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Matthew Shepherd
West Berkshire Council Market Street Newbury
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RG14 5LD

15th May 2024

Dear Matthew

Planning Application: Eagle Quarter II, Kennet Centre The Mall, The Kennet Centre, Newbury, RG14 5EN (ref: 23/02094/FULMAJ) Energy Response

I write in response to the comments provided by the Council's Environment Team following the letter from our consultant, Tim James of Environmental Economics (EE). The Council has requested that the Zero Carbon requirements set out in Policy CS15 are adhered to, unless it can be demonstrated that such provision is not technically or economically viable.

As set out in the Energy and Sustainability Report by EE (September 2023) and letter from Tim James dated 31 January 2024, the proposed development is designed to achieve very low carbon emissions through the adoption of good fabric performance and employment of ground source heat pumps to supply space heating and domestic hot water. The Ground Source Heat Pumps achieve a 48% reduction in carbon emissions from regulated and non-regulated sources.

In respect of the non-residential elements of the scheme, BREEAM 'Excellent' is achieved as required by CS15. All elements of the development are designed to comply with the new, more onerous Approved Document L1 & L2 2021.

Policy CS15 states that *"Major development shall achieve the following minimum reductions in total CO2 emissions (regulated and unregulated energy use) from renewable energy or low/zero carbon energy generation on site or in the locality of the development as long as a direct physical connection is used, unless it can be demonstrated that such provision is not technically or economically viable."*

Footnote 74 of Policy CS15 states, *"Requirements for zero carbon in line with stated Government aspirations, which may be subject to change"*.

The GSHP system provides an efficient and robust renewable energy solution for the site and the building fabric is designed to meet the Approved Document L1 & L2 2021. The proposals therefore meet and exceed the current Building Regulations requirements and are therefore in accordance with the latest Written Ministerial Statement of March 2015 and December 2023.

It is acknowledged that the Council maintains their position that Policy CS15 can require new developments to achieve zero carbon emissions subject to such provision being technically or economically viable.

In response, this is not a viable option in terms of the proposed development as confirmed in the applicant's viability assessment and the Council's response from their own consultants, Dixon Searle.

In respect of providing renewable energy in the locality with a direct physical connection to the site, this is not feasible in this instance. The proposal is located in the town centre of Newbury where no opportunity exists to provide any off-site renewable energy or low/zero carbon energy generation.

Therefore, the proposed development is considered to accord with WBC Core Strategy Policy CS15.

If you have any queries, please do not hesitate to contact us.

Yours sincerely

A handwritten signature in black ink that reads "SBWay". The letters are cursive and fluid, with the 'S' and 'B' being particularly large and connected.

Sarah Ballantyne-Way
Planning Director