

Central Lincolnshire Policy S13 Reducing Energy Consumption in Existing Buildings Evidence Report

Formerly Policy S12

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 S13, which relates to reducing energy consumption in existing 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 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.”

- 2.3. The NPPF does not set any further policy specifically in relation to existing buildings.
- 2.4. 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.
- 2.5. The PPG highlights that many improvements to existing buildings do not require planning permission, but that where permission is required, advice to developers should be coordinated to ensure consistency between energy, design and heritage matters.¹

Local Policy

- 2.6. The current Local Plan does not feature a specific policy on reducing energy consumption in existing buildings.

3. Context and Evidence

- 3.1. Whilst there is significant new development planned for Central Lincolnshire, the vast majority of buildings that will be occupied over the coming decades will be those built in earlier times when energy and performance standards were much lower than at present.

¹ NPPG Paragraph: 008 Reference ID: 6-008-20140306

- 3.2. As many improvements to existing buildings do not require planning permission, the scope of influence of the Local Plan upon improving energy efficiency in existing buildings is limited. However, the aim of policy S13 is to promote improvements to energy efficiency, to complement the wider policies of the new Local Plan which are primarily aimed at new buildings.

4. Issues and Options Consultation

- 4.1. The Issues and Options consultation that took place in 2019 did not pose specific questions or set out potential options in relation to reducing energy consumption in existing buildings.
- 4.2. A policy on reducing energy consumption in existing buildings is included in the Draft Local Plan because of the Central Lincolnshire authorities' commitment to addressing climate change, and (as highlighted at 3.1 above) in light of the fact that the majority of buildings occupied over the coming decades have already been built.

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. There were a number of comments received in relation to the policy on reducing energy consumption in existing buildings. Various responses in support of the policy were received, with some respondents suggesting that the policy should go further. Concerns and objections received included that the Local Plan evidence base focuses on technical ability and not the practicalities of sourcing materials and equipment, and there was also concern about the introduction of climate change policies ahead of the Future Homes Standard.

6. Proposed Approach in Proposed Submission Local Plan

- 6.1. The proposed approach set out in the Proposed Submission Local Plan is a policy encouraging proposals involving a change of use or extension to improve the buildings energy efficiency, and expressing particular support for proposals that take viable opportunities to do so.
- 6.2. The policy does include a caveat in relation to heritage assets, in recognition of the fact that energy efficiency improvement may be limited for such assets as improvements should not result in harm to, or loss of, the significance of the asset. Historic England expressed support for the inclusion of this caveat in their response to the Regulation 18 consultation on the Draft Local Plan.
- 6.3. No amendments were made to the policy wording following the consultation on the Draft Local Plan given the overall positive response to the policy, and the limited scope Local Plans have in regard to existing dwellings.

7. Reasonable Alternative Options

- 7.1. Two alternative policy approaches were considered in relation to this matter and appraised as part of the Sustainability Appraisal process. Option 2, a policy setting specific requirements (rather than 'encouraging') in relation to energy efficiency for proposals involving a change of use or extension to an existing building, and option 3, to have no local policy and instead rely on national policy.
- 7.2. Option 3 was discounted as the approach was unlikely to result in any positive effects in relation to any of the 15 sustainability objectives.
- 7.3. Policy options 1 and 2 score similarly on the whole, with neutral, positive, or mixed effects: no significant impacts are predicted. However, policy option 1 has mixed effects (0 / +) in relation to Objectives 2, 6, 7, 8, 11, 12, 14, while policy option 2 scores positively in relation to each of these Objectives to reflect the fact that policy option 2 sets requirements, while policy option 1 encourages developers to make improvement.
- 7.4. Despite policy option 2 scoring better in the sustainability appraisal, option 1 is taken forward as the preferred policy approach because:
- Of viability considerations associated with making the considerations requirements
 - Policy option 1 may result in positive impacts
 - The impacts of both policy options 1 and 2 may be limited as the policies would only apply to proposals which need planning permission: some proposals for change of use and extensions do not require permission, so would not be subject to the policy
 - Policy option 2 could be difficult to condition and enforce.

8. Conclusion

- 8.1. This Evidence Report demonstrates the rationale for the proposed policy as contained in the Proposed Submission 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.