

### Consultation comments on Policy CN2 – Energy Hierarchy

- Support – 21
- Neither support or object – 15
- Object - 11

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.

<b>Comments in support of CN2 – Energy hierarchy</b>		
<b>Respondent number</b>	<b>Comments</b>	<b>Officer comment</b>
ANON-KSAR-NKDW-5	<p>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 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>	Support noted and comments welcomed.
ANON-KSAR-N8GX-P	Provided it must be suitable for the sites intended.	The energy hierarchy in Policy CN2 applies to all development. <b>Recommended response: No Change.</b>
ANON-KSAR-N85J-P	Yes, as per response to policy CN1, Bloor Homes supports the proposed energy hierarchy, and in particular the need to minimise energy demand by employing the ‘fabric first approach.’	Support noted and comments welcomed.

BHLF-KSAR-N8TB-D	<p>Positive elements: - Theme of promoting sustainable, energy efficient development through all policies.</p>	Support noted and comments welcomed.
BHLF-KSAR-N8TG-J	<p>CPRE is supportive of this policy and commend the Council for pro-actively adopting LETI energy standard for residential homes. We are particularly pleased to see the intention to ensure all new non-residential building to include the 'maximum amount' of roof-mounted PV.</p> <p>We would urge the Authority to reconsider the opportunity to retro-fit solar onto existing commercial rooftops and to consider the use of existing open spaces, such as car parks, before any greenfield sites are developed. We note the UK Warehouse Association has identified the warehousing sector has the roof space for up to 15GW of new solar power and has the potential to "deliver the entire UK requirement for 2030 forecast by the National Grid future energy scenarios (FES)." We also note the French government that has now mandated that all existing and new car parks with space for at least 80 vehicles must now be covered by solar panels. We believe there is the opportunity for Winchester to adopt a similar approach and to show imagination and lead on climate change without detracting from its countryside, which plays a vital role in natural carbon reduction.</p>	<p>Support noted and comments welcomed.</p> <p>The council's climate emergency have commissioned a study on the solar potential of rooftops and this information should be available shortly. It is important that the LP is read as whole as Policy CN3 requires developers to include renewable energy on residential development. <b>Recommended response:</b> No Change.</p>
BHLF-KSAR-N8ZJ-U	Policy CN2 sets out the energy hierarchy expected of al new development following a fabric first approach. This approach is strongly supported.	Support noted and comments welcomed.
BHLF-KSAR-N8BQ-A Historic Environment <a href="#">Link here</a>	We support embedding the energy hierarchy in the Council's policy approach when allied with the other heritage-related policies in the draft Plan	Support noted and comments welcomed

BHLF-KSAR-N8BS-C	The policy is supported by BSP. The proposed approach to 'fabric first approach' will reduce energy demands and the proposals for Land east of Lovedon Lane will comply with this approach whilst also incorporating Air Source Heat Pumps and PV panels, real time energy use data and smart energy technology to ensure all homes are delivered to PassiveHaus standards.	Support noted and comments welcomed.
BHLF-KSAR-N8BP-9 Southampton City Council	This Council also supports the focus on climate change within the draft Winchester Local Plan 2039 including the requirement for development to meet BREEAM (Policies CN3 and CN4) and the London Energy Transformation Initiative (LETI) standards (linked to Policies CN2 and CN3).	Support noted and comments welcomed

<b>Comments which neither support or object to policy CN2 – energy hierarchy</b>		
<b>Respondent number</b>	<b>Comment</b>	<b>Officer comment</b>
ANON-KSAR-NKS3-G Bishops Waltham Parish Council	<p>CN2 Page 40 4.17 Question: In the Fabric First Approach, why does it not specify PV Arrays, Air/Ground heat source pumps as standard</p> <p>CN2 Page 42 4.21 Building Regulations Question: Building Regulations (due for upgrade before 2025) will not have net zero as Future Homes Standard! – Why not?</p> <p>CN2 Page 43 4.23 Question: Why exclude household extensions? This exclusion will be very</p>	<p>Policy CN2 has been worded so it does not specify what type of renewable energy should be used as technology will change over the LP period.</p> <p>The Future Homes standard is set by Central Government and in this respect, the standards that are contained in this are beyond the control of the City Council.</p> <p>However, it is important to read the LP as whole as Policy CN3 goes beyond the Future Homes standard. <b>Recommended response:</b> No Change.</p>

	<p>costly in the drive to Carbon Neutrality (same comment as CN1 Page 37)</p> <p>CN2 Page 44 4.29 Question: It doesn't state which version of BREEAM, this standard has been used for &gt; 14 years. Clarification on the correct version of BREEAM to be used is required.</p> <p>CN2 Page 44 4.30 Comment: This must also include residential, not just Non-Residential</p>	<p>Many household extensions and conversions do not require planning permission. It would also be particularly onerous on developers to meet the requirements of LETI energy efficiency standards if the development was only an extension to an existing building. <b>Recommended response:</b> No Change.</p> <p>The LP has not been specific which version of BREEAM standard to be used as this allows an element of flexibility as and when this standard changes over the lifetime of the LP. <b>Recommended response:</b> No Change.</p> <p>New residential development would be required to meet the LETI energy efficiency standards – non residential standards would be required to meet the BREEAM standard. <b>Recommended response:</b> No Change.</p>
ANON-KSAR-NK29-N	CN2 – Add: 'The way in which the energy hierarchy has informed and developed the design should be set out in the Energy and Carbon Statement (in Policy CN1).'	It is important that the LP is read as a whole. Further details on the content of the Energy and Carbon

		Standard would be set out on the Council's website. The Council's Local Validation List will also need to be updated to ensure that developers/applicants meet the requirements of the policies in the new Local Plan when it has been adopted. <b>Recommended response:</b> No Change.
ANON-KSAR-NKDG-N	<p>Policy CN2</p> <p>Should include a requirement that the way in which the energy hierarchy has informed and developed the design should be set out in the Energy and Carbon Statement, required within preceding policy (CN2)</p>	It is important that the LP is read as a whole. Further details on the content of the Energy and Carbon Standard would be set out on the Council's website. The Council's Local Validation List will also need to be updated to ensure that developers/applicants meet the requirements of the policies in the new Local Plan when it has been adopted. <b>Recommended response:</b> No Change.
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: <a href="mailto:planningpolicy@winchester.gov.uk">planningpolicy@winchester.gov.uk</a> on 14/12/2022 from, which includes the relevant figures and appendices, with tables correctly formatted]</p> <p>In similar terms the approach taken by Policy CN2 – Energy Hierarchy, should be adjusted to include reference to the positive spatial aspects of planning that will reduce energy consumption, noting that all sites should be</p>	It is important that LP is read as a whole. There are a number of other LP policies in the high quality

	<p>designed and planned in ways that minimise travel demand (as a secondary component of an overall spatial strategy advanced by the Plan that allocates sites with this objective in mind). The pursuit of an energy hierarchy policy that includes this factor as the first consideration would be more robust.</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.</p> <p>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. 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 additional land parcels at North Whiteley with these masterplanning principles in mind.</p>	<p>design and sustainable transport and active topics that address these issues. <b>Recommended response:</b> No Change.</p> <p>See above response.</p> <p>Additional land has been allocated North Whiteley – see policy SH2. <b>Recommended response:</b> No Change.</p>
--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

ANON-KSAR-N8YM-W	<p>BSP support the proposed energy hierarchy, and in particular the need to minimise energy demand by employing the ‘fabric first approach.’</p> <p>The opportunity Land at Fairthorne Grange has been designed on this basis, which will result in the delivery of high quality, energy efficient homes. In addition, it is highlighted that in accordance with the aspiration of Policy CN2, all homes will be heated using Air Source Heat Pumps, and photovoltaic panels will be fitted to all homes.</p>	<p>Support noted and comments welcomed.</p> <p>The comments relating to land at Fairthorne Grange have been dealt with in the omission sites. <b>Recommended response:</b> No change.</p>
ANON-KSAR-N8QD-C	Should include a requirement that the way in which the energy hierarchy has informed and developed the design should be set out in the required Energy and Carbon Statement.	Further details on the content of the Energy and Carbon Standard would be set out on the Council’s website. The Council’s Local Validation List will also need to be updated to ensure that developers/applicants meet the requirements of the policies in the new Local Plan when it has been adopted. <b>Recommended response:</b> No Change.
ANON-KSAR-NKAB-D	BSP support the proposed energy hierarchy, and in particular the need to minimise energy demand by employing the ‘fabric first approach.’ This is a key element of BSP developments, and is reflected in the aspirations for the opportunity at Land North of Rareridge Lane. This draft allocation will result in the delivery of high quality, energy efficient homes, according with the aims of Policy CN2.	Support noted and comments welcomed.
BHLF-KSAR-N8TE-G East Hampshire	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	Support noted and comments welcomed.

District Council	<p>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>Consultants have been appointed and their findings taken into consideration in terms of how the LP can take into account whole life carbon assessment.</p> <p><b>Recommended response:</b> See new policy on Embodied carbon.</p>
BHLF-KSAR-N8TW-2 Eastleigh Borough Council	<p>This Council also supports the focus on climate change within the draft Winchester Local Plan 2039 including the requirement for development to meet BREEAM (Policies CN3 and CN4) and the London Energy Transformation Initiative (LETI) standards (linked to Policies CN2 and CN3).</p>	<p>Support noted and comments welcomed.</p>
BHLF-KSAR-N8BX-H	<p>The Trust strongly supports a fabric first approach to design to reduce energy demand and running costs.</p> <p>We assume WCC should appreciate and accept that this will see materials proposed that do not necessarily align with traditional aesthetic aspirations. The Trust seeks reassurance that this is understood and acceptable to WCC?</p>	<p>Support noted and comments welcomed.</p> <p>It is important that LP is read as whole. Planning decisions are taken by assessing and weighing up all of the information and coming to decision.</p> <p><b>Recommended response:</b> No change</p>
BHLF-KSAR-N86T-1	<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</p>	<p>Support noted and comments welcomed.</p>



Hampshire County Council (Transport)	sustainable travel modes of transport and the design and layout of parking for new developments) which consider transport issues. The County Council's Climate Change Framework for Strategic Programmes (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.	
BHLF-KSAR-N863-Z	Policy CN2 sets out a 'fabric first', sequential approach to development. Persimmon supports this principle but, as set out in greater detail below, the Company has concerns that the Plan (notably Policy CN3) is too prescriptive on how housing development should deliver on the fabric first principle. There also appears to be a conflict between CN2 which allows 'other energy sources' (undefined) as part developments as very last resort, and CN3 which prohibits the burning of fossil fuels.	It is accepted that as currently written there potentially an unintended conflict between Policy CN2 and Policy CN3. <b>Recommended response:</b> delete the last bullet point on Policy CN2.

<b>Comments which object to policy CN2 – energy hierarchy</b>		
<b>Respondent number</b>	<b>Comment</b>	<b>Officer comment</b>
ANON-KSAR-NKYT-Q	The policy needs to be strengthened so that developers do not have the right to demolish rather than re-purpose or renovate buildings whether in a conservation area or not.	If you are proposing the demolition of a building on its own, in most circumstances you will need to apply for the Prior Approval from the Council. The exceptions to this are:

	<p>There also needs to be an inspection procedure to ensure that any building whether new or re-purposed meets the 'eco-standards' necessary as there have been many reports that short-cuts have been taken regarding insulation and heating of new builds in particular around the District. Furthermore, the excuse of 'unviable' to re-purpose existing buildings has been made, e.g. no high-speed internet or too difficult to install adequate insulation or heating systems.</p>	<ul style="list-style-type: none"> <li>• if the demolition is proposed or has been granted as part of a wider planning application for the redevelopment of the site</li> <li>• Listed Buildings and non-Listed Buildings in Conservation Area</li> <li>• Pubs and other drinking establishments (Use Class A4)</li> <li>• if it is deemed that the owner has rendered the building unsafe by their action or inaction</li> </ul> <p>The focus of a prior-approval application is the impact of the proposal on local amenity. In practice, this means the Council can consider whether the prior-approval of the authority is required in relation to the method of demolition and any proposed restoration of the site. There is a certain level of base information that needs to be submitted, and the Council has 28 days to issue the decision.</p> <p>Once the LP is adopted all new development would need to comply with the policies in the adopted LP and submit the necessary information to justify this. Any breaches of planning consent would then be an enforcement issue. The sale of the property would be covered by an EPC. A LP Viability Assessment has been undertaken alongside the creation of the LP in order to avoid the situation whereby a developer can claim that the policies are unviable. <b>Recommended response:</b> No change</p>
--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

ANON-KSAR-NKJV-A	Bloor Homes broadly supports the proposed energy hierarchy, and in particular the need to minimise energy demand by employing the ‘fabric first approach.’ This must, however, be balanced against practicality and viability considerations.	Support noted and comments welcomed. A LP Viability Assessment has been undertaken alongside the creation of the LP in order to avoid the situation whereby a developer can claim that the policies are unviable. <b>Recommended response:</b> No change
ANON-KSAR-N8M8-V	The approach taken by Policy CN2 – Energy Hierarchy, should be adjusted to include reference to the positive spatial aspects of planning that will reduce energy consumption, noting that all sites should be designed and planned in ways that minimise travel demand (as a secondary component of an overall spatial strategy advanced by the Local Plan that allocates sites with this objective in mind). The pursuit of an energy hierarchy policy that includes this factor as the first consideration would be more robust.	It is important that LP is read as a whole – there are a number of other LP policies that deal with design process and the need to design development to minimise the need to travel. <b>Recommended response:</b> No change
ANON-KSAR-N85A-D	<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: <a href="mailto:planningpolicy@winchester.gov.uk">planningpolicy@winchester.gov.uk</a> on 14/12/2022 from <a href="mailto:h.james@nexusplanning.co.uk">h.james@nexusplanning.co.uk</a>, which includes the relevant figures, footnotes and appendices, with correct formatting]</p> <p>In similar terms the approach taken by draft Policy CN2 – Energy Hierarchy, should be adjusted to include reference to the positive spatial aspects of planning that will reduce energy consumption, noting that all sites should be designed and planned in ways that minimise travel demand (as a secondary component of an overall</p>	It is important that LP is read as a whole – there are a number of other LP policies that deal with design process and the need to design/proposed development to minimise the need to travel. <b>Recommended response:</b> No change

	<p>spatial strategy advanced by the Local Plan that allocates sites with this objective in mind). The pursuit of an energy hierarchy policy that includes this factor as the first consideration would be more robust.</p>	
<p>ANON-KSAR-NKJ1-5</p>	<p>Winchester College support the principle of the City Council's approach to the energy hierarchy defined in Policy CN2.</p> <p>However, for clarification, the College requests that the wording of the policy distinguishes between new development and changes of use in recognition that measures to reduce carbon emissions may not be possible on existing buildings or appropriate on listed buildings. The requirement for a 'fabric first approach' to an existing building is not appropriate. Where these buildings are listed, the issue is compounded as retrofitting low energy solutions may have an adverse impact on the significance of the heritage asset or its setting.</p> <p>For clarification it is suggested that the policy be reworded to say:          "All new built development shall accord with the following energy hierarchy . . .".</p> <p>Should the Council wish to include specific requirements applicable to the change of use of existing buildings, this should be made clear in the policy having regard to the fact that any alteration should consider the impact on the character and setting of the building.</p>	<p>Support noted and comments welcomed.</p> <p>With the council's climate emergency and with the rising cost of energy prices, taking the fabric first approach in order to avoid the unnecessary costs of undertaking expensive retrofit costs is considered to be a logic and sound process to follow. In terms of designated or undesignated heritage assets, it is important to read the LP as whole. Policy HE14 deals with improvements and alterations to these heritage assets.  <b>Recommended response:</b> No change</p>

ANON-KSAR-N83B-C	It is recommended that LETI standards for retrofitting should be the presumption for all conversions and extensions	Many alterations to existing residential dwellings fall under 'Permitted Development Rights' and it would not be possible to include a Local Plan policy that could address this point. <b>Recommended response:</b> No change
ANON-KSAR-N8XG-P	The way in which the energy hierarchy has informed and developed the design should be set out in the Energy and Carbon Statement (in Policy CN1)	Further details on the content of the Energy and Carbon Standard would be set out on the Council's website. The Council's Local Validation List will also need to be updated to ensure that developers/applicants meet the requirements of the policies in the new Local Plan when it has been adopted. <b>Recommended response:</b> No Change.
ANON-KSAR-NKKV-B	Exempting extensions and conversions could create a loophole for all kinds of development to bypass energy efficiency standards. For example, 'conversions' may retain very little of the original fabric. This should be addressed in the plan. In particular conversion or extension of rental property must conform to the same standards as new build to avoid adversely affecting tenants. It is recommended that LETI standards for retrofitting should be the presumption for all conversions and extensions.	Converting properties is often by its very nature much more complicated than designing new residential development and the scope for introducing change (as would be required to meet the LETI energy efficiency standards) are much more limited. In view of this is not considered to be practical or viable to insist that conversions need to meet the same LETI energy efficiency standards as new build properties. <b>Recommended response:</b> No change.
ANON-KSAR-NKFQ-1 Upham Parish Council	The policy simply focusses on the energy efficiency of the building envelope. This is important and we support the methodology used to assess this, but it is by no means the only factor in determining the energy efficiency of any new development. Of prime importance in energy terms is the location of development in terms of its closeness to low energy forms of public transport or active travel (walking	It is important that the LP is read as a whole. There are a number of other LP policies that deal with design process and the need to design development to minimise the need to travel. <b>Recommended response:</b> No change

	<p>/cycling), thereby avoiding dependence on private cars which, however fueled, will militate against a zero carbon target. All policies in this section should be making clear that new development must be located so as to be well connected to public transport hubs and/or sustainable communities.</p>	
<p>BHLF-KSAR-N8ZV-7</p>	<p>Policy CN2 Energy Hierarchy OBJECT Winchester College support the principle of the City Council's approach to the energy hierarchy defined in Policy CN2. However, for clarification, the College requests that the wording of the policy distinguishes between new development and changes of use in recognition that measures to reduce carbon emissions may not be possible on existing buildings or appropriate on listed buildings. The requirement for a 'fabric first approach' to an existing building is not appropriate. Where these buildings are listed, the issue is compounded as retrofitting low energy solutions may have an adverse impact on the significance of the heritage asset or its setting.</p> <p>For clarification it is suggested that the policy be reworded to say: "All new built development shall accord with the following energy hierarchy . . . ". Should the Council wish to include specific requirements applicable to the change of use of existing buildings, this should be made clear in the policy having regard to the fact that any alteration should consider the impact on the character and setting of the building.</p>	<p>With the council's climate emergency and with the rising cost of energy prices, taking the fabric first approach in order to avoid the unnecessary costs of undertaking expensive retrofit costs is considered to be a logic and sound process to follow. In terms of designated or undesignated heritage assets, it is important to read the LP as whole. Policy HE14 deals with improvements and alterations to these heritage assets.</p> <p><b>Recommended response:</b> No change</p>

BHLF- KSAR- N86N-U	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.	In terms of designated or undesignated heritage assets, it is important to read the LP as whole. Policy HE14 deals with improvements and alterations to these heritage assets. <b>Recommended response:</b> No change
--------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<b>Comments which did not answer whether they support, object or neither support or object to policy CN2 – energy hierarchy</b>		
<b>Respondent number</b>	<b>Comments</b>	<b>Officer comment</b>
BHLF- KSAR- N87Z-8	In similar terms the approach taken by Policy CN2 – Energy Hierarchy, should be adjusted to include reference to the positive spatial aspects of planning that will reduce energy consumption, noting that all sites should be designed and planned in ways that minimise travel demand (as a secondary component of an overall spatial strategy advanced by the Local Plan that allocates sites with this objective in mind). The pursuit of an energy hierarchy policy that includes this factor as the first consideration would be more robust.	It is important that the LP is read as a whole. There are a number of other LP policies that deal with design process and the need to design development to minimise the need to travel. <b>Recommended response:</b> No change
<u>BHLF- KSAR- N8TB-D</u>	The energy hierarchy and focus on promoting energy efficiency in CN2 are right: the cheapest and most sustainable energy is the energy that you don't need. Emphasising energy consumption at all stages of	Support welcomed and comments noted. 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

	planning, development and build is essential. But part of the incoherence of the overall district carbon neutrality goal is that it will only affect a very small part of the total building stock — new development and limited upgrades.	number of other initiatives being undertaken to achieve the 2030 target. <b>Recommended response:</b> No change.
<u>ANON-KSAR-N8MP-M</u>	In similar terms the approach taken by Policy CN2 – Energy Hierarchy, should be adjusted to include reference to the positive spatial aspects of planning that will reduce energy consumption, noting that all sites should be designed and planned in ways that minimise travel demand (as a secondary component of an overall spatial strategy advanced by the Plan that allocates sites with this objective in mind). The pursuit of an energy hierarchy policy that includes this factor as the first consideration would be more robust.	It is important that the LP is read as a whole. There are a number of other LP policies that deal with design process and the need to design development to minimise the need to travel. <b>Recommended response:</b> No change
ANON-KSAR-N8MP-M	In similar terms the approach taken by Policy CN2 – Energy Hierarchy, should be adjusted to include reference to the positive spatial aspects of planning that will reduce energy consumption, noting that all sites should be designed and planned in ways that minimise travel demand (as a secondary component of an overall spatial strategy advanced by the Plan that allocates sites with this objective in mind). The pursuit of an energy hierarchy policy that includes this factor as the first consideration would be more robust.	It is important that the LP is read as a whole. There are a number of other LP policies that deal with design process and the need to design development to minimise the need to travel. <b>Recommended response:</b> No change
ANON-KSAR-N85A-D	In similar terms the approach taken by draft Policy CN2 – Energy Hierarchy, should be adjusted to include reference to the positive spatial aspects of planning that	It is important that the LP is read as a whole. There are a number of other LP policies that deal with design process and the need to design development to



	will reduce energy consumption, noting that all sites should be designed and planned in ways that minimise travel demand (as a secondary component of an overall spatial strategy advanced by the Local Plan that allocates sites with this objective in mind). The pursuit of an energy hierarchy policy that includes this factor as the first consideration would be more robust.	minimise the need to travel. <b>Recommended response:</b> No change
--	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------

	<b>Recommendations</b>	<b>Officer response</b>
Comments from SA/HRA	No recommendations provided	N/A

**Amendments to policy CN2**

All development shall accord with the following energy hierarchy (in order of preference):

Minimise energy demand by employing the ‘fabric first approach’;

- Maximise energy efficiency;
- Utilise renewable energy; **and**
- Utilise low carbon energy; ~~and~~
- ~~Utilise other energy sources as a very last resort.~~