

**Shaftesbury PLC**



# **Corporate Responsibility Audit 2007**

**RPS**

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## **Data Appendices**

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## 1.0 Summary and Conclusions

### 1.1 Introduction

This is the fifth annual Corporate Responsibility (CR) Audit following on from the Baseline Review of 2002. It provides Shaftesbury PLC with a progress report of how it has performed against its Policy Objectives and highlights areas in need of further improvement.

### 1.2 Conclusions

Shaftesbury has continued to make good progress during the financial year September 2006-07 managing its environmental and associated corporate responsibility issues. Shaftesbury has also responded to the various benchmarking assessment bodies and has maintained its listing in the FTSE4Good Index Series and the Kempen SNS Smaller European Index. It is also listed on the Dow Jones Sustainability Index and was placed 3<sup>rd</sup> out of the FTSE350 within the Good Companies Guide (compiled with research from Cooperative Investments.)

Shaftesbury reviewed and issued its Corporate Responsibility Policy from which key Policy Objectives have been implemented through the Action Plan. Year on year performance data has been collected for a number of key parameters and this year the company has made progress in obtaining quantifiable timber sourcing data for a number of schemes. In addition, this is the first year for which water data has been presented for the Carnaby / Seven Dials estates and it is intended to be used as a benchmark for future reporting.

The Longmartin project, a joint venture with the Mercers' Company, to regenerate a rundown part of Covent Garden, further demonstrated the company's commitment to sustainability and environmental issues. The approved planning application include key features such energy efficient design of the building envelopes, use of renewable energy sources where feasible and the use of green roofs to enhance biodiversity. The scheme is due to commence development in late 2007.

The company continued to issue its environmental policy and sustainability checklists to members of the refurbishment project teams to encourage good practice. Ongoing communication with tenants has also continued, including provision of its environmental policy and questionnaires including waste and recycling facilities.

Within the Head Office and parts of the managed portfolio, Shaftesbury should continue monitoring its energy use and collating data on water and waste where available. It is acknowledged that in parts of the portfolio i.e. Chinatown, meaningful data is difficult to obtain given the nature of the portfolio and the tenants.

Shaftesbury continues to use its website as the main means of reporting on its performance against its objectives and targets and also as a means of engaging with external stakeholders.

A summary of Key Performance indicators are below:

Performance Area	Key Performance Indicator	2003-04	2004-05	2005-06	2006-07
<b>Stakeholder Engagement</b>	Ranking amongst Real Estate companies in BiTC CR Index (overall position)	2 (78 <sup>th</sup> )	1 (Joint 69 <sup>th</sup> )	1 (Joint 48 <sup>th</sup> )	Did not participate
	Listing on FTSE4Good	Yes	Yes	Yes	Yes
	Listing on Dow Jones Sustainability Index	-	-	-	Yes
<b>Employees</b>	Proportion of employees that are female	33%	33%	47%	50%
	Proportion of females in managerial grade	50%	50%	57%	71%
	Number of employees having an annual training and development review	25%	66%	100%	100%
<b>Environment</b>	Carbon dioxide emissions from direct energy use for the Head Office (tonnes CO <sub>2</sub> )	24.189	25.919	17.932	22.077
	Carbon dioxide emissions associated with energy use in common parts of tenanted portfolio (tonnes CO <sub>2</sub> )	858.71	962.064	919.322	926.400
	Waste recycled as proportion of waste generated at Carnaby / Seven Dials (tenant generated waste)	6.5%	8.8%	2.4%	Not quantified by contractor
	Performance against requirements of Considerate Constructor Scheme – percentage of assessed schemes that achieved target	80% achieved target of 24/40	89% achieved target of 24/40	80% achieved target of 26/40	75% achieved target of 26/40
<b>Health &amp; Safety</b>	Number of days/1000 employees lost to accidents	0	0	0	0
	Number of notifiable health & safety incidents in refurbishment projects	0	1	1 (prohibition notice)	0
<b>Community Investment</b>	Total value of community investment	£134,000	£531,372	£266,433	TBC
	Proportion of pre tax profit spent on community investment	1.1%	3.72%	1.9%	TBC

### 1.3 Recommendations

The recommendations below are those which are achievable in the short to medium term i.e. within the next calendar year. A detailed programme for achieving these recommendations is identified in the follow-up CR Action Plan for 2007-08 prepared by RPS.

- It is recommended that Shaftesbury should continue to monitor and report publicly on its performance, including quantitative data. Use of the Company website and the Annual Report are considered to be the most sensible means of reporting.
- It is recommended that Shaftesbury should continue to collate year-on-year data on their energy use within the leased Head Office and identify ways in which to reduce use.
- It is recommended that Shaftesbury continues to collate and monitor both energy and water (where available) data within the managed portfolio, although, it should be noted that the existing low level of use means that it is difficult to demonstrate improvement.
- In relation to utility use, the potential for the use of “green tariff” electricity should be extended to the Seven Dials area of the common parts (dependent on the availability of supply).
- Shaftesbury should continue to improve their management of solid waste from Head Office, and particularly from its managed portfolio. It is expected that improved data will be obtained once the new contractor is in place in Autumn 2007 for the Carnaby and Seven Dials areas.
- Shaftesbury should continue to work with Westminster City Council to investigate potential improvement of waste management and increased recycling in Chinatown, although it is recognised that this is limited by the availability of suitable sites.
- Shaftesbury should continue to investigate ways to reduce water consumption in the cleaning operations of the Chinatown service yards.
- Shaftesbury, through their principal contractors, should ensure that all timber invoices are retained and that certification details are obtained from suppliers for all eligible refurbishment schemes in order to expand the data set on the use of timber from sustainable sources.
- The updated Corporate Responsibility Policy (July 2007) should be re-issued to all stakeholders: employees, subcontractors, key suppliers and key tenants. It should continue to be promoted strongly, through ongoing awareness raising by the Contractors Leaflet and the Environmental Policy and Occupiers leaflet. Other engagement initiatives, as exemplified by those undertaken in Carnaby and Seven Dials, should also be promoted

- Shaftesbury should continue to audit its suppliers and sub-contractors to measure their performance against its Policies for environmental and health & safety performance.
  
- Shaftesbury should review the feasibility of incorporating sustainability measures such as those used within the Longmartin Project in other schemes as appropriate.

## 2.0 Introduction and Methodology

### 2.1 Background

RPS Health, Safety & Environment (RPS) was first commissioned by Shaftesbury in March 2002 to undertake a Baseline Corporate Responsibility (CR) Review of activities throughout its operations. Subsequently an Action Plan was implemented in 2002, which has since been subject to an annual review and update. This is the fifth annual audit of Shaftesbury's CR activities and it assesses the progress against the objectives and targets set out in the Action Plan and Shaftesbury's overall performance with respect to CR issues.

Shaftesbury's business activities have not changed in the year 2006-07 and it still operates as a property management and investment company with a defined focus in Central London. Its activities are divided into the core areas of acquisition, refurbishment and property management and its primary operations can be divided between its Head Office activities, the management of a large portfolio concentrated in the areas of Carnaby Street, Seven Dials / Covent Garden and Chinatown, and the refurbishment of additional properties in these areas.

In Spring 2007, Shaftesbury incorporated part of the Opera Quarter into its portfolio. This includes 31 buildings, falling within the Chinatown portfolio. The properties are mostly retail, restaurants, offices and residential. A large proportion of the services are the responsibility of the tenants and Shaftesbury therefore has little control over their ongoing environmental impacts.

The company employs 20 staff, of whom 17 are based in the Head Office. In March 2007, the wholly owned portfolio comprised the following:

- 297 shops with a total area of 383,000 sq. ft
- 150 restaurants, bars and clubs with a total area of 393,000 sq. ft
- 419,000 sq. ft of office space
- 254 flats and maisonettes.

All of the properties are within Conservation Areas and a number of the buildings are also listed as being of architectural and historic interest. Within the constraints of Listed Building and Conservation Area legislation, Shaftesbury refurbishes and manages properties to meet the needs of existing and prospective tenants, but retaining the existing character and features of the buildings.

## **2.2 Methodology**

The audit has involved interviews with the following members of Shaftesbury and their consultant team:

### ***Shaftesbury PLC***

- Jonathan Lane – Chief Executive
- Penny Thomas – Company Secretary
- Elizabeth Neville – Office Manager

### ***Managing Agents***

- Stewart Avery – Nelson Bakewell (responsible for Chinatown and Opera Quarter)
- Wade Standen and Nick Bark – EA Shaw (responsible for Covent Garden and Carnaby Estate)

### ***Project Managers***

- Andrew Matthews – Single Point Project Management Ltd (SP.PM - responsible for Carnaby Estate)
- Robert Say, Colin Martin and Tom Balme – Fresson & Tee (Responsible for smaller individual projects)
- Jacqui Allen and Matthew Lown – TFT (Responsible for projects that will be commencing in 2007 – 08)

Using the findings of the interviews and site visits, this Audit consists of 5 sections:

1. Policies and Responsibilities;
2. Environmental / Health & Safety Management Systems;
3. Environmental / Health & Safety Performance;
4. Stakeholder Engagement; and
5. Workplace and Community.

## **3.0 Policies and Responsibilities**

### **3.1 Policy**

Shaftesbury has an integrated Corporate Responsibility (CR) Policy, which was originally drafted and signed off by the Board in July 2002 (as the Environment, Social and Community Policy). The Policy is reviewed annually and was signed off by the Board in July 2007.

The Policy is available to the public via the company website. It has also been issued to the company's key advisers and is included as part of the tenant's pack. A short report of performance against the Policy has been posted on the internet and updated annually since June 2003. In addition, reference was made to Shaftesbury's Corporate Responsibility performance within its Annual Report in 2003. Since 2004, this has included a more detailed statement, and in 2006 included an overview of its environmental strategy, health & safety issues and community issues, together with a list of CR objectives for the forthcoming year.

In support of the overall CR Policy is an Equal Opportunities Policy and Health & Safety Policy, which are also reviewed annually. In addition, in May 2007 the Whistleblowing Policy was reviewed and reissued.

### **3.2 Responsibilities**

Jonathan Lane, the Chief Executive exercises overall responsibility for the implementation of Shaftesbury's CR Policy. The responsibility for the implementation of the specifics of the Policy is passed directly to the managing agents and the project managers. Both of which have regular meetings with Shaftesbury.

Brian Bickell, Shaftesbury's Finance Director has overall responsibility for overseeing personnel issues such as health and safety, training and staff welfare.

Below Board-level, individuals have been identified for the implementation of specific aspects of the Policy through the annually updated Action Plan. Penny Thomas, as Company Secretary, reports directly to Jonathan Lane and coordinates the reporting and progress of the Action Plan.

The Policy is included within the contracts with suppliers and subcontractors through the project managers for all refurbishment projects above a capital sum of £75,000.

The Policy is also included within the standard contract for maintenance contractors in the Chinatown part of the estate and is issued to commercial tenants as part of the tenant's pack.

### 3.3 Performance Against Objectives and Targets

#### *Policy Goal A: Disseminate the Corporate Responsibility Policy*

No	Objectives 2006-07	Progress / Date Achieved
A1	Disseminate the Policy to all the Company's staff, managing agents, contractors, and tenants and ensure that it is available to the public	<ul style="list-style-type: none"> <li>Annual awareness seminar undertaken in November 2006. Attended by all staff and key suppliers.</li> <li>The CR policy is available publicly on the website and has also been issued to the company's key advisors.</li> <li>The policy has continued to be distributed to new commercial tenants as part of the tenant's pack.</li> </ul>

#### *Policy Goal B: Review the Policy on an annual basis and report on the Company's performance*

No	Objectives 2006-07	Progress / Date Achieved
B1	The Policy will be reviewed on an annual basis and objectives and targets will be set.	<ul style="list-style-type: none"> <li>Objectives and targets were set for the period September 2006 – 2007.</li> <li>The CR policy was reviewed in May 2007 and was signed off by the Board in June 2007.</li> </ul>
B2	The Company will monitor and report publicly on its performance.	<ul style="list-style-type: none"> <li>A summary of CR performance was included in the 2006 Annual Report.</li> <li>All annual CR Audit reports are publicly available on the website.</li> </ul>

### 3.4 Recommendations

- Ensure that the Policy continues to be reviewed on an annual basis and the current version is posted on the website.
- Maintain the regular reporting process via the website to report on Company performance.
- Summarise the Company's overall performance in the Annual Report 2007. Ensure that key CR objectives / goals are clearly identified and quantified data is presented where appropriate.

## **4.0 Environmental and Health & Safety Management**

### **4.1 Environmental and Health & Safety Management Systems**

As identified in earlier CR Audits, there are no plans to implement an externally-certified EMS within any part of Shaftesbury. This is to be expected given the structure of the organisation and the fact that it has relatively low direct environmental impacts.

A bespoke environmental management system is in place, which includes the core elements of a Policy, measurable objectives and targets, an audit programme and reporting.

Similarly, with respect to health & safety, there are no formal systems in place, although, a health & safety risk assessment undertaken in October 2003 for Shaftesbury's Head Office identified key actions, which were subsequently implemented. Health & safety is identified within the pre-tender documentation as an issue that contractors must address as part of the contract submission and is monitored on site by the contractor's site manager and Shaftesbury's project managers.

All contractors working for the property managers undertaking ongoing maintenance of the portfolio work to the health and requirements of the principal agents (EA Shaw and Nelson Bakewell). Health & safety policies are required as part of standard contract.

### **4.2 Internal Audits**

Shaftesbury continues to monitor and measure its performance against the requirements of its Corporate Responsibility Policy through the use of a series of mechanisms as follows:

#### **4.2.1 Annual Corporate Responsibility Audit**

An annual CR audit programme is in place to review Shaftesbury's performance against its Policy and Action Plan, of which this report forms a part.

#### **4.2.2 Pre-Purchase Audit**

A property purchase checklist was introduced in 2005 as part of the pre-purchase due diligence which confirms whether the property is subject to potential environmental liabilities such as previous contaminative uses, the presence of asbestos-containing materials etc. This was reviewed and revised in September 2006 and is used for all

property acquisitions to highlight any environmental liabilities at an early stage so the appropriate action can be taken.

#### **4.2.3 Considerate Constructors Scheme**

Refurbishment projects of a capital value above £75,000 are signed up to the national Considerate Constructors Scheme (CCS). The scheme includes external audits against an eight point Code of Considerate Practice, including categories such as consideration of neighbours, cleanliness, environmental awareness, waste management and health & safety. All registered sites are given a score out of 40, and a score out of 5 within each of the individual categories. Three points in any of the sections indicates that a site is complying with the Code and is therefore operating beyond standard industry requirements. Shaftesbury sets an in-house target of achieving 26/40 within the CCS site visits.

All projects above the threshold value were signed up to the CCS in 2006-2007. This includes two schemes managed by SP.PM and seven schemes managed by Fresson & Tee. Of these, eight were formally assessed by a CCS auditor and a report on their performance was provided. Although 30 Wellington Street was registered to the scheme, the site visit was scheduled for a date when site work had not commenced and, despite efforts by the project manager, another audit was unable to be scheduled prior to project completion.

A summary table of the audit findings is below and are available for viewing upon request.

Projects managed by Fresson & Tee:

Scheme	Contractor	Score	Comments
60 Chandos Street	T G Gregory & Associates Ltd	34	Restricted site conditions have created difficulties with the provision of welfare facilities, parking and material storage, but the problem has been managed by Tim Gregory, without impacting too much on neighbours. An excellently well thought out and implemented project that, despite its size, is an example of how a difficult task can be managed. A clean, tidy well presented site despite limitations. Congratulations to all those on site for a job well done.
40-42 Tavistock Street	Roots Contractors Ltd	33	This is a small very confined site but Ramunas and Roots nevertheless demonstrate a high degree of compliance with the CCS Code. The project gives a good impression of our industry and promotes good neighbour relations.
41-45 Beak Street	T G Gregory & Associates Ltd	28	Visit 1: A change of use from offices to flats in a building close to London's busy Carnaby Street. The assessor was pleased to find a generally good level of compliance with the CCS code. A few suggestions were made for this and future jobs.
		30	Visit 2: The assessor was pleased to note that the site manager had given active consideration to the suggestions made during visit 1. It seems as though as many as were reasonably possible were taken on board – well done.
32-34 Cranbourn Street	Roots Contractors Ltd	29	Site management are keen to ensure that the site meets all the requirements of the scheme, but some comments for improvement were noted. However, with a small site it can be difficult to fully show the commitment. Accessibility for all is difficult but the welfare facilities could be much better. Company has an environmental policy and a proactive approach to recycling and aware of percentage recycled. Induction procedure should include company's views on swearing and behaviour generally. Improvements can be made.
38 Wellington Street	TDC Building Services	24	The site basically complies with the CCScheme, but there are many ways where the company needs to look again at the CCS documentation and website and see how it can improve as a considerate constructor.
79 St Martin's Lane	KPM Construction Ltd	22	Visit 1: There are many areas of improvement highlighted for the site, particularly the lack of facilities for the operatives. Site operating below compliance suggest the company takes note of comments, reads our CCScheme pack, go on the website and become familiar with the scheme.
		21.5	Visit 2: The site was operating below compliance on the first visit and there has been no major improvement to the site on this visit. The company does not appear to have made any effort to read our CCScheme pack and become familiar with the expectations of the scheme.

**Projects managed by SP.PM:**

<b>Scheme</b>	<b>Contractor</b>	<b>Score</b>	<b>Comments</b>
61-67 Broadwick Street	Lakemead Construction Ltd	29.5	A project to bring forward a new shop front on a mixed-use building close to a busy central London shopping centre. The assessor was pleased to find all round compliance with the CCS code and it was noted that the site managers had recently attended a CCS seminar to learn more about the scheme.
23 Beak Street	Lakemead Construction Ltd	27.5	A refurbishment of a commercial and residential Victorian unit. The site manager made the assessor welcome and he was pleased to find all round compliance with the CCS code.

Of the eight assessed schemes, six (75%) scored in excess of the in-house target of 26/40, and the average score for all the visits was 28/40. This is considered to be a good achievement for schemes frequently constrained by space and locality. Excellent management of construction site impacts was demonstrated at 60 Chandos Place and 40-42 Tavistock Street with scores of 34 and 33, respectively. Chandos Place was commended for being an excellently thought out and implemented project despite the limitations regarding its small size. Tavistock Street was reported to give a good impression of the construction industry and promotes good neighbour relations.

Unfortunately, the St Martin's Lane scheme did not score satisfactorily within the CCS visits and no major improvements were recorded during a second site visit. Shaftesbury is aware that there were issues regarding the scheme, however, it is considered that the audit was not consistent with other assessments. Meeting the requirements of the Considerate Constructors Scheme is often extremely difficult on small sites such as this, particularly when neighbours are located on the ground and basement floors of the same building. It was also noted that the inspectors did not provide the appropriate prior notice for the visit and therefore the site Foreman was not present during one of the inspections. KPM Construction Ltd has been used on a number of Shaftesbury sites and no issues have been raised in the past.

For this site, the following main issues were raised:

- There was no written site induction procedure to cover all aspects of the CCScheme.
- Personal radios were allowed.
- The site does not cater for all abilities.
- There was no drying room with lockers or showers and no barrier creams were available in the toilets.
- The canteen / office area was not screened off and was very dusty.
- No fire drills had been undertaken.
- Although a record was kept of all accidents, near misses were not recorded.

- Skills and medical records of site operatives were not kept on site and no site ID card system was in use.
- The nearest hospital was not displayed on a location map and qualified first aiders were not identified with a cross.

General issues for improvement by contractors that were raised relate to the following:

- Written contact should be made with site neighbours at the beginning of the project.
- There should be policies in place for behaviour, swearing and smoking.
- Sites should be provided with lockers, drying facilities or showers. Toilet facilities should be provided for female and disabled site users and barrier creams should be available within the facilities.
- It would be beneficial to include a location plan of the nearest hospital (A&E).
- All first aiders should be identified with a green cross on their hat and photos should be shown during the induction process and displayed on site.
- Identification cards should be used.
- Records of operative medical conditions and skills should be kept on site.

Some of these points are similar to those raised in the 2005-06 audit and it is considered that particular consideration should be given to providing written notification to neighbours, providing adequate welfare facilities (within the space limitations), identifying on-site first aiders and using site identification cards.

#### **4.2.4 Building Health**

EA Shaw maintains a programme of inspections for the following:

- Water risk assessments (legionella) – 6 monthly testing
- Health & Safety audits
- Fire risk assessments
- Disability Discrimination Act assessments where feasible within the constraints of listed building restrictions

All asbestos in the Carnaby / Seven Dials part of the estate is removed at the time of purchase and the asbestos register updated accordingly. No asbestos has been removed and disposed of this year.

An asbestos register is held by Nelson Bakewell for the Chinatown part of the estate. There are no high-risk areas and annual inspection is undertaken to ensure that any asbestos present is being managed. Nelson Bakewell also undertakes annual health & safety audits of each building and annual fire risk assessments.

#### **4.2.5 Waste Duty of Care Audits**

##### *The Managed Portfolio*

EA Shaw, the managing agents for the Carnaby and Seven Dials sections of the portfolio, commissioned *Enviro-Waste* to undertake a waste audit of three key properties in February 2007. The main focus of the report was to highlight current practices and possibilities for improving waste management and recycling in these areas. The main findings were as follows:

- *Ganton House*: Glass and edible oil (from the nightclub) were being recycled. It was considered that recycling rates could be increased to 35% of the waste by introducing cardboard and glass recycling.
- *Kingly Court*: Cardboard and glass were separated for recycling.
- *Carnaby Court*: Glass and oil were recycled, but cardboard is not currently separated for recycling.

The report recommended that waste was collected daily from the properties and transported to a shared waste and recycling operation at Carnaby Court using an electric pedestrian tow-tug. It was recommended that all cardboard be baled for recycling at Kingly Court. On the basis of these findings, EA Shaw has commissioned a new waste contractor to start from November 2007. This will also enable more precise reporting of waste data in future years as they will provide a summary of the amount of each waste stream.

##### *Refurbishment Projects*

During 2007, waste Duty of Care audits of the following refurbishment projects were undertaken by RPS:

- 14 Wardour Mews (contractor: T G Gregory and Associates);
- 128 Long Acre (contractor: Lakemead Construction Ltd).

The majority of waste was confirmed to be construction / demolition waste and the audits confirmed that the waste management procedures practiced by Shaftesbury's contractors are compliant with the current regulations. In addition, the shortage of space on the sites visited necessitated that any waste was managed carefully and in a controlled way. The sites were observed to be organised with relatively good housekeeping for construction sites and the contractors were aware of what is required for good waste management.

### **4.3 Supplier Programmes**

A “Supplier Programme” refers to the integration of environmental and social/ethical factors into the procurement process of the organisation: for example, sourcing of water-based rather than oil-based paints, or sourcing of office furniture from certified sustainable wood resources or ensuring sub-contractors are using legitimate workers. In this context, suppliers which meet Shaftesbury’s qualification criteria are defined as those companies that have been assessed and prioritised on the basis of potential environmental or business risk associated with their provision of products, processes or services, which Shaftesbury monitors as below:

#### *Use of Policy & Contractor’s Induction Leaflet*

Shaftesbury’s prioritised suppliers would, in the first instance, be its managing agents and project managers and through these - down the supply chain - to selected subcontractors and suppliers. The Corporate Responsibility Policy is included as standard in all contract documentation issued by the project managers Fresson & Tee and SP.PM. In addition, the Contractor’s Induction leaflet, produced in November 2004, has been issued to all subcontractors working on Shaftesbury refurbishment projects. It is also issued by the managing agents (Nelson Bakewell and EA Shaw) to contractors working for the managed portfolio. It is recommended that this leaflet is updated in 2007-08 to reflect recent changes in the Policy.

#### *Use of Checklists*

As part of the contract documentation, the project managers issue the following Shaftesbury checklists at the opening site meeting of each refurbishment project:

- Legislation checklists to ensure all members of the team are aware of relevant environmental legislation;
- A specification checklist to ensure environmental issues are considered at an early stage in the design of the scheme;
- A contractors checklist to ensure that the contractors are aware of the potential environmental impacts of site activities; and
- A waste checklist to confirm types and quantities of waste produced on site, and whether they are disposed of or recycled.

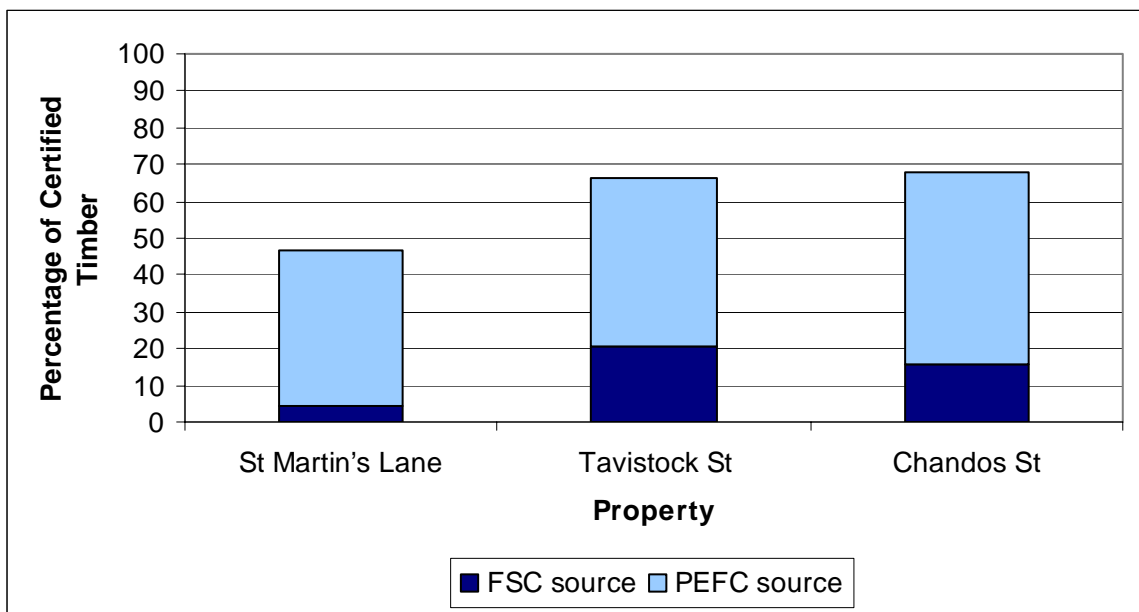
The checklists are completed during the course of the project and analysed as part of the annual audit. As part of the completion of the checklists, the project team is also required

to submit supporting documents, e.g. the Considerate Constructors Report, waste transfer notes, certification of timber supplies etc.

*Timber Sourcing*

Although Shaftesbury is not a significant user of timber as a large proportion of its refurbishments involve re-using existing timber features e.g. windows and doors, it is recognised that it is an important issue that needs to be monitored. In the past, Shaftesbury endeavoured to obtain information regarding the sustainable sourcing of timber through timber tracking questionnaires provided to the project managers and completed by the suppliers. In reality this information proved extremely difficult to obtain from the suppliers and the structure of the questionnaire. A trial has been undertaken this year to obtain numerical information regarding timber sourcing from invoicing, together with certification from the supplier. By taking a more direct approach, it is more likely that Shaftesbury will be able to begin to collect meaningful and quantifiable data. Figure 1 illustrates data for three refurbishment sites and the detailed figures are provided in Appendix A.

**Figure 1 – Percentage of Certified Timber Sourced at Refurbishment Sites**



The data indicates that the sourcing of sustainable timber is occurring successfully on a small number of projects, with in excess of 65% of all timber procured from a certified source. This is in excess of Shaftesbury's target for 30% to be sourced from sustainable supplies. Given similar contractors and project management teams are involved with all Shaftesbury refurbishment projects, it is likely that a similar proportion of certified timber is procured during other schemes. The majority of the certified timber is claimed to have originated from sources accredited to the Programme for the Endorsement of Forest

Certification (PEFC) scheme, however, a limited volume was also sourced from Forestry Stewardship Commission (FSC) accredited suppliers. Shaftesbury maintains a policy commitment to only use legally sourced timber, and this is clearly required in all specification documentation. It should be noted, however, that although Chain of Custody numbers were available, suppliers did not always provide certificates.

This data provides a baseline against which to report future results and set targets and the methodology of retaining all timber invoices and supplier certification details will be extended for all refurbishment projects in 2007-08.

#### **4.4 Environmental and Social Stewardship of Services/Facilities**

“Environmental and Social Stewardship” means considering and influencing the environmental/social impacts that arise directly or indirectly from a company’s processes or services.

For Shaftesbury, the most pertinent influence it has is over its tenants in the use of its portfolio and how it can encourage good environmental and social practice. There are over 800 tenants within the portfolio and Shaftesbury maintains a direct communication link to all of them. This includes issuing its CR policy and a copy of Shaftesbury’s Environmental Policy and Occupiers Leaflet to all tenants. Within the Carnaby Estate, two surveys have also been undertaken with tenants to gain information regarding tenants’ approaches to environmental issues and existing waste management practices. These are discussed in more detail in Section 6.2.

In the planning and design process, Shaftesbury is also in a position of influence in how it promotes sustainability and environmental measures as part of its project proposals. This is particularly exemplified by the Longmartin Project - a Shaftesbury and Mercers Company joint venture to regenerate a run-down area of Covent Garden. The scheme is by definition inherently sustainable as a proportion of the development will involve refurbishing and improving existing building structures. In addition, it is including specific energy efficiency measures and other features such as green roofs and initiatives to minimise the use of private vehicles

#### **4.5 Performance Against Objectives and Targets**

***Policy Goal D: Prior to purchase, environmental audits are conducted where appropriate***

No.	Objectives 2006 -07	Progress/Date Achieved
D1	Undertake environmental / building health surveys of properties prior to	<ul style="list-style-type: none"><li>Environmental/building health surveys are utilised to screen all properties prior to purchase.</li></ul>

	purchase if appropriate	
D2	Continue to maximise use of 'brownfield' land in central London	<ul style="list-style-type: none"> <li>All purchases have been within central London and therefore 100% utilisation of 'brownfield' sites has been maintained.</li> </ul>

**Policy Goal F: Shaftesbury PLC expects its contractors, as supervised by its consultants to adopt 'best environmental practice' in the refurbishment of the Company's property portfolio.**

No.	Objectives 2006 -07	Progress/ Date Achieved
F1	Efficient use of energy and water	<ul style="list-style-type: none"> <li>The Specification Checklist has been updated for use in 2007-2008 in line with requirements of the Mayor of London's Sustainable Design and Construction Supplementary Planning document and BRE guidance.</li> <li>Longmartin proposals incorporate energy efficient design in both the building envelopes and service installations and renewable energy sources are being evaluated.</li> </ul>
F2	Timber will be sourced, where possible, from well managed sources certified by third party certification bodies	<ul style="list-style-type: none"> <li>The approach to monitoring timber has been reviewed as a result of poor data collection in previous years. A trial has been undertaken this year and, as this proved successful, the approach will be used at all refurbishment sites in 2007-2008.</li> <li>The target of 30% of timber to be sustainably sourced has been surpassed for the three refurbishment sites used as a sample.</li> <li>The new approach is to collect timber invoices from each site (with stated proportions of certified timber) and correspond these to certificates from suppliers to maintain a documented audit trail.</li> </ul>
F3	Management and disposal of construction waste	<ul style="list-style-type: none"> <li>Construction waste generated data for all projects above £75,000 has continued to be monitored.</li> <li>Project managers ensure waste transfer notes are retained as part of contract documentation and some are provided to RPS for the annual audit.</li> <li>RPS has audited all waste data during September 2007.</li> <li>RPS undertook a repeat Duty of Care audit in 2007 including two refurbishment contracts (&gt;20%).</li> <li>A waste audit of current practices was undertaken for part of the managed portfolio in February 2007.</li> </ul>
F4	For projects of capital value over £75,000, Shaftesbury will sign up to Considerate Constructors Scheme	<ul style="list-style-type: none"> <li>All eight eligible schemes were registered within the scheme in 2006-2007.</li> <li>The target to maintain last year's performance by achieving a minimum score of 26/40 (above satisfactory performance) on 80% of schemes audited was not achieved; performance in 2006-07 was 75%.</li> <li>RPS has audited the results and areas for further improvement in 2007-08 have been identified.</li> </ul>

No.	Objectives 2006 -07	Progress/ Date Achieved
F5	During construction, the Company through its Project Managers, will endeavour to minimise adverse impacts on the environment	<ul style="list-style-type: none"> <li>• Shaftesbury has continued to provide all contractors with a copy of the Company Policy &amp; specification questionnaires etc. in tender documentation.</li> <li>• The company has continued to issue Induction Leaflet to all contractors working on the portfolio.</li> <li>• Maintain documented audit trail of contractors that have received leaflet.</li> </ul>

#### **4.6 Recommendations**

- Continue to audit the performance of principal suppliers against the Policy.
- Ensure that all schemes adhere to the Considerate Constructors Code. Specifically, the following should be considered: making written contact with site neighbours, providing adequate welfare facilities, displaying a location plan of the nearest hospital, ensuring that all first aiders are easily identifiable on site and using ID cards.
- Extend the timber tracking trial to all refurbishment projects for 2007-08. This should include obtaining all timber invoices for each scheme and certification documentation from the suppliers. The current Timber Tracking Questionnaire should be withdrawn.
- Ensure the Contractor's induction leaflet continues to be issued to all subcontractors working on the portfolio, both for managing agents and within refurbishment projects. Once the existing supply has been depleted, it is recommended that the leaflet should be updated.
- Ensure that the Environmental Policy and Occupiers leaflet continues to be issued to all new commercial tenants. Review the content of the leaflet on a regular basis (e.g. every two years) and revise and reissue as necessary.

## 5 Environmental and Health & Safety Performance

### 5.1 Measuring Environmental Performance – Current Status

Generating environmental and health & safety improvement – and hence business improvement – crucially depends on Shaftesbury being able to measure, monitor and collate performance data against its significant environmental and health and safety impacts.

The generally accepted key environmental impacts – and KPIs – against which performance can be measured include:

- *Inputs:* energy consumption, water consumption and raw materials consumption.
- *Outputs:* Greenhouse Gas emissions (GHG)<sup>1</sup>, ozone-depleting substances, waste water generation and solid waste generation.
- *Other issues:* building health (asbestos, legionella), transport, health and safety incidents, environmental incidents including noise.

Each main topic is explained in more detail below, in relation to the activities at the company's Head Office, within its managed portfolio and within its refurbishment projects. Detailed data is provided in the Appendix.

#### 5.1.1 Energy Consumption and Greenhouse Gas Emissions (GHG)

##### *Head Office*

With respect to inputs, Shaftesbury's main issue is controlling the consumption of resources. The use of electricity is monitored through a review of bills over the year. No gas or other fuels are used within the Head Office and it is noted that Shaftesbury switched to a 'green tariff' electricity supplier in October 2006.

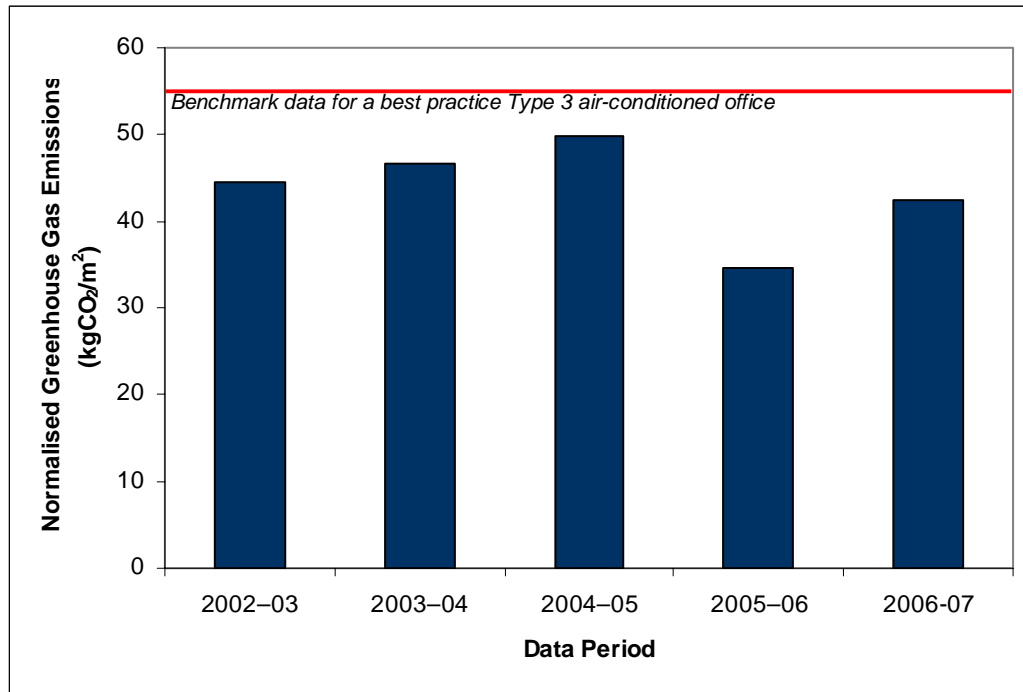
The electricity consumption increased in 2006-07, however, it still remains significantly below figures from 2004-05 and preceding years. Total carbon emissions in 2006-07 were 22,077kgCO<sub>2</sub>. The results compare favourably against good practice electricity use benchmarking figures for offices<sup>2</sup>. Figures provided for the most relevant office type (Type 3: an air-conditioned standard office) are 226kWh/m<sup>2</sup> for typical practice and 128kWh/m<sup>2</sup> for best practice, with carbon emissions of 97.18kgCO<sub>2</sub>/m<sup>2</sup> and 55.04kgCO<sub>2</sub>/m<sup>2</sup> respectively.

<sup>1</sup> Greenhouse gases which contribute to global warming include CO<sub>2</sub>, SO<sub>x</sub>, NO<sub>x</sub> etc.

<sup>2</sup> The Government's Best Practice Energy Efficiency Programme - Energy Consumption Guide 19, Energy Use in Offices, 2000.

Head Office figures for 2006-07 indicate that energy usage is significantly below best practice at 98.92kWh/m<sup>2</sup>, with correspondingly low carbon emissions (42.54kgCO<sub>2</sub>/m<sup>2</sup>). A comparison of year-on-year data is shown in Figure 2, and detailed data is provided in Appendix B.

Figure 2 – Comparison of Greenhouse Gas Emissions from Head Office against a standard benchmark



*The Managed Portfolio*

The use of energy within the managed property portfolio is the responsibility of the tenants with the exception of certain common areas, e.g. stairwell lights and facilities. The usage in these areas is measured through the use of bills and a summary of the data is provided in Figures 3 and 4. More detailed data is provided in Appendix C.

Review of standard benchmarking criteria, indicates that there are no available benchmarking figures for common parts, however, the data is considered to be low when compared against even the lowest energy-using office type in the Carbon Trust office benchmarking data. This again emphasises the difficulties of endeavouring to set standard improvement targets for a company such as Shaftesbury, particularly when the level of energy use is so low.

Figure 3 – Energy Usage within the Managed Portfolio

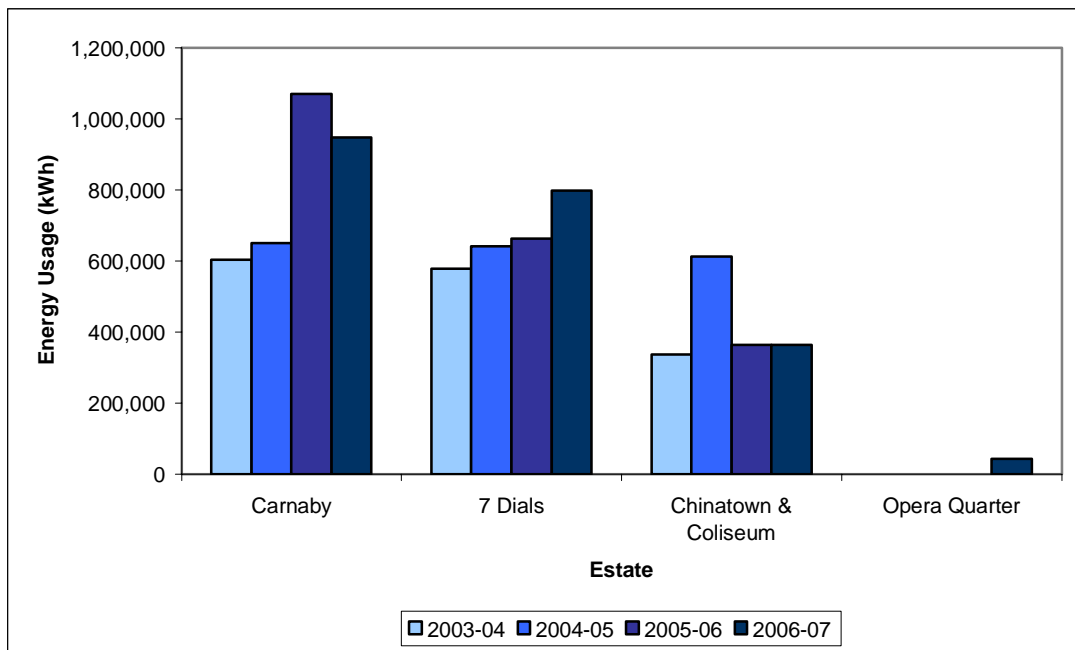
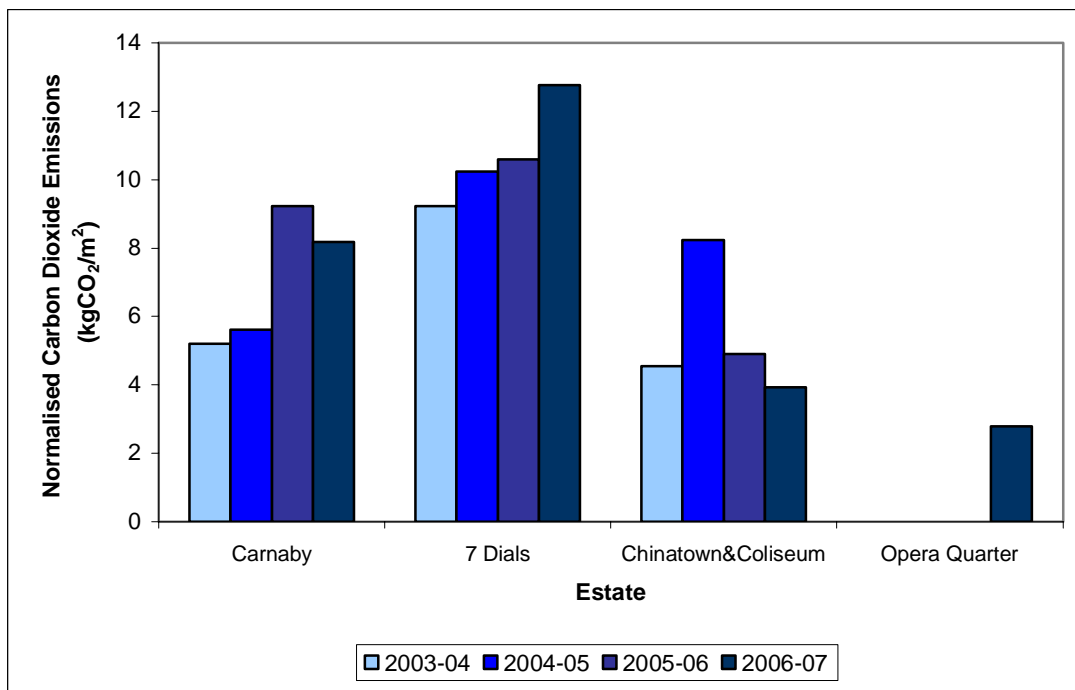


Figure 4 – Normalised Carbon Emissions from the Managed Portfolio according to Floor Area



An analysis of the data and energy saving measures employed in each of the three managed portfolios is provided below:

- *Seven Dials*

There has been a continued increase in electricity consumption in the Seven Dials area. This is likely to relate to an increased occupancy of this area and therefore a greater tenant usage of common parts.

In 2006-2007, a scheme was put into place to replace as many traditional light bulbs as possible with low energy light bulbs; this has proved to be successful, with the number of efficient bulbs increasing from 20% in 2006 to the current level of 94%. This has resulted in a measurable decrease in maintenance cost at several properties. This can particularly be demonstrated in Ganton House where maintenance costs have decreased by 75% compared to 2005-06 and this has been accompanied by a 6.5% decreased in electricity usage. At Neal Street, a 78% decrease in electricity usage has been achieved compared to 2005-06 results. In addition, all Christmas lighting in 2006-07 utilised energy efficient bulbs.

Consideration has also been given to switching the supply at Seven Dials to a 'green tariff', however, the availability of green energy from the current supplier is limited to 3% of the total supply on a first come first served basis. Consultation has also been undertaken with other suppliers in the area and it appears the provision of green energy is limited. Subject to availability, this situation will be reviewed in April 2008.

- *Carnaby*

The Carnaby area saw a significant increase in energy consumption in 2005-2006, but a reduction has been demonstrated in 2006-2007. The estate has also been supplied with 100% 'green tariff' energy since September 2006.

Currently 69% of bulbs are long life / low energy bulbs and this has shown a continual improvement since the initiative was commenced in 2005. All Christmas lighting in 2006-07 utilised energy efficient bulbs.

In 2006-07 the Carnaby Christmas decorations were 'oversized light bulbs' which created a great deal of attention at a time when the diminution of manufactured household light bulbs was consistently in the media. The oversized light bulbs were internally lit by energy saving bulbs, which not only was an environmental benefit also helped to facilitate an extremely unique Christmas display in keeping with those of previous years.

*Chinatown, Coliseum and Opera Quarter*

For Chinatown and Coliseum, in 2005-06 energy was monitored from a standard sample of properties and extrapolated for the remainder of the portfolio. For 2006-07, employment

of a specialist meter reading company has enabled data to be obtained for two quarters, which has been extrapolated to provide a full year's data.

Within the Chinatown part of the estate, 100% of the bulbs within the common parts are low energy models. A consequent cost saving on maintenance is being demonstrated, due to the longer life of the bulbs and a new performance indicator, the number of bulbs required replacement, has been introduced by the managing agents.

From April 2007, Opera Quarter was added to this part of the portfolio, but as indicated in the graphs only a small amount of electricity has been used, due to the fact a significant part of this area is unused and awaiting redevelopment

#### *Refurbishment Projects*

Consideration is given to energy efficiency as part of the specification of refurbishment, where it is feasible within the constraints of the listing (or otherwise) of the property. For example:

- Long-life light fittings installed in common areas;
- Timer controls on the lights in common areas;
- High-efficiency individual boilers installed within each unit with thermostatic controls;
- Insulation used in roof voids to reduce losses;
- Secondary glazing installed, where possible.

All refurbishment projects in 2006-07 included the use of energy efficiency measures.

The Longmartin project, which achieved planning approval in August 2007, included energy efficient design within both the building envelope and services installations and had also considered the use of renewable energy sources (photovoltaic cells and water heating panels) to supplement existing power supplies.

### **5.1.2 Water Consumption**

#### *Head Office*

The Head Office is a leased premises, hence the use of water is part of the lease and is currently not monitored.

#### *The Managed Portfolio*

Water meters have been installed throughout the Seven Dials and Carnaby areas to measure water use in the common parts. In previous years there have been some issues with data collection across this part of the portfolio and this is the first year for which data can be presented. Water meters were installed in all of the properties in 2005-06 and

Shaftesbury is able to provide data for over 50% of the premises (11 properties out of 21). This equates to a usage of 3647m<sup>3</sup> for an estimated floor area of 40,253m<sup>2</sup>, or 0.09m<sup>3</sup>/m<sup>2</sup>. Full details are provided in Appendix D. Given the mixed use of the properties including office, retail and catering facilities, and the consequent differing water demands, no appropriate benchmarking figures are available. However, the managing agents EA Shaw aim to continue to increase the proportion of the portfolio represented over the coming years, and this will be compared to the baseline established in this audit report. Now that figures are available for each property, further investigation can also be undertaken into properties with high uses with the aim to reduce water usage in the future. In particular, it is considered that water usage at the following properties should be investigated: 23 Ganton Street, 14-22 Ganton Street, 1a Earlham Street and 26 Kingly Street.

Water is not monitored for Chinatown and it is considered inappropriate to install meters for the very small volume of water used in the common parts. However, a meter was installed last year for the water supply to South Service Yard, which is the highest water use location in this part of the portfolio. This area is used for the storage of waste items and requires regular cleaning, and therefore, the use of a significant volume of water. In 2005-06, water consumption was 368m<sup>3</sup>. The meter reading for 2006-07 indicates a usage of 286m<sup>3</sup>, a decrease of over 20%. Steam cleaning is now used in the yard area as this is a more water efficient method, hence the lower figure.

### *Refurbishment Projects*

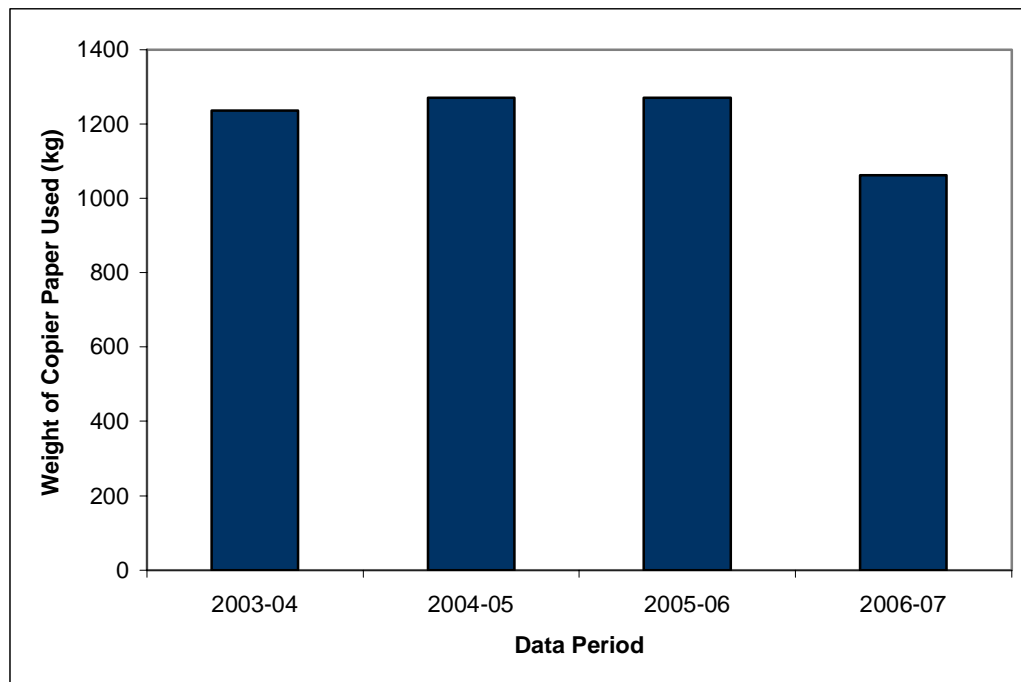
Water efficiency is also considered during refurbishment projects. Measures incorporated include dual flush WCs, motion detectors / timers for urinal flushing, low flow showers and taps and energy efficient appliances (where applicable), the installation of water meters and leak detection systems. The Shaftesbury specification checklist ensures that these are considered at an early stage in the design process. All refurbishment projects undertaken in 2006-07 incorporated water efficiency measures.

### **5.1.3 Use of Other Materials**

#### *Head Office*

Paper is the main resource used within the Head Office. Figure 5 shows the volume of copier paper used since 2003-2004 and demonstrates a reduction in paper usage in 2006-2007 compared with previous years. In addition, in summer 2007, Shaftesbury rectified all issues relating to the supply and quality of recycled paper and is now able to guarantee that 100% of its A4 and A3 copier paper is recycled. This compares to a 81% in 2003-04, 86% in 2004-05 and 0% in 2005-06. Detailed data is provided in Appendix E.

Figure 5 – Paper consumption in the Head Office.



A small proportion of paper usage also results from the use of business cards and compliments slips.

#### *Refurbishment Projects*

Within refurbishment projects, there is the potential for significant use of raw materials. However, by the nature of reusing buildings rather than constructing new-build properties, Shaftesbury is significantly reducing the need for raw materials.

Shaftesbury issues a specification checklist to all project managers to ensure that the re-use and prudent use of raw materials is considered at an early stage of the design process. The use of materials is then dictated by the specification that is included within the contract tender documentation to the contractor.

Within projects, efforts are made to reuse timber wherever possible. All of the buildings being refurbished are listed properties and there is often a requirement to maintain the existing materials. For example, traditional timber sash windows are often refurbished rather than replaced and wood panelling within buildings is often retained. Where additional timber is required, efforts are made to source it sustainably (see Section 4.3). In 2006-07, all of the refurbishment sites were able to reuse some materials on site. For example, the fireplaces were relocated at 23 Beak Street and the existing flooring and murals were retained at 61-67 Broadwick Street.

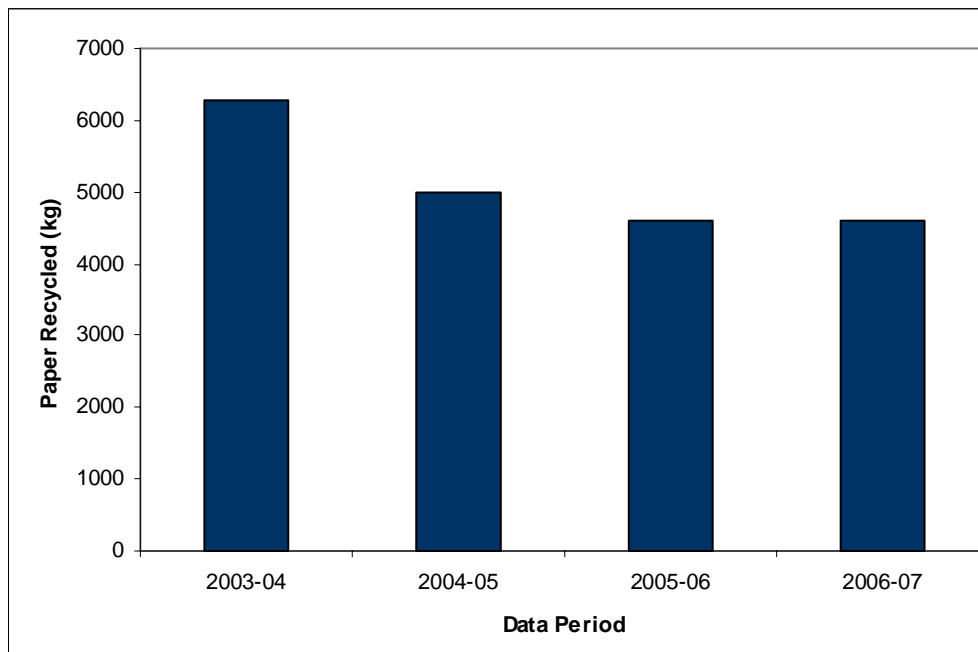
However, whilst it is often possible to reuse timber and other materials during the refurbishment works, it is more difficult to use prefabricated materials due to the listed status of the buildings and conservation area constraints. Only a third of the refurbishment projects were able to do this in 2006-07. All of the sites were able to minimise resources and waste by selecting standard size modules. Refurbishing listed properties also restricts the types of masonry and timber materials that are appropriate; this was discussed in more detail in Section 2.

**5.1.4 Waste Management**

*Head Office*

Due to the Head Office being leased, there are significant limitations on controlling waste management issues. However, the principal solid waste is paper and this is all now recycled. The amounts of paper recycled are shown in Figure 6 below and detailed in Appendix F:

**Figure 6 – Quantity of Paper Recycled at Head Office**



The total figure recycled has remained relatively constant compared to 2005-06. It should be noted that paper waste generated is to a certain extent outside Shaftesbury’s control as a significant proportion relates to incoming post and reports etc (including junk mail).

In general, redundant IT equipment and furniture go in the first instance to staff, and then to selected charities. Given the number of staff employed by Shaftesbury, the volume produced and waste generated are limited.

### *Managed Portfolio*

With respect to the managed portfolio, the volume of waste generated is a result of the tenants' activities and the responsibility for waste disposal lies with Shaftesbury's managing agents. There are a number of estate specific initiatives that were initiated in previous years relating to waste management, and these have continued for 2006-07 as outlined below.

- Chinatown

In Chinatown, Shaftesbury continues to work closely with Westminster City Council (WCC) to manage the issues that are specific to the area such as controlling the problems of fly tipping and disposal of food and oil waste.

The undercover bin store at Horse & Dolphin Yard built in 2005 has proved effective for taking bins off the street and preventing leaching of waste into the road. Consequently, the local environment has been improved for both passers by and local residents. A contract cleaner also attends this yard. In 2006-07, the number of bins remained constant despite an increase in the number of site users.

South Service Yard has a dedicated cleaner to maintain the area and ensure the bins are kept clean, however, there are some ongoing issues regarding flytipping. Security systems are now in place. In 2007-08, there are plans to set up a new residential recycling point on the west side of South Service Yard. This will initially be for glass only and will be extended in the future to cover more recyclable materials. The materials will be collected by Westminster City Council and all residents encouraged to make use of the new facilities through a circular.

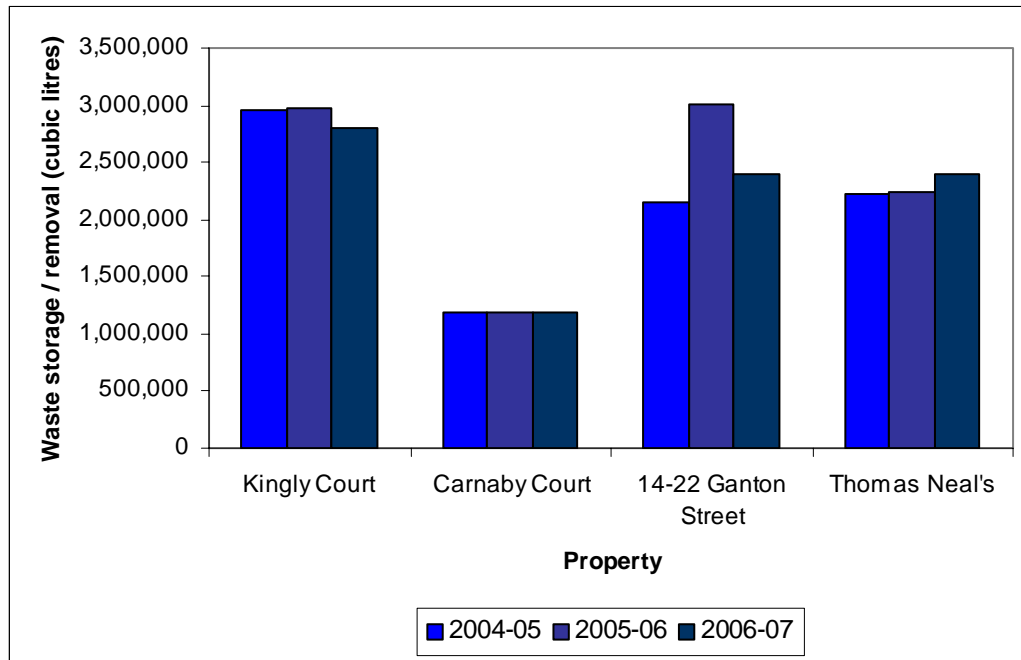
There is still no progress with Westminster City Council regarding recycling and / or compacting due to the lack of space and / or a suitable site available from the Council. However, options are being investigated to encourage restaurants in the area to recycle bottles. This has already been initiated by the brewery serving a number of restaurants and it is proposed to extend this to cover a larger proportion of the portfolio in the coming years.

- Carnaby and Seven Dials

There are currently 4 sites within Carnaby St/Seven Dials where Shaftesbury is responsible for waste management: (1) Kingly Court; (2) Carnaby Court; (3) 22 Ganton Street; and (4) Thomas Neal's Centre. Waste volumes at Kingly Court and Ganton Street have decreased in 2006-07 and those at Carnaby Court have remained constant. There has been a slight increase in waste production at Thomas Neal's, which is attributable to

increased occupancy. Generally around 20% is compacted on site, and in recent years the percentage segregated for recycling has varied between 2.4 and 8.8% (no figure was available for 2006-07). The low percentage is as a result of the contractor sorting waste for recycling after collection. Specific figures for Shaftesbury's tenants' waste are not available but the contractor estimates that 47% to 78% of waste is recycled on a daily basis. A summary of the waste data is provided in Figure 7 below, with full figures provided in Appendix G.

Figure 7 – Waste Removal Data Carnaby / Seven Dials



E A Shaw undertook a survey of the Carnaby estate in 2007. Of the 44% of tenants who responded, all were in favour of the provision of recycling facilities.

Enviro-waste undertook an audit of waste and recycling management of the Carnaby Estate in February 2007, specifically reviewing opportunities at Ganton House, Carnaby Court and Kingly Court. This recommended a shared waste and recycling operation for all of the buildings, to use a new Carnaby Court waste compactor for waste from all of the buildings and to use smaller bins for towing to Carnaby Court. Following this report, a single waste contractor will be in place in the Carnaby and Seven Dials area from November 2007. Although this is unlikely to have an impact on production volumes, it will serve to reduce transport impacts in the area and improve data collection.

*Refurbishment Projects*

With respect to refurbishment projects, the management of waste in the contract is generally the responsibility of the subcontractor. Again due to the specific nature of the

portfolio, certain materials will be re-used / recycled within the refurbishment process e.g. fireplaces, masonry features etc, but the remaining solid waste is disposed of to landfill.

As identified in previous years, there are several problems with data collection which means that currently the available data is not in a form to set against a recognisable performance indicator:

- The small scale of most of Shaftesbury's refurbishment projects means that there is often insufficient space to segregate waste;
- Equally, the size of the contracts also means that the volumes of waste are relatively low and often waste from several contracts may be disposed of at the same time, therefore linking waste to a specific contract can be difficult.

This is a continuing problem, which is unlikely to be resolved given the unusual nature of Shaftesbury's portfolio. It is recommended that waste production will continue to be monitored, but it is recognised that a KPI will not be identified. Monitoring waste disposal has the added benefit of ensuring that the sub-contractors demonstrate 'duty of care' in the disposal of the construction waste.

#### **5.1.5 Health & Safety Performance**

##### *Head Office*

During 2007, one member of the Shaftesbury staff also attended a health and safety awareness course.

##### *Refurbishment Projects*

There were no reportable health and safety incidents within the refurbishment projects undertaken in 2006-07.

##### *The Managed Portfolio*

Within the managed portfolio there were no reportable health and safety incidents in 2006-07. Health and safety checks were undertaken on the Chinatown Portfolio by an external contractor and an annual health and safety and fire audit was also completed by the managing agent, Nelson Bakewell. No significant issues were raised during these audits.

#### **5.1.6 Other Issues**

##### *Transport*

With respect to transport issues, since the Head Office is within central London employees generally use public transport (or walk). To encourage use of public transport

season ticket loans are available from Shaftesbury for its employees (except directors). The majority of staff have taken up the opportunity for the use of this loan so maximising the use of public transport. Directors also use public transport.

Within refurbishment projects, contractors are encouraged to use local suppliers where possible to reduce the impact of transportation of materials to the site. Of the 9 refurbishment projects in 2006-07, five reported that they were able to source materials locally. Given the small-scale nature of refurbishment projects, it is often not possible to install bicycle facilities within the buildings or external areas. However, efforts are made to incorporate them where sufficient space is present. In addition, all sites are located within Central London and are in close proximity to the public transport network.

Within the Longmartin Project it is proposed to include vehicle recharging facilities in order to encourage the use of hybrid vehicles. Cycle parking will also be provided for all new residents as will a car club to reduce the reliance upon private vehicles.

### *Asbestos*

Asbestos surveys are conducted, as appropriate, by the managing agents and their subcontractors in the management of the Chinatown part of the portfolio and records are kept for each individual property. All buildings are audited annually to confirm the condition of any in-situ asbestos containing materials. For Seven Dials and Carnaby Asbestos Surveys have been undertaken of all buildings and the register is held by EA Shaw. All asbestos removed from refurbishment projects is handled by a suitably licensed contractor and records are retained.

### *Legionella*

Legionella surveys are conducted, as appropriate, by the managing agents and their subcontractors in the management of the portfolio.

### *Environmental Incidents.*

There were no notifiable environmental incidents within the managed portfolio or the refurbishment schemes in 2006-07.

*CFCs and HCFCs*

With the exception of St Martin’s Lane and Beak Street, the refurbishment projects were able to exclude the use of all CFC and HCFC-containing materials.

*Storage of Hazardous Materials*

All of the refurbishment sites require the use and storage of paint. All but one of the projects selected water-based paints in preference to solvent-based paints and the storage was reported to be satisfactory in all. This generally included storage within a steel container in a well ventilated area. Two of the sites also had spill kits available in the event of an incident. No other hazardous substances were reported to be kept on site.

**5.2 Performance against Objectives and Targets**

***Policy Goal C: Comply with legal requirements***

No.	Objectives 2006 -07	Progress/Date Achieved
C1	Comply with all legal requirements for environment	<ul style="list-style-type: none"> <li>There have been no legal non-compliances reported.</li> </ul>

***Policy Goal E: Minimise environmental impacts during management of portfolio***

No.	Objectives 2006-07	Progress/ Date Achieved
E1	Monitor & where possible reduce energy consumption	<ul style="list-style-type: none"> <li>Energy use within the Head Office has increased this year, however, still remains below the best practice benchmark figure.</li> <li>The managing agents have collected data for Carnaby and Seven Dials and Chinatown so that year on year comparisons are possible.</li> <li>Usage in managed portfolio is low and is difficult to improve upon.</li> <li>Green tariff electricity is now used within 100% of the Carnaby part of the portfolio, which represents 40% of the overall portfolio.</li> <li>All of Chinatown Common parts have long life bulbs and the proportion of long life bulbs has now been increased to 94% in the Seven Dials area and 69% in the Carnaby estate.</li> <li>The 'Environmental Policy and Occupiers' leaflet has been issued to all tenants to raise awareness with regard to reducing energy consumption.</li> </ul>
E2	Monitor and, where possible, minimise water consumption	<ul style="list-style-type: none"> <li>No water data is available for the Head Office.</li> <li>Water consumption at the South Service Yard has reduced by over 20% due to the introduction of steam cleaning – a more efficient use of water.</li> <li>Water usage figures have been reported for more than 50% of the</li> </ul>

No.	Objectives 2006-07	Progress/ Date Achieved
		<p>Carnaby &amp; Seven Dials portfolio and this will be used as a benchmark for future years.</p> <ul style="list-style-type: none"> <li>The 'Environmental Policy and Occupiers' leaflet has been issued to all tenants to raise awareness with regard to reducing water consumption.</li> </ul>
E3	Monitor and reduce waste for its managed properties	<ul style="list-style-type: none"> <li>The volume of paper recycled in the Head Office has remained consistent with previous years as has volume of paper used.</li> <li>Initiatives to improve waste management have been implemented such as the installation of CCTV at Horse &amp; Dolphin yard and South Service yard to monitor and reduce fly tipping.</li> <li>At Horse &amp; Dolphin Yard, the undercover bin store built by Shaftesbury has proved successful freeing up space in the yard and improving the local environment</li> <li>Waste recycling and compacting facilities are well used by tenants within the Carnaby /Seven Dials portfolio. A new single contractor will be in place by November 2007. This should enable the provision of more detailed data on recycling.</li> <li>The 'Environmental Policy and Occupiers' leaflet has been issued to all tenants to raise awareness with regard to reducing waste.</li> </ul>
E4	Ensure that contractors (including cleaners, maintenance personnel etc.) comply with the Company Policy	<ul style="list-style-type: none"> <li>Contractors' induction cards are provided to all contractors working on both the Chinatown and Carnaby / Seven Dials parts of the portfolio.</li> </ul>
E5	Remove and dispose of hazardous materials e.g. asbestos in accordance with relevant legislation	<ul style="list-style-type: none"> <li>Both managing agents for Nelson Bakewell and EA Shaw hold up to date asbestos registers for the managed portfolio.</li> </ul>

### 5.3 Recommendations

- Continue to use utility bill data to monitor energy consumption in the Head Office and common areas. Use this data to calculate GHG emissions.
- Increase the proportion of long life bulbs at the Carnaby Estate.
- Investigate the potential to extend proportion of portfolio with 'green tariff' electricity for use in common areas of portfolio.
- Continue to use the leaflet 'Environmental Policy and Occupiers' to encourage improvements in energy, water and waste management.
- Continue to work with Westminster City Council to investigate potential improvement of waste management and increased recycling in Chinatown.
- Encourage further tenants to use the brewery scheme for recycling glass.
- Continue to take water meter readings for Carnaby and Seven Dials. Investigate those sites highlighted to have relatively high water usage.

## 6.0 Stakeholder Engagement

### 6.1 Internal Communication to Employees

Shaftesbury continues to maintain a proactive approach to the communication of its Corporate Responsibility performance to its key stakeholder groups: employees, customers and consumers, lenders and insurers, investors and analysts, local government, regulators, local communities and suppliers.

With respect to Shaftesbury's internal stakeholders – the employees - the Corporate Responsibility Policy has been issued to all Head Office staff and all attend an annual Corporate Responsibility seminar, which reviews the contents of the Policy and progress against the Action Plan.

The forum for staff feedback is possible at monthly staff meetings and through the annual Corporate Responsibility seminar. No staff questionnaires are issued, as it is not considered necessary within the structure of the company.

As stated in Section 2.0, the Corporate Responsibility Policy is issued to the Shaftesbury's principal consultants who then include the Policy within contract documentation for subcontractors. All the key project managers and property management consultants attend the annual Corporate Responsibility seminar.

### 6.2 External Communication to Stakeholders

#### *Investors & Shareholders*

Brian Bickell and Jonathan Lane of Shaftesbury communicate regularly with the major investors in the company with respect to Shaftesbury's business performance.

A measure of the effectiveness of Shaftesbury's open approach to reporting on its Corporate Responsibility and Corporate Governance issues was reflected in the company being listed 3<sup>rd</sup>, and highest ranked real estate company, out of the entire FTSE 350 within the Good Companies Guide in August 2007. The Good Companies Guide, compiled with research from Co-operative Investments and reported in the Observer, assesses all companies, with the exception of investment trusts, on a range of social, environmental and corporate governance criteria and scores highly those companies, such as Shaftesbury, that have a no-nonsense approach to CR reporting.

Another accolade achieved in the 2006-07 reporting period was the BDO Stoy Hayward Property Accounts Award 2006 for the quality of Shaftesbury's Annual Reports and Accounts.

Shaftesbury continues to maintain its listing on the FTSE4Good Index and is also listed on the Kempen SNS Smaller European Index. Earlier in 2007, Shaftesbury participated in the Carbon Disclosure Project and in September 2007, Shaftesbury was also listed within the internationally recognised Dow Jones Sustainability Index.

Despite its previous good performance in the Business in the Community (BiTC) Corporate Responsibility Index, Shaftesbury chose not to participate in 2006-07. As in previous years, Shaftesbury published a summary of its performance against the Action Plan in its Annual Report for 2006.

### *Tenants & Customers*

There are over 800 tenants within the portfolio and Shaftesbury has personal contact with them all. These tenants range from a large number of small specialist businesses and restaurants, particularly in the Chinatown estate, to the larger retail lets in the Carnaby estate. Each tenant has direct contact with at least one director of the company and tenants are encouraged to contact the company with any issues or concerns. This is particularly the case for the Chinatown estate where specific cultural issues need to be recognised when dealing with the community. In addition, full time estate managers are on each of the three estates to deal with day to day problems.

Shaftesbury continues to maintain a close and direct relationship with its tenants, which has been further enhanced by the activities of the Communications Manager whose role is to maintain contact with the smaller retail tenants.

Shaftesbury has issued the Corporate Responsibility Policy to all its Chinatown tenants. A proposed new waste initiative for 2007-08 will require the need to engage with the Chinese community and hopefully demonstrate the business as well as environmental benefits of improved waste management. Efforts to undertake further engagement with individual tenants in the Opera Quarter has been limited due to changes in personnel.

In the Carnaby and Seven Dials Estate, all new tenants receive a copy of the Corporate Responsibility Policy and a copy of the Environmental Policy and Occupiers leaflet. Further specific engagement has been undertaken in two areas:

- A questionnaire has been issued to the 10 largest tenants in Carnaby requesting information regarding their approach to environmental issues. Responses have been received from two companies and further dialogue will be held to identify ways in which Shaftesbury can work with the tenants to achieve environmental improvement.
- A second survey was undertaken throughout the Carnaby estate regarding waste management in order to identify existing practices. 50% of consultees responded and the findings will be used to identify ways to maximise recycling and optimise frequency of collections throughout the estate.

### *Local Councils & Regulatory Bodies*

Shaftesbury predominantly deals with Westminster City Council (WCC) but also with the London Borough of Camden. Shaftesbury maintains direct contacts at Councillor and Senior Officer level. The main issues of concern relate to planning, solid waste removal, street lighting and street cleaning.

Shaftesbury also provides support and finance. In 2006 - 07 the ongoing initiative by Shaftesbury with WCC to improve the road surface in areas of Chinatown is continuing with an commitment of £500,000 over a three year period and with the next phase (Lisle Street) due to commence in October 2007.

In the Carnaby/Seven Dials estate, major investment has included some £300,000 in contributions to a WCC scheme to level and repave the surface in Broadwick Street, thereby improving it for pedestrians.

Another key initiative is Shaftesbury's involvement with the Steering Group for a Soho Retrofitting and Sustainability for City Centres Project.

The group includes representatives from the University of Westminster, WCC, the Soho Society, the Crown Estate, the Max Lock Centre and Central Cities Institute.

The aim of the project is to look at sustainability in city centres, particularly those that are historic and focus on refurbishment and sustainability issues. It is intended that there will be a pilot project, which is focusing on Soho and its specific issues particularly with regard to dealing with conservation areas and listed buildings. A report from the project is anticipated by the end of the year.

### 6.3 Performance against Objectives and Targets

*Policy Goal G: Shaftesbury will conduct its business with integrity*

No.	Objectives 2004/05	Progress / Date Achieved
G1	Be honest, open, helpful and polite	<ul style="list-style-type: none"> <li>In September 2007 Shaftesbury was listed on the Dow Jones Sustainability Index.</li> <li>Shaftesbury has maintained listing on the FTSE4 Good Index</li> <li>Shaftesbury was listed 3<sup>rd</sup> in the Good Companies Guide.</li> <li>Shaftesbury is listed on the Kempen SNS Smaller European Index.</li> <li>Shaftesbury participated in the Carbon Disclosure Project.</li> </ul>
G2	Provide the standards of accommodation and services that have been agreed	<ul style="list-style-type: none"> <li>Shaftesbury continues to maintain regular and direct contact with tenants</li> <li>Various Tenant Engagement exercises undertaken in Carnaby/Seven Dials Estate to identify ways in which Shaftesbury can work with tenants to improve environmental performance.</li> </ul>
G3	Obey all relevant laws and regulations and comply with other key policy goals with regard to customer relations.	<ul style="list-style-type: none"> <li>No non-compliances</li> </ul>

### 6.4 Recommendations

- Continue to maintain proactive stance to stakeholder engagement and where appropriate maintain listing on recognised indices.
- Continue to monitor and report publicly on its performance. Use of the Company website and the Annual Report are considered to be the most sensible means of reporting.
- Ensure that managing agents issue the Policy to all new commercial tenants and new customers when granting new tenancies and also issue copies of the Environmental Policy and Occupiers leaflet.
- Continue to undertake awareness training for environmental/social responsibility of full time staff to highlight Shaftesbury’s performance against the Policy and Action Plan.
- Follow up the issue of the Environmental Policy and Occupiers leaflet to identify particular issues that can be promoted with a selected sample of tenants.
- Build on success of community investment schemes at Seven Dials and Chinatown.

## 7.0 Workplace and Community Issues

### 7.1 Workplace Issues

Workplace issues refer to employment concerns such as equal opportunities, employment rights and obligations, training and development of employees.

#### *Equal Opportunities*

Shaftesbury has a total of 20 employees with 17 based in its Head Office and 3 on site, 2 of these employees are part time. The Corporate Responsibility Policy is supported by an Equal Opportunities Policy (signed and dated September 2006) which, contains policy statements with respect to recruitment and promotion, job descriptions and selection, training, disabilities, harassment and complaints.

During the reporting period there has been one new recruitment – a female senior surveyor and no resignations.

There are now five women in senior executive positions (71% of senior executive staff, excluding directors) but there are no women on the Board. However, it is important to note that since Shaftesbury only has 20 staff, a number of specialist advisors are employed by the company to provide the necessary expertise – including lawyers, accountants, surveyors, project managers etc. Of these, women represent 50% of the senior advisors.

#### *Training*

Corporate Responsibility Awareness Training has been undertaken annually since August 2002 for all full-time Shaftesbury staff. It is considered unnecessary for the internal Shaftesbury staff to have more detailed training given that their remit is to oversee the management of the property portfolio and they rely on the project managers and property management agents to deal with day-to-day issues relating to environmental, health & safety and social issues.

Given the small number of staff the most effective measure is the percentage that receive training for the benefit of their jobs. Training and development needs are assessed as part of the annual review process for all employees including Directors. In addition, executive and non executive Directors' needs are assessed as part of the annual board evaluation process. Professional staff attend appropriate training as required to maintain their Continued Professional Development (CPD).

### ***Employee Development***

In October 2005, a formal review process was initiated which allowed individuals to identify goals to work towards for each year as well as identify training requirements. This process has proved successful and is repeated annually.

### ***Staff Welfare and Health & Safety***

The workplace environment is viewed positively by Shaftesbury's employees. Again the relaxed management structure of Shaftesbury means that if staff consider that improvements are required to their individual work station, they are able to make those requests which are dealt with accordingly.

Flexible working is accommodated according to individual circumstances and the holiday allowance is five weeks.

There are no health and safety incidents to report this year. One member of staff went on a health and safety awareness course in March 2007.

## **7.2 Community**

Shaftesbury is proactive in addressing its responsibility to the local Community. The Corporate Responsibility Policy identifies Shaftesbury's approach to charitable giving and involvement with the Community.

Shaftesbury has long established relationships with several NGOs which are directly relevant to its business, in particular the company provides advice to the Theatres Trust, the Royal Shakespeare Company, the Art Fund and the Tennis Foundation. The company also provides support and free business assistance to the National Campaign for the Arts, the Association of British Orchestras and the Orchestra of the Age of Enlightenment who would otherwise be unable to afford to be in central London.

The groups receiving help and advice in 2006 –07 were:

- The National Campaign for Arts
- The Association of British Orchestras
- The Orchestra of the Age of Enlightenment
- The Theatre Trust
- The London branch of the Samaritans (located in Carnaby)
- The Hungerford Drugs Rehabilitation Project
- The Soho Family Centre
- The Chinatown Stakeholders Group
- The Seven Dials Trust

- Yellow Earth Theatre Company
- The Classical Road Show
- The Art Fund
- The London Chinatown Chinese Association
- Victim Support Westminster Ltd

Within its managed portfolio Shaftesbury continues to maintain strong community links by providing a full time on site estate manager in each of its key locations: Carnaby Street, Covent Garden and Chinatown. These estate managers act as interface between Shaftesbury and the tenants as well as the local Councils.

### ***The Grand Tour***

Shaftesbury worked closely with the National Gallery to facilitate the Grand Tour, a successful initiative to introduce fine art to the general public. Over the course of twelve weeks in summer the streets of Soho, Piccadilly and Covent Garden were lined with some of the world's most famous paintings, turning the West End into a giant gallery. Of the 44 paintings displayed, more than 30 were on Shaftesbury owned buildings.

### ***Other Initiatives***

In addition, during 2006 -07 Shaftesbury has been involved with the following initiatives to further improve its standing in the community:

- In August 2007, Shaftesbury worked with one of its tenants BBH (an advertising agency), to facilitate a Barnados day out, by offering space within two empty units in Kingly Court. As a result of this partnership, BBH, Shaftesbury and Barnados will continue to work together over the forthcoming year on a number of key fundraising events.
- In October 2006, Shaftesbury facilitated a 'Wicked Day', which was held in Thomas Neal Centre with funds being raised for the Seven Dials Monument Charity.
- Shaftesbury is currently working with Chinatown Arts Space (CAS) to run a national public arts competition for British East Asian visual artists, to design a new contemporary mural for Horse & Dolphin Yard in Chinatown. The winning commission is to be unveiled to celebrate the Beijing Olympics opening on 8.8.08. The mural will be installed for 2 years. CAS and Shaftesbury will work collaboratively in all key areas. CAS will appoint public arts consultants Parker Harris and oversee their project management, with support from Shaftesbury and Westminster Council. Parker Harris currently manages the successful Jerwood Sculpture Prize. Shaftesbury will liaise

with Chinatown stakeholders, gain planning permission, appoint an engineer, and provide marketing/PR support alongside sponsorship.

- Shaftesbury is assisting with PR and marketing support to enable Soho Parish School (a primary school and the only school in Soho) to achieve the fundraising goal, which enabled them to extend their school premises by acquiring part of the building next to the school.
- Soho Parish Choir held a Christmas Carol fundraising event in Kingly Court with Shaftesbury's support.
- Two vacant units in Marshall Street were used free of charge for four months by ITV for the WAGS Boutique show which raised substantial funds for Great Ormond Street Childrens Hospital.

**Employee Charitable Giving**

As a new initiative for 2007, Shaftesbury introduced payroll giving. The amount donated is at the discretion of the individual employee and the administration costs paid by Shaftesbury.

**7.3 Performance Against Objectives and Targets**

***Policy Goal H: Shaftesbury recognises the need for investing in its employees and provides opportunities for training and personal development***

No.	Objectives 2006 - 07	Progress/ Date Achieved
H1	Ensure all employees have a performance review annually	<ul style="list-style-type: none"> <li>• Annual Review process undertaken in October each year.</li> <li>• Staff are made aware of CR Policy and strategy implementation through the annual awareness training seminar undertaken since 7<sup>th</sup> August 2002.</li> </ul>

**Policy Goal I: Shaftesbury is committed to providing its employees with safe and favourable working conditions that are free from unnecessary risk.**

No.	Objectives 2006 -07	Progress/ Date Achieved
I1	Fully comply with all the requirements of the Health & Safety at Work Act 1974 etc. for employees and those that may be affected by its activities	<ul style="list-style-type: none"> <li>• There were zero reportable Health &amp; Safety incidents within the Head Office and the managed portfolio</li> <li>• There have been zero reportable Health &amp; Safety incidents during any refurbishment projects within the portfolio.</li> </ul>

**Policy Goal J: Shaftesbury is committed to providing equal opportunities for all its employees and potential employees**

No.	Objectives 2006 -07	Progress/ Date Achieved
J1	Monitor the effectiveness of the equal opportunities policy	<ul style="list-style-type: none"> <li>• Shaftesbury continues to monitor its equal opportunities policy. One new employee recruited in 2006-07 (female senior surveyor) and no resignations.</li> </ul>

**Policy Goal K: The Company provides financial help and advice to local community groups and charities operating within Carnaby Street, Covent Garden and Chinatown**

No.	Objectives 2006 -07	Progress/ Date Achieved
K1	Seek to continue to qualify as a member of the One Per Cent Club and will continue to align its charitable giving and community involvement to its chosen areas of investment in the heart of London's West End.	<ul style="list-style-type: none"> <li>• Support has continued of a wide selection of charities and community groups in the West End and Shaftesbury has maintained membership of the One Per Cent Club.</li> <li>• Introduced employee payroll giving scheme, with Shaftesbury paying administration costs.</li> </ul>
K2	Shaftesbury will continue to engage with the local community through the provision of advice and resources.	<ul style="list-style-type: none"> <li>• Continued support to nominated charities through staff involvement for 2006-07.</li> <li>• Support through funding and facilitation of a number of community events throughout 2006 –07.</li> <li>• Ongoing successful mentoring of small local business Beyond the Valley through funding of NCA advisor.</li> <li>• Proactive involvement with the National Gallery to facilitate the Grand Tour.</li> </ul>

## 7.4 Recommendations

- Continue to maintain membership of One Per Cent Club.
- Continue to partner local community groups and charities.
- Continue to mentor local companies to help them improve their involvement with the local community.

## Data Appendices

### (A) Sustainable Timber Sourcing in Sample of Refurbishment Projects

Site	Total quantity of timber purchased (m <sup>3</sup> )	% from a certifiable source	% from an FSC source	% from a PEFC source
St Martin's Lane	42.5	47.9	4.5	42.5
40-42 Tavistock St	4.5	66.5	20.6	45.9
60 Chandos St	4.12	67.7	16.03	51.7

### (B) Electricity Consumption at Head Office

Year	Total Electricity Consumption (kWh)	Greenhouse Gas Emissions <sup>3</sup> (kgCO <sub>2</sub> equivalent)	Greenhouse Gas Emissions per area of floorspace (kgCO <sub>2</sub> /sqm) (Office area: 519 sqm)
2002 – 2003	53,761	23,117	44.54
2003 – 2004	56,254	24,189	46.60
2004 – 2005	60,277	25,919	49.94
2005 – 2006	41,703	17,932	34.55
2006 - 2007	51,342	22,077	42.54

<sup>3</sup> Greenhouse gas emissions calculated using conversion factors published by the Carbon Trust. The figure of 0.43 has been used to convert kWh of electricity usage to kgCO<sub>2</sub>.

**(C) Energy Consumption within the Managed Portfolio**

Year	Floor Area (sq m)	Energy Consumption (kWh)	Carbon Dioxide Emissions (kgCO <sub>2</sub> )	Carbon Dioxide Emissions per area of floorspace (kgCO <sub>2</sub> /sqm)
<b>Chinatown</b>				
2002 - 2003	No data	84,471	37,167	No data
<b>Chinatown &amp; Coliseum</b>				
2003 - 2004	31,957.6	337,886	145,290	4.55
2004 - 2005	31,957.6	612,523	263,385	8.24
2005 - 2006 (a)	31,957.6	364,610	156,782	4.9
2006 - 2007 (b)	37,983.2	363,349	156,670	3.93
<b>Opera Quarter</b>				
2006 - 2007 (b)	71,421	43,152	18,555	2.79
<b>Carnaby Estate</b>				
2002 - 2003	No data	6 months: 232,821	102,441	No data
2003 - 2004	49,887.3	806,371	346,739	6.95
2004 - 2005	49,887.3	1,231,107	529,376	10.61
2005 - 2006	49,887.3	1,109,912	477,262	9.58
2006 - 2007	49,877.3	947,732	407,525	8.17
<b>Seven Dials</b>				
2002 - 2003	No data	No data	No data	No data
2003 - 2004	26,941	578,108	248,586	9.23
2004 - 2005	26,941	641,642	275,906	10.24
2005 - 2006	26,941	663,438	285,278	10.59
2006 - 2007	26,941	799,187	343,650	12.76

Note:

- (a) Data for Chinatown was collected from a 20% sample of properties, which represented typical examples, e.g. common parts with lifts, stairs only etc. These figures have then been extrapolated to give a portfolio wide figure.
- (b) Data extrapolated from meter readings from two quarters.

Estate	Proportion of Long Life Bulbs (%)		
	2005	2006	2007
Carnaby	55	65	69
Seven Dials	20	20	94

Property	Maintenance Cost (£)			Electricity Usage (kWh)		
	2005	2006	2007	2005	2006	2007
Ganton House	2,908	2,828	701	10,398	7,051	6,590

35/37 Neal Street	250	1,119	-	935	2,077	457
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**(D) Water Usage: Carnaby and Seven Dials**

Property	Meter Reading September 06 (m <sup>3</sup> )	Meter Reading September 07 (m <sup>3</sup> )	Water Usage 2006-07 (m <sup>3</sup> )
41-45 Beak Street	- (a)	- (a)	- (a)
47 Beak Street	173	204	31
46 Broadwick Street	205	248	43
5-7 Carnaby Street	-	246	-
22 Carnaby Street	1222	1264	42
28 Carnaby Street	498	563	65
30 Carnaby Street	-	1671	-
30 Carnaby Street	157956	-	-
39 Carnaby Street	156	225	69
46-47 Carnaby Street	10000624	- (b)	-
48-49-51 Carnaby Street	-	- (b)	-
4 Ching Court	-	2052	-
5 Ching Court	-	9250	-
1a Earlham Street -1st/Basement	793	1002	209
1a Earlham Street – 2 <sup>nd</sup>	572	676	104
1a Earlham Street – 3 <sup>rd</sup>	569	652	83
1a Earlham Street – 4 <sup>th</sup>	3002	3466	464
23-25 Fouberts Place	-	12121	-
30-32 Fouberts Place	-	167	-
26 Fouberts Place	18	28	10
14-22 Ganton St – 1 <sup>st</sup>	864	1171	307
14-22 Ganton St – 2 <sup>nd</sup>	1350	1721	371
14-22 Ganton St – 3 <sup>rd</sup>	472	574	102
14-22 Ganton St – 4 <sup>th</sup>	599	708	109
14-22 Ganton St – 5 <sup>th</sup>	1123	1371	248
14-22 Ganton St – 2 <sup>nd</sup>	201	256	55
14-22 Ganton St – 3 <sup>rd</sup>	445	602	157
14-22 Ganton St – 4 <sup>th</sup>	59	70	11
23 Ganton St	8810	9510	700
26 Kingly St	545	971	426
16 Neal Yard	449	- (c)	-
3 Newburgh St	1433	1474	41
	<b>Total Usage (m<sup>3</sup>)</b>		<b>3,647</b>
	<b>Number of Usable Readings</b>		<b>32</b>
	<b>Properties with Readings</b>		<b>11</b>
	<b>Total Number of Properties</b>		<b>21</b>
	<b>Total Area of Properties (m<sup>2</sup>)</b>		<b>76,818</b>
	<b>Approx. area coverage of readings (m<sup>2</sup>)</b>		<b>40,253</b>
	<b>Usage by area (m<sup>3</sup>/m<sup>2</sup>)</b>		<b>0.09</b>

Note:

(a) It was under refurbishment in September 2006 and new meters and being installed to collect data in the future.

(b) Meter under water at time of reading

(c) Partition placed in front of meter

**(E) Paper Usage at Head Office**

Year	Paper Usage (kg)	Proportion Recycled (%)
2003 – 2004	1236	81
2004 – 2005	1271	86
2005 – 2006	1271	0
2006 - 2007	1062.5	100(a)

Note: (a) 100% recycled paper procured from Summer 2007.

**(F) Paper Recycling at Head Office**

Year	Paper Recycled (kg)
2003 – 2004	6270
2004 – 2005	4990
2005 – 2006	4600
2006 - 2007	4597.5

**(G) Waste Collection Data for Carnaby and Seven Dials**

Site	Waste Collected (cubic litres)		
	2005	2006	2007
Kingly Court	2,961,000	2,982,100	2,802,800
Carnaby Court	1,198,400	1,198,400	1,198,400
14-22 Ganton Street	2,153,000	3,001,900	2,402,400
Thomas Neal's	2,217,600	2,237,400	2,402,400