

1. Introduction

PHP invests in flexible, modern properties for the delivery of primary healthcare to the communities in which they are located. The buildings are let on long term leases where the NHS, HSE, GPs and other healthcare operators are our principal occupiers.

We are committed to creating great primary care centres by focusing on the current and future needs of our occupiers and local communities and promoting high standards of sustainability.

This policy sets out our approach and requirements for new build and refurbishment projects where PHP is responsible for delivering these directly. Where we provide funding to other developers or acquire shell developments, we will promote the adoption of these standards.

2. New Development

For new developments, we work very collaboratively with the NHS, HSE, local health bodies and local communities to develop modern primary healthcare centres which are sustainable and which meet current and future needs. New developments must meet NHS and local planning requirements as a priority.

All PHP developed projects must achieve a minimum of BREEAM Excellent or Very Good for fit outs [and projects in rural areas].

We employ an integrated design and construction approach with collaboration at its heart. The following standards and principles should be embraced for all projects.

Energy and carbon

We aim to deliver only net zero carbon new build developments by 2025 onwards. These are developments which have minimised embodied carbon with residual emissions offset and which can be operated to net zero standards by occupiers. We commit to:

- Achieve a minimum EPC of B and nZEB standard in Ireland (BER A3 or higher);
- Implement an energy hierarchy to prioritise passive measures with high levels of fabric efficiency – aiming for all electric designs where

feasible and maximising on-site renewable energy generation;

- Model operational energy use in line with BREEAM and CIBSE TM54;
- Aim to benchmark and set targets for minimum energy intensity in use (kWh/m² for regulated and unregulated energy) and bring targets in line with industry net zero standards for health care buildings e.g. CRREM UK Healthcare Pathways.;
- Produce commissioning plans in line with BREEAM and deliver enhanced commissioning approach to ensure systems perform as intended from first occupancy;
- Provide a metering strategy that allows PHP and occupiers to remotely and intelligently monitor and analyse energy consumption in use;
- Assess whole life embodied carbon in line with RICS methodology and BREEAM, from RIBA Stage 2 to practical completion, providing an as built embodied carbon model; and
- Minimise embodied carbon from RICS stages A1-A5 and offset any residual emissions, setting targets, over time, for minimum levels of embodied carbon, in line with industry standards.

Resource efficiency and materials

We aim to minimize waste and support the principles of a circular economy, making assets easy to maintain, creating minimal waste over their lifetime and minimizing embodied carbon impacts. We commit to:

- Employ design for resource efficiency principles, minimizing potential for waste production and maximizing recycling, reuse and diversion from landfill for any waste produced;
- Design and specify for robustness and disassembly and reuse, in line with BREEAM;
- Prioritise materials from certified responsible sources namely certified to BES6001 or Cradle-to-Cradle Certified™ or as a minimum with an ISO 14001 EMS in place for manufacturing;
- Source all timber and timber-based products from legal and sustainable sources, certified to FSC or PEFC;
- Promote and consider the use of materials with high recycled content and/or which are from re-used sources;

- Prioritise lower carbon materials and those which have an Environment Product Declaration (EPD); and
- Where possible and in line with NHS and HSE specifications, source materials locally from within the UK or EU.

Climate resilience

We are committed to ensuring all developments are resilient to future impacts of climate change. Therefore, all developments must have strategies to assess, manage and aim to minimise climate related risks. We will:

- Perform risk assessment to identify, evaluate and set out how climate impact risks are managed;
- Perform Flood Risk Assessments to assess future climate impacts from storms and flooding, informed by PHP physical climate risk assessments;
- Perform thermal modelling taking account of UK Climate Projections to assess warmer weather impacts and adaptation options (including warmer future scenarios RCP6.0 & 8.5); and
- Consider risks as part of design and where feasible, implement measures to guard against future risks, including nature-based solutions, enhanced thermal efficiency and options to integrate additional cooling in the future.

Biodiversity

There is a direct link between a healthy and thriving natural environment and human health and wellbeing. All developments where PHP is in control of the site (i.e. is developing the shell and fit out) should contribute towards enhanced biodiversity locally. We will:

- Appoint suitably qualified ecologist (in line with BREEAM) and landscape architect to inform design, alignment with surrounding biodiversity and planting and devise a strategy;
- Aim to increase biodiversity for sites, with a net gain of at least 10% on site;
- Specify climate resilient species of plants appropriate to an area's future climate e.g. flood/drought/heat tolerant and which suit tenants' ability to maintain planting; and
- Design to enhance biodiversity, urban greening and landscaping to improve air quality, ecological enhancement, surface water attenuation and climate resilience.

Water

We aim to minimise potable water use for occupiers by implementing a water hierarchy. We will:

- Minimise the use of potable water for landscape gardens by specifying climate resilient native plant species where possible;
- Specify water efficient fittings and sanitaryware to reduce tenants' use of water;
- Where feasible, recycle rainwater for non-potable uses to minimise the impact on existing supply and discharge water infrastructure;
- Optimise water use with management of water systems within the building, provision of water metering and leak detection; and
- Target minimum total potable water use per person per day in line with BREEAM.

Health & wellbeing

Given all our buildings are health care facilities, we deliver buildings to NHS and HSE requirements as a priority. In addition, we aim to ensure the highest levels of health and wellbeing for occupiers through considered design of systems and specification of materials. We will:

- Integrate Wellbeing Principles into designs which meet the needs of our occupiers;
- Focus on good levels of Indoor Air Quality (IAQ), producing an IAQ plan for each development and plan to minimise local outside air, noise and light pollution impacts;
- Specify materials with low or no toxins and VOCs and in line with BREEAM;
- Prioritise natural ventilation strategies and ensure spaces achieve thermal comfort requirements, with consideration to future climate scenarios;
- Provide high quality light levels, maximizing provision of natural light where feasible and ensuring high quality artificial lighting is specified; and
- Where suitable for the scope of the development, contribute to sustainable travel options and provide weatherproof cycle storage and cyclist facilities.

Ethical procurement & modern slavery

PHP takes the risks posed by modern slavery and other human rights abuses in the construction supply chain seriously.

For developments we have the following minimum requirements:

- Main contractors to have ensured staff have received training in modern slavery awareness and spotting the signs;
- Appropriate due diligence processes to be in place by main contractor and their supply chain;
- Audit live construction sites at least once, working with an independent third party, to conduct unannounced ethical labour audits;
- Reserve the right to carry out further audits where any issues are identified; and
- Engage with contractors and suppliers/manufacturers for higher risk products and materials, to ensure they have processes in place to protect and support the rights of workers in the supply chain.

Operations

We aim to prepare new developments to be operated efficiently and to ensure occupier needs are met as intended. We will:

- Embed sustainable leasing agreements that improve environmental and social impacts;
- Adopt Soft Landings to ensure design is operationally focused from the outset and meets the needs of occupiers and health specific requirements; and
- Perform Post Occupancy Evaluation (POE) surveys in line with BREEAM and with Asset and Property Management Teams to inform future designs and ensure buildings perform as intended.

3. Refurbishment

Our opportunity to refurbish and improve the performance and functionality of our assets is determined by existing lease terms and clauses and is constrained by the need to keep assets in operation during any works. We aim to work with our occupiers to find the best solutions to ensure buildings provide excellent facilities for health care provision and minimize environmental impacts.

We strive to apply the same principles for refurbishment projects as we do for new build developments. As a minimum we will:

- Aim to improve EPC rating to a B or where outside of the scope of the project, enable this to be achieved through follow on works and before 2030;
- For projects over £1.0 million value, achieve a minimum certification of BREEAM Very Good

(unless there is an NHS requirement to achieve certification on lower value projects);

- Review options for decommissioning any onsite fossil fuel systems, such as gas and oil, where full electrification is feasible. Where not possible, plan for how this can be achieved in the future.
- Identify feasible and cost effective measures to reduce tenant energy use intensity in line with future net zero operations, including upgrading lighting, controls, heating and ventilation and fabric efficiency;
- Maximise opportunity for onsite generation of energy, principally through Solar PV;
- Upgrade metering so as a minimum whole building consumption is recorded via automated means, available for monitoring and analysis by PHP and occupiers;
- Minimise waste and maximise opportunities for material reuse through design and construction and aim to specify and install new products which can be easily maintained, upgraded or refurbished over their lifetime;
- Have a preference for materials with responsible sourcing certification including BES6001 and Cradle to Cradle certification;
- Source materials and services locally where possible to minimize environmental impacts and support the local economy;
- Consider the embodied carbon impacts of materials through design, specification, procurement and over the life of the building, with a preference for materials that have an Environmental Product Declaration;
- Specify materials with low or no VOC;
- Review and act on opportunities for improving climate resilience and adaptation for the property, drawing on PHP's physical climate related risks analysis; and
- Conduct ethical labour audits on a proportion of projects over £1.0million in value.

Ownership

The Executive Leadership Team is responsible for the operation of this policy.

Mark Davies

Chief Executive Officer
Primary Health Properties PLC