

## Sustainability Strategy for Developments

February 2025

We challenge  
ourselves to reach new  
heights

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- At Clearbell we believe that during our stewardship of assets we can generate value beyond the financial, providing social and environmental benefits too.
- We recognise our fiduciary duty to our clients to consider these risks and opportunities in our investment decisions. The integration of ESG considerations into our core investment processes and activities is therefore a fundamental aspect of the way we operate.
- We integrate sustainability considerations into our principal activities of investment, asset management and development.
- Our full policy can be found on our website [here](#).

The following guidelines, expands on our sustainability policy and applies it to the **minimum standards we expect in construction or refurbishment projects.**

To further the impact we can have, **additional requirements** have been set and should be considered in consultation with Clearbell and, where possible, incorporated into construction or refurbishment projects.

Where evidence of compliance is available, this should be shared with Clearbell on completion of the project.



# 1. Management/ Brief

## Minimum Requirements

- Achieve at least a 'B' EPC rating for all new construction and major refurbishment. At least EPC 'B' rating should be targeted on all other projects depending on the scope of the existing building specification.
- Engage with stakeholders and third parties and demonstrate consideration for neighbours during construction activities.
- Wherever possible, Contractor to demonstrate compliance with ISO:14001 Environmental Management System, preferably certified by an UKAS accredited body.
- Project Manager to ensure that contractors are aware of sustainability requirements, ensure this guide is part of the project brief and that the design incorporates future flexibility as appropriate.
- Project Manager, Contractor, and any appointed supplier, is required to adhere to the UK Modern Slavery Act 2015 to combat slavery and human trafficking.
- Contractor to register and provide a certificate of compliance with the Considerate Constructors Scheme.
- Project Manager, Contractor, and any appointed supplier, to ensure that all workers are paid the Real Living Wage.
- Contractor and Project Manager to provide construction & social value data (as per 1a Construction & Social Value Data Request) for all construction/major refurbishments with a program of 3 months or more and total sum value of £300,000 or more.

## Additional Requirements

- Contractor to monitor and record site related energy, water and transport impacts. Mitigation measures to be agreed at outset, and set targets where relevant.
- Contractor to use where appropriate local labour and find ways to benefit the local community.
- Project Manager to ensure that designs incorporate recommendations from relevant design guides such as the British Council for Offices and where possible the BRE Green Guide to Specification.
- Achieve at least a BREEAM 'Very Good' on all new construction or major refurbishments.
- Contractor to name individuals responsible for management of sustainability programmes, including a suitable qualified BREEAM Sustainability Champion, where relevant.
- Contractor to produce a building user guide upon project completion for future facility and asset managers to evidence improvements made to the building to improve operational performance, as part of the Soft Landings Framework.



# 1a. Construction & Social Value Data Request

To be sent to project managers on appointment & sent out with tender documents. Contractors to be asked to include a monthly update in their monthly progress reports. For programs of at least £300,000 in value.

Site/ Investment Name: []

Request	Number/ Percentage	Details
Number of health and safety courses provided to workers		
Number of workers who have received health and safety training (% of overall)		
Number of sites with a dedicated health and safety manager/supervisor (% of overall)		
Number of workers with access to an Employee Assistance Programme (EAP) (% of overall)		
% of workers who have accessed EAP services		
Number of local people employed on site (FTE)		
Number of apprentices employed on site (FTE)		
% of first tier supply chain paying the Real Living Wage		
% of second tier supply chain paying the Real Living Wage		

**Note for Clearbell - Use data to then report on:**

- Number of sites with a dedicated health and safety manager/supervisor (% of overall)
- Number of sites that are accredited to the CSCS scheme, or equivalent (% of overall)
- Number of sites adhering to specific responsible construction practices and programmes (e.g., Considerate Construction Scheme) (% of overall)
- % of sites that have had a health and safety risk assessment carried out
- % of sites with qualified First Aiders & facilities



## 2. Health & Wellbeing

### Minimum Requirements

- Project Manager and Contractor to ensure both in design and construction that public, operatives and occupier's safety during construction is considered, controlled and monitored.
- Factors such as air quality, lighting, thermal comfort, occupant controls, views and interior layout should be considered during design to improve the health and satisfaction of occupiers.
  - Consider the use of natural ventilation and other forms of passive internal fresh air environments.
  - Maximise where possible the use of natural daylight to improve wellbeing in design.
- Consider ways to capture data from health and wellbeing measures.
  - Consider monitoring of indoor environment quality (e.g. particulate matter, temperature, carbon dioxide) post-occupancy.
- Consider bike spaces/facilities to accommodate walking commuters and onsite supporting services such as showers and lockers.
- Consider business case for health and wellbeing certification for new builds of major refurbishments.

### Additional Requirements

- Contractor to develop Indoor Air Quality Plans to ensure quality of environment for future occupiers.
- Contractor to undertake health impact assessment for major developments.
- Record social impact metrics for developments and major renovations.



## 3. Energy & Carbon

### Minimum Requirements

- Project Manager and Contractor to ensure an energy efficient design.
- If being replaced the Project Manager and Contractor to design and install energy efficient plant and mechanical and electrical systems that reduce carbon dioxide emissions.
- Where possible commission whole building EPCs as opposed to each demise when services are shared.
- Sub-metering to be installed to help understand distinct end-use consumption and comparison benchmarking.
- Install energy meters with Automated Meter Reading (AMR) capability on main utility meters to help understand building usage. Install separate AMR meters for landlord and tenant supplies.
  - Meter must have automatic meter reading capability that is able to transfer data to an appropriate data platform via a FTP link.
- Consider the use of smart technology including application based systems that help assess and consequently manage building usage and reduce energy consumption.
- Undertake net zero carbon feasibility design study for major developments.
- Embodied carbon of the project and design must be minimised in line with best practice industry benchmarks. Embodied carbon life cycle survey to be undertaken as required.
- Consider the use of energy efficient measures within lighting, air conditioning, space heating, water heating, ventilation and occupant controls and utilise passive energy where practicable and appropriate.
  - Consider the introduction of passive solar design.
  - Consider the installation of LED lighting.
  - Design for improved amounts of natural daylight.

### Additional Requirements

- Incorporate integrated engineering systems and system controls, such as a Building Management System, and incorporate monitors to report on performance in design.
- Consider the use of renewable energy sources including: solar thermal heating, photovoltaic, ground source heating and cooling and undertake a feasibility assessment where appropriate.
- Conduct a full life cycle assessment (LCA) of materials using an IMPACT compliant tool (e.g. OneClick LCA) at the concept and detailed design stage in order to understand and minimise embodied carbon of materials selected.
- Set a whole life cycle embodied carbon target within the project design in line with LETI and Clearbell Capital's carbon commitments.

## 4. Transport

### Minimum Requirements

- Where appropriate and practicable in the design provide showers, changing and storage facilities for cyclists and runners in design.
- Where appropriate and practicable provide covered, secure and lit cycle storage for use by the buildings occupiers in the design.
- Where appropriate and practicable consider potential changes to make access easier and safer via public transport facilities in the design.
- Where appropriate and practicable provide electric charging points or enable infrastructure for future installation in the design.
- Where appropriate and practicable consider locally sourced materials to reduce transport distances.
- Provide EV Charging points for car, bicycles and trucks (if required).

### Additional Requirements

- Where appropriate Project Manager to arrange for a Green Travel Plan for the building.





## 5. Water

### Minimum Requirements

- Contractor to produce a site water management strategy.
- Design and install where possible water efficiency measures such as proximity sensors, spray taps, low flush or dual flush toilet cisterns and where possible specify water efficient appliances.
- Project Manager to include water meters in the building design, preferably with Automated Meter Reading (AMR) capability.
  - Meter must have automatic meter reading capability that is able to transfer data to an appropriate data platform via a FTP link.
- Where practicable utilise rainwater harvesting and grey water recycling in the design.

### Additional Requirements

- Where appropriate and practicable in the design provide water efficient plant controls including automatic shut off systems such as PIRs.
- Where appropriate and practicable in the design provide water consumption monitors and water leak detection devices linked with Building Management Systems.
- Where practicable utilise soft landscaping and attenuation tanks to minimise additional load to the underground drainage system and mitigate flood risk.



## 6. Materials

### Minimum Requirements

- Project Manager and Contractor, where reasonable, should ensure that the environmental and health attributes of materials are recorded with environmental product declarations and/or health product declarations.
- Project Manager and Contractor, where reasonable, to favour specification / installation of materials with low environmental impact, including those that disclose environmental impacts.
- Project Manager and Contractor, where reasonable, to favour specification / installation of materials with low impact on human health, including those that disclose potential health hazards.
- Project Manager and Contractor to ensure design and construction prioritises products / designs that use materials with low Volatile Organic Compounds (VOCs).
- Project Manager and Contractor to ensure design and construction prioritises products / designs that use materials with low embodied carbon content.
- Design materials that are easy to clean or require infrequent cleaning.

### Additional Requirements

- Design and construction to include materials that contain high recycled content, are reclaimed and/or are readily reused/recycled.
- Consider the use of pre-fabricated building components.
- Utilise robust detailing that is easy to construct and subsequently easy to adapt or remove.
- Where possible materials are to be specified that can be repaired/restored to extend their service life.
- Project Manager and Contractor during design and installation to provide chain of custody certificates and sustainability credentials to demonstrate that materials have been sourced responsibly and locally if possible. All directly procured timber to be sourced with full FSC certification or agreed equivalent e.g PEFC.



## 7. Waste

### Minimum Requirements

- Produce a Site Waste Management Plan pre-construction to minimise the production of waste and the supply to landfill. Project Manager and Contractor to reduce waste during design and through construction methodology; and reuse existing materials and recycle/compost waste wherever possible.
- Contractor to segregate non-hazardous and hazardous waste and provide waste recovery, collection and segregation system.
- Contractor to ensure any supplier moving waste off site is a registered waste carrier and that all compliance documentation is held on file in accordance with legal requirements.
- Identify and record the amount and type of waste created on site and removed off site.
- Where possible recycle building materials.

### Additional Requirements

- Contractor to target at least 75% by weight or 65% by volume of non-hazardous waste to be diverted from landfill.
- Contractor to recycle paper, cardboard, plastics, glass and organic waste and use bio-degradable packaging for easier disposal.
- Contractor to use materials with minimal packaging to reduce waste.



## 8. Ecology & Biodiversity

### Minimum Requirements

- Where appropriate, Project Manager and Contractor to carry out an ecological assessment of the site to identify any protected / endangered species and arrange mitigation measures to minimise damage to the existing environment and disruption to wildlife.
- Soft landscaping features should incorporate the use of drought tolerant / native plants that have low maintenance and water intensity requirements.
- Where appropriate, ensure biodiversity net gains of at least a 10% increase in biodiversity units is achieved as a result of the development, in line with best practice e.g. Natural England's Biodiversity Metric 2.0.
- Protect existing ecological features from substantial damage during site preparation and completion of construction works. EHO

### Additional Requirements

- During design consider the introduction of in-built habitats, e.g. green roofs and green walls, as appropriate.
- During design consider the use of bird or bat nesting boxes, as appropriate.

## Slide 12

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**EHO** Per Evora comment on GRESB submission for development: - DRE1 this is not directly addressed by the Clearbell Sustainability Strategy for Developments.

Per GRESB definition - Site selection and land use:

Encourage the use of previously occupied or contaminated land.

Encourage development on land that already has limited value to wildlife and to protect existing ecological features from substantial damage during site preparation and completion of construction works.

Clearbell response was: We considered this on Maidstone and resulted in preserving/creating new wildlife ponds and 12 acres of new wildlife habitat. Is that sufficient?

Evora response: Unfortunately, no – this would need to be a strategic objective for all developments and referenced as part of a publicly available strategy document.

Elliot Haynes, 2024-10-11T10:54:46.844



## 9. Pollution Control

### Minimum Requirements

- The design and construction methodology is to minimise project impact on air pollution, water pollution, ground pollution, air quality pollution and noise pollution.
- Contractor to control on site storage, have spillage procedures in place and ensure staff are adequately trained.





## 10. Climate Risk Adaptation/ Resilience

### Minimum Requirements

- The potential impacts from severe temperature and flooding must be considered and mitigation measures integrated within the design.
- Consider the potential impacts of extreme temperature on equipment performance and thermal comfort. Mitigate risks e.g. reduce solar gains, enhance thermal performance of building fabric.

### Additional Requirements

- Consider completion of a climate change risk assessment to ensure the design incorporates measures to address climate change risks to the development in the future.

# Clearbell

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Thank you



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