



Sustainability Statement

**The Meadway Centre, Honey End Lane, Tilehurst
Presented to Chillingham Limited**

Issued: January 2019

Delta-Simons Project No. 19-1841.03



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Report Details

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1.0 Introduction

1.1 Context

Delta-Simons Environmental Consultants Ltd was instructed by Chillingham Limited ('the Client') to undertake a Sustainability Statement in support of an outline planning application (with all matters reserved except for means of access) for the partial re-development of the Meadway Centre (the 'Proposed Development'), Tilehurst in Reading (the 'Site').

Figure 1 – Existing Site Plan Layout

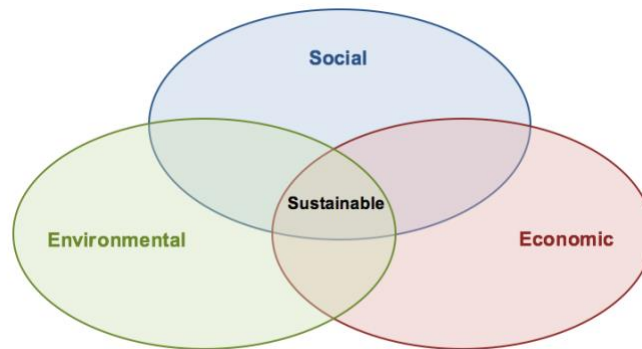


This report is provided to accompany an Outline Planning application proposing an extended residential community at the Meadway District Centre.

1.2 Purpose

According to the Brundland Commission, of the United Nations, a sustainable development is “*the development that meets the needs of the present without compromising the ability of the future generations to meet their own needs*”. This requires the reconciliation of social, environmental, and economic demands – the “three pillars” of sustainability.

Figure 2 – The Three Pillars of Sustainability



The primary purpose of this Sustainability Statement is to demonstrate how the proposed development has responded to relevant national and regional sustainability policies. The National Planning Policy Framework (NPPF) states that *“development that is sustainable should go ahead, without delay – a presumption in favour of sustainable development that is the basis for every plan, and every decision”*.

1.3 Scope

The scope of the Sustainability Statement is based on national and local planning policies and strategies that address sustainability.

The Statement provides an account of how the project team have considered and implemented sustainable design throughout Proposed Development. Based on a review of national and local planning policy (see Section 2.0 and 3.0), the Sustainability Statement has been structured to address how sustainability practises have been incorporated into the development.

As this statement is provided at Outline Planning stage, insufficient design detail exists to allow for the production of SAP calculations and/or BREEAM Pre-Assessment Estimators, as would be required to support a detailed application.

As such, Section 4.0 provides a summary of sustainable elements of the considered design in accordance with the needs of the Sustainable Design and Construction Checklist, set out within the Sustainable Design and Construction SPD.

1.4 Proposed Development

The existing site is primarily retail. It is proposed that the existing ground level retail with existing residential units above be removed and replaced with a phased redevelopment of mixed-use retail and residential units.

An illustrative masterplan design considers the potential to incorporate a total of 266 dwellings, including a combination of studio apartments, 1 bed apartments, 2 bed apartments and maisonettes and 3 bed town houses. There is also approximately 5,293.7m² of non-residential spaces, including existing and proposed retail, public toilets, medical centre, leisure and management suites, in addition to plant spaces and shared amenity cores.

An Extant Consent (2016-17) for expanded retail is generally incorporated into the outline application, with the intent to incorporate many elements of that permission, within a rearranged configuration, with the additional introduction of residential units.

2.0 National Planning Policy

The relevant planning and dedicated sustainability policy documents that promote themes of sustainable development have been summarised below. It is understood that the following policies are applicable to the proposed Site and form the basis of Delta-Simons' Sustainability Statement.

2.1 National Planning Policy Framework (NPPF)

In February 2019, the Government published the National Planning Policy Framework (NPPF) which superseded a number of planning policies including the previous National Planning Policy Framework published in March 2012 and revised in July 2018 (and subsequently updated June 2019).

The NPPF outlines the Government's planning policies for England. It provides a framework within which local people and accountable councils can produce their own distinctive local plan which reflect the needs and priorities of their neighbourhoods and communities. The purpose of the NPPF is to contribute to the achievement of sustainable development.

The NPPF aims to strengthen local decision making as a way to foster the delivery of sustainable developments. However, the NPPF also outlines that sustainable developments require careful attention to viability and costs in plan-making and decision-taking processes. Over everything else, plans should be deliverable. Therefore, the sites and scale of development within the plan should not be subjected to large scale obligations and burdens, so that their ability to be developed viably is threatened.

The NPPF guidance promotes planning for climate change. Chapter 14 of the NPPF, Meeting the Challenge of Climate Change, Flooding and Coastal Change (paragraphs 149 to 154) state that:

Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.

▲ New development should be planned for in ways that:

- Avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and
- Can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.

▲ To help increase the use and supply of renewable and low carbon energy and heat, plans should:

- Provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);
- Consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and
- Identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.

▲ Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.

- ▲ In determining planning applications, local planning authorities should expect new development to:
 - Comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and
 - Take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
- ▲ When determining planning applications for renewable and low carbon development, local planning authorities should:
 - Not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and
 - Approve the application if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.

3.0 Local Planning Policy

The current existing local policy that is used to determine planning applications consists of the following documents:

- ▲ Reading Borough Local Plan (Adopted November 2019)
- ▲ Sustainable Design and Construction SPD (Adopted December 2019)

3.1 Reading Borough Local Plan (Nov 2019)

The details set out within this section are taken verbatim from the above document.

3.1.1 Policy CC2: Sustainable Design and Construction

Proposals for new development, including the construction of new buildings and the redevelopment and refurbishment of existing building stock, will be acceptable where the design of buildings and site layouts use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change.

To meet these requirements:

- ▲ All major non-residential developments (>1,00m²) or conversions to residential are required to meet the most up-to-date BREEAM 'Excellent' standards, where possible;
- ▲ All minor non-residential developments (<1,00m²) or conversions to residential are required to meet the most up-to-date BREEAM 'Very Good' standard as a minimum;
- ▲ All non-residential development or conversions to residential should incorporate water conservation measures so that predicted per capita consumption does not exceed the appropriate levels set out in the applicable BREEAM standard. Both residential and nonresidential development should include recycling greywater and rainwater harvesting where systems are energy and cost effective.

3.1.3 Policy CC4: Decentralised Energy

In meeting the sustainability requirements of this plan, developments of the sizes set out below shall demonstrate how consideration has been given to securing energy for the development from a decentralised energy source.

Any development of more than 20 dwellings and/ or non-residential development of over 1,000 sq m shall consider the inclusion of decentralised energy provision, within the site, unless it can be demonstrated that the scheme is not suitable, feasible or viable for this form of energy provision.

Where there is existing decentralised energy provision present within the vicinity of an application site, further developments of 10 dwellings or more or non-residential development of 1,000 sq m or more will be expected to link into the existing decentralised energy network or demonstrate why this is not feasible.

3.1.4 Policy CC5: Waste Minimisation and Storage

Development should demonstrate measures to minimise the generation of waste in the construction, use and life of buildings and promote more sustainable approaches to waste management, including the reuse and recycling of construction waste and the promotion of layouts and designs that provide adequate, well-designed space to facilitate waste storage, reuse, recycling and composting.

3.1.5 Policy EN18: Flooding and Drainage

Development will be directed to areas at lowest risk of flooding in the first instance, following the Sequential and Exceptions Test set out in the NPPF, and taking into account the effects of climate change. It will consider flooding from all sources, including fluvial, surface water, groundwater and sewer flooding. Where development in areas at risk of flooding is necessary, it will not reduce the capacity of the flood plain to store floodwater, impede the flow of floodwater or in any way increase the risks to life and property arising from flooding. Wherever possible, development should be designed to reduce flood risk, both on- and off-site.

All major developments must incorporate sustainable drainage systems (SuDS) as appropriate and in line with the Government's Technical Standards⁶⁴. Smaller schemes are encouraged to incorporate SuDS, where possible. Runoff rates should aim to reflect greenfield conditions and, in any case, must be no greater than the existing conditions of the site. Schemes should ensure that the movement of water through vertical infiltration as well as horizontal run-off does not worsen contamination effects. Wherever possible, SuDS provision should maximise ecological benefits, link into the existing Green Network, incorporate tree planting and landscaping and avoid damage to existing significant trees, including through changes to the site hydrology. All new developments in areas of flood risk should give priority to SuDS.

3.1.6 Policy H5: Standards for New Housing

New build housing should be built to the following standards, unless it can be clearly demonstrated that this would render a development unviable:

- a. All new build housing outside the Central Area as defined on the Proposals Map will comply with the nationally-described space standard.
- b. All new build housing will be built to the higher water efficiency standard under Regulation 36(3) of the Building Regulations.
- c. All major new-build residential development should be designed to achieve zero carbon homes.
- d. All other new build housing will achieve at a minimum a 19% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations.
- e. All new build housing will be accessible and adaptable in line with M4(2) of the Building Regulations, unless it is built in line with M4(3) (see below).
- f. On developments of 20 or more new build dwellings, at least 5% of dwellings will be wheelchair user dwellings in line with M4(3) of the Building Regulations. Any market homes provided to meet this requirement will be 'wheelchair adaptable' as defined in part M, whilst homes where the Council is responsible for allocating or nominating an individual may be 'wheelchair accessible'.

3.1.7 Policy TR5: Car and Cycle Parking and Electric Vehicle Charging

Development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport.

Development should make the following provision for electric vehicle charging points:

- ▲ All new houses with dedicated off-street parking should provide charging points;
- ▲ Within communal car parks for residential or non-residential developments of at least 10 spaces, 10% of spaces should provide an active charging point.

3.2 Sustainable Design and Construction SPD (Dec 2019)

The details set out within this section are taken from the above document in respect to the sustainability standards required for developments within Reading Borough Council area, and with regards to the Sustainable Design and Construction Checklist only.

3.2.1 Required Level of Sustainability Standard

The following standards are set out within Table 3.1 of the Sustainable Design and Construction SPD.

	Size of Development	Required Standard
New-build residential	Minor (fewer than 10 dwellings)	19% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations
	Major (10 dwellings or more)	Zero Carbon (or if unachievable, a minimum 35% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations and planning contribution to offset remaining carbon emissions to zero)
Creation of new residential units through conversion from other uses and/or	Minor (fewer than 10 dwellings)	BREEAM 'Very Good'
	Major (10 dwellings or more)	BREEAM 'Excellent'
Non-residential development (including development for non-C3 residential)	Minor (less than 1,000 sq. m of floorspace)	BREEAM 'Very Good'
	Major (1,000 sq. m of floorspace or more)	BREEAM 'Excellent'
Non-residential refurbishment (including refurbishment for non-C3 residential)	Minor (less than 1,000 sq. m of floorspace)	BREEAM 'Very Good'
	Major (1,000 sq. m of floorspace or more)	BREEAM 'Excellent'

Additional information:

- ▲ For mixed-use development, depending on the specific mix, a combination of standards may be sought.
- ▲ Applications for change of use may fall to be considered as refurbishment depending on the level of internal alterations proposed. The appropriate approach with regards to sustainability will be considered on a case by case basis.
- ▲ Requirements in the table are subject to the caveats in the relevant policies (CC2 and H5) around viability and achievability.

3.2.2 Sustainable Design Checklist – Residential Development

Energy/CO₂:

1. How has the development been designed to optimise the use of the energy from the sun and limit heat losses?
2. How has the development been designed to optimise natural daylighting, energy efficient lighting, external lighting and natural ventilation?
3. How will the design of the building make efficient use of energy? (e.g. use of thermally massive materials, levels of insulation, energy efficient white goods and use of green/ brown roofs etc.).
4. Has local energy generation from renewables and/or decentralised energy been considered as part of the scheme?
5. How have cycle storage facilities been considered?
6. Does the development meet the requirements of policies H5? Is this clearly illustrated?
7. Is a Section 106 contribution required? If so, what amount?

Water:

8. How will the development incorporate the use of water saving devices to achieve the higher water efficiency standard under Regulation 36(3) of the Building Regulations?
9. How will the development incorporate recycling rainwater and reduce the use of potable water?
10. Has the collection, treatment and re-use of grey water been considered? If so, how will these facilities be incorporated within the development?

Materials:

11. How will the selected materials help retain local character, ensure long life and ensure a low environmental impact, including consideration of embodied energy

Surface Water Runoff:

12. How has the development considered flooding and pollution?
13. Has the design considered the use of sustainable drainage systems (SuDS) and how will they be incorporated within the development?
14. Does the development meet the requirements of policy EN18?

Waste:

15. How will the development minimise waste sent to landfill?
16. How will the development make the maximum use of construction and demolition waste?
17. How will the development make maximum use of re-used and recycled materials?
18. How will provision be made for the storage and recycling of waste for all users of the site?

Pollution:

19. What measures have been incorporated to ensure that noise and light pollution will be minimised through the development?
20. What measures have been incorporated to reduce nitrogen oxide emissions and reduce the global warming potential of insulants?
21. What measures have been incorporated to reduce the release of pollution into the atmosphere?

Health and Wellbeing:

22. How has the development been designed to maximise natural lighting, reduce the likelihood of noise complaints, incorporate private outdoor space and ensure the layout of the development can be easily adapted to meet the needs of future occupants?

Management:

23. What measures have been taken to ensure the construction of the site is managed in an environmentally and socially considerate manner, mitigating environmental impacts?
24. How has the development been designed to ensure people feel safe and secure?

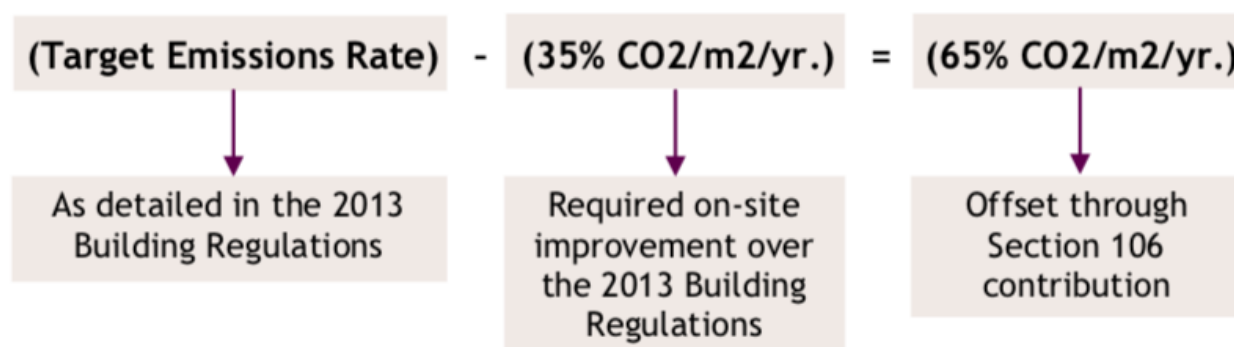
Ecology:

25. How have the wildlife habitats and natural features on and adjacent to the site been considered and how will they be retained, protected and enhanced?

3.2.2 Section 106 Contributions

In achieving Zero Carbon Homes for major residential developments, the preference is that new build residential of ten or more dwellings will achieve true carbon neutral development on-site. If this is not achievable, it must achieve a minimum of 35% improvement in regulated emissions over the Target Emissions Rate in the 2013 Building Regulations, plus a Section 106 contribution of £1,800 per remaining tonne towards carbon offsetting within the Borough (calculated as £60/ tonne over a 30 year period). £60 per tonne of carbon is a nationally-recognised price of carbon and reflects the amount established by the Zero Carbon Hub¹⁵. Based on a review of other Local Planning Authorities (LPA) carbon pricing¹⁶, £60 is the amount used by a majority of LPAs and is lower than the £95/tonne proposed in the new draft London Plan¹⁷.

The following example calculation should be used to determine contribution:



TER as defined in the Building Regulations 2013 (fuel factor = 1.0)	16.10 kg CO ₂ /m ² /yr.
35% of TER improvement required on-site	5.635 kg CO ₂ /m ² /yr.
65% of TER to be offset through S106 contribution	10.465 kg CO ₂ /m ² /yr.
(65% of TER) x total square metres = total excess CO ₂ emissions annually	711.62 kg CO ₂ /yr. = 0.71162 tonnes CO ₂ /yr.
Annual excess CO ₂ emissions x £1800 = S106 contribution	£ 1280.916

The price per tonne of CO₂ may be reviewed over time in order to account for the effects of inflation, the decreasing carbon intensity of the electricity grid or other changes in the future.

The approach means that in most cases, the assessment required to satisfy Part L of the Building Regulations will need to be carried out at the application stage, rather than afterwards. The financial contributions towards carbon offsetting will be secured through a S106 agreement. In order to account for the performance gap between a building as designed and as occupied, the as-built SAP assessment for major developments will need to be carried out after occupation.

As a baseline, the Section 106 agreement will usually require submission of the as-built assessment at the latest six months after first occupation, unless a different timescale is agreed with the Council to reflect the characteristics of the development. This assessment will inform the final contribution due.

4.0 Sustainability Statement

4.1 General

An Extant Consent (2016-17) for expanded retail is generally incorporated into the outline application, with the intent to incorporate many elements of that permission, within a rearranged configuration, with the additional introduction of residential units.

On this basis, and owing to the limited available detailed design at this Outline Planning stage, it is not suitable to produce SAP/Energy/CO₂ emissions calculations for residential dwellings or non-residential buildings at this stage.

Similarly, it is not suitable to produce a BREEAM Pre-Assessment Estimator at this stage.

As such, suitable design considerations in line with the wider requirements of the Sustainable Design and Construction SPD are provided.

4.2 Energy/CO₂

4.2.1 Approach to Energy Efficient Design

Consideration to building orientation and configuration is made within the outline masterplan. Previously approved elevations act as the design guide for the revised proposals. The proposed site layout provides opportunity for varied configurations of glazing in order to maximise beneficial solar gains and daylight.

Energy efficient lighting, in addition to suitable controls, can be incorporated into the shared amenity areas and public access spaces, as well as into the detailed design of open spaces.

The Proposed Development is to provide high quality energy-efficiency homes and non-dwellings which contribute towards reducing greenhouse gas emissions, whilst including provisions to support sustainable transport choices.

Residential dwellings can be designed to meet energy efficiency standards required by the Sustainable Design & Construction SPD, including a reduction in CO₂ emissions of 35% beyond current Building Regulations.

The design shall seek to incorporate energy efficiency measures through a 'fabric first' approach to design, in order to reduce energy demand. This approach shall include improvements to building insulation levels beyond minimum U-values, enhanced air tightness and accredited construction details to reduce heat loss through junctions.

It is proposed that a local district heat network incorporating a combined heat and power (CHP) system be incorporated into the scheme to serve the overall development, providing a combination of electrical supply and heating/hot water to the residential and non-residential units.

Through the combination of high design standards and local district heat network incorporating CHP, significant reduction in CO₂ emissions can be achieved across the development.

Where required, further reduction in CO₂ emissions (to the level required by Reading Borough Council) shall be achieved through the installation of local Solar Photovoltaic (PV) panels. The Proposed Development benefits from significant areas of shallow pitched roof, with excellent access to sunlight and limited overshadowing, making the incorporation of Solar PV the most suitable low carbon technology.

4.2.2 Estimated Energy Consumption and CO₂ Emissions

Sufficient design information is not available to produce suitably accurate SAP calculations at this Outline Planning stage, however estimation of energy consumption and CO₂ emissions are provided for context.

In the development of the Zero Carbon Homes standard, Zero Carbon Hub proposed a Carbon Compliance level (CO₂ emissions per m²) Fabric Energy Efficiency Standard (FEES) which would allow for the delivery of zero carbon homes similar to the approach adopted by Reading Borough Council.

The report published in February 2011 titled “Carbon Compliance – Setting an appropriate limit for zero carbon new homes”¹ proposed a carbon compliance level (equivalent to Target Emission Rate, TER) of 14 kgCO₂/m².yr for low rise apartment blocks. This target was deemed to represent a reduction of 44% over 2006 Building Regulations.

The report published in February 2012 titled “Fabric Energy Efficiency for Part L 2013”² modelled various dwelling scenarios, including an Apartment Block, to achieve a Target Fabric Energy Efficiency (TFEE) of 39 kWh/m².yr

The TER sets a limit for the allowable CO₂ emissions from a new build dwelling, while the TFEE sets a limit for the allowable heating energy demand for a new build dwelling. Adopting the figures stated above as set out by the Zero Carbon Hub would be in line with anticipated calculated performance required by Reading Borough Council.

On this basis, across the 266 dwellings proposed in the Outline Application, with associated GIA of 15,256m², we can estimate a total remaining CO₂ emissions for the development of 213.6 tCO₂/yr, and an associated heating energy demand of 595 MWh/yr.

Based on the established Section 106 contribution costs of £1,800 per remaining tCO₂, this results in an estimated total contribution of £384,480.

Through the combination of passive design measures, energy efficient design, CHP heat network and local solar PV, it may be possible to achieve improved performance beyond these estimated levels.

A detailed Energy Statement, in accordance with the requirements of the Sustainable Design and Construction SPD shall be produced at the Reserved Matters stage, which shall incorporate the calculation of energy consumption and associated CO₂ emissions for the Proposed Development for a representative sample of dwellings and proposed commercial properties, incorporating developed design specification, dwelling layouts, elevations and sections, as well as considerations for Solar PV array and CHP network.

4.3 Water

Water efficiency shall be built into the design of dwellings and non-residential elements during detailed design at the Reserved Matters stage.

The use of rainwater harvesting shall be considered for irrigation of green spaces within the shared public spaces, as well as specification of water saving fittings throughout the development.

Where possible, grey water recycling shall be considered.

4.4 Materials

The design intent set out within the Outline Application incorporates the use of modelled brickwork buildings of varying hues to reflect the Site's previous use as a Brickworks, retaining local character.

The selection of materials, as well as their sourcing, shall be considered such as to reduce embodied energy as far as is practicable.

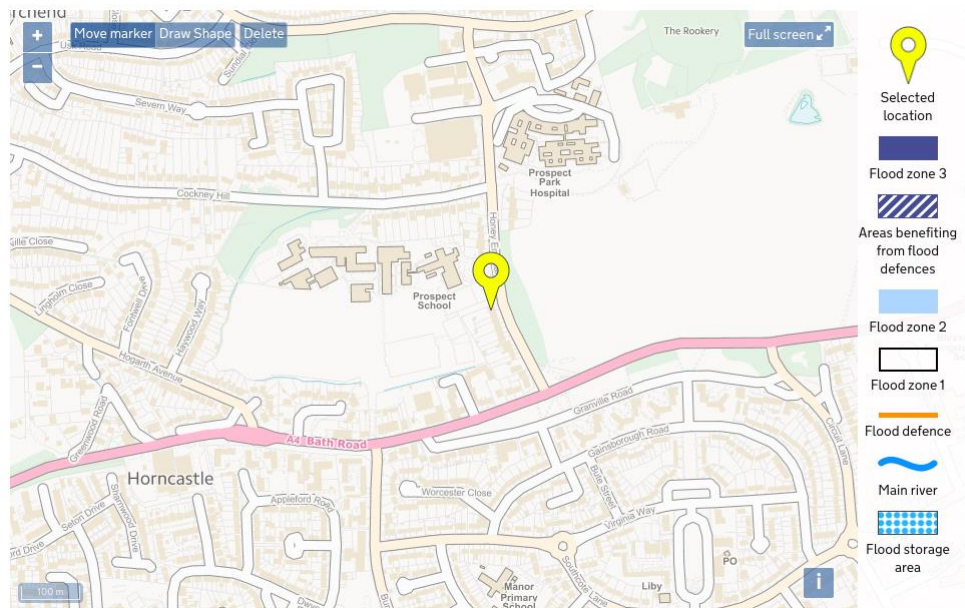
¹ http://www.zerocarbonhub.org/sites/default/files/resources/reports/Carbon_Compliance-Setting_an_Appropriate_Limit-Findings_and_Recommendations.pdf

² http://www.zerocarbonhub.org/sites/default/files/resources/reports/Fabric_Standards_for_2013-Worked_Examples_and_Fabric_Specification.pdf

4.5 Surface Water Runoff

The Site is primarily within Flood Zone 1 as defined by the Environment Agency Flood Maps, demonstrating a low risk to flooding.

Figure 3 – Environment Agency Flood Map for Meadway Centre, Tilehurst



The incorporation of hard and soft landscaping throughout the Proposed Development shall aid with reducing the potential for flooding and reduction in surface water run off.

A flood risk assessment shall be completed at the Reserved Matters stage.

SuDS shall be incorporated into the detailed design in accordance with the requirements of Policy EN18.

4.6 Waste Management

The sustainability objective is to reduce waste going to landfill through material efficiency, recycling and sustainable construction methods.

The waste hierarchy will be employed throughout the design and construction process. Waste is to be designed out of the proposed development to limit unnecessary waste, where possible. Site Waste Management Plans will be utilised during construction to ensure that waste is collected, treated and processed in the most environmentally beneficial way as possible.

The proposed phasing of the development shall also be incorporated into the approach to waste management.

4.7 Pollution

The Proposed Development considers the impact of noise and light pollution through its layout configuration and usage, including separation of retail loading areas away from residential dwellings.

Attempts to reduce pollution to the air from vehicles shall be made through the installation of electric vehicle charging points (encouraging the adoption of low emission vehicles for both retail visitors and residents) and cycling facilities, as well as the promotion of public transport options.

The wider impacts of pollution shall be addressed in greater detail at the Reserved Matters stage.

4.8 Health and Well-being

The extent of the public realm has been increased during the planning consultation period to integrate play space along with street furniture and public information in a cohesive, usable and expansive public space.

Incorporation of a leisure/gym facility provides access to exercise and fitness equipment, promoting healthy lifestyles to residents and retail visitors.

The new proposed buildings to the south and east of the residential amenity are lower to enable daylight and sunlight into the residential amenity courtyard.

4.9 Ecology

Existing banking, of the site ownership and beyond, provides extensive biodiversity habitats. The addition of the proposed residential amenity space shall compliment the existing habitat to enhance biodiversity on the development.

Appendix A – Data Sources

Data Sources

- ▲ National Planning Policy Framework, February 2019;
- ▲ Reading Borough Local Plan, November 2019;
- ▲ Sustainable Design and Construction SPD, December 2019;
- ▲ Design and Access Statement, Accord Architecture, January 2019; and
- ▲ Outline Planning Layouts, Accord Architecture, January 2019.

Appendix B – Limitations

Limitations

The recommendations contained in this Report represent Delta-Simons professional opinions, based upon the information listed in the Report, exercising the duty of care required of an experienced Sustainability Consultant.

Delta-Simons obtained, reviewed and evaluated information in preparing this Report from the Client and others. Delta-Simons conclusions, opinions and recommendations has been determined using this information. Delta-Simons does not warrant the accuracy of the information provided to it and will not be responsible for any opinions which Delta-Simons has expressed, or conclusions which it has reached in reliance upon information which is subsequently proven to be inaccurate.

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