will be achieved.

- C) Proposals that fail to take reasonable steps to achieve the required savings will be resisted. However, if the Council is minded to approve the application despite not meeting the carbon reduction targets, then it will seek an off-site contribution to make up for the shortfall. The contribution will be sought at a flat rate at of £/tonne over the lifetime of the development, in accordance with the current 'allowable solutions cost'.

**Draft Policy DMEI 3 – Decentralised Energy**

- A) All major developments are required to be designed to be able to connect to a Decentralised Energy Network (DEN).
- B) Major developments located within 500 metres of an existing DEN, and minor new-build developments located within 100 metres, will be required to connect to that network, including provision of the means to connect to that network and a reasonable financial contribution to the connection charge, unless a feasibility assessment demonstrates that connection is not reasonably possible.
- C) Major developments located within 500 metres of a planned future DEN, which is considered by the Council likely to be operational within 3 years of a grant of planning permission, will be required to provide a means to connect to that network and developers shall provide a reasonable financial contribution for the future cost of connection and a commitment to connect via a legal agreement or contract, unless a feasibility assessment demonstrates that connection is not reasonably possible.
- D) The Council will support the development of decentralised energy networks DENs and energy centres in principle, subject to meeting the wider policy requirements of this plan and in particular on design and air quality.

**10.0 SUSTAINABILITY DESIGN PROPOSALS & APPRAISAL**

This section presents an overview of the proposed sustainable design features for the scheme.

The objective of the Sustainability Report is to outline how sustainability and the principles of sustainable development have been incorporated into the development proposals.

**10.1 Health & Welbeing**

Design will take into consideration good practice daylighting criteria as recommended by the latest industry standards; and a Daylight, Sunlight and Overshadowing report has been prepared to improve the visual environment wherever possible.

Thermal comfort will be considered in the context of designing the appropriate types of space heating, ventilation and cooling systems for each intended use and of allowing occupants to control internal conditions according to preference.

Access to the site shall be safe for pedestrians and cyclists and the design team has liaised with the Designing Out Crime Officer at the Metropolitan Police to ensure the final design embodies the principles of Secured by Design in reducing the opportunity for and fear of crime.

## **10.2 Energy**

Further detail on energy matters is presented in the Energy Statement accompanying the application.

### **Energy Efficiency**

It is intended to optimise the extent of glazing to improve access to natural daylight whilst preserving heating within the properties.

It is intended that the performance of the building fabric will incorporate relatively low U-Values to reduce the rate at which the building loses heat, preserving the heat within the space and reducing the requirement for mechanical heating.

### **Low Carbon & Renewables Technologies**

Renewable and low carbon technologies have been considered as part of the design following the prioritisation of efficiency. The following is proposed:

- Photovoltaic Panels – PV is considered a potentially feasible and viable technology for the proposed scheme.

## **10.3 Water Conservation**

Water saving fittings and appliances shall be installed and whilst appliances have yet to be selected, consideration has been given to inclusion of the following:

- WCs Dual flush 6 litre / 4 litre;
- Taps (excluding kitchen & external) Flow rate 4 litres / minute;
- Shower Flow rate 7.5 litre / minute;
- Kitchen sink taps Flow rate 5.5 litres / minute;

An overall rate of consumption of 105 litres / person / day will be targeted.

No irrigation systems are proposed and all landscaping will rely on manual watering.

#### 10.4 Materials

The materials strategy for the development shall consider lifecycle environmental impacts, durability, responsible sourcing and pre-fabrication potential, with a view to optimising materials utilisation and safeguarding natural resources. Measures will include:

- The majority of major elements (walls, floors, roof) with an 'A' or 'A+' rating in the BRE's Green Guide to Specification;
- Use of all timber products that come from an accredited Forest Stewardship Council (FSC) source;
- Use of suppliers/products that operate Environmental Management Systems (e.g. ISO14001, EMS) as per minimum and BES 6001 certification for major applications; and
- Consideration of durability, pre-fabrication and dismantling potential in selecting main elements.

#### 10.5 Operational Waste

Waste management shall prioritise prevention of waste generation and target re-use, recycling and recovery, in line with the Waste Hierarchy.

Responsibility for prevention of waste generation and re-use lies with the occupants/consumers; however, the developments can promote recycling by providing appropriate infrastructure and facilities.

The operational waste strategy comprises provision of dedicated space of adequate size and in convenient locations for storage of general refuse and recyclables. Storage provisions for recyclables and refuse shall be considerate of the Building Regulations and Council requirements.

#### 10.6 Pollution

Transport emissions shall be minimal, as the site offers excellent connections to public transport services and a wide range of amenities at walking distance; the development shall also promote cycling by providing secure cycle storage spaces.

Measures relating to building design, fabric design and landscaping shall be implemented as appropriate so that internal ambient noise levels are acceptable for the intended use and do not compromise the health & well-being of occupants.

The external lighting strategy shall be designed to minimise light spillage and night time light pollution in line with the ILP's Guidance notes for the reduction of obtrusive light; low illuminance levels, fittings and controls shall be employed accordingly.

Good internal air quality will be achieved through the creation of a building envelope with a low air permeability; meaning that the building fabric will reduce the infiltration of pollution from the external environment.

The developer will also endeavour to avoid the use of materials with a high VOC (volatile organic compound) content; therefore, ensuring an improved air quality for the completed development.

## **10.7 Design Appraisal**

Based upon the above, it is considered that the design accords with planning policy and goes significantly beyond standard practice. As a result, the environmental impact of the building will be reduced and building occupants will benefit from improved health and wellbeing.

## **11.0 SUSTAINABLE CONSTRUCTION PROPOSALS & APPRAISAL**

It is recognised that the construction industry has the potential to cause significant environmental impacts through resource use, waste generation and pollution. It is therefore proposed to manage the construction phase in a sustainable manner to ensure that these impacts are reduced.

### **11.1 Responsible Construction Practices**

#### **Impacts on Neighbours, Pedestrians, Road Users and Workforce**

The main contractor will register with the Considerate Constructors Scheme to ensure that the contractor carries out the construction operations in a safe and considerate manner, with due regard to local residents, road users, the workforce and the environment. A target of achieving a score of at least 35 and with a minimum score of 7 in each of the five sections shall be set. This represents a high level of performance and a commitment to responsibly manage construction activities.

#### **Environmental Management**

It is expected that the principal contractor for the project shall also operate a third party certified Environmental Management System (EMS), demonstrating sound management and systematic control of environmental impacts.

### **11.2 Materials Optimisation & Waste**

A pre-demolition audit shall be undertaken to establish the potential for reuse of materials for on-site applications or salvaging for reuse/recycling off-site.

The Site Waste Management Plan (SWMP) will detail the design measures towards optimum use of materials, set specific targets for construction and demolition waste generation and appropriate mechanisms/protocols for segregating waste on-site and monitoring overall waste management.

The development will aim for more than 95% by tonnage of demolition and construction waste to be diverted from landfill as per minimum.

### **11.3 Pollution Prevention**

#### **Pollution Prevention Guidelines**

The Environment Agency's (EA) Pollution Prevention Guidelines (PPG) shall be followed as appropriate to minimise pollution risks from construction activities; works will also be in line with the Environment Agency's Building a better environment, A guide for developers (2006) guidance.

#### **Air Pollution**

Best practice methods for minimising the formation of dust and emissions from construction activities shall be implemented, as appropriate to the specific site and proposed activities. Control measures may include:

- Appropriate site layout;
- Solid screens/barriers or other physical boundaries around dust/emission generating activities;
- Good site maintenance and regular inspections for liquid spillages; and
- Sealed storage for cement, sand and fine aggregates.

In addition to the above, the contractor shall comply with the BRE Code of Practice to control dust from construction and demolition activities.

### **11.4 Water Pollution**

Appropriate measures shall be implemented to minimise risks of watercourse and underground water pollution, in line with EA's PPG 5 Works in, near or liable to affect watercourses and the Guide for developers Building a better environment, as stated above. Relevant guidance within the London Plan's SPGs shall also be followed as appropriate. Specific measures shall be outlined in the contractor's CEMP.

### **11.5 Construction Appraisal**

Given that the development proposals are seeking to go significantly beyond standard practice; targeting best practice to mitigate many of the social and environmental impacts, the construction proposals are considered in accordance with sustainable development.

## 12.0 SUMMARY

This Sustainability Statement provides an overview as to how the proposed scheme contributes to sustainable development in the context of the strategic, design and construction considerations.

Sustainability is a broad concept and covers a range of environmental, social and economic considerations. A review of the London Borough of Hillingdon's planning policy has identified a number of requirements relating to sustainability. Of these, Local Plan Part 1 policies NPPF1 (National Planning Policy Framework – Presumption in Favour of Sustainable Development), BE1 (Built Environment) and EM1 (Climate Change Adaptation and Mitigation) are considered of greatest pertinence. Consideration has also been given to the emerging Local Plan Part 2, NPPF, GLA London Plan as well as the supporting guidance accompanying these documents.

The proposed scheme includes the redevelopment of the site to provide residential accommodation.

At a strategic level, the development of residential will assist with addressing the supply side housing shortages and will improve affordability. In addition, the proposals are consistent with the objectives of the local community strategy.

A range of sustainable design and construction features are proposed including:

- Incorporation of Combined Heat and Power (CHP) and provision to allow connection to any future District Energy Network;
- Water saving sanitary fittings and appliances to deliver a water efficient development;
- The use of materials with a low lifecycle environmental impact and embodied energy;
- Efficient construction and operational waste management;
- Biodiversity enhancement;

Overall, the proposals for the scheme are in line with the overarching principles of sustainable development as well as the policy requirements of the planning authority.

13.0 SITE

