

**Examination of the Winchester District Local Plan 2020-2040 (the submitted Plan/the Plan)**

**Winchester College – Hearing Statement**

**Matter 11: Carbon Neutrality and Designing for Low Carbon Infrastructure**

**Regulation 19 consultation reference number: BHLF-AQTS-328K-1**

Issue: Whether strategic policy CN1 and policies CN2-CN8 would provide an effective policy framework to ensure the Plan mitigates and adapts to climate change and in this regard whether they would be justified, effective and consistent with national policy?

As set out in Document ED17:

- Strategic Policy CN1 Mitigating and adapting to climate change

**Question 6: Would the policy appropriately recognise the contribution of a heritage led approach to mitigating and adapting to climate change?**

Winchester College support the principles of mitigating and adapting to climate change as set out in draft Policy CN1. Whilst the College's concerns in meeting these requirements for developments involving change of use have been addressed in respect of the policy relating to mitigating against change of use, the same concerns have not been addressed in that part of the policy relating to adapting to climate change. No consideration has been given as to the impact the adaptations referred to in the policy (part ix to xv) would have on a listed building or other building within a Conservation Area. It will not always be possible to retrofit the measures included in the draft policy such as green roofs and walls without causing harm to the listed building.

Winchester College, in which a high proportion of its estate is formed of listed buildings of varying heritage value, does not therefore consider that Policy CN1 sufficiently reflects the heritage led approach to adapting to climate change.

Draft Policy CN1 should be amended to confirm that criteria (ix to xv) do not apply to proposals for change of use as follows (suggested additional text is underlined):

*'In order to adapt to climate change, development proposals (excluding household extensions and changes of use) will need to demonstrate.....*

The draft policy should also include a requirement for the heritage value of the site to be considered in determining which measures would be appropriate to mitigate and adapt to climate change.

As set out in Document ED17:

- Policy CN3 Efficiency standards to reduce carbon emissions

**Question 5: Would the policy be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?**

As currently drafted the policy is not clearly written and it is ambiguous and therefore the policy is not effective for the reasons set out in representations made by Winchester College at the Regulation 19 stage.

Whilst it is acknowledged and supported that under the sub-heading 'all new residential development', the words (excluding conversion and change of use) have been inserted, this wording has not been inserted into the sub-section on 'non-residential development'. It is not clear why 'excluding conversion and change of use' has not been added to this part of the policy.

It might not be possible for proposals for the change of use of existing buildings to meet 'BREEAM Excellent'. Where these buildings are listed, the issue is compounded as retrofitting solutions may have an adverse impact on the significance of the heritage asset or its setting. For clarity, it is suggested that this policy is amended as follows (suggested additional text is underlined):

*'...Non-residential development (excluding change of use) should meet the BREEAM Excellent standard...'*