

Winchester District Proposed Submission Local Plan (Regulation 19) Consultation

Policy CN1 – Representations on behalf of Crest Nicholson Partnerships and Strategic Land

October 2024

Introduction

1. These representations have been prepared on behalf of Crest Nicholson Partnerships and Strategic Land (herein, “Crest Nicholson”) in response to the Winchester City Council (herein, “the Council”) Proposed Submission Local Plan (herein, “the Plan”) Regulation 19 Consultation.
2. Crest Nicholson has an interest in all strategic and non-strategic matters informing the preparation of the Plan. However, these representations are made specifically in the context of Crest Nicholson’s interests in land falling within the North Whiteley Major Development Area (herein, “MDA”) (specifically, land parcels CU14, CU34 & CU45), which are identified under Policy SH2 of the Plan. Through these representations, Crest supports the allocation of the site for residential development.
3. These representations concentrate only on matters that are relevant to the allocating policy and matters that would associate with delivery of the site in due course pursuant to the terms of that policy.
4. These representations follow the structure of the Regulation 19 Consultation online survey, as relevant, with a particular focus on the Development Allocations (notably Policy SH2) and consider whether the policies are legally compliant, meet the tests of soundness and are compliant with the duty to co-operate. These representations also consider the evidence base which has informed the Regulation 19 Consultation including the Integrated Assessment documents which assess each of the proposed allocation sites.
5. Overall, these representations cover the following areas:
 - Strategic Policy SP1: Vision and Objectives
 - Strategic Policy SP2: Spatial Strategy and Development Principles
 - Strategic Policy CN1: Mitigating and Adapting to Climate Change
 - Policy CN3: Energy Efficiency Standards to Reduce Carbon Emissions
 - Strategic Policy D1: High Quality, Well Designed and Inclusive Places
 - Strategic Policy D3: Design Principles for the South Hampshire Urbans Areas
 - Strategic Policy T1: Sustainable and Active Transport and Travel
 - Policy NE5: Biodiversity

- Strategic Policy H5: Meeting Housing Needs
- Policy SH2: North Whiteley
- Integrated Impact Assessment (Sustainability Appraisal)

National Planning Policy Framework

6. The current version of the National Planning Policy Framework (herein “the Framework”) was published in December 2023. It should be noted that an updated version of the Framework was consulted on by the government between 30th July 2024 and 24th September 2024, with significant changes proposed to support the government’s ambitions to deliver 1.5 million homes over the next five years. Amendments are proposed to reverse the changes made to the Framework in December 2023, including making the standard method for housing needs a mandatory requirement¹.
7. The government also consulted on a new standard method for assessing housing need based on housing stock which would result in significant uplifts in housing needs for some areas, including in Winchester.
8. Whilst the new Framework and updated standard method may not be relevant for the purpose of examining the Council’s Local Plan if the Council submits the Plan before the new Framework comes into effect (plus one month)², they are a material consideration.

Strategic Policy CN1: Mitigating and Adapting to Climate Change

Do you consider the supporting text and policy are:

- Legally compliant – Yes
- Sound – No
- Complies with duty to co-operate – Yes

Comments

9. Crest Nicholson is committed to tackling the challenges of climate change and acknowledges the important role the development industry has to play in the national transition to a low and zero carbon society.
10. Crest Nicholson supports the overarching aims of Strategic Policy CN1 to mitigate and adapt to the impacts of climate change, and of the Council aspiring to become a carbon neutral authority. However, Crest Nicholson questions the construction of the policy and the assignment of obligations, notably in respect of criterion (ii), which implies that spatial considerations relating to the identification of sites are the responsibility of developers/applicants, when such matters should properly fall to the plan-making process, and should be the building blocks of any comprehensive policy framework. This policy should therefore be reworded as it is not consistent with the Framework; specifically Paragraph 16 which states that policies should be ‘*clearly written and unambiguous*’.

¹ Proposed Paragraph 62

² Proposed Paragraph 226

11. Indeed, as is stated within our representations to Policy SP2, the most effective response to tackling the climate emergency the Council has declared is via the promulgation of a spatial strategy that focuses development at scale in the most sustainable locations, in close proximity to day-to-day services and facilities so that motorised travel demand is reduced. The importance of planning at scale, a policy response pursued successfully in the adopted Local Plan through the MDA allocations, is evidenced by the propensity for such sites to include the provision of local centres and facilities that can meet the needs of the resident population and therefore support self-containment and foster the creation of 15/20-minute neighbourhoods. The North Whiteley MDA is a highly successful example of this policy approach and the decision to allocate further land to maximise the potential of the allocation is supported fully.
12. The allocation of further land at the North Whiteley MDA is a positive policy measure that is rightly driven by the objective of curtailing travel demand and promotion of highly accessible places as the foci for development.

What modification(s) are necessary to make the policy legally compliant or sound?

13. Amendment to criterion ii (see below).

What is your suggested wording or text for the policy:

14. Criterion (ii) is not clearly written and unambiguous and should therefore be amended as follow:

~~“Carbon emissions have been considered as part of the identification of sites for development, and it has been demonstrated that as part of the design process, how site layout and the orientation, fabric glazing ratio and the choice of construction materials for the buildings proposed have been designed to minimise energy demand;”~~

15. Reference to Policy CN3 in Criterion (i) should also be deleted (see our separate representations on this policy).

If the Inspector invites you, do you consider it necessary to participate in the examination hearing sessions?

16. Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate.