

Central Lincolnshire Policy S12 Water Efficiency and Sustainable Water Management Evidence Report

Formerly Policy S11

March 2022



Central Lincolnshire
LOCAL PLAN

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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 S12, which relates to water efficiency and sustainable water management.

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. A key addition in the 2021 update of the NPPF was Annex 3, entitled ‘flood risk vulnerability classification’, which supports paragraph 163. This annex sets out what land uses fall under various categories, namely:
 - Essential infrastructure
 - Highly vulnerable
 - More vulnerable
 - Less vulnerable
 - Water-compatible development
- 2.3. Paragraph 153 requires that plans take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for various matters, including water supply.
- 2.4. While the NPPF does not set specific policy in relation to water efficiency and sustainable water management, the overarching climate change policies and principles are relevant. Specifically, Chapter 2 of the NPPF sets out national policy for achieving sustainable development, which 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.
- 2.5. 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.”
- 2.6. 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.”

- 2.7. 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 lists considering availability of water and water infrastructure for the lifetime of the development and designing responses to promote water efficiency and protect water quality as examples of adapting to climate change, along with considering the impact of and promoting design responses to flood risk.¹

Local Policy

- 2.9. Policy LP14, Managing Water Resources and Flood Risk, of the current Local Plan sets the requirement for development proposals to meet the water efficiency standard of 110 litres per occupier per day: the 110 litre requirement is a ‘higher’ requirement than the standard building regulation requirement of 125 litres per day.
- 2.10. The 110 litre requirement was chosen because Central Lincolnshire lies within the East Midlands area of serious water stress where drought is a cause for concern.

3. Context and Evidence

- 3.1. Lincolnshire lies within the East Midlands area of serious water stress where drought is a cause for concern. This is a major challenge in the context of Central Lincolnshire’s planned growth, and will require careful conservation and management of water resources to ensure that demand for water can be achieved in a sustainable manner. It also provides the justification to require, via the Local Plan, the higher water efficiency standard of 110 litres per day which can be achieved through the installation of water efficient toilets, showers and taps.
- 3.2. Furthermore, parts of Central Lincolnshire are currently constrained by the capacity of water recycling infrastructure, which further justifies the need to limit water consumption.
- 3.3. In addition, the supply and disposal of water has a significant carbon impact. Whilst the bulk (90%) of water-related carbon emissions come from the heating of water, the process of treating and pumping water to homes also has an impact (10%). Reducing water use (supply and disposal) therefore can have a significant carbon impact, even more so if that water is heated.

4. Issues and Options Consultation

- 4.1. The Issues and Options Consultation Report highlighted that policy LP14 of the current Local Plan was not intended to be significantly changed in the new Local Plan. There were no objections to the proposal to continue to require 110 litres standard above the 125 standard.

¹ NPPG Paragraph: 003 Reference ID: 6-003-20140612

5. Regulation 18 Consultation

- 5.1. A Consultation Draft of the Local Plan was published for consultation between 30 June and 24 August 2021. During this eight week consultation comments were received on the plan, the policies within the plan, and supporting information and evidence.
- 5.2. A number of comments were received in relation to the water efficiency and sustainable water management policy. There were various comments broadly supporting the policy, and wider support for a net zero Local Plan and policies that will deliver this.
- 5.3. There was mixed response to the 110 litre requirement: it was felt by some that the 110 litre requirement was not justified, and that the evidence behind this was weak, while others supported it, and acknowledged that this requirement is in the current Local Plan.
- 5.4. Other suggestions included that the policy needed to be more flexible, and that the policy should be incorporated into the flood risk policy.

6. Proposed Approach in Proposed Submission Local Plan

- 6.1. The approach we propose in the Local Plan is a policy requiring residential development proposals to achieve the water standard of 110 litres per day per person and setting out other requirements for water management applicable to all proposals comprising of new buildings. The other requirements include permeable surfacing, 'green' roofs on flat-roofed areas, and installation of water butts.
- 6.2. The policy has been retained as per the Regulation 18 Draft, though the introductory text has been amended.
- 6.3. The additional introductory paragraph provides information that Central Lincolnshire is in an area of serious water stress, which justifies the uptake of the optional 110 litre standard.
- 6.4. The policy has been retained as previously drafted, in light of the comments in support of the policy. Furthermore, the Central Lincolnshire authorities believe that the 110 litre optional standard is justified.

7. Reasonable Alternative Options

- 7.1. Two alternative policy options were considered. Option 2, to have a policy setting out certain requirements for water management applicable to all proposals comprising of new buildings (as per those set out in the preferred policy taken forward in the Proposed Submission Draft Local Plan) but not require proposals to meet the optional 'higher' 110 litre standard. Option 3, to have no local policy, and instead rely on national policy, guidance and building regulations.
- 7.2. Option 3, to have no policy, was discounted as a local policy is likely to deliver more significant benefits and greater certainty in terms of positive outcomes.
- 7.3. While option 2 is likely to result in positive effects in relation to several of the sustainability appraisal objectives, and no negative impacts are predicted, policy option 1- to require proposals to meet the Technical Housing Standard of 110 litres per person per day in

addition to the other requirements- will deliver more substantial benefits and thus this policy option is preferred and taken forward in the 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.