



Policy LP18 Climate Change and Low Carbon Living Evidence Report

**Proposed Submission
April 2016**

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1 Introduction and Policy Context

Introduction

- 1.1 A joint Local Plan for the Central Lincolnshire area is being produced which will set the framework for how development will be considered across the districts of the City of Lincoln, North Kesteven and West Lindsey to 2036.
- 1.2 This Evidence Report (which is one of a collection) provides background information and justification for policy LP18, which relates to climate change and low carbon living.

National policy

- 1.3 The National Planning Policy Framework (NPPF) was published in March 2012 and the National Planning Practice Guidance (NPPG) was introduced in 2014 which offers 'live' government guidance.
- 1.4 Section 10 of the NPPF concerns "meeting the challenge of climate change" and there is a separate section on "Plan-making". The following paragraphs are particularly relevant:
 - Paragraph 7- There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles: ...an environmental role ...use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.
 - Paragraph 17- One of the 12 core planning principles is that planning should "support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy)."
 - Paragraph 93- Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development.
 - Paragraph 94- Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change.
- 1.5 The above NPPF policies have been taken into account in preparing the Local Plan as a whole, and policy LP18 in particular.
- 1.6 The NPPG (Reference ID: 6-001-20140306) also provides the following guidance in relation to climate change:

"...effective spatial planning is an important part of a successful response to climate change as it can influence the emission of greenhouse gases....Planning can also help increase resilience to climate change impact through the location, mix and design of development. ... To be found sound, Local Plans will need to reflect this principle and enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework. These include the requirements for local authorities to adopt proactive strategies to mitigate and adapt to climate change in line with the provisions and objectives

of the Climate Change Act 2008, and co-operate to deliver strategic priorities which include climate change.”

2 Central Lincolnshire Context in Relation to Policy LP18

- 2.1 In response to issues such as rising fuel costs, fuel poverty, dwellings over heating in hot weather and dwellings being difficult to heat in winter, and in light of climate change, the Central Lincolnshire authorities' want to encourage developers to consider the measures they can take to reduce energy demand, maximise resource efficiently, generate energy, and off set carbon.
- 2.2 Taking action in light of these considerations could help minimise the number of households experiencing fuel poverty in the future; improve the reliability of electricity supply; and will positively contribute to the national goal of reducing greenhouse gas emissions by at least 80% by 2050 (compared to 1990 levels).

3 Local Plan Policy: Preliminary Draft

- 3.1 The Preliminary Draft version of the Local Plan (published for consultation in October – November 2014) included a policy on climate change and low carbon living.
- 3.2 The consultation on the Preliminary Draft version of the Local Plan revealed a mixed response to the priority approach set out in this policy, with some comments suggesting the removal of the priority order, stating that each item needs to be addressed simultaneously to achieve dramatic reductions in emissions, while other comments supported the priority approach. Some also welcomed the policy for the long term benefit it will bring to improving health and wellbeing.
- 3.3 Comments made included that 'could' should be 'should' in relation to the 'resource efficiency', 'energy production' and 'carbon offsetting' sections; that the plan needs to be realistic about car use, recognising that people living in remote areas rely heavily on cars; and that where statutory targets exist (e.g. through building regulations) the policy should not require these to be exceeded, as the potential cost implication of compliance could have viability implications.
- 3.4 One consultee also raised concern that the criterion are unduly restrictive, explaining that stating that infrastructure must be inconspicuous suggests there may not be a presumption in favour of sustainable development, as it could for example mean that solar panels are not permitted as they are visible on roof tops. They highlighted that in order to make a significant contribution, technology may not be inconspicuous, and that a balance in respect of impact against contribution is not taken into consideration.
- 3.5 Another commented that woodland planting is not the only option for carbon offsetting: other habitats such as fenland and grassland also store carbon and it was suggested that the Central Lincolnshire Biodiversity Opportunity Mapping should be used to guide the most suitable habitat in a particular area.

4 Local Plan Policy: Further Draft

- 4.1 In response to comments received during the consultation and in light of the viability work undertaken on the emerging Local Plan, the policy was revised so that it no longer placed a

requirement on developers to demonstrate how they will make a significant contribution to one or more of the four areas: rather, the Further Draft policy *supported* developments which make a significant and positive contribution to the objectives by stating that such proposals will be looked upon favourably.

- 4.2 In response to the comments summarised in section 3 above, the introductory text was amended to read “not travelling by car where possible”, in recognition of the fact that in some areas there are no other options.
- 4.3 Furthermore, the policy wording in relation to carbon offsetting was amended as suggested, and the potentially restrictive wording regarding infrastructure being inconspicuous was revised.

Further Draft Consultation

- 4.4 Various comments were received in relation to policy LP18 during the consultation on the Further Draft Local Plan. There was mixed support for and objection to the policy.
- 4.5 Concern was raised that neither the Local Plan nor Integrated Impact Assessment indicate that a baseline survey of renewable energy developments in Central Lincolnshire has been conducted, which was felt to be essential information to gauge progress towards addressing climate change.
- 4.6 There was support for the amendments made to the policy in relation to carbon offsetting and to the changed emphasis from prescriptive requirements to incentives, though others felt that the policy was too vague on how climate change aspirations would be achieved.
- 4.7 Other comments made included that the policy needs to incorporate flexibility to allow applications to be considered on their merits, balanced against the other benefits the proposal may be delivering; concern about the potential loss of high grade agricultural land; concern that the positive stance of policy LP18 is undermined by policy LP19; and that car ownership and commuting need to be reduced.

5 Local Plan Policy: Proposed Submission

- 5.1 Policy LP18 in the Proposed Submission version of the Local Plan has only been slightly amended from the Further Draft version: ‘location’ has been added to the ‘reducing demand’ category, as location will be a key consideration in minimising the need to travel and maximising opportunities for sustainable travel.
- 5.2 In relation to the comments made during the Further Draft consultation, a baseline survey of renewable energy development in Central Lincolnshire has not been undertaken. National Policy is clear that “local planning authorities should adopt proactive strategies to mitigate and adapt to climate change” (NPPF, 2012, paragraph 94): it is felt that a baseline survey would not serve any benefit for planning policy purposes, as the Local Plan is required to adopt a proactive approach, regardless of renewable energy development in the area to date.
- 5.3 The support for changed emphasis from prescriptive requirements to incentives is noted. The comments that the policy is too vague on how climate change aspirations would be achieved are noted, however the policy cannot set out detailed requirements because of the financial obligation it will place on developers, which may consequently pose viability issues in light of the other obligations required from developers (such as CIL contributions and affordable housing for example).

- 5.4 The concern about the potential loss of high grade agricultural land has not been addressed in this policy as part G of policy LP55 deals with the protection of the best and most versatile agricultural land. Likewise, no action has been taken to the comment that car ownership and commuting need to be reduced as policy LP13 addresses these matters.

6 Alternative Reasonable Options

- 6.1 The following alternative options have been considered for this policy. (Option 1 is the preferred policy approach which has been included in the Proposed Submission Local Plan.)
- 6.2 **Option 2:** No policy on climate change and low carbon living and rely on national policy. This option has been discounted: whilst the policy is not requiring developers to deliver measures in respect of the four priorities listed, it is felt that the policy is essential in highlighting that proposals which address these issues will be looked upon favourably, in order to fulfil the governments ambition to minimise vulnerability and provide resilience to the impacts of climate change.
- 6.3 **Option 3:** Retain policy as per Preliminary Draft version, i.e. have policy placing an obligation on developers to demonstrate how the proposal will make a positive and significant contribution towards reducing demand, maximising resource efficiency, energy production and/ or carbon offsetting. This approach has been discounted because of the financial obligation it will place on developers, which may consequently pose viability issues in light of the other obligations required from developers (such as CIL contributions and affordable housing for example), and being more prescriptive would be contrary to the outcome of the Housing Standards Review and the recent changes to building regulations.

7 Conclusion

- 7.1 This Evidence Report demonstrates the rationale for the proposed policy as contained in the April 2016 Proposed Submission Local Plan. We hope this helps demonstrate how we have responded to comments received during both the Preliminary and Further Draft consultations, as well as how the latest evidence and national guidance has been taken into account.