

Consultation comments on Policy CN1 – mitigating and adapting to climate change

- Support – 40
- Neither support of object – 29
- Object – 19

The changes to the supporting text and the Local Plan policies have not only been informed by the responses to the Regulation 18 consultation but they have also taken on board any additional feedback that has come out of discussions/meetings with statutory consultees and members in order to improve the clarity and understanding of the contents of the Local Plan.

Comments in support of Policy CN1 – mitigating and adapting to climate change		
Respondent number	Comment	Officer comment
ANON-KSAR-NK3D-1	I very much welcome the Council’s decision as per para 4.2 adopt a Climate Emergency especially given the extent of Global warming. The paper makes clear for all developments to be Carbon Neutral and the impact any new infrastructure builds. Therefore, I urge you to maintain this position despite the pressure from outside developers to build on Green Field sites that go contrary to everything the Council proposes and residents want.	Support welcomed and comments noted.
ANON-KSAR-NK9G-A	I’m not sure if I missed it, but all new housing developments should be free from fossil fuel heating.	Policy CN3 requires all new residential development to not burn fossil fuels. Recommended Response: No change.
ANON-KSAR-NKC8-5	I support the policy in general terms. To achieve carbon neutrality will be difficult. New development , particularly housing has to be stopped except for allowing environmentally sustainable development of brownfield sites	Support welcomed and comments noted.
ANON-KSAR-NKDW-5	Littleton and Harestock Parish Council warmly welcomes the intentions to put climate change, adaptation and mitigation at the heart of the Plan’s strategy. Given the challenges we face, there is no other option than to address these head on. Of course future practice needs to match the	Support welcomed and comments noted.

Littleton and Harestock Parish Council	<p>good intentions, but whenever there is a perceived balance between climate considerations and other factors, the imperatives of addressing climate change should be uppermost. Littleton and Harestock Parish Council supports these policies.</p> <p>Support policies CN1-7 inclusive.</p>	
ANON-KSAR-NKJ4-8	<p>Please see accompanying Representations</p> <p>Policy CN1 – Mitigating and Adapting to Climate Change</p> <p>5.1 Vistry Partnerships support Draft Policy CN1 in-principle and note that the Government has now decided to allow Local Planning Authorities ('LPAs') to set energy efficiency requirements above those set out in Building Regulations.</p> <p>5.2 It is welcomed that the policy sets out a design process through which development proposals can consider and incorporate varied forms of low carbon solutions. Additionally, it is welcomed that the policy recognises the role of broader green infrastructure provision (which is multifunctional in purpose) as contributing positively to avoiding and/or mitigating climate change effects. This will help to influence the masterplanning and design process, ensuring that sustainability measures are considered at an early stage and are holistically integrated.</p>	Support welcomed and comments noted.
ANON-KSAR-NKYT-Q	<p>However, it should place more emphasis on re-purposing and renovating to 'eco-friendly' standards, including insulation, to reduce the amount of demolition and new building which adds to carbon emissions.</p>	<p>Permission or 'prior approval' may be required to demolish a building; it depends on a number of factors including the type and size of building and where it is located. Paragraph 4.16 of the Reg 18 LP identifies the need for developers to consider the role of embodied</p>

		<p>carbon as part of the design process and whether buildings can be reused/refurbished. A report has now been prepared as part of the LP Evidence Base that has identified the different options for tackling embodied carbon and how this can be addressed in the LP.</p> <p>Recommended Response: No change.</p>
ANON-KSAR-N81K-K	<p>Welbeck supports the inclusion of Policies CN 1-7 and commends the primacy of carbon neutrality in the Local Plan. Policies CN1-CN7 have been well considered and adopt a proven route to reducing emissions from new homes, the energy hierarchy. This prioritises energy demand reduction in the first instance, which has the dual benefit of reducing energy bills for residents – an issue of critical importance at the time of writing. The best way of achieving demand reduction is through the ‘fabric first approach’ which requires a high level of building fabric performance, targeting high levels of insulation, low thermal bridging and low air permeability to minimise heat loss through the building envelope.</p> <p>The focus on energy, rather than carbon, is welcomed, as it ensures that reducing energy consumption will be prioritised as the national electricity supply is decarbonised and ensure fair access to green energy in the future.</p>	Support welcomed and comments noted.
ANON-KSAR-N85K-Q	<p>Strategic Policy CN1 – Mitigating and Adapting to Climate Change</p> <p>Croudace is committed to the move to ‘net zero carbon’ and supports Draft Policy CN1 in-principle. It is welcomed that the policy recognises the role of broader green infrastructure provision (which is multifunctional in purpose) in contributing positively to avoiding and/or mitigating climate change effects. This will help to influence the masterplanning and design</p>	Support welcomed and noted.

	<p>process, ensuring that sustainability measures are considered at an early stage and are holistically integrated.</p> <p>It is further noted that the Government has now decided to allow Local Planning Authorities ('LPAs') to set energy efficiency requirements above those set out in Building Regulations. Nonetheless, and as detailed below, Croudace are concerned that the Draft Local Plan proposes energy efficiency / building sustainability targets that (cumulatively) may increase build costs to the point that developments may become unviable.</p> <p>In the context of the current inflationary and recessionary environment, the cumulative impacts of all policies that impact build costs require careful scrutiny. Indeed, should impacts on development viability be underestimated, this could in-turn undermine the effectiveness of the Local Plan as a whole.</p>	<p>A Local Plan Viability Assessment has been undertaken as part of the preparation of the Local Plan and this will be updated as the Council moves to the Regulation 19 stage and the Local Plan Examination.</p> <p>Recommended Response: No change.</p>
ANON-KSAR-NK7T-N	<p>We support the objectives of Policy CN1 in mitigating and adapting to climate change and the movement towards carbon neutrality. The reduction of carbon emissions, integration of low carbon energy and material solutions, promotion of sustainable travel and lifestyles etc. are all essential steps in combatting climate change. It is worth considering however that all of the measures included in CN1 (point ix open space, tree planting, biodiversity net gain) may prove difficult for smaller developments to accommodate onsite. Where this is not possible, offsite provision and mitigation should be an option so that smaller development sites remain viable.</p>	<p>The council does want to support smaller development and smaller housebuilders. However, in terms of criteria ix (open space), it is important that every opportunity is taken to create space for residents to enjoy and biodiversity net gain will become a mandatory requirement (please see Policy NE5).</p> <p>Recommended Response: In recognition that not all development (i.e. flats and apartments) can provide open space, criteria ix can be amended to say open</p>

		space/ outdoor space , tree planting and biodiversity net gain.
ANON-KSAR-NK2C-Y Southern Water Link here	As the statutory water and wastewater undertaker to parts of Winchester District, Southern Water supports criterion viii of this policy which relates to water use management and conservation. There are additional benefits to minimising water use in terms of reduced carbon emissions from treating, supplying, and heating water, as well as lower water and energy bills for future occupants. In addition to conserving water resources, measures such as rainwater harvesting, greywater recycling, SuDS and rain gardens can all contribute to helping reduce pressure on drainage networks by ensuring surface water from new development is kept out of foul or combined sewers.	Support welcomed and noted.
ANON-KSAR-N8MB-6	Sport England is supportive of the proposed policy and the council's approach. Sports facilities and playing field land have a role to play in adapting to and mitigating the effects of climate change, and can make valuable contributions to biodiversity net gain aims for example.	Support welcomed and noted.
ANON-KSAR-N85J-P	<p>Bloor support WCCs recognition that climate change is one of the greatest challenges which we face and their strive to be a carbon neutral council by 2024 and District by 2030 as per the adopted Carbon Neutrality Action Plan 2020- 2030. Further Bloor agree with the fact that mitigating and adapting to climate change and designing for low carbon infrastructure are vitally important and defining issues for WCC's draft Local Plan (paragraph 4.1).</p> <p>Bloor consider that the policies set out in the draft Local Plan consultation relating to Carbon Neutrality and Designing for Low Carbon Infrastructure (CN1 – CN7) have been well considered and adopt a proven route to reducing emissions from new homes; the energy hierarchy. This prioritises energy demand reduction in the first instance, which has the dual benefit of reducing energy bills for residents – an issue of critical</p>	<p>Support welcomed and noted.</p> <p>Support welcomed and noted.</p>

	<p>importance at the time of writing. The best way of achieving demand reduction is through the 'fabric first approach' which requires a high level of building fabric performance, targeting high levels of insulation, low thermal bridging and low air permeability to minimise heat loss through the building envelope.</p> <p>Manor Parks is able to deliver against the criteria set out in policy CN1 as demonstrated within the submitted (emailed) representations titled 'Manor Parks Regulation 18 Representations' and accompanying appendices.</p>	<p>Please see assessment of omission sites 'Winchester'.</p>
BHLF-KSAR-N8TG-J	<p>CPRE Hampshire commends Winchester City Council for its vision in placing climate change and Green House Gas (GHG) reduction at the heart of this draft Local Plan and acknowledges that this crosses over with a number of Policies contained within it.</p> <p>CPRE is fully supportive of the intentions of this policy in terms of mitigation and adaption. We are particularly pleased to see an acknowledgement that buildings can be sensitively repurposed or reused.</p>	<p>Support welcomed and noted.</p> <p>Support welcomed and noted.</p>
BHLF-KSAR-N8RP-S	<p>The Council's plan to reduce the district's carbon footprint and respond to climate change is fully aligned with Abri's corporate objective to work towards a sustainable future, taking responsibility for our emissions and environmental footprint. A key part of our strategy is to respond to the challenge of a generation, climate change, minimising our carbon footprint and maximising the positive steps we take to protect the environment. This policy is therefore fully supported in its aims.</p> <p>As the Council will be taking account of carbon emissions as part of the identification and allocation of sites and areas appropriate for development this need not be added as a further hurdle for individual planning applications. Part ii. should be amended to remove this element, retaining its focus instead on how proposals will minimise energy demand.</p>	<p>Support welcomed and noted.</p> <p>Policy CN1 is intended to cover sites that have been allocated for development in the new Local Plan and any sites that comes forward through the planning application</p>

	<p>Parts iv. and ix. effectively reference the latest Building Regulations in relation to Part S (electric vehicle charging points) and Part O (overheating). These elements could be removed from the policy to reduce duplication with other statutory requirements.</p>	<p>process. Recommended Response: No change required.</p> <p>Criterion iv requires developers to think about the location of charging points as part of design process to ensure that charging points are located in convenient locations. Criterion ix is important as cross refers to the policy on overheating and the policy on biodiversity net gain.</p> <p>Recommended Response: No change required.</p>
<p>BHLF-KSAR-N8ZZ-B</p>	<p>Chapter 4 contains a suite of planning policies designed to assist the Council in meeting its net zero target by 2030 (Policies CN1-7).</p> <p>Hazeley supports the inclusion of Policies CN1-7 and commends the primacy of carbon neutrality in the Local Plan. Policies CN1-CN7 have been well considered and adopt a proven route to reducing emissions from new homes, the energy hierarchy. This prioritises energy demand reduction in the first instance, which has the dual benefit of reducing energy bills for residents – an issue of critical importance at the time of writing. The best way of achieving demand reduction is through the ‘fabric first approach’ which requires a high level of building fabric performance, targeting high levels of insulation, low thermal bridging and low air permeability to minimise heat loss through the building envelope.</p> <p>The focus on energy, rather than carbon, is welcomed, as it ensures that reducing energy consumption will be prioritised as the national electricity supply is decarbonised and ensure fair access to green energy in the</p>	<p>Support is welcomed and comments noted.</p> <p>Support is welcomed and comments noted.</p>

	future.	
BHLF-KSAR-N8ZJ-U	The strategic Policy CN1 is supported by Sovereign and closely aligns to the organisations own Home and Place Standard.	Support is welcomed and comments noted.
BHLF-KSAR-N8ZF-Q	Dudsbury Homes fully support the concept of carbon neutrality to tackle the climate emergency. As such the company commits to deliver housing designed on the criteria set out within Policy CN1.	Support is welcomed and comments noted.
BHLF-KSAR-N8BF-Y	<p>Policy is supported in principle, given the 'climate emergency'.</p> <p>We do not support the implication that development sites should be selected on basis of their likely carbon emissions. The location of sites is dictated by many factors, including context of the local built environment, and accessibility. Supporting development in accessible locations will by definition help reduce carbon emissions by reducing the need to travel. The detailed design of development can help to reduce carbon emissions further.</p> <p>The policy should also be amended to make provision for new technologies to achieve the same outcomes rather than insist on charge points - after all, the way in which we charge vehicles may evolve over the plan period.</p> <p>Provision of allotments may only be appropriate/feasible with some (not all) major residential developments, not small scale infill development.</p>	<p>Support is welcomed and comments noted.</p> <p>Policy CN1 is intended to cover sites that have been allocated for development in the new Local Plan and any sites that comes forward through the planning application process. Recommended Response: No change required.</p> <p>Whilst it is accepted that technology will change over the LP period 'recharging point' is considered to be a generic term that is not restricted to one particular method of infrastructure. Recommended Response: No change required.</p> <p>Criterion v requires developers to investigate as part of the design process, opportunities for local food production and composting – this does not necessarily equate to the need for allotments as opportunities for food growing can take many different forms and can equally be</p>

	<p>Designing homes that can be adapted to meet changing needs is supported in principle.</p> <p>Provision of technology such as superfast broadband is not in the gift of developers. The policy should be amended to require new development to include the infrastructure for connections to these technologies, to allow householders or businesses to connect when the services are available.</p> <p>Multi-functional green spaces are likely to be applicable to major developments only, and only where there is sufficient space and viability.</p> <p>Supplementary guidance relating to Energy & Carbon Statements should be prepared before making this a requirement. What is a 'proportionate' statement? Clarification is also needed about when these statements are required.</p>	<p>accommodated in flats and small infill development. Recommended Response: No change required. Support is welcomed and comments noted.</p> <p>Ensuring that new development has access to superfast broadband is now essential part of our everyday working lives to enable people to work at home which reduces the need to travel.</p> <p>Providing multi-functional green spaces is considered to be essential as this will not only assist with biodiversity net gain but it will also make the best use of land.</p> <p>The council recognises that not planning applications are the same and in this respect, if there is a planning application for a single dwelling the word 'proportionate' has been include to recognise this particular point. Further guidance will be made available on the website as and when this policy is adopted. Recommended Response: No change required.</p>
--	---	--

<p>ANON-KSAR-N8MP-M ANON-KSAR-N85A-D</p>	<p>In this respect, 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.</p> <p>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.</p> <p>Indeed, as is stated elsewhere within these representations, the most effective response to tackling the climate emergency the Council has declared is via the promulgation of a spatial strategy that focusses 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.</p> <p>However, Policy CN1 should be set within the strategic context of a spatial policy framework that places the locational aspects of tackling climate change at its heart. 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</p>	<p>Support is welcomed and comments noted.</p> <p>Policy CN1 is intended to cover sites that have been allocated for development in the new Local Plan and any sites that comes forward through the planning application process. Recommended Response: No change required</p> <p>Support is welcomed and comments noted.</p> <p>Strategic Policy SP2 requires development proposals to address the impact of climate change and make the most use of public transport. Recommended Response: No change required.</p>
--	---	---

	<p>places as the foci for development.</p> <p>The construction of energy efficient homes that are adaptable and flexible is supported, but Crest Nicholson considers that such requirements could and should be mandated most effectively, nationally via the Building Regulations, thereby applying a consistent national standard that all developments should be required to meet, irrespective of location. As circumstances dictate at the time of writing the draft policy should be consistent with the national policy approach that is set out currently by the Written Ministerial Statement from March 2015, which advises that additional standards over and above Building Regulations, which provide the baseline technical standard for all new homes, should be required only if they address a clearly evidenced locally occurring need, justified by locally specific data and where their impact on viability has been considered. This position is reinforced by National Planning Practice Guidance (herein, “PPG”) (Paragraphs 007 Reference ID: 56-007-20150327; and 020 Reference ID: 56-020-20150327). It is acknowledged that the City Council has an ambition to accelerate the move towards carbon neutrality as a proactive response to climate change and this is supported. Crest Nicholson recognises the importance of delivering development that is truly sustainable and appreciates the role that the development industry must play in this respect.</p> <p>However, as set out above it is considered that the spatial policy framework that underpins the whole plan is not sufficiently rooted in tackling climate change because the overall strategy does not focus development in locations where the opportunity to support sustainable lifestyles is greatest. The approach to maximising development opportunities at the North Whiteley MDA is an important aspect of this. The planning system is concerned principally with the development and use of land; therefore, the most effective contribution that can be made to</p>	<p>Winchester City Council has declared a climate emergency and has taken the decision that it wants to move faster than the Building Regulations. The additional costs (7%) that are associated with policy CN3 have been assessed through the LP Viability Assessment and this has been reflected in the policy on affordable housing which Winchester City Council agrees is also a major priority for the whole of the district. Recommended Response: No change.</p> <p>Strategic Policy SP2 deals with spatial strategy for the delivery of new housing in the district. It is important that the LP is read as whole as there are other LP policies that deal with sustainable transport and active transport. Recommended Response: No change.</p> <p>A LP evidence base has been prepared including undertaking a LP Viability Assessment alongside the preparation of the Reg 18 LP.</p>
--	---	--

	<p>combatting climate change is through the preparation of spatial development strategies within Local Plans that allocate land for development in locations that actively support the adoption of sustainable lifestyles.</p> <p>Through the Local Plan formulation process, it will be important to ensure that the policies and ambitions that are set out within are in step with the national agenda and can be fully justified through the examination process. This will necessarily require a full and thorough assessment of the potential impacts on delivery of the Plan’s strategy, the viability of which will be affected by any application of locally specific standards.</p>	Recommended Response: No change.
BHLF-KSAR-N8BS-C	BSP support the thrust of Policy CN1 and its ambition to ensure that all new development is designed in a way that adapts to the challenges of climate change in a comprehensive and integrated way.	Support is welcomed and comments noted.
BHLF-KSAR-N8BX-H	<p>Carbon Neutrality</p> <p>The Trust is fully supportive of the WCC objective to achieve carbon neutrality by 2030 and to encourage others to do the same. This broadly aligns with the NHS net zero and HHFT Green Plan targets of 2040 and 2045.</p> <p>The Trust would welcome direct engagement with the City Council, the University and other public sector bodies on collaborative projects.</p> <p>Strategic Policy CN1</p> <p>The Trust is committed to achieving Net Zero Carbon by 2040 and is keen to support WCC’s aspiration for new developments to meet this standard across the metrics identified. However, it should be appreciated that some patients are less able to engage with certain sustainable travel modes as their condition may dictate, they are not suited for their use. Where staff</p>	<p>Support is welcomed and comments noted.</p> <p>Providing a reduction in travel fares and discounted parking at the Park & Ride sites is unfortunately, not within the remit of the LP. Recommended Response: No change.</p>

	(for example) are concerned, the Trust would welcome discussion and support from WCC to enable accessible and affordable travel and transport alternatives to car use, as the discounted parking at Park and Rides offered during covid. The Trust would be keen to support moves towards carbon zero healthy forms of onward travel from these hubs.	
--	---	--

Comments which neither support or object to policy CN1 – mitigating and adapting to climate change		
Respondent number	Comment	Officer comment
ANON-KSAR-NKM4-B	<p>Far too much Policy and little in the way of Practical Proposals. For example:</p> <ol style="list-style-type: none"> 1. You want to cut carbon emissions yet you have recently cut the availability of public transport (an example is X9/X10 buses through Bishop's Waltham). 2. You want to cut carbon emissions but new build housing requirements do not include sufficient insulation nor sufficient PV panelling nor air source or ground source heat pumps. The planning regulations appear to favour the builders rather than the environment and energy conservation/generation. 3. Local services are poor. The Doctors' surgery in Bishop's Waltham is not fit for purpose. It is overloaded, very difficult to speak to via phone and there is no car parking available for pick up or set down. Contrast this with the new Wickham surgery (where there is free parking and recently even availability on Saturday!) 	<p>Unfortunately, the implications of Stagecoach cutting public transport services is beyond the remit of the LP.</p> <p>Policy CN3 (LETI) is to raise the bar on energy efficiency standards for new residential development. Discussions are currently ongoing as part of the work on the emerging LP in terms of the provision of new site for Doctor's surgery in Bishops Waltham. This issue and other infrastructure related issues will be addressed in the Infrastructure Delivery Plan. Recommended Response: No change.</p>

<p>ANON-KSAR-NKS3-G</p> <p>Bishops Waltham Parish Council</p>	<p>CN1 Page 37 Mitigating Against climate change Question: Why exclude household extensions? This exclusion will be very costly in the drive to Carbon Neutrality</p> <p>CN1 Page 37 iv. Question: This is not strong enough; it needs to say every dwelling will have a charging point, with reverse charging, and allowance made for flats</p> <p>CN1 Page 38 viii. The addition of "Water Butts" to each house to harvest rainwater should be added.</p> <p>CN1 Page 38 ix. Energy and Carbon Statement Question: Why are contractors not submitting Carbon Reduction Plans? They surely fall into PPN 06/21</p>	<p>Household extensions and change of use have been excluded from Policy CN1 as many of these improvements do not require planning permission and can go down the Prior Approval route.</p> <p>It is important the LP is read as whole Policy T3 (Transport topic) includes a policy on charging points (this is also covered by Building Regulations).</p> <p>It is implicit that to have rain water recycling and water use management this would involve rain water storage. This is also in the best interest of the home owner as it will help to reduce the cost of their water bills.</p> <p>The Energy and Carbon Statement would need to set out clearly what a developer is doing to meet the requirements of Policy CN1. PPN 06/21 specifically relates to the procurement of Government contracts rather than applying to the requirements of a</p>
---	---	---

		Local Plan. Recommended Response: No change.
ANON-KSAR-NKRJ-6	<p>Six in ten local councils omit food and farming in their plans to tackle climate change, a new report by food and farming charity Sustain has found, despite the food system contributing a third of all UK greenhouse gas emissions. The UN has warned that our efforts to curb the climate emergency will fall short without large-scale changes in land use, agriculture and diets.</p> <p>With an annual procurement spend of £70 billion, and as owners of up to 1.3 million acres of land, UK councils have significant opportunities to take action on climate change. Sustain found evidence of better performing councils taking action on food and farming including buying sustainable food for council catering, ensuring their county farms are sustainable, allocating land for local food growing and supporting citizens to eat more healthy, sustainable diets. But the findings from Sustain show that the majority are not doing so.</p>	Unfortunately, the issues that have been raised in this representation are beyond the remit of a LP. Recommended Response: No change.
ANON-KSAR-NKBJ-P Soberton Parish Council	<p>CN1 Mitigating and adapting to climate change</p> <p>Household extensions are included, consideration should be to exclude single new houses in the countryside as well. Policy is too onerous in these circumstances.</p>	It is important that the LP is read as a whole. Single new houses in the countryside have a separate high bar to meet and will only be granted planning permission if they can demonstrate that they can meet the necessary criteria. Recommended Response: No change.
ANON-KSAR-NK29-N	Para 4.1 – Add ‘and protecting and enhancing biodiversity’	It is important that the LP is read as whole as this topic is particularly focusing on carbon neutrality – there is a separate

	<p>Para 4.9 – Add new paragraph to explain whole life carbon neutrality. For example: Carbon neutrality should consider whole life carbon costs of the development i.e. both embodied carbon emissions from construction (typically 20-50%) and operational (on-going) carbon emissions. Embodied carbon once 'spent' cannot be reversed. In contrast, operational emissions can be improved during the lifetime of a building, for example by implementing a range of energy efficiency measures. Management of embodied carbon should therefore be included at the outset of the design process.</p> <p>Para 4.11 – Add 'These examples can be optimized by application of holistic Nature-based Solutions.'</p> <p>Page 34 – Add definitions for Whole life Carbon & Nature-based Solutions</p> <p>Page 36, Diagram – Amend Second bullet point to 'Site layout, design and material choice to minimize energy demand and embodied carbon.'</p> <p>Page 36, Diagram – Add new bullet point to Adaptation: 'Nature-based solutions'</p>	<p>topic on nature conservation and biodiversity.</p> <p>Recommended response: See new Policy on Embodied carbon.</p> <p>Change. Recommended Response. The wording of Policy CN1 has been altered to place a greater emphasis on developers identifying nature-based solutions.</p> <p>See response above regarding a new policy on 'Embodied carbon'.</p> <p>Change. Recommended Response. Amend wording on the diagram on page 36.</p> <p>Change. Recommended Response. Add new bullet point</p> <p>A new policy has been added on 'Embodied carbon' and the criteria have been amended to address</p>
--	---	--

	<p>CN1 – Modify point ii to: ‘Carbon emissions (both embodied and operational) and Nature-based Solutions have...’</p> <p>CN1 – Query: Who monitors the point ix requirement for “biodiversity to be maintained for a period of 30 years” and what sanctions apply if a developer fails to comply with this requirement?</p>	<p>the point on nature based solutions.</p> <p>Further details are still awaited from the Government in terms of what sanctions could be put in place if a developer fails to comply with this requirement. Recommended Response: No change.</p>
ANON-KSAR-NKDG-N	<p>Key issues following para 4.8</p> <p>This should be made clearer by stating that the Council WILL support proposals for low carbon energy infrastructure.</p> <p>POLICY CN1</p> <p>The requirement for an energy statement should be listed as requirement x.</p>	<p>It is important that the LP is read as whole – there are a number of other LP policies that support low carbon energy development and providing that they are able to demonstrate that they meet the criteria and any other relevant policies in the LP, planning permission can be granted. Policy CN1 is already very clear that developers need to submit an Energy and Carbon Statement. Recommended Response: No change.</p>
ANON-KSAR-NKUC-2	<p>Catesby is committed to the move to ‘net zero carbon’ and supports Draft Policy CN1 in principle. It is welcomed that the policy recognises the role of broader green infrastructure provision (which is multifunctional in purpose) in contributing positively to avoiding and/or mitigating climate change effects. This will help to influence the masterplanning and design process, ensuring</p>	<p>Support is welcomed and comments noted.</p>

	<p>that sustainability measures are considered at an early stage and are holistically integrated.</p> <p>It is further noted that the Government has now decided to allow Local Planning Authorities ('LPAs') to set energy efficiency requirements above those set out in Building Regulations. Nonetheless, and as detailed below, Catesby are concerned that the Draft Local Plan proposes energy efficiency / building sustainability targets that (cumulatively) may increase build costs to the point that developments may become unviable. In the context of the current inflationary and recessionary environment, the cumulative impacts of all policies that impact build costs require careful scrutiny. Indeed, should impacts on development viability be underestimated, this could in-turn undermine the effectiveness of the Local Plan as a whole.</p>	<p>Winchester City Council has declared a climate emergency and has taken the decision that it wants to move faster than the Building Regulations. The additional costs (7%) that are associated with policy CN3 have been assessed through the LP Viability Assessment and this has been reflected in the policy on affordable housing which Winchester City Council agrees is also a major priority for the whole of the district. Recommended Response: No change.</p>
ANON-KSAR-NKXV-R	<p>It will become increasingly possible to conduct full carbon lifecycle analyses for new developments such that the embodied carbon is included in the assessment as well as the end of life treatment for 'temporary' planning applications.</p> <p>It should be a requirement that for all major developments, a full life-cycle carbon analysis is conducted to be submitted with any planning application. For major developments (including 'renewable energy' developments) this is a more useful measure than simply an Energy and Carbon statement as it allows comparison between applications.</p> <p>In this way, the council can actually quantify and assess levels of carbon saving. Unless it is measured at an absolute level, it will not happen.</p> <p>With a full carbon life-cycle analysis being required up front, it will force</p>	<p>A report has now been prepared as part of the LP Evidence Base that has identified the different options for tackling embodied carbon and how this can be addressed in the LP.</p> <p>Recommended Response: see new Embodied carbon policy.</p>

	<p>developers to make decisions that consider building materials, sourcing of materials and components and the recyclability of infrastructure/components rather to really make a difference to the carbon emissions of the planet (and not simply discard the issue of embodied carbon and/or end of life disposal as 'not my problem'). Winchester District needs to take an evidence based approach to carbon reduction and not simply risk greenwashing.</p> <p>The policies within this section (carbon neutrality) appear to concentrate primarily on energy generation and new development. There is little mention of carbon reduction within existing development and or new development that might help the district to create a carbon sink (https://www.southdowns.gov.uk/major-tree-planting-under-way-as-new-research-reveals-potential-to-create-massive-carbon-sink-in-south-downs/)</p> <p>We ought to be encouraging development like this through our policies.</p>	<p>The City Council is doing a range of other initiatives to tackle climate change including planting trees – these are all included in the Carbon Neutrality Action Plan and the Carbon Neutrality Roadmap. Recommended Response: No change.</p>
ANON-KSAR-N8MP-M	<p>This response should be read in conjunction with the full copies of the 'North Whiteley Representations to the Winchester Local Plan Regulation 18 representations OBO Crest Nicholson' representations submitted by email to: planningpolicy@winchester.gov.uk which includes the relevant figures and appendices, with tables correctly formatted.</p> <p>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. In this respect, 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.</p>	<p>Support is welcomed and comments noted.</p>

	<p>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.</p> <p>Indeed, as is stated elsewhere within these representations, the most effective response to tackling the climate emergency the Council has declared is via the promulgation of a spatial strategy that focusses 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.</p> <p>However, Policy CN1 should be set within the strategic context of a spatial policy framework that places the locational aspects of tackling climate change at its heart. 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.</p> <p>The construction of energy efficient homes that are adaptable and flexible is supported, but Crest Nicholson considers that such requirements could and</p>	<p>Policy CN1 is intended to cover sites that have been allocated for development in the new Local Plan and any sites that comes forward through the planning application process. Recommended Response: No change required.</p> <p>Support is welcomed and comments noted.</p> <p>Support is welcomed and comments noted.</p>
--	--	--

	<p>should be mandated most effectively, nationally via the Building Regulations, thereby applying a consistent national standard that all developments should be required to meet, irrespective of location.</p> <p>As circumstances dictate at the time of writing the draft policy should be consistent with the national policy approach that is set out currently by the Written Ministerial Statement from March 2015, which advises that additional standards over and above Building Regulations, which provide the baseline technical standard for all new homes, should be required only if they address a clearly evidenced locally occurring need, justified by locally specific data and where their impact on viability has been considered. This position is reinforced by National Planning Practice Guidance (herein, “PPG”) (Paragraphs 007 Reference ID: 56-007- 20150327; and 020 Reference ID: 56-020-20150327). It is acknowledged that the City Council has an ambition to accelerate the move towards carbon neutrality as a proactive response to climate change and this is supported. Crest Nicholson recognises the importance of delivering development that is truly sustainable and appreciates the role that the development industry must play in this respect.</p> <p>However, as set out above it is considered that the spatial policy framework that underpins the whole plan is not sufficiently rooted in tackling climate change because the overall strategy does not focus development in locations where the opportunity to support sustainable lifestyles is greatest. The approach to maximising development opportunities at the North Whiteley MDA is an important aspect of this. The planning system is concerned principally with the development and use of land; therefore, the most effective contribution that can be made to combatting climate change is through the preparation of spatial development strategies within Local Plans that allocate land for development in locations that actively support the adoption of sustainable lifestyles.</p>	<p>The Council has declared a climate emergency and want to move faster the Building Regulations. The additional costs (7%) that are associated with policy CN5 have been assessed through the LP Viability and this has been reflected in the policy on affordable housing which Winchester City Council agrees is also a major priority for the whole of the district. Recommended Response: No change.</p> <p>The Development Strategy does focus development towards the most sustainable settlements and additional land has been allocated for development at North Whiteley (Policy SH2). Recommended Response: No change.</p>
--	--	---

	<p>Through the Local Plan formulation process, it will be important to ensure that the policies and ambitions that are set out within are in step with the national agenda and can be fully justified through the examination process. This will necessarily require a full and thorough assessment of the potential impacts on delivery of the Plan’s strategy, the viability of which will be affected by any application of locally specific standards.</p> <p>Crest Nicholson believes that the most effective way for the planning system to address the challenges of climate change is through adherence to the objectives set out at paragraphs 104 and 105 of the Framework, which advocate early consideration of the transport implications of spatial planning, because carbon emissions associated with travel are a significant cause of climate change. The WCC Carbon Neutrality Action Plan 2020-2030 notes that transport is the main source of district CO2 emissions, contributing 287,000 tonnes (46%) of CO2 in 2017. This is significantly higher than CO2 emissions arising from domestic energy use, which amounted to 193,000 tonnes (31%). While both are significant contributors, transport has a significantly greater impact on climate change locally. Ensuring that development is located in places where motorised travel demands can be minimised and opportunities for public transport usage and active travel maximised should be the principal policy consideration in responding positively to the climate emergency the Council has declared. The additional land at North Whiteley MDA is in a sustainable location through its close proximity to the facilities of Whiteley District Centre and benefits from high quality active travel routes through the development of the wider MDA which together help the Council in meeting and adapting to the challenges of climate change.</p> <p>The planning system can also address masterplanning issues such as requiring the layout of developments to maximise passive solar gain and photovoltaic energy generation opportunities, and Crest Nicholson would</p>	<p>See point above about the LP Viability Assessment. Recommended Response: No change.</p> <p>The Development Strategy does focus development towards the most sustainable settlements and additional land has been allocated for development at North Whiteley.</p>
--	--	--

	seek to develop the additional land parcels at North Whiteley with these masterplanning principles in mind.	The layout of development is an important part of the design process that developers will be required to follow. Recommended Response: No change.
ANON-KSAR-N8YM-W	BSP support the ambition for development proposals to mitigate and adapt to climate change, as well as helping the district meet its targets contained within the Council's Climate Emergency Declaration.	Support is welcomed and comments noted. Response to the Fairthorne Grange proposals have been moved to omission sites.
ANON-KSAR-N8QD-C	The Climate Assembly participants support points iii and v in terms of enabling active transport and local food production. They would like to see stronger wording in point i to state that all new homes will be free from fossil fuels and powered by 100% renewable energy.	Support is welcomed and comments noted. It is important that Local Plan is read as whole – Policy CN3 deals with energy efficiency standards in new homes and this makes it clear that all new homes will be fossil free and to provide 100% of energy consumption through the installation of photovoltaic solar panels. Recommended Response: No change.
ANON-KSAR-NKAB-D	BSP support the ambition for development proposals to mitigate and adapt to climate change, as well as helping the district meet its targets contained within the Council's Climate Emergency Declaration.	Support is welcomed and comments noted. Response to the Land of Rareridge Lane has been moved to Policy BW4.

<p>ANON-KSAR-N8GX-P</p>	<p>I would comment that the need for planting trees should give consideration of the type of trees, their ultimate height/spread and rate of growth. On my estate many of the trees have been felled in the 35 plus years I have lived here because they have not been kept under control, or the close proximity they are in both to buildings causing both subsidence damage and shade.</p>	<p>It is important that the Local Plan is read as whole. Policy NE15 (criteria v) sets out that new planting should be suitable for the site conditions and use of native species. The planting of trees should be considered as part of the design process (Policy D1). Recommended Response: No change.</p>
<p>ANON-KSAR-N8XU-4</p>	<p>Grainger Plc supports the principle of moving towards a carbon zero future and recognises the legal duty the Local Planning Authority has in meeting the requirements of the Climate Change Act 2008 through the inclusion of policies designed to mitigate and adapt to Climate Change. The objective of adopting the LETI standards is understood and supported in the context of the Climate Change emergency.</p> <p>The application of the LETI standards by way of the policies identified in CN1 – CN7 may raise challenges with the implementation of extant outline planning consents, if, the application of the policy requirements impacts the deliverability of the planned development. This in turn may have implications on the delivery of dwellings on schemes for which the parameters, provision of open space, layout, and density have already been set. The suite of policies designed to assist the Council in meeting its net zero targets by 2030 (CN1-7) should be worded so as to allow for an element of flexibility in their application where sufficient evidence has been provided to demonstrate that full compliance cannot be achieved.</p>	<p>Support is welcomed and comments noted.</p> <p>Whilst it is challenging for the LP to plan for every situation, the Council wants to be very clear on expectations on development and the need to take fully into consideration all of the policies in the adopted Local Plan. A LP Viability Assessment has been undertaken to understand the costs of implementing the LP policies and in view of this, there is no need to add the element of flexibility as that is the whole reason for undertaking a LP</p>

		<p>Viability Assessment at the Plan-making stage. Recommended Response: No change.</p>
<p>ANON-KSAR-N81Y-1</p>	<p>The definition of “Carbon Neutrality” provided on page 34 of the draft Local Plan should be updated to acknowledge both operational and embodied carbon (with offsets) and also identify the process by which carbon neutrality would need to be achieved, for example as in line with the UK Green Building Council.</p> <p>Strategic Policy CN1- Mitigating and Adapting to climate Change. The aspirations set out within this policy are generally supported. However, the policy should be clear on what details the Energy and Carbon Statement will need to cover.</p> <p>As drafted, it is not clear practically how the Statement could be effectively updated through a phased development. Baseline circumstances are factored into the beginning of development phases and will typically inform the viability of development. The draft policy should reflect that. We would therefore suggest reference to “the up to date baseline circumstances” is</p>	<p>There are a number of different definitions of carbon neutrality which vary between organisations. The definition in the Reg 18 LP was taken from the United Nations Climate Change. Recommended response: No change.</p> <p>The intention is that further details on what will be required in an Energy and Carbon Statement will be included in a Supplementary Planning Document and on the LP website as this will enable this guidance to be updated as and when there is further best practice and how it can deal with different phases of development. Recommended response: No change.</p> <p>It is considered to be helpful for the policy is refer to the baseline information as this might well change over the course of the planning application.</p>

	removed from the policy wording. This element of the policy would then read “In the case of a phased development, the Energy and Carbon Statement will need to be updated at each phase to reflect any new or emerging opportunities.”	Recommended response: No change.
ANON-KSAR-N8VD-H	<p>Whilst Anchor Properties supports the ambition for development proposals to mitigate and adapt to climate change, as well as helping the district meet its targets contained within the Council’s Climate Emergency Declaration, they do not fully support the approach set out in Policy CN1, which they do not consider to be effective. The provision of rainwater gardens is an admirable aspiration. However, there are significant spatial implications of such proposals and these would need to be considered alongside the views of Hampshire County Council as highways authority.</p> <p>Whilst the climate change and environmental goals of the plan are understandably ambitious given that the council has declared a climate change emergency, due consideration must be given to the viability implications of such policies, otherwise the plan will simply not facilitate delivery of the growth levels required during the plan period. The policy therefore needs to be preceded by the phrase “subject to viability considerations”.</p>	<p>Rainwater gardens are given as an example, in the Policy CN1 along with greywater recycling harvesting). Recommended response: No change.</p> <p>A LP Viability Assessment is being undertaken alongside the development of the LP. The whole idea of undertaking a LP Viability Assessment is that the costs of implementing are considered early on in the Plan-making process. Any costs that are associated with implementing any policies factored into the LP Viability Assessment. Recommended response: No change.</p>
ANON-KSAR-NKFQ-1	The policy does not explicitly require all new development to comply with the councils target to be net zero across the district by 2030. This means that any new development now permitted should itself be net zero.	It is important that the LP is read as whole. Policy CN3 requires new residential development to not burn fossil fuels on site for space heating, hot water or used in cooking and be able to

	<p>It needs to be borne in mind that at the current rate of new building only about 5% of the districts built environment will have been designed and built from 2023-2030. If the Council is serious about its net zero by 2030 target, this means that the 5% new development will have to do the heavy lifting towards net zero, not only for itself but also to make a significant contribution on behalf of the existing 95%. Para 4.6 sets out the limitations on what the local plan can achieve but the fact remains that it is the Council's most powerful tool in achieving its aspiration to net zero by 2030 so it needs to maximise its effectiveness. Policy CN1 does not go far enough towards that.</p> <p>We believe that CIL also needs to be reviewed with a view to it also providing infrastructure to enable the remaining 95% of housing stock and built environment to achieve net zero through enhanced public transport and building envelope efficiency.</p>	<p>demonstrate net zero operational carbon.</p> <p>It is important that the City Council's target of 2030 is met through a combination of measures – the LP is just one element albeit it a very important element, of this as there are a number of other initiatives being undertaken to achieve the 2030 target.</p> <p>A review of CIL is currently been undertaken. Recommended response: No change.</p>
BHLF-KSAR-N8TD-F	<p>In the section on carbon neutrality I would like to see reference to compelling developers to submit detailed accounts of how they will encourage the use of renewable energy sources. Eg encouraging placement of solar panels on rooves both for hot water and electricity generation. Even considering the orientation of each dwelling to maximise efficiency of panels. Heat pumps if truly effective etc</p>	<p>Developers will be required to submit information on how they will meet the policy requirements. Policy CN3 will new residential development to provide 100% of energy consumption through renewable energy.</p> <p>Recommended response: No change.</p>
BHLF-KSAR-N8TB-D	<p>However, I believe that some of them could be improved. - Climate Goals: whilst few would disagree with the need and aspiration to reduce the carbon footprint of the District, it is unclear to what activities the goal of a “carbon neutral district by 2030” refers. There are no measures for this goal, there will be scarcely 5-6 years remaining to achieve it when the Plan starts, and many of the plan activities are outside WCC control. The goals of a “carbon</p>	<p>The 2030 date originates from Winchester City Council's climate emergency declaration. It is important that the City Council's target of 2030 is met through a combination of measures – the LP</p>

	<p>neutral district by 2030” lacks coherence and realism. This goal is repeated in most sections and in many policies, but leaves it ambiguous if the goal refers to the activities controlled by Winchester City Council, or more widely to all activities in the District. The former is challenging enough given the timescale, but if the intention is to cover the latter, it is utterly unrealistic as many of the levers are outside WCC control. In addition, whatever the scope of the goal, measuring its success simply by “monitoring planning applications and appeals” is totally insufficient: that is simply a measure of activity not progress.</p> <p>Without proper definition and measurement of one of the founding goals, many parts of the Plan are devalued. It would be preferable to rephrase this goal to one that is within the direct control of WCC, stands a realistic chance of being achieved by 2030 and it must accompanied by proper measurement.</p>	<p>is just one element albeit it a very important element, of this as there are a number of other initiatives being undertaken to achieve the 2030 target.</p> <p>The City Council climate emergency team provides regular updates on progress on meeting the council’s climate emergency targets. Recommended response: No change.</p>
<p>BHLF-KSAR-N8TE-G East Hampshire District Council</p>	<p>As a local planning authority that has also declared a climate emergency, East Hampshire District Council (EHDC) supports Winchester City Council's (WCC's) ambition to achieve net-zero carbon development by 2030. EHDC has been working with professional consultants to understand the implications of a net-zero requirement and recognises that there will be challenges to achieving such a policy goal. The preferred approach of WCC's draft Local Plan appears to define 'net-zero' in relation to operational energy (regulated and unregulated), whilst encouraging developers to consider the role of embodied carbon as part of the design process.</p> <p>EHDC is aware that embodied or whole-life cycle emissions contribute significantly to a development's greenhouse gas emissions - has WCC considered alternative policy options that would (e.g.) require developers to minimise these? We recognise that this is a difficult policy area, but it is likely to be important for achieving radical reductions to emissions over the lifetime of the Local Plan</p>	<p>Support welcomed and comments noted.</p> <p>A report has now been prepared as part of the LP Evidence Base that has identified the different options for tackling embodied carbon and how this can be addressed in the LP.</p>

		Recommended Response: see policy on Embodied carbon.
BHLF-KSAR-N8R7-Z Colden Common Parish Council	<p>The population figures by parish are out of date as they do not take into account population growth up to 2021. Latest figures from the Census show population of Colden Common to be 4306 and not 3987 as stated in the draft Local Plan.</p> <p>Allotment waiting lists are very high and more allotment space is needed. The requirement per hectare has not increased since 2014. The plan focuses on climate change and encouraging people to grow their own produce</p>	<p>Population projections have been recently released and these can be updated in the Reg 19 LP.</p> <p>Policy CN1 (criteria v) does include as part of the design process, developers to consider the need for local food production within their developments. Recommended response: No change.</p>
BHLF-KSAR-N87J-R Micheldever Parish Council	<p>We feel that there should be a clear aim that reduces the need for commuting (other than working from home) i.e. that homes are near places of employment rather than in large developments / new towns with limited employment and therefore the majority of residents requiring to commute to places of work.</p>	<p>The development strategy that has been included in the Reg 18 LP is based on feedback from the Strategic Issues & Priorities consultation document and it is based on a sustainable development strategy of concentrating new residential development to places that have services and facilities. Recommended response: No change.</p>
BHLF-KSAR-N8ZG-R	<p>We are very pleased to see that Winchester City Council recognises the role of nature-based solutions in policy CN1 which requires developments to demonstrate how the design enables the development to adapt to the impacts of climate change through 'multi-functional areas of open space, tree planting, biodiversity net gain' for the benefit of both people and wildlife. We also are pleased to see the use of SuDS (Sustainable Urban Drainage</p>	<p>Support welcomed and comments noted.</p>

	<p>Solutions) and Rainwater gardens to minimise the risk and the impact of flooding and extreme weather conditions.</p> <p>However, we would like to see the role of nature-based solutions to mitigating climate change included within this policy. In addition, any nature-based solutions that aim to deliver increased levels of carbon sequestration must also provide additional benefits, including delivering increased biodiversity.</p> <p>Most nature-based solutions should be strategically targeted through the Local Nature Recovery Strategy to form an integral part of the nature recovery network and put the foundations in place to tackle both the climate and nature emergencies long term.</p>	<p>Change. Recommended response: The wording of Policy CN1 has been amended to include reference to nature based solutions. The role and the importance of Local Nature Recovery Strategies have now been referred to in the Biodiversity and the Natural Environment topic.</p>
<p>BHLF-KSAR-N8BQ-A Historic Environment Link here</p>	<p>While we support much of the content in this draft policy, we think the policy would be strengthened by inclusion of a commitment to reuse buildings where possible. As the acknowledged in paragraph 4.16, there is a significant body of evidence demonstrating that repair and re-use of historic buildings is materially less carbon intensive than either demolition and rebuild or new build on open land (our Heritage Counts publications provide more information if that is useful). Including a headline commitment to the appropriate re-use of buildings would strengthen this policy. Suggest changing the opening paragraph to Policy CN1 as follows:</p> <p>The plan will help to meet the targets in the council's Climate Emergency Declaration and reduce the district's carbon footprint <u>by supporting the re-use and refurbishment of existing buildings where possible and responding to the changes that are currently occurring to the climate and ensuring that new development is designed in a way that adapts to challenges of climate change in a comprehensive and integrated way.</u>by:</p>	<p>The council is keen to promote the reuse and refurbishment of buildings so this is welcome addition to the Policy. Recommended response: Change the policy wording to reflect the above.</p>
<p>BHLF-KSAR-N8BB-U Test Valley</p>	<p>TVBC welcomes the strategic emphasis in the plan on designing for carbon neutrality and adapting for future climate change over the plan period and beyond, which recognises the role local plans can play in supporting wider</p>	<p>Support welcomed and comments noted.</p>

Borough Council	ambitions to mitigate and adapt to climate change. TVBC has declared a climate emergency and the overarching theme of countering climate change runs throughout our draft Regulation 18 (Stage 1) Local Plan, including through Strategic Policy 1.	
BHLF-KSAR-N86T-1 Hampshire County Council (Transport)	<p>P37 – Strategic Policy CN 1 – Mitigating and adapting to climate change</p> <p>This policy is to be supported however it could be strengthened by including reference to the Carbon Management Hierarchy (Avoid-Reduce-Replace-Offset) principles outlined in the emerging LTP4 Policy C4 (page 66) which includes delivery of the following interventions:</p> <ul style="list-style-type: none"> - avoid carbon-intensive activities by reducing the need to travel, and looking for opportunities to ‘live locally’ and undertake shorter trips; - reduce dependency on the private car by providing better walking, cycling and public transport choices, and use our vehicles more efficiently; and - replace our petrol and diesel vehicles (which emit CO2) with zero emission vehicles. Policy C4 of the emerging LTP4 (page 66) also refers to working with local planning authorities to require transport-related carbon emissions associated with developments to be estimated and assessed at the site selection and planning approval determination stages. The County Council would welcome further discussions as to whether there is still an opportunity to reflect this in the emerging local plan. <p>Appendix 4: Climate Change</p> <p>The County Council is pleased to see that the issue of climate change is being addressed via a range of policies to address strategic carbon neutrality and designing for low carbon infrastructure, alongside Policy T1 (Sustainable and Active Transport and Travel) and Policy T3 (Promoting sustainable travel modes of transport and the design and layout of parking for new developments) which consider transport issues.</p> <p>The County Council’s Climate Change Framework for Strategic Programmes</p>	<p>It is important that the LP is read as whole as there are a number of policies in the Sustainable Transport and Travel topic that address the points that have been outlined in this representation.</p> <p>Recommended response: No change.</p> <p>Support welcomed and comments noted.</p>

	<p>(2020 – 2025) sets out the mitigation and resilience programmes which the County Council will be pursuing. These strategic programmes have been designed to deliver outcomes to reach the County Council’s targets in 2050 and are therefore very long term and extensive in nature. The County Council is therefore supportive of the Strategic Policy CN1 (Mitigating and adapting to climate change), Policy CN 2 (Energy Hierarchy), Policy CN 3 (Energy efficiency standards to reduce carbon emissions), Policy CN 4 (Water efficiency standards in new developments), Policy CN 5 (Renewable and low carbon energy schemes), Policy CN 6 (Micro energy generation schemes) and Policy CN 7 (Energy Storage) which are all designed to help mitigate and adapt to climate change and which the County Council considers are all aligned with the key milestones set out in the building and infrastructure theme of the County Council’s Climate Change Framework for Strategic Programmes.</p>	
<p>BHLF-KSAR-N86F-K Natural England Link here</p>	<p>The Council declared a Climate Emergency in 2019 and pledged to become a carbon neutral district by 2030. We welcome that this policy refers to the Council’s Climate Change Action Plan which was formally adopted following the climate emergency declaration.</p> <p>Strategic Policy CN1 Mitigating and adapting to Climate change. Climate change is already impacting on nature and society in England. The projected scale and rate of climate change, coupled with existing environmental pressures, has serious implications for the natural environment. The faster that we can rapidly reduce greenhouse gas emissions, the more we can reduce the overall pressure on the natural environment. Positive management, guided by the best available evidence, can build resilience to the impacts of climate change.</p> <p>‘Nature-based solutions,’ are essential to achieve this. We recommend Strategic Policy CN1 includes reference to nature-based solutions. These involve the restoration of ecosystems for the long-term benefit of people and nature. Examples include:</p>	<p>Support welcomed and comments noted.</p> <p>Change. Recommended Response: Amend the wording of Policy CN1 to pick up nature based solutions that can go hand</p>

	<ul style="list-style-type: none"> • Expansion of tree and woodland cover - to strengthen woodland habitat networks, protect soils, provide shade whilst capturing additional carbon from the atmosphere. • Restoration and creation of priority habitats such as lowland meadows, lowland fens, and rush pastures. This improves places where people live and recreate, protecting carbon stores and strengthening the nature recovery network. • Natural floodplain management - through the use of tree planting, habitat creation and restoration, to alleviate flooding further downstream. • Retrofitting of green and blue infrastructure such as trees and sustainable urban drainage systems (SUDS) in urban localities to address flood risk and heat island effects <p>We therefore suggest 4 specific actions to include in the Plan:</p> <ol style="list-style-type: none"> 1. Set an ambitious climate-specific policy with targets for reducing greenhouse gas emissions. Plans should include a clear commitment to achieving the national statutory target of net zero emissions by 2050, with policies to secure significant reductions in greenhouse gas emissions over the Plan period; 2. Identify opportunities to increase tree and woodland cover consistent with the UK target. Wherever possible, this should provide multi-functional benefits. This should be informed by the Biodiversity Action Plan. Careful consideration of whether places are a suitable location for woodland planting/regeneration is required, ecologically valuable areas of non-woodland should be avoided. 3. Identify areas where nature-based solutions can provide benefits to people whilst reducing climate change vulnerability in the natural 	<p>in hand with climate change and adaptation.</p>
--	---	--

	<p>environment.</p> <p>4. Identify habitats and protected sites that are particularly vulnerable to the impacts of climate change and consider how the planning system can work to reduce these vulnerabilities.</p> <p>We advise that these actions are integrated into a strategic approach alongside green infrastructure, health and wellbeing, biodiversity net gain, natural flood management, air, and water quality to deliver multifunctional benefits to people and wildlife. The Plan should make clear that development will be consistent with these policies, to ensure sustainable development is properly achieved across the Plan period. Meaningful targets should be set that can be appropriately monitored over the Plan period to demonstrate the effectiveness of the Plan/Policy in addressing climate change and to ensure appropriate remedial action can be taken, as necessary.</p> <p>Natural England has published a range of resources to help with the recommended actions; please see links listed under Annex 1 of this letter. Natural England would be happy to advise further on this aspect of the Local Plan development.</p> <p>The Plan should commit the authority to developing a strategic approach to maintaining and enhancing networks of habitats and green infrastructure (as required by NPPF paragraph 175). Where possible the provision of GI should be influenced by the Local Biodiversity Action Plan and Biodiversity Opportunity Area targets.</p>	
--	--	--

Comments which object to policy CN1 – mitigating and adapting to climate change		
Respondent number	Comment	Officer comment

ANON-KSAR-NKBN-T	<p>If you were serious about carbon emissions and protecting people from unaffordable energy costs you would require building to, or close to, passivhaus standards where heating is rarely needed.</p>	<p>It is important that the LP is read as whole. Policy CN3 deal with energy efficiency standards and it requires new residential development to demonstrate net zero carbon on site. Recommended response: No Change.</p>
ANON-KSAR-NKJV-A	<p>Bloor Homes supports in principle the ambition for development proposals to mitigate and adapt to climate change, as well as helping the district meet its targets contained within the Council’s Climate Emergency Declaration. The application of this policy must be proportionate and take into account site-specific considerations. It should be recognised that it may not be possible for all of the criteria to be met on each site. For example, there are significant spatial implications arising from the provision of rainwater gardens, including next to roads and footways. This needs to be considered alongside the views of Hampshire County Council as highways authority as well as the potential implications for viability, long-term future maintenance and design considerations.</p> <p>Requiring developments to provide open space for people to grow their own food is also admirable, but consideration needs to be given to how such space would be managed and maintained, unless as a traditional allotment, and the impacts that such areas would have for developers who are already struggling to meet stringent nutrient neutrality requirements. Furthermore, increasing green infrastructure requirements could have a detrimental impact on the quantum of homes a site can deliver and lead to the inefficient use of sustainably located sites, particularly smaller sites. Such provision may be more appropriate in some locations than others. There would equally need to be demand from new residents for such facilities which simply won’t be known at the plan-making or even necessarily at the planning application stage of the development process.</p>	<p>Support welcomed and comments noted.</p> <p>It is important to note that rainwater gardens are only given as an example and it would be down to HCC if this was suitable and achievable. Recommended response: No Change.</p> <p>Policy CN1 is on purpose not specific about how this can be achieved as opportunities for local food production could just be raised bed(s) or as part of a larger development there may be opportunities to do something on a larger scale such as allotments. The main point is that we want developers through the design process to consider this issue.</p>

	<p>Whilst the climate change and environmental goals of the plan are understandably ambitious given that the council has declared a climate change emergency, due consideration must be given to the viability implications of such policies, otherwise the plan will simply not facilitate delivery of the growth levels required during the plan period.</p>	<p>Recommended response: No Change.</p> <p>A LP Viability Assessment is being undertaken alongside the development of the LP. The whole idea of undertaking a LP Viability Assessment is that the costs of implementing are considered early on in the Plan-making process. Any costs that are associated with implementing any policies factored into the LP Viability Assessment.</p> <p>Recommended response: No change.</p>
<p>ANON-KSAR-N8M8-V</p>	<p>Vistry and Taylor Wimpey are committed to tackling the challenges of climate change and acknowledge the important role the development industry has to play in the national transition to a low and zero carbon society.</p> <p>In this respect, support is expressed for the overarching aims of Strategic Policy CN1 that seek to mitigate and adapt to the impacts of climate change, and for the Council aspiring to become a carbon neutral authority. However, the construction of the policy and the assignment of obligations is questioned, notably in respect of criterion (ii), which implies that spatial considerations relating to the identification of development sites are the responsibility of developers/applicants, when such matters should properly fall to the plan-making process and should be the building blocks for any comprehensive policy framework.</p>	<p>Support welcomed and comments noted.</p> <p>Policy CN1 is intended to cover sites that have been allocated for development in the new Local Plan and any sites that comes forward through the planning application process.</p> <p>Recommended Response: No change required.</p>

	<p>Indeed, as stated elsewhere within these representations, the principal response to tackling the causes of the Climate Emergency the Council has declared should be via the promulgation of a spatial strategy that focusses 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. As highlighted within these representations carbon emissions generated by transport are significantly higher locally than those arising from any other sector. A joined-up, sustainable, spatially coherent strategy should underpin the new Local Plan, with development at scale concentrated at Winchester Town where the greatest potential exists to promote active travel and to reduce travel demand.</p> <p>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, 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 adjoining Kings Barton MDA will create locally accessible facilities to meet the needs of its population in due course. In the case of Whiteley the scale of the MDA (3,500 dwellings) provides greater potential to create a wider range of services and facilities compared to Kings Barton (2,000 dwellings). However, a decision to continue growth northwards incorporating the land to the north of Wellhouse Lane would create a cohesive neighbourhood of up to 4,000 dwellings matching and exceeding the scale of Whiteley, with all of the self-containment advantages and active travel opportunities that would associate with such critical mass.</p> <p>Policy CN1 should be set within the strategic context of a spatial policy framework that places the locational aspects of tackling climate change at its heart. As drafted the new Local Plan does not have sufficient focus on this opportunity and is therefore starting from the wrong place in determining the</p>	<p>The development strategy in the Reg 18 LP is based on feedback from the SIP consultation and is based on focussing development in the most sustainable locations. Recommended Response: No change required.</p> <p>Support welcomed and comments noted regarding the various MDA's that have been allocated in the adopted LP. The site to the north of Wellhouse Lane has not been allocated for development as this site is not needed to meet the scale of development that is needed in this Local Plan. Recommended Response: No change required.</p>
--	---	---

	<p>overall strategy. There is not a suitably wide suite of allocations that are based on this principle; the principal motivation underlying which is the reduction of carbon emissions driven by the objective of curtailing travel demand and promotion of highly accessible places as the foci for development. MDA scale development to the north of Kings Barton on land that is controlled by Vistry and Taylor Wimpey and which is available for the development of around 2,000 dwellings and extensive supporting community and green infrastructure should be incorporated into the Draft Plan as a major component of the fight against climate change locally.</p> <p>The construction of energy efficient homes that are adaptable and flexible is supported, but Vistry and Taylor Wimpey consider that such requirements could and should be mandated most effectively, nationally, via the Building Regulations, thereby applying a consistent national standard that all developments should be required to meet, irrespective of location. As circumstances dictate at the time of writing the draft policy should be consistent with the national policy approach that is set out currently by the Written Ministerial Statement from March 2015, which advises that additional standards over and above Building Regulations, which provide the baseline technical standard for all new homes, should be required only if they address a clearly evidenced locally occurring need, justified by locally specific data and where their impact on viability has been considered. This position is reinforced by NPPG, paragraphs 007 Reference ID: 56-007- 20150327; and 020 Reference ID: 56-020-20150327. It is acknowledged that the City Council has an ambition to accelerate the move towards carbon neutrality as a proactive response to climate change and this is supported. Vistry and Taylor Wimpey recognise the importance of delivering development that is truly sustainable and appreciate the role that the development industry must play in this respect. The Council must ensure that its Plan its in-step with the national policy frameworks in this respect and demonstrate that the approach taken locally is justified and sound. Vistry and Taylor Wimpey will ensure that all developments for which they are responsible will be fully policy</p>	<p>Policy CN3 deals with energy efficiency standards in new development. The Council has declared a climate emergency and it has decided that it move faster that the current Building Regulations. The requirements of Policy CN3 have been tested through the LP Viability Assessment.</p>
--	--	--

	<p>compliant in this regard.</p> <p>However, as set out above it is considered that the spatial policy framework that underpins the whole plan is not sufficiently rooted in tackling climate change because the overall strategy does not focus development at locations where the opportunity to support sustainable lifestyles is greatest. The planning system is concerned principally with the development and use of land; therefore, the most effective contribution that can be made to combatting climate change is through the preparation of spatial development strategies within Local Plans that allocate land for development in locations that actively support the adoption of sustainable lifestyles.</p>	<p>The allocations have been included in the Reg 18 LP have been focussed on sustainable locations and in the case of Winchester Town, the majority of the new residential development will take place on the SJM Barracks which is previously developed land. Recommended Response: No change required.</p>
<p>ANON- KSAR- N85A-D</p>	<p>[This response should be read in conjunction with the full copies of the 'Bishop's Waltham Representations to the Winchester Local Plan Regulation 18 representations OBO Crest Nicholson' representations submitted by email to: planningpolicy@winchester.gov.uk on 14/12/2022 from h.james@nexusplanning.co.uk, which includes the relevant figures, footnotes and appendices, with correct formatting]</p> <p>Crest Nicholson is committed to tackling the challenges of climate change and acknowledges the role the development industry has in the national transition to a low and zero carbon society.</p> <p>In this respect, Crest Nicholson supports the overarching aims of draft 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 draft policy and the assignment of obligations, notably in respect of criterion (ii), which implies that spatial</p>	<p>Support welcomed and comments noted.</p> <p>Policy CN1 is intended to cover sites that have been allocated for development in the new Local Plan and any sites that comes forward through the planning</p>

	<p>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.</p> <p>Indeed, as is stated elsewhere within these representations, 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.</p> <p>However, draft Policy CN1 should be set within the strategic context of a spatial policy framework that places the locational aspects of tackling climate change at its heart. The allocation of further land at the Bishop’s Waltham (notwithstanding the issues identified earlier in these representations relating to the selected option for growth at Bishop’s Waltham) is, therefore, a positive policy measure.</p> <p>The construction of energy efficient homes that are adaptable and flexible is supported, but Crest Nicholson considers that such requirements could and should be mandated most effectively, nationally via the Building Regulations, thereby applying a consistent national standard that all developments should be required to meet, irrespective of location. As circumstances dictate at the time of writing the draft policy should be consistent with the national policy approach that is set out currently by the Written Ministerial Statement from March 2015, which advises that additional standards over and above Building Regulations, which provide the baseline technical standard for all new homes, should be required only if they address a clearly evidenced locally occurring need, justified by locally specific data and where their impact on viability has been considered. This position is reinforced by</p>	<p>application process. Recommended Response: No change required.</p> <p>The allocations have been included in the Reg 18 LP have been focussed on sustainable locations Recommended Response: No change required.</p> <p>Policy CN1 is intended to cover sites that have been allocated for development in the new Local Plan and any sites that comes forward through the planning application process. Recommended Response: No change required.</p> <p>Policy CN3 deals with energy efficiency standards in new development. The Council has declared a climate emergency and it has decided that it move faster than the current Building Regulations. The requirements of Policy CN3 have been tested through the LP Viability Assessment.</p>
--	---	---

	<p>National Planning Practice Guidance . It is acknowledged that the Council has an ambition to accelerate the move towards carbon neutrality as a proactive response to climate change and this is supported. Crest Nicholson recognises the importance of delivering development that is truly sustainable and appreciates the role that the development industry must play in this respect.</p> <p>The planning system is concerned principally with the development and use of land; therefore, the most effective contribution that can be made to combatting climate change is through the preparation of spatial development strategies within Local Plans that allocate land for development in locations that actively support the adoption of sustainable lifestyles. Through the Local Plan formulation process, it will be important to ensure that the policies and ambitions that are set out within are in step with the national agenda and can be fully justified through the examination process. This will necessarily require a full and thorough assessment of the potential impacts on delivery of the Local Plan strategy, the viability of which will be affected by any application of locally specific standards.</p> <p>Crest Nicholson believes that, in relation to draft Policy CN3, the most effective way for the planning system to address the challenges of climate change is through adherence to the objectives set out at paragraphs 104 and 105 of the Framework, which advocate early consideration of the transport implications of spatial planning, because carbon emissions associated with travel are a significant cause of climate change. The Winchester City Council Carbon Neutrality Action Plan 2020-2030 notes that transport is the main source of the district's CO2 emissions, contributing 287,000 tonnes (46%) of CO2 in 2017. This is significantly higher than CO2 emissions arising from domestic energy use, which amounted to 193,000 tonnes (31%). While both are significant contributors, transport has a significantly greater impact on climate change locally. Ensuring that development is located in places where motorised travel demands can be minimised and opportunities</p>	<p>See above response.</p> <p>The allocations have been included in the Reg 18 LP have been focussed on sustainable locations. It is important that the LP is read as whole as there are a number of other LP policies that deal with issues such as accessibility of sites to public transport and ensuring that development maximises the use of sustainable transport.</p>
--	--	---

	<p>for public transport usage and active travel maximised should be the principal policy consideration in responding positively to the climate emergency the Council has declared.</p> <p>The site is in a sustainable location through its close proximity to the facilities of Bishop's Waltham which help the Council in meeting and adapting to the challenges of climate change. The planning system can also address masterplanning issues such as requiring the layout of developments to maximise passive solar gain and photovoltaic energy generation opportunities, and Crest Nicholson would seek to develop the Site with these masterplanning principles in mind.</p>	<p>Recommended Response: No change required.</p> <p>This comment relates to a specific site rather than a Policy CN1. Recommended Response: No change required.</p>
<p>ANON-KSAR-N8Q1-S</p>	<p>The importance of climate change is such that the City Council declared a climate emergency, and consequently produced the Carbon Neutrality Action Plan to support the Council's objective of ensuring that new development is designed in a way to adapt to the challenges of climate change.</p> <p>We agree with the Council's assertion that the Local Plan has a role to play in reducing the carbon footprint of the district and ensuring that new development is directed towards areas where existing sustainable infrastructure is located. It is imperative that in order for the Local Plan to achieve this, that the Council delivers objectives around good growth which addresses carbon emissions. In this regard transport is recognised as one of the highest contributors towards the carbon footprint of the district which is evidenced within the Carbon Neutrality Action Plan produced in 2020. Statistics produced in this report (sourced to WinAcc) indicated that of the 629,000 tonnes of CO2 produced across the District, 287,000 of these were related to transport. Of particulate note, and a direct reference to the reliance on private car use, is that a further 205,000 tonnes of CO2s was produced if</p>	<p>Support welcomed and comments noted.</p> <p>The allocations have been included in the Reg 18 LP have been focussed on sustainable locations. It is important that the LP is read as whole as there are a number of other LP policies that deal with issues such as accessibility of sites to public transport and ensuring that development maximises the use of sustainable transport. Recommended Response: No change required.</p>

	<p>motorway emissions are included, with the Council stating that they will focus on measures that reduce the need to travel by car.</p> <p>Therefore, whilst the requirements for active travel to be encouraged within new developments and the advocacy for reducing the need to travel such as the introduction of super-fast fibre broadband are all encouraged, there is a requirement for a fundamental shift in Winchester’s approach to the location of development, and how new development can be utilised to make best use of Winchester’s existing public transport infrastructure. It is imperative that the Local Plan spatial strategy, and therefore consequentially the allocations arising, minimise the reliance on car usage. For example, any new homes in any location across Winchester can introduce in-built low carbon solutions, but the factor that will govern what impact they have on ultimately have on climate change within the District will be how people behave and how they travel to places of work or leisure.</p> <p>The location of development and spatial strategy is therefore one of the greatest contributory factors as to whether the local plan will achieve this reduction in private vehicle use and is identified specifically under IIA Objective 2: “To reduce the need to travel by private vehicle in the District and improve air quality”</p> <p>The Integrated Impact Assessment (IIA) references baseline evidence on ‘climate change mitigation and adaptation’ (Appendix D). However, this is related to the ‘as-is’ situation across the district and provides little context for estimating the future nature of how individual development proposals might affect carbon emissions.</p> <p>Sustainable modes of transport, and the ability to incentivise and drive change in transport behaviour (shifting trips away from the car) should be intrinsic into the identification of new development sites. A generally more dispersed and sub-urban development strategy, adding bits of development onto the edge of many existing locations as in significant proposed by the</p>	<p>Comments noted.</p> <p>This point has been picked up in Policy D1 and Policy CN1 – whereby we are asking developers to be able to document and justify</p>
--	--	---

	<p>Local Plan, will not address the climate emergency in the district, and will demonstrably result in greater car reliance. This can be seen in the Census data (2011) where dispersed development around Waterloo and Whiteley have a travel to work method that is heavily weighted towards the private car/van (52% and 54% respectively compared to denser town style development around a train station.</p> <p>Indeed Census 2011 travel to work data (Census Table QS701EW) shows that for the types of 'built up areas' in the south of the District where allocations and much of the growth in the Plan is proposed, only between 12-15% of employed people travelling to work will use active modes (walking/cycling) or public transport (train/bus), including Bishops Waltham (14%), Denmead (12%), Knowle (8%), Horndean/Waterlooville (13%) and Whiteley (15%). This can be compared with what is likely to be achieved in a town centred around a railway station (as Micheldever Station would be) where rates of active/public transport travel would be around 30%, like in Petersfield. It is also notable that even the Micheldever built-up-area covering the existing village has an active/public transport share of 20%, the majority of that (15%) associated with train travel. That illustrates how development better connected to transport nodes can fundamentally influence travel modes and contribute to reducing carbon emissions. In short, a mixed-use and compact settlement centred around a train station is twice as likely to have residents commuting by active or public transport modes, than the equivalent growth provided as many 'bolt-ons' to the edge of existing smaller settlements without the benefit of that infrastructure and choice of travel options.</p> <p>Micheldever railway station is located on the south west main line, with trains directly into London Waterloo, calling at significant areas of employment such as Basingstoke and Woking with trains operating south stopping at Winchester and Portsmouth. The Council should seek to achieve a far more efficient use of the railway station at Micheldever, which should seemingly be</p>	<p>why and how the development will address the council's climate emergency. Recommended Response: No change required.</p> <p>The spatial distribution of development is based on a sustainable pattern of development that resulted from comments that were made during the SIP public consultation. Recommended Response: No change required.</p>
--	---	---

	<p>providing a far greater option for those close by to commute from than the use of private car transport.</p> <p>Surprisingly, despite our proposals at Land at Micheldever Station (MI04) seeking to deliver housing centred around the existing train station, the IIA currently considers that the proposals would have a minor negative impact against the aims of IIA Objective 2. The justification advanced for this within the IIA Appendices states that the appraisal criteria are the same as shown under the SA objective 1: greenhouse gas emissions which are associated with travel. It is unclear how this consideration can be accurate, given that a new development, delivering a joined up active travel approach, focussed on enabling the use of public transport and discouraging private car use would result in a lesser impact than the equivalent allocation of a site to an existing smaller settlement. The delivery of our Micheldever Station scheme would also result in improvements to the rail network, with increased level of services and enhancements to the station itself. This appears to be a fundamental shortcoming of the IIA, which fails to consider what modal share of transport could occur and the consequent impact on climate change objectives.</p> <p>In our view, and supported by evidence on travel patterns, the Council's current spatial strategy would prevent it from delivering the objectives set out under this policy in respect of mitigating climate change. Instead of seeking to reduce the need to travel by private car as a first step in the Plan, this policy instead relies on making good shortcomings in the location of new development by placing stringent (and still welcome) standards on the quality, form and carbon credentials of new buildings. In order to best achieve this objective, the Council needs to identify locations - such as Micheldever Station - that can truly deliver principles around sustainable transport at its core, promoting a step change away from private transport by car, as well as then requiring residual measures such as low carbon energy,</p>	<p>This is a specific point in relation to a site that has not been included in the LP.</p> <p>Recommended Response: No change required.</p>
--	---	---

	building design and electric charging points (among others). The latter without the former will not address the climate emergency	
ANON-KSAR-NKJC-Q	Whilst development can provide the necessary infrastructure to connect to 'super-fast fibre broadband', the delivery of this service is beyond the developer's control. This criterion should be revised to limit such requests to the provision on-site of the infrastructure necessary to make connections to this service when available.	Access to broadband is a vital component of infrastructure, especially for economic growth, future education, home working and community cohesion and resilience. Therefore, planning of telecommunications infrastructure in relation to development is vital part of the Local Plan. If access to superfast broadband is not technically possible, developers will need to demonstrate why this is not possible. Recommended response: No change.
ANON-KSAR-N8XZ-9 Denmead Parish Council	CN1 ix calls for planting trees to shade buildings – the type of trees planted by developers will be too small to shade buildings unless they are planted too close – causing problems with subsidence as the trees mature.	The key point is that natural environment and the impact that planting around a building needs to be considered early on in the design process as this can have a dramatic impact on helping buildings to not overheat. It is fully accepted that trees will take time to mature and there needs to be special attention to ensure that they do not cause subsidence but these are all issues that can be considered as part of the design

		process. Recommended response: No change.
ANON-KSAR-NKJ1-5	<p>Winchester College support the principle of the City Council's approach to adapting to climate change defined in Strategic Policy CN1.</p> <p>However, for clarification, the College requests that the wording of the policy distinguishes between new development and changes of use. Development proposals which involve the change of use of an existing building would not be able to demonstrate that the design process has considered site layout, orientation and choice of materials etc. Where these buildings are listed, the issue is compounded as retrofitting low carbon solutions may have an adverse impact on the significance of the heritage asset or its setting.</p>	<p>Support welcomed and comments noted.</p> <p>Recommended response: Amend the wording in the policy. In order to clarify this point the words change of use have been added after the words excluding household extensions).</p>
ANON-KSAR-N81F-E	<p>Bargate Homes support this policy in principle, recognising the Council's Declaration of Climate Emergency. Bargate Homes do not support part of this criterion, which implies development sites should be selected on the basis of their likely carbon emissions. The location of sites is dictated by many factors, including context of the local built environment, and accessibility. Supporting development in accessible locations (covered by other policies in the plan) will inherently help reduce carbon emissions by reducing the need to travel. The detailed design of development will then also help to reduce carbon emissions further. Bargate Homes support the rest of the criterion, which requires detailed design to take into account reducing carbon emissions, by reducing energy demand for example by choice of construction materials.</p> <p>The requirement to 'consider' charge points is too vague. What would qualify as being considered? The provision of EV charge points for new dwellings is now a legal requirement. The policy should also be future proofed, by</p>	<p>Policy CN1 is intended to cover sites that have been allocated for development in the new Local Plan and any sites that comes forward through the planning application process.</p> <p>Recommended Response: No change required.</p>

	<p>allowing for new technologies to achieve the same outcomes rather than insist on charge points. The way in which we charge vehicles may evolve over the plan period.</p> <p>Guidance would be needed on when it would be appropriate/necessary to include local food production and composting facilities. For example, provision of allotments would only be appropriate/feasible with major residential developments not small scale development. Does the provision of composting facilities mean communal facilities or private household facilities?</p> <p>The principle of designing homes that can be adapted to changing needs is supported. Clarity is needed here; the policy is about climate change, but adapting to changing lifestyles is a separate issue, better dealt with in the Housing policies.</p> <p>Provision of technology such as superfast broadband is not in the capacity of developers. The policy wording should be amended to require developments to include the infrastructure for connections to these technologies, to allow householders or businesses to connect when the services are available.</p>	<p>Recommended Response: The wording could be clarified by replacing the word ‘considered’ with the word ‘incorporated’.</p> <p>The policy wording is intended to sufficiently flexible to encourage developers as part of the design process to assess the suitability of a range of different opportunities without being perspective what these might be. Recommended response: No change.</p> <p>Providing flexible and adaptable space is an important component of mitigating against climate change as it provides people with an opportunity to work at work. It is important that the LP is read as whole and in this respect, it is considered appropriate to include this requirement in Policy CN1 rather than a housing policy. Recommended response: No change.</p> <p>Access to broadband is a vital component of infrastructure, especially for economic growth, future education, home working</p>
--	---	--

	<p>Clarity is needed about when it is feasible to have multi-functional green spaces. It is likely to be in major developments only, where there is sufficient space and viability for this.</p> <p>The principle of providing an energy carbon statement is supported in principle. Clarification is needed of what is a 'proportional' statement (a commitment to supplementary guidance on this may be appropriate). Clarification is also needed about when these statements are required; all types of development, even minor development or just when new floorspace</p>	<p>and community cohesion and resilience. If access to superfast broadband is not technically possible, developers will need to demonstrate why this is not possible. Recommended response: No change.</p> <p>Multi-functional green spaces are places that integrated different functions at a different time in the same place. The versatility in urban spaces can contribute to the vitality of shaping urban growth by creating multipurpose places for a community. It does not necessarily follow that an area of green space needs to be large to be multifunctional as even smaller areas of green space can serve different functions. Recommended response: No change.</p> <p>Further guidance will be provided on the council's website about what should be included in an Energy and Carbon Statement – this may be in a form of Supplementary Planning</p>
--	---	---

	<p>is proposed? Outline proposals or reserved matters and detailed application stage?</p> <p>The energy hierarchy is supported in principle, but it needs to be sufficiently flexible to allow for innovations appropriate to specific contexts, which would accord with the theme of the NPPF to avoid stifling innovation to achieve the same or better outcomes. Allowing alternative solutions only in the stated "very last resort" would be likely to stifle such innovation. Applying the policy to "all development" is not appropriate/feasible, for example, the redevelopment of heritage assets into a optimum conservation use.</p>	<p>Guidance or it may be in a form of website based form. Recommended response: No change.</p> <p>It is important that the LP is read as whole. Policy HE14 deals with improvements and alterations to improve the energy efficiency of designated and non designated heritage assets. The intention is not to stifle innovation and it is recognised that technology will change over the course of the LP period. Recommended response: No change.</p>
ANON-KSAR-N838-2	There needs to be more emphasis on areas of agricultural land that take up carbon and can be used for growing.	The role that agricultural land has in terms of take up carbon and its use for growing are important but issues that are beyond the remit of the Local Plan. Recommended response: No change
ANON-KSAR-N8XG-P	Key issue xi: para 4.11 should be made clearer that Council WILL support proposals for low carbon energy infrastructure.	It is important that the Local Plan is read as whole. Policy CN5 includes the issues that need to be taken into account when assessing proposals for renewable and low carbon schemes. Recommended response: No change

<p>ANON-KSAR-N8Q5-W</p>	<p>The policy is generally good but missing a key element.</p> <p>Natural solutions are rightly referenced in the second part of draft policy CN 1 dealing with climate adaptation (paras viii and ix).</p> <p>However, the policy should also reference natural solutions in the first part, dealing with mitigation. For example, para ii could reference natural shading from tree cover. Trees, woodland and hedgerows help mitigate the impacts of climate change, delivering natural cooling in urban heat islands through transpiration as well as providing shelter and shade, and contributing to sustainable urban drainage systems.</p> <p>Trees and woodland soil provide natural carbon capture and storage. A rapid increase in the rate of woodland creation has been proposed by the UK's Committee on Climate Change (CCC). The Woodland Trust supports the CCC's recommended increase in UK woodland cover from its current 13% of land area to 19% by 2050. More information can be found in the Trust's 2020 publication The Emergency Tree Plan. We recommend setting a canopy cover target as part of policy CN 1.</p>	<p>Support welcomed and comments noted.</p> <p>The role and the importance of overheating and shading is dealt with under ix as this is one of ways that the design and layout of buildings can respond to adapt to climate change. Recommended response: No change</p> <p>Support welcomed and comments noted.</p>
<p>ANON-KSAR-NKX6-R</p>	<p>Specifically, Key Issue ii) and the ambition for Winchester City Council to be carbon neutral by 2024 which is unrealistic and not in the best interest of utilising the many new and improved measures which will come forward to tackle climate change over the further six years. The timescale should be amended to 2030 in line with the wider District target.</p>	<p>The City Council has declared a climate emergency and has set the date of 2030 for the whole of the district to be carbon neutral. There is a Carbon Neutrality Action Plan and a roadmap for how this can be achieved on the City Council website.</p> <p>Recommended response: No change</p>

<p>ANON- KSAR- N88Q-Z</p>	<p>New point after v. 'Access to good food and sustainable food infrastructure will help to address issues of waste and recycling, achieving biodiversity net gain and strengthening the resilience of communities to climate change'</p> <p>Policy CN1 - add to v. Opportunities have been incorporated within all residential development for local food production and composting. 'As well as allotments, community gardens, orchards and innovative spaces for growing food, landscaping should include productive trees and plants.</p> <p>Policy CN1- add to vi. Flexible and adaptable space has been incorporated into the design of residential development that facilitates the ability for people to be able to work from home, to adapt to changing lifestyles, 'to be able to create a new community by working together on sustainable open spaces;' and</p>	<p>It is important that the Local Plan is read as a whole. Waste and recycling are issues covered by the HCC Minerals and Waste LP. Biodiversity net gain is covered by Policy NE5. Recommended response: No change</p> <p>Criteria v is considered to be suitably flexible to deal with a range of opportunities without being specific on what these measures could be. Recommended response: No change</p> <p>Criterion vi is focussed around the design of new residential development whereas the point that is made by this representation is much wider and not linked to this. Recommended response: No change</p>
<p>BHLF- KSAR- N8ZV-7</p>	<p>Strategic Policy CN1 – Managing and adapting to climate change OBJECT</p> <p>Winchester College support the principle of the City Council's approach to adapting to climate change defined in Strategic Policy CN1. However, for clarification, the College requests that the wording of the policy distinguishes between new development and changes of use.</p> <p>Development proposals which involve the change of use of an existing</p>	<p>Recommended response: Amend the wording in the policy. In order to clarify this point the words change of use have been added after the words excluding household extensions).</p>

	<p>building would not be able to demonstrate that the design process has considered site layout, orientation and choice of materials etc. Where these buildings are listed, the issue is compounded as retrofitting low carbon solutions may have an adverse impact on the significance of the heritage asset or its setting.</p>	
<p>BHLF- KSAR- N8BD-W</p>	<p>The following should be added as a new paragraph:</p> <p>“The sourcing, manufacture, transport and assembly of materials to produce new houses, should be taken onto account when calculating carbon emissions and reducing the carbon footprint for the District.”</p> <p>No data is offered on current emissions, and on how information is collected and calculated, in order to enable policies to be measured.</p> <p>Policy CN1 is largely directed at and more appropriate for larger scale developments, but smaller ones including extensions (which are excluded by the policy) and single dwelling houses should be required to take into account those aspects of climate change considerations which are relevant to the size of such developments so either this policy needs amending or a new one added stating which aspects of climate change adaption and mitigation should be included for smaller developments.</p> <p>Given the emphasis in the plan on tackling the challenge of climate change, this chapter would be strengthened by the inclusion of a new policy requiring major developments to demonstrate when they will become carbon neutral. Local plans in preparation elsewhere are seeking to control the release of</p>	<p>Recommended Response: A report has now been prepared as part of the LP Evidence Base that has identified the different options for tackling embodied carbon and how this can be addressed in the LP.</p> <p>Details of how Policy CN1 will be monitored are set out in the monitoring section.</p> <p>Recommended response: No change</p> <p>Policy CN1 would cover all new residential development apart from extensions (which are largely covered by Prior Approval) and change of use. Single dwelling houses would be covered by this policy. Recommended response: No change</p>

	<p>embedded carbon through demolition and redevelopment. See https://beta.bathnes.gov.uk/local-plan-core-strategy-and-placemaking-plan-partial-update/whole-life-carbon-assessments-new</p>	<p>It is important that the Local Plan is read as whole. Policy CN3 deals with energy efficiency standards for new residential homes and requires them to demonstrate that they are net zero operational carbon. Recommended response: No change</p>
<p>BHLF-KSAR-N86N-U</p>	<p>Policy is supported in principle, recognising the Council's Declaration of Climate Emergency.</p> <p>We do not support part of criterion (ii), which implies development sites should be selected on the basis of their likely carbon emissions. The location of sites is dictated by many factors, including context of the local built environment, and accessibility. Supporting development in accessible locations (covered by other policies in the plan) will inherently help reduce carbon emissions by reducing the need to travel. The detailed design of development will then also help to reduce carbon emissions further. We support the rest of the criterion, which requires detail design to take into account reducing carbon emissions, by reducing energy demand for example by choice of construction materials.</p> <p>The requirement to 'consider' charge points is too vague under criterion (iv). What would qualify as being considered? The provision of EV charge points for new dwellings is now a legal requirement. The policy should also be future proofed, by allowing for new technologies to achieve the same outcomes rather than insist on charge points. The way in which we charge vehicles may evolve over the plan period.</p> <p>Guidance would be needed on when it would be appropriate/necessary to include local food production and composting facilities (criterion (v)). For example, provision of allotments would only be appropriate/feasible with</p>	<p>Support welcomed and comments noted.</p> <p>Policy CN1 is intended to cover sites that have been allocated for development in the new Local Plan and any sites that comes forward through the planning application process. Recommended Response: No change required.</p> <p>Recommended Response: The wording could be clarified by replacing the word 'considered' with the word 'incorporated'.</p> <p>The policy wording is intended to sufficiently flexible to encourage developers as part of the design</p>

	<p>major residential developments but not small scale development. Does the provision of composting facilities mean communal facilities or private household facilities?</p> <p>The principle of designing homes than can be adapted to changing needs (criterion vi) is supported. Clarity is needed here; the policy is about climate change, but adapting to changing lifestyles is a separate issue, better dealt with in the Housing policies.</p> <p>Provision of technology such as superfast broadband is not in the gift of developers. The policy wording of criterion (vii) should be amended to require developments to include the infrastructure for connections to these technologies, to allow householders or businesses to connect when the services are available.</p>	<p>process to assess the suitability of a range of different opportunities without being perspective what these might be. Recommended response: No change.</p> <p>Providing flexible and adaptable space is an important component of mitigating against climate change as it provides people with an opportunity to work at work. It is important that the LP is read as whole and in this respect, it is considered appropriate to include this requirement in Policy CN1 rather than a housing policy. Recommended response: No change.</p> <p>Access to broadband is a vital component of infrastructure, especially for economic growth, future education, home working and community cohesion and resilience. If access to superfast broadband is not technically possible, developers will need to demonstrate why this is not possible. Recommended response: No change.</p>
--	---	---

	<p>Clarity is needed about when it is feasible to have multi-functional green spaces (criterion ix). It is likely to be in major developments only, where there is sufficient space and viability for this.</p> <p>The principle of providing an energy carbon statement is supported in principle. Clarification is needed of what is a 'proportional' statement (a commitment to supplementary guidance on this may be appropriate). Clarification is also needed about when these statements are required; all types of development, even minor development or just when new floorspace is proposed? Outline proposals or reserved matters and detailed application stage?</p>	<p>Multi-functional green spaces are places that integrated different functions at a different time in the same place. The versatility in urban spaces can contribute to the vitality of shaping urban growth by creating multipurpose places for a community. It does not necessarily follow that an area of green space needs to be large to be multifunctional as even smaller areas of green space can serve different functions.</p> <p>Recommended response: No change.</p> <p>Further guidance will be provided on the council's website about what should be included in an Energy and Carbon Statement – this may be in a form of Supplementary Planning Guidance or it may be in a form of website based form.</p> <p>Recommended response: No change.</p>
--	---	--

Comments which did not answer to whether they support, object bor netiher support or object to policy CN1 – mitigating and adapting to climate change		
Respondent number	Comment	Officer comments
BHLF-KSAR-N8T1-V	<p>All proposals except householder extensions will be engaged by CN1. Not all criteria are relevant to all other types and scale of development. While an Energy and Carbon Statement must be ‘proportionate’ clearer guidance will be required to explain what level of information will be required to judge any conflict with CN1.</p> <p>Bullet point 2 is particularly onerous by introducing a sequential approach to the rationale for the land use / site as a matter of principle and this is inconsistent with national policy.</p>	<p>Further guidance will be provided on the council’s website about what should be included in an Energy and Carbon Statement – this may be in a form of Supplementary Planning Guidance or it may be in a form of website based form.</p> <p>Recommended response: No change.</p> <p>Policy CN1 is intended to cover sites that have been allocated for development in the new Local Plan and any sites that comes forward through the planning application process.</p> <p>Recommended Response: No change required.</p>
BHLF-KSAR-N8RJ-K	<p>Catesby is committed to the move to ‘net zero carbon’ and supports Draft Policy CN1 in principle. It is welcomed that the policy recognises the role of broader green infrastructure provision (which is multifunctional in purpose) in contributing positively to avoiding and/or mitigating climate change effects. This will help to influence the masterplanning and design process, ensuring that sustainability measures are considered at an early stage and are</p>	<p>Support welcomed and comments noted.</p>

	<p>holistically integrated.</p> <p>It is further noted that the Government has now decided to allow Local Planning Authorities ('LPAs') to set energy efficiency requirements above those set out in Building Regulations. Nonetheless, and as detailed below, Catesby are concerned that the Draft Local Plan proposes energy efficiency / building sustainability targets that (cumulatively) may increase build costs to the point that developments may become unviable.</p> <p>In the context of the current inflationary and recessionary environment, the cumulative impacts of all policies that impact build costs require careful scrutiny. Indeed, should impacts on development viability be underestimated, this could in-turn undermine the effectiveness of the Local Plan as a whole.</p>	<p>A LP Viability Assessment is being undertaken alongside the development of the LP. The whole idea of undertaking a LP Viability Assessment is that the costs of implementing are considered early on in the Plan-making process. Any costs that are associated with implementing any policies factored into the LP Viability Assessment.</p> <p>Recommended response: No change.</p>
<p>BHLF-KSAR-N8RV-Y</p>	<p>a) Widening of the current settlement boundary to accommodate more homes would reduce the surrounding rural countryside that is currently helping to combat carbon pollution and offset the local carbon footprint.</p> <p>b) It would create a greater population base that would further increase the carbon footprint of the rural parish.</p>	<p>The role that agricultural land has in terms of take up carbon and its use for growing are important. However, the City Council is required by central government to meet its Objectively Assessed Need for housing.</p> <p>Recommended response: No change</p>
<p>BHLF-KSAR-N87Z-8</p>	<p>Vistry and Taylor Wimpey are committed to tackling the challenges of climate change and acknowledge the important role the development industry has to play in the national transition to a low and zero carbon society. In this respect, support is expressed for the overarching aims of Strategic Policy CN1 that seek to mitigate and adapt to the impacts of climate change, and for the Council aspiring to become a carbon neutral authority.</p>	<p>Support welcomed and comments noted.</p>

	<p>However, the construction of the policy and the assignment of obligations is questioned, notably in respect of criterion (ii), which implies that spatial considerations relating to the identification of development sites are the responsibility of developers/applicants, when such matters should properly fall to the plan-making process and should be the building blocks for any comprehensive policy framework.</p> <p>Indeed, as stated elsewhere within these representations, the principal response to tackling the causes of the Climate Emergency the Council has declared should be via the promulgation of a spatial strategy that focusses 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. As highlighted within these representations carbon emissions generated by transport are significantly higher locally than those arising from any other sector. A joined-up, sustainable, spatially coherent strategy should underpin the new Local Plan, with development at scale concentrated at Winchester Town where the greatest potential exists to promote active travel and to reduce travel demand.</p> <p>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, 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 adjoining Kings Barton MDA will create locally accessible facilities to meet the needs of its population in due course. In the case of Whiteley the scale of the MDA (3,500 dwellings) provides greater potential to create a wider range of</p>	<p>Policy CN1 is intended to cover sites that have been allocated for development in the new Local Plan and any sites that comes forward through the planning application process. Recommended Response: No change required.</p> <p>The allocations have been included in the Reg 18 LP have been focussed on sustainable locations. It is important that the LP is read as whole as there are a number of other LP policies that deal with issues such as accessibility of sites to public transport and ensuring that development maximises the use of sustainable transport. Recommended Response: No change required.</p> <p>Support welcomed and comments noted regarding the various MDA's that have been allocated in the adopted LP.</p>
--	---	--

	<p>services and facilities compared to Kings Barton (2,000 dwellings). However, a decision to continue growth northwards incorporating the land to the north of Wellhouse Lane would create a cohesive neighbourhood of up to 4,000 dwellings matching and exceeding the scale of Whiteley, with all of the self-containment advantages and active travel opportunities that would associate with such critical mass.</p> <p>Policy CN1 should be set within the strategic context of a spatial policy framework that places the locational aspects of tackling climate change at its heart. As drafted the new Local Plan does not have sufficient focus on this opportunity and is therefore starting from the wrong place in determining the overall strategy. There is not a suitably wide suite of allocations that are based on this principle; the principal motivation underlying which is the reduction of carbon emissions driven by the objective of curtailing travel demand and promotion of highly accessible places as the foci for development. MDA scale development to the north of Kings Barton on land that is controlled by Vistry and Taylor Wimpey and which is available for the development of around 2,000 dwellings and extensive supporting community and green infrastructure should be incorporated into the Draft Plan as a major component of the fight against climate change locally.</p> <p>The construction of energy efficient homes that are adaptable and flexible is supported, but Vistry and Taylor Wimpey consider that such requirements could and should be mandated most effectively, nationally, via the Building Regulations, thereby applying a consistent national standard that all developments should be required to meet, irrespective of location. As circumstances dictate at the time of writing the draft policy should be consistent with the national policy approach that is set out currently by the Written Ministerial Statement from March 2015, which advises that additional standards over and above Building Regulations, which provide the baseline technical standard for all new homes, should be required only if they address a clearly evidenced locally occurring need, justified by locally specific data</p>	<p>The site to the north of Wellhouse Lane has not been allocated for development as this site is not needed to meet the scale of development that is needed in this Local Plan. Recommended Response: No change required.</p> <p>Policy CN3 deals with energy efficiency standards in new development. The Council has declared a climate emergency and it has decided that it move faster than the current Building Regulations. The requirements of Policy CN3 have been tested through the LP Viability</p>
--	--	--

	<p>and where their impact on viability has been considered. This position is reinforced by NPPG, paragraphs 007 Reference ID: 56-007- 20150327; and 020 Reference ID: 56-020- 20150327. It is acknowledged that the City Council has an ambition to accelerate the move towards carbon neutrality as a proactive response to climate change and this is supported. Vistry and Taylor Wimpey recognise the importance of delivering development that is truly sustainable and appreciate the role that the development industry must play in this respect. The Council must ensure that its Plan its in-step with the national policy frameworks in this respect and demonstrate that the approach taken locally is justified and sound. Vistry and Taylor Wimpey will ensure that all developments for which they are responsible will be fully policy compliant in this regard.</p> <p>However, as set out above it is considered that the spatial policy framework that underpins the whole plan is not sufficiently rooted in tackling climate change because the overall strategy does not focus development at locations where the opportunity to support sustainable lifestyles is greatest. The planning system is concerned principally with the development and use of land; therefore, the most effective contribution that can be made to combatting climate change is through the preparation of spatial development strategies within Local Plans that allocate land for development in locations that actively support the adoption of sustainable lifestyles.</p>	<p>Assessment. Recommended Response: No change required.</p> <p>The allocations have been included in the Reg 18 LP have been focussed on sustainable locations. It is important that the LP is read as whole as there are a number of other LP policies that deal with issues such as accessibility of sites to public transport and ensuring that development maximises the use of sustainable transport. Recommended Response: No change required.</p>
<p>BHLF- KSAR- N8ZD-N</p>	<p>Croudace is committed to the move to ‘net zero carbon’ and supports Draft Policy CN1 in principle.</p> <p>It is welcomed that the policy recognises the role of broader green</p>	<p>Support welcomed and comments noted.</p>

	<p>infrastructure provision (which is multifunctional in purpose) in contributing positively to avoiding and/or mitigating climate change effects. This will help to influence the masterplanning and design process, ensuring that sustainability measures are considered at an early stage and are holistically integrated.</p> <p>It is further noted that the Government has now decided to allow Local Planning Authorities ('LPAs') to set energy efficiency requirements above those set out in Building Regulations. Nonetheless, and as detailed below, Croudace are concerned that the Draft Local Plan proposes energy efficiency / building sustainability targets that (cumulatively) may increase build costs to the point that developments may become unviable. In the context of the current inflationary and recessionary environment, the cumulative impacts of all policies that impact build costs require careful scrutiny. Indeed, should impacts on development viability be underestimated, this could in-turn undermine the effectiveness of the Local Plan as a whole.</p>	<p>Support welcomed and comments noted.</p> <p>Policy CN3 deals with energy efficiency standards in new development. The Council has declared a climate emergency and it has decided that it move faster than the current Building Regulations. The requirements of Policy CN3 have been tested through the LP Viability Assessment. Recommended Response: No change required.</p>
ANON-KSAR-N8QS-U	<p>Strategic Policy CN1 (Mitigating and adapting to climate change) states that development proposals will need to demonstrate that "carbon emissions have been considered as part of the identification of sites for development" (ii) and that "sustainable travel modes of transport have been fully incorporate into the layout in a way that encourages people to use more sustainable forms of transport, such as buses, cycles or working" (iii). However, if sites are unsustainably located to begin with, failing to meet sub-section (ii) by virtue of travel distances being too far for active travel and public transport to offer relevant and practical choices, , no amount of local attention to the urban design of the development is going to sufficiently rebalance those</p>	<p>Points noted and this is the whole emphasis of the LP to direct new development to sustainable locations. Recommended Response: No change required.</p>

	developments away from car use. Therefore, the role and proper formulation of the spatial strategy is of the essence to mitigating carbon from transport sources.	
--	--	--

	Recommendations	Officer response
Comments from SA/HRA	No recommendations provided.	N/A

Amendments to supporting text

4.14. As technology in this area is rapidly changing, if a development proposal is phased it will be important that the Energy and Carbon Statement is updated to reflect the up to date baseline circumstances and any new or emerging opportunities to address climate change issues that will take place over the local period to 2039**40**.

Insert new text after paragraph 4.14:

With changing temperatures, it is important to consider the risk of overheating as part of the design process. This risk needs to be fully assessed and mitigated against through measures such as:

- **the incorporation of passive cooling techniques;**
- **ensuring that there is good ventilation to floor space ratio;**
- **external shutters and vents, and**
- **green roofs and green walls covered in vegetation.**

Equal consideration needs to be given to the design of the external environment that surrounds a building in terms of the types of surfacing, vegetation, tree planting and habitats that are being created as part of the development of a site.

Tree planting and canopy cover can not only be used to have a positive impact in terms of mitigating the impacts of overheating of a building but trees also have an important role in terms of absorbing carbon dioxide from the atmosphere

and creating habitats for wildlife. As trees mature their root system can sometimes have an impact on the stability of buildings. It will, therefore, be essential that as part of the design process consideration is given to providing the suitable rooting environment for trees. This is for the benefit of the trees and also to ensure that any subsequent potential problems with tree roots on a public right of way are addressed as part of the design process.

It is also important as part of the design process, to consider the position and orientation of buildings on a site which can influence the amount of solar gain and natural daylighting that enters a building which are important considerations in terms of potential carbon emissions. Considering these issues early on in the design process it can result in a positive benefit for the owners and occupiers of buildings in terms of lower energy and heating bills as well as having a positive role on people's mental health and physical well-being. However, it is important to remember that there is a balance between maximising solar gain in the winter, and keeping buildings cool in the summer in order to avoid the risk of overheating.

Policy CN1 requires new development proposals to demonstrate how the development reduces the potential risk of overheating for the inhabitants and the surrounding ecosystems. By taking this approach it will reduce the need for mechanical air conditioning systems in buildings which are very resource intensive and increase carbon dioxide emissions, and emit large amounts of heat into the surrounding area. This expands upon the recently enabled Part O Building Regulations on Overheating, to seek measures to be considered at the outset of the design process. The Chartered Institution of Building Services Engineers have published a TM59 'Design Methodology for the Assessment of overheating risk in Homes', which provides further information. As part of the submission of an Energy and Carbon Statement it must be demonstrated how the proposed scheme's layout and design has addressed the orientation, shading, ventilation and impact of overheating.

Along with the need to address overheating it is equally important the proposed development includes nature-based solutions, protects and increases carbon stores, ensuring that there is multi-functional green infrastructure and areas for open space, tree planting and biodiversity net gain which are all connected together whilst at the same time strengthening the nature recovery network.

Page 36, Diagram – Amend Second bullet point to '**Site layout, design and material choice to minimize energy demand and embodied carbon.**'

Page 36, Diagram – Add new bullet point to Mitigation and Adaptation: '**Nature-based solutions**'

Amendments to policy

The plan will help to meet the targets in the council's Climate Emergency Declaration and reduce the district's carbon footprint **by supporting the re-use and refurbishment of existing buildings where possible and responding to the changes that are currently occurring to the climate** and ensuring that new development is designed in a way that adapts to challenges of climate change in a **positive, and comprehensive and integrated way**.~~by:~~

Mitigating against climate change

In order to mitigate against climate change, development proposals (excluding household extensions **and changes of use**) will need to demonstrate through the design process that:

- i. Low carbon solutions have been incorporated that reduce and minimise energy consumption through the energy hierarchy classification of energy options (Policy CN2) and how carbon emissions have been considered at every stage of the design process;
- ii. 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;

Add new criteria

Nature-based solutions have been incorporated into the development that deliver multifunctional benefits for health and well-being, biodiversity net gain, natural flood management, air and water quality;

- iii. Sustainable travel modes of transport ~~has~~ve been fully incorporated into the layout in a way that encourages people to use more sustainable forms of transport such as buses, cycles or walking and reduces car dependency;
- iv. Recharging points for sustainable modes of transport are ~~considered~~ **incorporated** early on in the design **and build** process (Policy T3) and they are provided in a conveniently located positions within the development; **in a timely way to benefit residents from the first occupation.**
- v. Opportunities have been incorporated within residential development for local food production and composting;
- vi. Flexible and adaptable space has been incorporated into the design of residential development that facilitates the ability for people to be able to work from home and to adapt to changing lifestyles; and

- vii. Development (where it involves the creation of new residential **and new commercial** development) is connected to super-fast fibre broadband that reduces the need for people to travel and is capable of being connected to SMART technology.

Adapting to Climate Change

In order to adapt to climate change, development proposals (excluding household extensions) will need to demonstrate through the design process that:

- viii. Water use management and conservation (e.g. rainwater recycling and greywater harvesting) has been fully considered as part of the design process and ~~what that~~ measures have been taken to minimise the risk and the impact of flooding and extreme weather conditions through the design of the building and reduce surface water run off through the use of SuDS and Rainwater gardens (Policy NE6);
- ix. The layout has incorporated **and connects** multi-functional **nature-based solutions**, areas of open space/**outdoor space**, tree planting **and** biodiversity net gain (Policy NE5); ~~and has addressed the role of shading and overheating of the built and natural environment (Policy D9) so as to maximise the comfort and well-being of residents, visitors and wildlife in a changing climate (Policy D9).~~

Add new criterion:

Buildings have been designed in a way that balances temperature and ventilation throughout the year;

Buildings have been designed to reduce the amount of heat that enters a building in the warmer months through the orientation and design of the building and where appropriate, includes the planting of additional trees, to protect soils and provide shading from canopy coverage whilst capturing carbon from the atmosphere;

The design process, ensures that the landscaping, the type of vegetation and planting around the outside of the building is appropriate for the site and it has been designed in a way that assesses and mitigates against the impacts of the climate change;

The design process assesses and considers the use of green roofs and walls that are covered in vegetation, fenestration, insulation, external shutters, and the use of colour of external materials that can all contribute towards overheating; and

As a last resort, install mechanical air conditioning systems could be installed in a building (ensuring this uses the lowest source of carbon emissions).

Developers will be required to submit an Energy and Carbon Statement, which is proportionate to the nature of application, to demonstrate how the design process has addressed the above requirements. In the case of a phased development, the Energy and Carbon Statement will need to be updated at each phase to reflect the up to date baseline circumstances and any new or emerging opportunities.