

Central Lincolnshire
Policy S20
Resilient and Adaptable Design
Evidence Report
Formerly Policy S19
March 2022



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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 S20, which relates to resilient and adaptable design in terms of heat resilience, and adaptability to future social, economic, technological and environmental requirements.

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, 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.
- 2.3 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 does not contain a policy that encompasses resilient and adaptable design criteria and considerations. Some measures are touched on by policies, including policy LP15, Community Facilities, which includes a policy requirement that proposals for new community facilities ‘be designed so that they are adaptable and can be easily altered to respond to future demands if necessary’. But this policy criterion is solely directed at new community facilities, and not wider development proposals.
- 2.12 In addition, policy LP14 Managing Water Resources and Food Risk, includes a requirement that ‘the development will be safe during its lifetime’, and LP13 (Accessibility and Transport) requires that all proposals ‘ensure allowance is made for low and ultra-low emission vehicle refuelling infrastructure’.

3 Context and Evidence

- 3.1 A specific policy on resilient and adaptable design is needed to satisfy national policy and guidance; to future proof development; and to ensure, ultimately, that the built environment is built to last.
- 3.2 Adaptable building design avoids, or at least minimises, waste, reduces the use of materials, and reduces overall emissions from the demolition and redevelopment of buildings that are no longer fit for purpose or incapable of being easily changed.

4 Issues and Options Consultation

- 4.1 The Issues and Options consultation that took place in 2019 did not ask any specific questions in relation to resilient and adaptable design.

¹ PPG Reference ID: 6-003-20140612

² PPG Reference ID: 6-004-20140612

³ PPG Reference ID: 6-004-20140612

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 Numerous comments were received in relation to this policy, with the policy receiving a mixed response. Some respondents felt that the policy could go further, while others thought that it needed flexibility, or that there was a risk of it being too burdensome.

6 Proposed Approach in Proposed Submission Local Plan

- 6.1 The policy option taken forward in the Local Plan is a policy setting out various considerations in relation to heat resilience and adaptable design: applicants will be required to demonstrate consideration of the heat resilience criteria, commensurate with the scale and location of the proposal. Applicants would be required to meet the adaptability criteria, as applicable.
- 6.2 Following the Regulation 18 consultation, a minor amendment was made to the proposed policy: reference to the wider network of green infrastructure was added to criteria 2.

7 Reasonable Alternative Options

- 7.1 Two other policy options were considered for this policy: option '2', to have a policy outlining optional considerations in relation to heat resilience and adaptable design, and option '3', to have no local policy, and instead rely on national policy and guidance.
- 7.2 Policy option 3 was discounted because it would have neutral or negligible effects in relation to 15 of the sustainability appraisal objectives and had potential for negative effects in relation to the built and historic environment.
- 7.3 Option 2 scored more favourably than option 3, though not as well as policy option 1. Policy option 1 was the preferred policy approach presented in the Regulation 18 Draft Local Plan. Following consideration of the responses received at Regulation 18 consultation the detailed policy wording has been amended slightly from that of the Draft Local Plan. However, the detailed wording in the Proposed Submission Local Plan still aligns with the overarching position of option 1, and so it is considered that the policy options remain the same.
- 7.4 Therefore, the same options were appraised at this stage as the previous: while the scoring of option 1 has been reviewed in light of the revised detailed policy wording, the scoring emerged the same as the previous assessment. Therefore, policy option 1 remains the preferred approach and is taken forward in the Proposed Submission Local Plan.
- 7.5 Policy option 1 is likely to result in positive effects or major positive effects in relation to several of the Objectives. Against these same Objectives, policy option 2 scored mixed positive uncertain effects, as the impact of the policy is uncertain given the fact that the considerations would not be requirements, rather they'd be optional. Policy option 1 therefore offers greater certainty for more positive sustainability outcomes, and is

considered to be achievable as most of the measures outlined can be easily integrated into proposal at an early design stage.

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.