

**CAPITAL WAREHOUSE, MID
SUSSEX**

PGQ PROPERTY

SUSTAINABILITY STATEMENT



QUALITY ASSURANCE

1. Accountability for this document

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1. INTRODUCTION AND CONTEXT

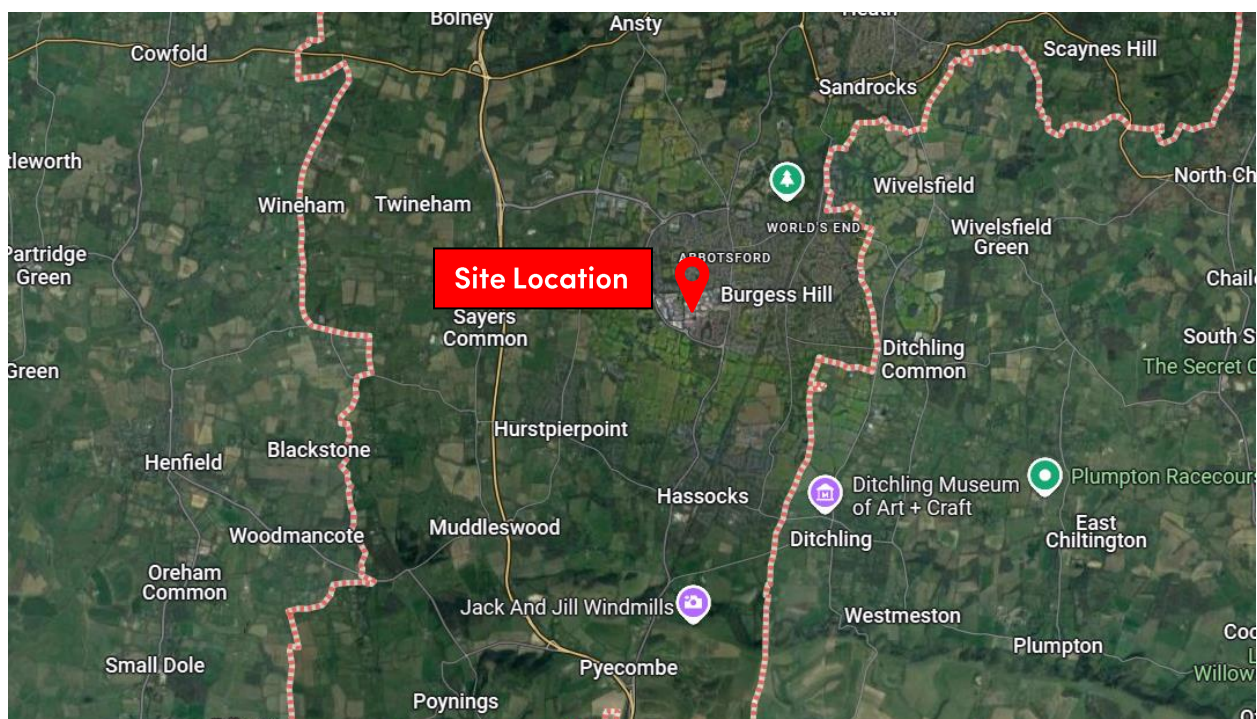
1.1 INTRODUCTION

Coreus Projects Ltd were appointed by PGQ Property to produce a Sustainability Statement to support the proposed development of a light industrial unit in Burgess Hill, Mid Sussex ('The development'). The development aims to meet the growing demand for flexible, energy-efficient industrial spaces, aligning with national and local planning policies to promote sustainable design and minimise environmental impact. In line with the National Planning Policy Framework (NPPF 2021) the design will be developed to minimise carbon emissions through a fabric-first approach and contribute to the local economy, aligning with the need for developments that balance economic growth with social and environmental sustainability.

1.2 SITE CONTEXT

The proposed development will be located on Consort Way in Burgess Hill (Figure 1), a well-established commercial area within Mid Sussex, providing convenient access to local infrastructure and transport networks. The site includes an existing car park, with EV charging points planned as part of the proposed development to enhance sustainable transport options for building users. The development site is well-suited for light industrial use, in line with other buildings in the area, and regional economic and sustainability objectives. The Mid Sussex District plan emphasises the importance of supporting local business infrastructure. Design considerations discussed throughout this statement intend to support long-term sustainability objectives and contribute to the local economy, aligning with the values of the NPPF and Mid Sussex District plan.

FIGURE 1: SITE LOCATION



The industrial setting of the existing site is demonstrated by the photos presented below (Figures 2-4).



FIGURE 2: EXISTING SITE FACING SOUTH WEST



FIGURE 3: EXISTING SITE FACING NORTH WEST



FIGURE 4: EXISTING SITE FACING SOUTH

Developing existing brownfield sites such as this is more sustainable than targeting greenfield sites, where ecological value is typically lower, as demonstrated later in this report. Further, existing transport infrastructure provides better opportunity for sustainable travel, and limits the need to implement damaging infrastructure associated with greenfield development; the sustainable travel opportunities for this site specifically are also explored later in this report.

1.3 PLANNING POLICY CONTEXT

The proposed light industrial unit aligns with both national and local planning policy and relevant legislation. This development incorporates key sustainability principles outlined in the following policies:

1. National Planning Policy Framework (NPPF 2021)

The NPPF provides a framework to support sustainable development across England, emphasising the balance between environmental, social and economic objectives. The proposed development aligns with NPPF principles by:

- Promoting sustainable design: Practices and material selection which incorporate energy efficiency and minimise carbon emissions will be considered throughout the design and implemented as appropriate.
- Minimising environmental impact: Design considerations will include measures to manage flood risk, such as SuDs where required, supporting resilience to climate change.

2. Mid Sussex District Plan 2014-2031

The Mid Sussex District Plan sets out the local authority's vision for sustainable development. The proposed development seeks to align with key policies, including:

- DP39: Sustainable Design and Construction: During design, considerations will include minimising energy use, and the incorporation of renewable energy sources will be explored. Efficient use of resources will be prioritised, minimising waste and maximising recycling and re-use of materials during construction and operation. Durability and longevity form part of the design considerations, understanding the importance of resilience in future climate scenarios.
- DP42: Water Infrastructure and the Water Environment: The design will meet the equivalent of a 'Good' standard, as a minimum, with regard to the BREEAM water consumption targets. Water-efficient systems and fittings will be incorporated in the design.

3. Environment Act 2021 and Schedule 7A of the Town and Country Planning Act 1990

The Environment Act seeks to protect and enhance the natural environment, with a focus on biodiversity net gain in new developments. In conjunction with the Town and Country Planning Act 1990, the proposed warehouse development will need to meet the mandatory 10% biodiversity net gain requirement. Although there is minimal existing biodiversity on-site, the project will contribute to environmental objectives through:

- Compliance with biodiversity net gain (BNG) standards. Ensuring that the development achieves the 10% increase in biodiversity through enhancements or off-site contributions, in line with the Environment Act's requirements.

4. West Sussex Transport Plan 2022-2036

The West Sussex Transport Plan outlines strategies to create a sustainable, efficient and low-carbon transport network across the region. The proposed development aligns to the plan's goals by:

- Minimising road impact: The proposed industrial unit design and preparations will consider efficient logistics to mitigate traffic impact on local roads in construction and operations.
- Provision of electric vehicle charging infrastructure: The proposed unit plans to incorporate EV charging to encourage and facilitate the use of electric vehicles by building users.

2. ENERGY

2.1 ENERGY EFFICIENCY AND CARBON REDUCTION

The proposed light industrial unit is being designed with a focus on energy efficiency and reducing carbon emissions in operation, supporting the NPPF objectives which promote sustainable design and the reduction of greenhouse gas emissions. The measures being considered in design collectively support the Mid Sussex District Plan's ambitions for sustainable development, and particularly DP39: Sustainable Design and Construction. The exact energy strategy is subject to detailed design, however the measures being considered aim to achieve an EPC rating of A, highlighting the aim for this development to minimise operational energy demand, and demonstrating a proactive approach to sustainability.

The building envelope incorporates a durable steel frame construction with aluminium cladding, enhancing the building's thermal performance, reducing the heating and cooling requirement, contributing to reduced operational energy use and associated costs. Passive design measures under consideration aim to minimise the energy demand for the industrial spaces, prioritising a fabric-first approach. Favourable orientation, a sustainable glazing specification and appropriately placed rooflights intended to maximise natural daylight will all contribute to lower electricity demand, ahead of renewable energy solutions being considered to reduce the reliance on grid-sourced electricity. This approach not only decreases the demand, but also contributes to the wellbeing of building users by considering daylight in their working environment.

Part L2 of Building Regulations 2021 applies to structures with walls, roofs and conditioning applied to internal spaces. It is assumed as part of this statement that portions of the development will eventually be conditioned, and therefore Part L will apply. Part L allows for flexibility within the design of a building, such that developments can consider the most appropriate way to achieving high levels of energy performance. The development will adopt a fabric-first approach to energy performance, ensuring it adheres to the energy hierarchy outlined below in Figure 5.

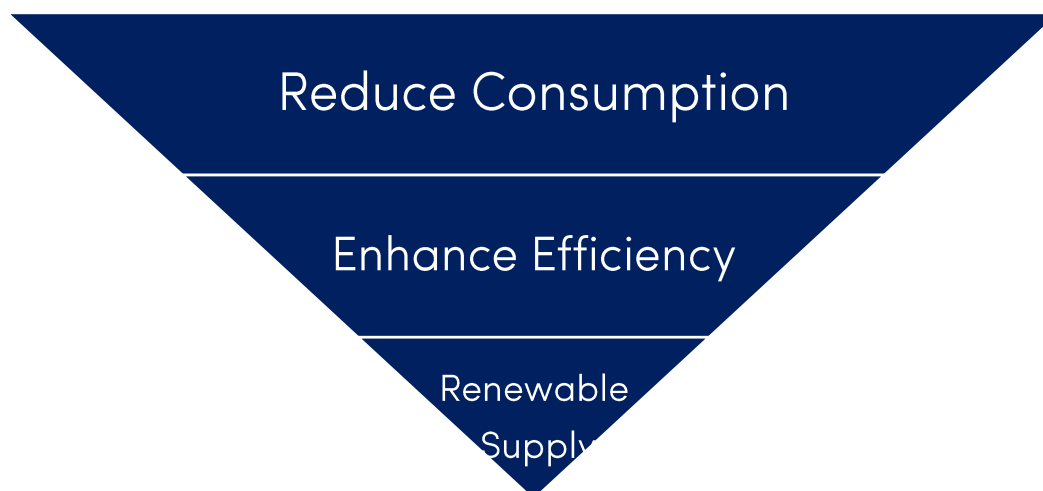


FIGURE 5. THE ENERGY HIERARCHY PROMOTES SUSTAINABLE BUILDING DESIGN.

1. Proposed Fabric

Effective application of the energy hierarchy relies on assessments carried out during the detailed design stage, where the development will target the high-impact elements of the specific development with regard to energy reduction and efficiency measures. In line with building regulations, the below minimum fabric performance will be adopted, where performance beyond these will be subject to the as-designed energy profile for the development:

Specification Element	Minimum Standard	Proposed Construction	Proposed U Value
External Roof	0.16 W/m ² K	TATA Trisomet 120mm core, HPS200 Coating	0.16 W/m ² K
Heat-loss wall	0.26 W/m ² K	TATA Trisomet 80-90mm Core Thickness, Prisma external coating	0.24 – 0.25 W/m ² K
Floors	0.18 W/m ² K	150mm Solid concrete floor. Insulation to meet Part L compliance.	Maximum 0.18 W/m ² K, subject to regs requirement
External Glazing	1.60 W/m ² K	Aluminium, thermally broken, double or triple glazing.	Maximum 1.60 W/m ² K, subject to regs requirement
Pedestrian Doors	1.60 W/m ² K	Thermally insulated personnel doors where required to meet building regulations.	Maximum 1.60 W/m ² K, subject to regs requirement
Air Permeability	8.0 m ³ /(hm ²) @ 50Pa	Subject to requirements for building regulations, but will not exceed the minimum standard.	Maximum 8.0 m ³ /(hm ²) @ 50Pa
Thermal Bridging	Limited within a reasonable standard in line with Part L Performance.		

The exact method of conditioning the space is not yet known, and is subject to detailed design. The specification outlined above is subject to change through the detailed designed process, however the minimum values will not be exceeded, and thermal performance will be dictated by requirements to meet 2021 Part L Building Regulations standards, as required.

2. Low Carbon Technology

Photovoltaic (PV) panel integration forms part of the design considerations, being explored as a source of on-site renewable energy in line with DP39. Should this option be implemented, the energy generated would contribute to the building's energy needs. With no communal heating network available, the most appropriate renewable energy option would be photovoltaic panels to the roof. The design will consider renewables in line with the energy hierarchy above, focusing first on fabric measures to reduce consumption. Energy efficient solutions to condition the space will then be considered, including LED lighting, high-efficiency heat pumps for heating and cooling, and advanced control measures to ensure efficient space conditioning. Should renewables be required in order to achieve the performance required, then roof-

mounted PV panels will be considered, prioritising space that has favourable orientation, and with consideration of the pitch to maximise energy generation.

The inclusion of 7 EV charging points within the development will encourage the use of electric vehicles by building users, reducing emissions associated with commuting for those using the building. Commuting is often a significant portion of an organisations Scope 3 emissions, which typically account for more than 60% of an organisation's total footprint, and in some cases can be greater than 90%. Allowing for a low-carbon method of commuting will support sustainable operations for the occupiers of the proposed building.

3. Water

3.1 WATER MANAGEMENT AND FLOOD RISK

Water efficiency

The proposed development will be designed to promote efficient water use in alignment with policy DP39 (Sustainable Design and Construction) and policy DP42 (Water Infrastructure and the Water Environment) of the Mid Sussex District Plan. To ensure responsible water use in consideration of increased pressure on water resources due to climate change, the project will meet or exceed the standards required for a BREEAM 'Good' rating in water efficiency for an industrial building, as stipulated by DP42, with the goal of reducing overall water consumption.

To achieve this standard, the development will specify water-efficient systems and fittings, such as low-volume flush toilets. Aside from toilet facilities, it is not anticipated that the building will require high water-using activities such as a kitchenette, further saving water. The BREEAM Wat 01 calculator will be used to evaluate the building's water efficiency once a specification has been produced through detailed design, providing an objective assessment of the design's performance against benchmarks for non-domestic buildings. Domestic-scale water-consuming components will be included in the calculator, ensuring components meet the targeted water performance. This allows water consumption to be monitored and improved on through design specification iterations if required. Adhering to this standard demonstrates the proposed developments commitment to sustainable water management, aligning with the water conservation objectives of the Mid Sussex local plan and the NPPF 2021.

Flood risk

The proposed development will proactively manage flood risk through considerate design, aligning with Policy DP42 and the NPPF which highlight the need to ensure that new developments are resilient to flooding and do not increase flood risk elsewhere. The site is already within a developed area, with an existing car park.

A flood risk assessment has been drafted to support this application and outlines the existing infrastructure and any flood-related risk of the proposed development. It has been identified that the site itself lies within a low-risk Flood Risk Zone 1, and that the nearest high-risk zone is situated to the west, associated with the Herrings Stream. The assessment finds that the site is free from flood risk from river and sea related flooding for events up to a 1 in 1000 annual storm event. Flooding from surface water must be treated differently, and in this regard the flood risk assessment has highlighted that the northern area of the site lies within a High-Risk zone of flooding from surface water, indicating the site has a more than 1 in 30 probability of flooding in a given year. The flood risk assessment finds that there is no risk of flooding arising from other scenarios, including from reservoirs, groundwater, critical drainage areas, or overland runoff.

The Building Regulations drainage hierarchy outlines that drainage solutions should intercept and attenuate runoff through the implementation of sustainable drainage techniques that make use of infiltration as the primary method of surface water disposal. Details on how this can be adhered to are subject to detailed design, but will follow the recommendations made

in the accompany flood risk assessment. It has been demonstrated within the flood risk assessment that the proposed development can be conducted in a sustainable manner without presenting risk to neighbouring settlements, downstream properties and the proposal is in line with the NPPF drainage hierarchy.

4. Materials and Resources

4.1 MATERIALS, WASTE AND RESOURCE MANAGEMENT

The proposed development will be designed to prioritise responsibly sourced materials, waste minimisation and long-term adaptability. These considerations align with DP39 of the Mid Sussex District Plan which promotes sustainable design and resource efficiency, and the NPPF which encourages developments to reduce waste and resource use throughout their lifecycle.

Materials will be responsibly sourced by the main contractor and specified to reduce the embodied carbon impact. Specific materials required for the construction of the industrial unit are subject to detailed design, where a balance between embodied, operational and end of life impact will be struck to minimise overall lifecycle emissions. Material selection is determined by a variety of factors, including architectural context and design, building requirements, maintenance and longevity, and cost. A steel frame is proposed, with aluminium cladding. These options are considered for their high-performance features, contributing to the building's energy efficiency, thermal performance, and longevity. Steel and aluminium are both highly recyclable, supporting a circular economy and considering the building's end of life.

For the proposed development, locally sourced materials will be prioritised wherever possible to reduce the carbon impact associated with transportation of materials. Using local materials where possible also supports the local economy. Recycled and recyclable materials will also be prioritised where possible, in line with circular economy principles. Materials with recycled content or sustainable certifications will also be prioritised to reduce embodied carbon. Reuse of materials will be considered where possible, limiting the lifecycle impact of the proposed development.

Where timber is required, it will be selected and purchased with consideration for sustainable sourcing, with the intention for all timber for permanent or temporary use to be procured with evidence, such as FSC certification. It is also intended that non-timber materials will be certified with Environmental Management Systems such as ISO 14001 or BES6001 where possible.

Prior to the construction phase, a project-specific Site Waste Management Plan (SWMP) will be produced that will be followed during construction, minimising the impact of construction waste on the environment and strongly encouraging the use of circular economy on site. The SWMP will include monitoring waste streams, using licensed waste removal contractors and resource efficiency to reduce waste. Waste will be disposed of responsibly during the construction and operational phases, focusing on reducing landfill. The production of a Site Waste Management Plan aligns with best practice.

The building will be designed for long-term adaptability and resilience, responding to changing needs and uses. The proposed development is designed to be adaptable, with demountable internal walls, allowing for reconfiguration during the building's lifecycle without significant disruption. This flexibility limits the risk of the need for significant capital works should a variation in build use occur in the future, and as such reduces the expected whole life carbon associated with this development, even when considered over a 60-year lifecycle. It is now widely documented that in reality one of the major causes of unnecessary carbon over a

building's lifecycle is the need to demolish or significantly adapt a building should its use needs change over time. By constructing in the way proposed by this development, the design limits the risk of this additional lifecycle carbon, by enhancing the adaptability of the space.

Additionally, the PV panels under consideration are intended to be roof mounted, providing an adaptable energy solution which can be expanded or upgraded with technological advancement. This approach to adaptability supports the NPPF objectives which promote durability, adaptability, and efficient use of resources.

5. Ecology and Biodiversity

5.1 ECOLOGY AND BIODIVERSITY

The proposed development is situated in an industrial area with an existing car park and minimal existing ecological features. An ecologist has been appointed to determine the ecological value of the existing site, and outline any likely habitats that could be affected by development.

The site is 0.3 hectares in size and comprises mostly hardstanding due to previous industrial use, and is surrounded by similar industrial hardstanding, with very limited vegetative habitats present. The only potential habitat identified on site is a narrow grass roadside verge running along the north boundary parallel to consort way. Potential habitats provide their greatest value when they are connected to a network of other habitats via nature corridors, however, the position of this site means there is very little evidence of connectivity between the identified grass verge habitat and any surround potential habitats. This further strengthens the case for development on brownfield sites such as this, as it avoids the need to disrupt the ecosystem network associated with greenfield sites.

The proposed design would only remove 2m² of this verge, and there would be no further impact to this potential habitat. Given the limited impact to existing habitat, it has been confirmed by the appointed ecologist that this development is not required to achieve a 10% Biodiversity Net Gain, and that because of the low existing ecological value the impact to biodiversity on site is not significant.

6. Pollution

6.1 POLLUTION

The proposed development is committed to managing and minimising environmental impacts relating to air quality, noise, and water pollution during both the construction and operational phases. This includes implementing measures to mitigate air quality, noise, and water pollution. The development will comply with the Mid Sussex Development Plan policy DP29 (Noise, Air and Light Pollution) and the NPPF, which emphasises the need to reduce pollution and manage air quality. Seeking to prevent environmental harm, in the detailed design stage, specified procedures will be set out to mitigate pollution, such as through a Construction Environmental Management Plan (CEMP).

Air Quality

The Proposed Development is situated within the Victoria Business Park and land-use surrounding the Site is almost exclusively commercial and industrial. The nearest highly sensitive uses are the residential dwellings located over 150m to the north. Further, the site is not located within or near an Air Quality Management Area (AQMA), which are areas identified as having existing poor air quality. An Air Quality Assessment accompanies this sustainability statement to identify the potential impacts of the proposed development with regard to air quality in the local area, and proposed mitigating measures where required, in line with industry best practice.

This Air Quality Assessment has considered polluting activities associated with the use of the proposed development and on the risk of pollutants arising from the construction of the proposed building. Regarding pollutants arising from vehicles using the site, and from measures taken to condition the space, such as gas boiler flues, the Air Quality Assessment and this sustainability statement have highlighted that the energy strategy would be all-electric, negating the source of potential emissions from building conditioning. The proposal includes provision for 7 EV chargers, which is above the minimum provision associated with best practice from EPUK & IAQM, contributing to measures that can reduce the risk of emissions arising from internal combustion engines from vehicles.

Although located in an industrial area, best practice measures for managing dust and emissions during construction will be employed in line with recommendations from the Air Quality Assessment. These measures have been recommended to align to best practice, but the risk level of dust soiling effects to local spaces has been identified as low. It is recommended that these recommendations are adopted within the CEMP, or similar acting document, as referenced above.

Noise Pollution

Noise mitigation strategies will be implemented during construction, such as management of construction timing to minimise noise disruption to the surrounding areas, and monitoring noise levels to ensure they are within acceptable thresholds. To further mitigate noise impacts during the operational phase, any mechanical equipment associated with the building, such as ventilation systems, will be specified appropriately in consideration of their noise levels. Noise impacts will be considered during detailed design, with appropriate measures in place to

mitigate impacts and comply with regulations, ensuring minimal impact on the surrounding area.

Light Pollution

To prevent light pollution, the development will specify any external lighting in line with principles set out in DP29, and will aim to reduce light spill and follow best practice. Lighting will be specified as flood lighting around the perimeter of the building and will make use of low-energy LEDs throughout to mitigate emissions associated with this requirement. LED fixtures will be specified internally to reduce energy consumption associated with the operational phase of the development. Lighting will be motion-activated where appropriate to limit operational hours and offer further energy savings.

Water Pollution

Site-specific water management strategies will be implemented to ensure that contamination of water is prevented during construction. This will include monitoring of hazardous materials and implementing spill prevention procedures. The water management and flood risk measures detailed in section 3 will play a key role in preventing water pollution in the operational phase. Exploring the use of SuDs where appropriate and if not pre-existing as discussed in section 3 will help filter pollutants before they reach natural watercourses.

7. Transport

7.1 TRANSPORT

The proposed development is committed to promoting sustainable transport options in alignment with Mid Sussex District Plan policy DP21 (Transport) and the NPPF, which encourages reducing dependency on single-occupancy vehicles, lowering emissions, and improving accessibility. Given the industrial location and use of the proposed development, design considerations will focus on providing practical alternatives to high-emission car travel, and supporting sustainable movement of goods and people, but developing on brownfield sites will take advantage of existing infrastructure, negating the impact associated with new build travel infrastructure.

A Transport Statement has been drafted to accompany this sustainability statement and provide a review of the existing transport links, including analysis of existing travel behaviour in the local area. This allows consideration of the impact of a new development on this transport infrastructure, and of the accessibility to sustainability transport options for occupiers of the proposed building.

Road access to the site is offered at the front of the site from Consort Way, as with other industrial units in the area. Analysis has shown that 73% of occupants are likely to travel as a car driver, with a further 7% arriving as a car passenger, suggesting that this will be the primary transport option for occupiers of the proposed development. 19% of local travel is via sustainable travel, such as public transport or active travel, which is consistent with the wider Mid Sussex region. The inclusion of 7 EV charging points is a key feature supporting the shift to low-emission vehicles, targeting a high-use transport area with a view to support local decarbonisation. In recognition of the site's industrial use, the design will ensure sufficient space for commercial vehicles, considering loading and unloading requirements to enable efficient and safe operations.

This analysis shows that the proposed development is well connected by good pedestrian routes and the area already accommodates pedestrian movement for the surrounding industrial and business units within the business park. There are no dedicated cycle ways in the area, but the area is deemed safe for cycle travel by way of road use, as highlighted in the Transport Statement. This presents a good opportunity for the occupiers of this unit to promote sustainable active travel as part of their commuting habits.

Public travel is also considered a sustainable transport option, alongside active travel. The nearest bus stop is just a 4-minute walk from the development site, offering excellent sustainable connection to Pulborough and Burgess Hill via the service 100 bus route. This presents very good connectivity with local public transport, as expected with an existing industrial site. With regard to train travel, the nearest train station is a 20-minute walk, or 7-minute cycle from the development site, offering good accessibility to trains taking passengers south towards Brighton and north in London and the surrounding area. In summary, there is a variety of good availability for commuters to and from the proposed development site, with suitable options that would negate the use of single car occupancy, allowing use of sustainable travel options.

These considerations are key to mitigating potential impact on surrounding infrastructure, helping to manage transport demand effectively in the industrial setting. Overall, the impact on the local infrastructure will not be adversely affected by the proposed development according to the Transport Statement.

8. Conclusion

8.1 CONCLUSION

The proposed light industrial development addresses key priorities of the National Planning Policy Framework, Mid Sussex District Plan, and the Environment Act 2021. By integrating energy and water efficiency, biodiversity net gain, resource responsibility, and transport and pollution considerations, the development aims to deliver a sustainable, resilient design.

The development demonstrates that through detailed design sustainability measures will be incorporated to reflect the balance between environmental responsibility and the practical requirements of an industrial building suitable for the end user. Through the strategies detailed in this statement, the proposed development aligns with regional and national objectives for sustainable development.

