

Central Lincolnshire Policy S6 Design Principles for Efficient Buildings Evidence Report

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1. Introduction

- 1.1. The Central Lincolnshire Local Plan is being updated since the first Local Plan for Central Lincolnshire, an area covering the districts of City of Lincoln, North Kesteven and West Lindsey, was adopted in April 2017.
- 1.2. This Evidence Report (which is one of a collection) provides background information and justification for Policy S6, which relates to design principles for the delivery of efficient buildings.

2. Policy Context

National Policy and Guidance

- 2.1. Since the Central Lincolnshire Plan was adopted, the National Planning Policy Framework (NPPF) was updated in July 2018, with subsequent additional changes being published in February 2019 and again in July 2021.
- 2.2. Chapter 2 of the NPPF sets out national policy for achieving sustainable development, and separates it out into three objectives – economic, social and environmental. Within the environmental objective, “*mitigating and adapting to climate change, including moving to a low carbon economy*” forms a key part of achieving sustainable development – a key goal of the planning system.
- 2.3. Paragraph 20 of the NPPF sets out the strategic matters that should be addressed through strategic policies, including “*planning measures to address climate change mitigation and adaptation.*”
- 2.4. Chapter 14 of the NPPF provides national planning policy relating to climate change. It provides some clarity for the expectations of how Local Plans should address the challenges of climate change in paragraph 152 where it says:

“The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”
- 2.5. At paragraph 154, the NPPF goes on to state that development “*should be planned for in ways that...can help to reduce greenhouse gas emissions, such as through its location, orientation and design...*”
- 2.6. This all makes it quite clear that Local Plans should not be silent on climate change and in fact that they should proactively address the challenge as a key vehicle to achieving sustainable development.
- 2.7. The Planning Practice Guidance (PPG) was first introduced in 2014 and offers ‘live’ government guidance. The PPG provides guidance to help in the implementation of policy in the NPPF.
- 2.8. The PPG includes an entire section devoted to climate change including a subsection entitled “How can the challenges of climate change be addressed through the Local Plan?”¹ Within this section it provides examples of mitigating climate change through the

reduction of emissions, including “*promoting low carbon design approaches to reduce energy consumption in buildings...*”

- 2.9. Another section – “How can adaption and mitigation approaches be integrated?”² – highlights that Local Plans should “*pay particular attention to integrating adaptation and mitigation approaches*” and lists examples of how this could be achieved. The examples given include maximising summer cooling through natural ventilation in buildings and avoiding solar gain.
- 2.10. The PPG³ also highlights the risk of maladaptation (adaptation that could become more harmful than helpful). For example, designing buildings to maximise solar gain in winter without thinking through the implications for overheating in summer.

Local Policy

- 2.11. The current Local Plan contains policy LP18 Climate Change and Low Carbon Living, which encompasses efficient design criteria and considerations. Specifically, the policy supports proposals that: reduce energy demand via consideration of landform, location, layout, building orientation, design, massing and landscaping; use resources efficiently to avoid products with high embodied energy content and minimise construction waste; incorporate site based decentralised or renewable energy infrastructure; and carbon off-set. However, the policy states that proposals which ‘*make a positive and significant contribution*’ towards the considerations will be ‘*considered more favourably*’: the policy does not establish the considerations as *requirements* that proposals must meet.
- 2.12. Policy LP26, Design and Amenity, of the current Local Plan, sets out various design and amenity considerations that all proposals must meet, as relevant. These criteria centre around perseverance of character and local distinctiveness, and creation of sense of place, rather than efficiency.

3. Context and Evidence

- 3.1. A specific policy on efficient design is needed to satisfy national policy and guidance; to contribute to the achievement of a net zero carbon Central Lincolnshire; and to future proof development against the challenges climate change poses, such as increased energy prices.

4. Issues and Options Consultation

- 4.1. This policy issue of efficient design and the options for it were not consulted on as part of the Issues and Options consultation.

5. Regulation 18 Consultation

- 5.1. Again, this policy was not included in the Consultation Draft Local Plan presented at Regulation 18 consultation (which ran from 30 June and 24 August 2021).
- 5.2. The Consultation Draft Local Plan included an ‘energy hierarchy’ in the Climate Change section introduction. On review of the Local Plan following the Regulation 18 consultation, and in response to various comments received, the decision was taken to include this hierarchy in a policy, and thus policy S6, Design Principles for Efficient Buildings was introduced into the Proposed Submission Local Plan. Responses to the Draft Local Plan that motivated this decision included:

- Support for the Local Plan going further;

- Support for a net zero Local Plan and policies that will deliver this.

6. Proposed Approach in Proposed Submission Local Plan

- 6.1. The approach presented in the Proposed Submission Local Plan is a policy that sets out various design considerations aimed specifically at ensuring delivery of efficient buildings. The principles are set out in the order that they should be considered as part of the design process, to ensure efficiency considerations and measures are considered from the initial proposal design stages. These considerations are considered to be essential to deliver energy efficient homes.
- 6.2. The policy sets a requirement for applicants to demonstrate how each principle has been approached in their proposals.

7. Reasonable Alternative Options

- 7.1. As this policy is a new policy and wasn't presented in the previous Draft Local Plan, it was not included in the previous sustainability appraisal.
- 7.2. Sustainability appraisal was undertaken on the policy options considered for the Proposed Submission Local Plan. The following alternative options have been considered for this policy (option 1, as summarised at 6.1 above, being the preferred option).

Option 2: No specific policy in climate change section, instead incorporate efficient design principles into Design and Amenity policy.

Option 3: No policy, instead rely on national policy and guidance.

- 7.3. Policy options 1 and 2 scored similarly, with neutral, minor positive, major positive, or mixed effects predicted across the SA objectives: no negative impacts are considered likely.
- 7.4. Policy option 3 is likely to have neutral effects against all of the objectives: with no positive impacts predicted, it can be discounted.
- 7.5. The one objective where policy option 2 scores preferably over policy option 1 is SA5 Landscape and Townscape. The combined policy approach would see the design efficiency principles incorporated into an overarching design policy, which also addresses matters such as the protection and enhancement of amenity, important views, and character.
- 7.6. However, given that the Local Plan includes a 'Design and Amenity' policy, which incorporates the wider, overarching design principles and considerations, the selection of policy option 1 will not result in negative implications against the SA5 objective.
- 7.7. Option 1 has been selected as preferable over option 2 because of the overarching ambition of the Local Plan to deliver a net zero Central Lincolnshire. Having a policy solely aimed at energy efficiency design principles puts emphasis on the importance of these considerations. Policies S7 (Reducing Energy Consumption – Residential Development) and S8 (Reducing Energy Consumption – Non-Residential Development) both include

reference to the principles set out in policy S6, given the interrelationship between the policy goals: having a separate policy on design principles for efficient buildings means that these considerations can be easily cross referenced in S7 and S8.

- 7.8. Therefore, policy option 1 is the preferred approach, and is taken forward in the Proposed Submission Local Plan.

8. Conclusion

- 8.1. This Evidence Report demonstrates the rationale for the proposed policy as contained in the Proposed Submission Draft Central Lincolnshire Local Plan. This helps bring together relevant evidence that has informed this policy and how we have responded to comments received during the plan making process, as well as how the latest evidence and national guidance has been taken into account.