



Examination of the Winchester District Local Plan 2020-2040

Matter 11

Historic England, Hearing Statement

14 April 2025

This statement addresses selected Inspector's questions regarding Matter 11 of the Winchester District Local Plan 2020-2040

This hearing statement should be read alongside Historic England's comments submitted at previous consultation stages of the Local Plan.

Historic England is the principal Government adviser on the historic environment, advising it on planning and listed building consent applications, appeals and other matters generally affecting the historic environment. Historic England is consulted on Local Development Plans under the provisions of the duty to co-operate and provides advice to ensure that legislation and national policy in the National Planning Policy Framework are thereby reflected in local planning policy and practice.

The tests of soundness require that Local Development Plans should be positively prepared, justified, effective and consistent with national policy. Historic England's representations on the Publication Draft Local Plan are made in the context of the requirements of the National Planning Policy Framework ("the Framework") in relation to the historic environment as a component of sustainable development.

Matter 11: Carbon neutrality and designing for low carbon infrastructure

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?

Strategic Policy CN1 Mitigating and adapting to climate change

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

In our response at Regulation 19, we encouraged the addition of text to the key issues listed on pages 33 and 34 to recognise the contribution that heritage can make to climate change mitigation and adaptation. The opening of policy CN1 offers scope to connect with that contribution, but the supporting text does not make that explicit.

Furthermore, we would also be open to more detail being added to that opening paragraph of policy CN1; for example:

“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, including the sensitive adaptation of heritage assets where appropriate (Policy HE14) and ensuring that new development is designed in a way that adapts to challenges of climate change in a positive, comprehensive and integrated way:”

Policy CN2 Energy hierarchy

5. Would the policy appropriately address heritage assets when a fabric first approach may not always be appropriate? In this regard would reference to all development be justified, effective and consistent with national policy?

We refer to our response at Regulation 19. Without text highlighting that a fabric first approach is not appropriate for traditionally constructed buildings, we are concerned that this policy could result in maladaptation of historic buildings. In referring to all development, the policy could apply to the adaptation of existing buildings, which risks harm to heritage assets that would run counter to the plan’s heritage policies and national policy. We suggested amending the first bullet in this policy as follows:

“Minimise energy demand: for new build this is done by employing the ‘fabric first approach’;”.

In parallel, we suggested the supporting text be expanded as follows:

““Not only is the ‘fabric first’ approach the most sustainable and environmentally best approach for new build, but it can also make an important contribution to addressing fuel poverty and improving social equity. A fabric first approach is not appropriate for traditionally constructed buildings, as outlined in the text supporting policy HE14.”

Policy CN5 Renewable and low carbon energy schemes

2. Would policy CN5iv accord with national heritage policy, particularly in relation to the heritage balance in NPPF paragraphs 207 and 208?

We refer to our response at Regulation 19, in which we recognise that the wording of CN5iv is unlikely to facilitate the balancing exercise referenced. We recommend this is amended.