

**Winchester District Local Plan Part 1**

**Joint Core Strategy**

**EXAMINATION IN PUBLIC**

**EXAMINATION STATEMENT**

**GRAINGER PLC**

**Submitted 12 October 2012**

**Issue 9 – Policy CP11 to CP14**

GRAINGER EXAMINATION STATEMENT  
**GRAINGER REF: 03204**

**Matter – Policy CP11 – CP14****Introduction**

This Examination Statement has been submitted by Grainger plc as part of the Examination in Public on the Winchester District Local Plan Part 1 – Joint Core Strategy. The Statement highlights and where necessary expands upon representations submitted by Grainger plc at the Submission (Regulation 20) stage of the process. It does not repeat representations.

The following Grainger representations are relevant to this statement:

<b>Ref</b>	
CP11 03204	Policy CP11

**Abbreviations / Glossary**

- WCC – Winchester City Council
- HBC - Havant Borough Council
- HCC – Hampshire County Council
- Savills – Planning Consultant
- SEP – South East Plan
- WDLP – Winchester District Local Plan – Part 1
- NPPF – National Planning Policy Framework

**Session/ Issue 9**

- i) Are the policies consistent with the NPPF and/or justified by clear and robust local evidence and if not, what needs to be changed and why?**
- ii) Are the targets for renewable energy in Policy CP11 appropriate, reasonable and realistic, in light of national policy?**

1. The requirement for development to deliver a higher requirement for both energy and water in the Code for Sustainable homes or the higher levels of BREEAM is not sound. This fails the test of soundness in paragraph 182 of the NPPF as this policy is not consistent with national policy. The policy is also ineffective as it will require every application where it is neither practical nor viable to deliver the higher local requirements to produce evidence to deliver the schemes. As the Council's own Viability Study demonstrates, this is a significant cost burden on development. The policy should reflect the desire to deliver development in accordance with the NPPF requirement to positively plan for development, whilst seeking to minimise impacts on the environment.
2. As set out in Grainger's representation, WCC has sought to justify a local requirement, as the supporting text to Policy CP11 states that the high carbon footprint of the District and the severity of water stress in the area require actions to address levels of CO2 emissions and water use in advance of national requirements. These issues are not unique to Winchester District and do not warrant this approach. Indeed the neighbouring Havant Borough which administers part of the West of Waterlooville MDA has a policy that follows the national requirements. Paragraph 95 of the NPPF is clear that when setting any local requirement for a building's sustainability, it should do so in a way that is consistent with the Government's zero carbon buildings policy and adopt nationally described standards.
3. The Government is clearly committed to the Code for Sustainable Homes (CfSH) and achieving zero carbon homes by 2016 (buildings by 2019). This was demonstrated in the now superseded PPS1 Supplement. The UK's CO2 and Water targets are being implemented via planned future tightening of Building Regulations. In the case of CO2 targets, these have been nationally set at 25% improvements in CO2 for current housing developments, 44% for those after 2013 and "zero carbon" after 2016.
4. Code for Sustainable Homes: A Cost Review was published in March 2010 for CLG. In the report, Coding and Lifetime Homes are said to add as much as 10% to the cost of a

home based on Code 4 and 30% or more at Code 6. Such costs would be passed on to homebuyers and potentially make developments too costly to purchase. WCC itself produced a “Low Carbon Policy Viability Study” in February 2010 (EB101). This Study highlighted that the Council's proposed approach to higher standards would result in a substantial increase in construction costs for new dwellings. With reference to Waterloo locations, the report notes that development will find it difficult to sustain any level of affordable housing, infrastructure contributions or an acceleration of the building regulations.

5. In a challenging housing market, any significant additional costs on top of normal building costs (which are rising), will potentially dampen demand further and even risk new housing coming forward. These extra-over costs may have a detrimental impact on development viability and are deemed unnecessary when it is considered Part L 2010 standards are already set to such a high level. There is a risk that the policy may have an adverse effect on development viability and hence would be ineffective in respect of the wider plan priorities.
6. It is clear that the Government wants development to contribute to tackling climate change through zero carbon development, and that significantly the Government has sought to add flexibility to achieve this in order to meet the regulatory ‘carbon compliance’ (the so-called ‘allowable solutions’). Grainger supports the modification to policy CP11 to include allowable solutions.
7. The first three bullet points of Policy CP11 should be deleted as the requirements should just be to meet the national requirements for Sustainable Low and Zero Carbon Built Development. The Local Plan should not repeat national policy.
8. Grainger supports the hierarchy in the second part of policy CP1. However, the second bullet relating to connecting to existing CHP and District networks, or contributing to their development is not clear or concise, leaving developers no certainty of provision or costs. This bullet point should be deleted. The third bullet point should be amended to reflect the definition of renewable energy in the Regional Plan and so should be changed to “use renewable energy, **low carbon or decentralised** technologies to produce required energy onsite”.

**END OF STATEMENT**