

7 November 2025

Attention: Liz Harrison
Planning Department
Eastleigh Borough Council

Sent Electronically only

SLR Project No.: 402.064843.00001

**RE: Discharge of condition 22 of full planning permission F/19/86233
Land to the North and East of Boorley Green, Winchester Road, Botley, SO32 2UA**

SLR Consulting have previously submitted a discharge of conditions application on behalf of Vistry Group for Condition 22, reference DC/25/99442.

Condition 22 – Energy

The condition states:

‘Prior to the occupation of any building within this phase of the development (or in accordance with a timetable to be agreed in writing with the Local Planning Authority), the following shall be submitted to and approved in writing by the Local Planning Authority:

For residential development as-built stage SAP data and as-built stage water calculator confirming energy efficiency and the predicted internal mains water consumption to achieve:

- In respect of energy efficiency, a standard of a 19% improvement of dwelling emission rate over the target emission rate as set in the 2013 Building Regulations*
- In respect of water consumption, a maximum predicted internal mains water consumption of 105 litres/person/day. The development shall not be carried out otherwise than in accordance with the approved details.*

For non-residential development:

- A report indicating how the development meets the relevant essential requirements in the Eastleigh Borough Council’s adopted Environmentally Sustainable Development Supplementary Planning Document, including*
- A BREEAM New Construction Post Construction certificate at “Excellent” standard..’*

The following further information has been requested to be submitted to support this application:

‘With regards to the non-residential development, the submission of the Energy Statement (rev 1) is noted, however whilst it comments on why green roofs have not been provided, it does not comment on why rainwater harvesting and greywater recycling are not provided, as required by ESD2 of the Environmentally Sustainable Development SPD.

It also does not demonstrate that the retail block achieves a 15% carbon dioxide emissions reduction via local low/zero carbon energy, as required by ESD6 Carbon Dioxide Reduction of the SPD. Reference is made to a possible use of use of Air Source Heat Pumps and this would only equate

to a 4.7% reduction in CO₂ emissions. I appreciate Vistry have only built the building to shell only and that the fit-out is being carried out by others, however sufficient information still needs to be provided to demonstrate full compliance with the condition.

In addition, a BREEAM New Construction Post Construction certificate at “Excellent” standard is still required.’

Response:

AES have responded to confirm that the statement does demonstrate that the non-residential development will achieve a greater than 15% reduction in CO₂ emissions. This has primarily been achieved through energy saving measures which Vistry are able to implement to ensure that the reduction will be achieved regardless of which systems are installed at fit out stage by the incoming occupier.

A 27% reduction in carbon dioxide emissions has been achieved through fabric energy efficiency and energy demand reduction, far exceeding planning requirements. A further 5% saving was predicted through the installation of an air source heat pump resulting in an overall 32% reduction.

The reason the benefit of the Air Source Heat Pump seems so low is that the buildings have been assessed under a version of the building regulations which still assumed that the national grid was powered primarily by coal and gas power stations, and therefore as the national grid energy mix evolved, electric systems (including air source and ground source heat pumps) were un-necessarily penalised when calculating predicted carbon emissions. In practise the benefit is likely to be even greater.

This approach is in line with the energy hierarchy, which is considered best practise. Further details on the energy hierarchy and it’s benefits can be found in section 3 of the energy strategy.

Rainwater and greywater systems which recycle water for non-potable uses such as flushing toilets both require significant additional space for pumps and water storage, as well as adding significant extra cost. Greywater systems generally require storage tanks where grey water can be treated with chlorine before being re-directed to toilet cisterns.

For this reason these systems are currently generally installed in larger scale commercial developments where space is less of an issue and the demand for non-potable water is higher. There are no widely available and well tested reputable small scale systems that have been considered suitable for installation in the houses or apartments.

Future occupiers of the houses on the development have the option to fit water butts for the watering of plants etc. depending on their own preferences and how they choose to use or develop their gardens and other external spaces.

The total water demand of the retail units is expected to be low by nature and the water demand of the residential development has been lowered as far as practicably possible with a calculated internal water usage of 96.1 litres/person/day, significantly below the building regulations compliant level.

As stated in the submitted energy and sustainability strategy, the alternative option of providing green rooves has not been possible as the development uses pitched rooves with lower embodied



carbon emissions and more suited to the installation of PV. Green rooves would also potentially increase the irrigation requirements of the development during dry weather spells.

The BREEAM New Construction Post Construction certificate at “Excellent” standard is due shortly and will be forward to you as soon as it is received.

Should you have any questions please do not hesitate to contact me.

Regards,

SLR Consulting Limited

Debra Higginbotham

Senior Consultant - Planning

