

Central Lincolnshire Policy S10: Supporting a Circular Economy Evidence Report

Formerly Policy S9

March 2022



Contents

1. Introduction.....	3
2. Policy Context.....	3
National Policy and Guidance.....	3
Local Policy	3
3. Context and Evidence.....	3
4. Issues and Options Consultation.....	4
5. Regulation 18 Consultation	4
6. Proposed Approach in Proposed Submission Local Plan.....	4
7. Reasonable Alternative Options.....	5
8. Conclusion	5

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 S10, which relates to supporting a circular economy.

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. The purpose of the planning system is to contribute to the achievement of sustainable development (NPPF para 7). National Planning Policy establishes three overarching objectives- economic, social and environmental (NPPF para 8)- and states, in relation to the 'environmental' objective, that planning must minimise waste and pollution, use natural resources used prudently, and contribute to the move to a low carbon economy.
- 2.3. Furthermore, national policy requires Local Plans to '*encourage the reuse of existing resources*' (para 152).
- 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, and includes specific guidance in relation to climate change.
- 2.5. PPG highlights that [Section 19\(1A\) of the Planning and Compulsory Purchase Act 2004](#) requires local planning authorities to include in their Local Plans "*policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change*". This will be a consideration when a Local Plan is examined (NPPG 6-002-20140306).
- 2.6. While national policy and guidance do not offer any specific policy or steer in relation to 'circular economy' principles, the overarching climate change policies and principles are relevant and applicable.

Local Policy

- 2.7. The current Local Plan (2017) does not contain a specific policy, nor specific mention of, circular economy principles: it does however contain policy LP18, Climate Change and Low Carbon Living, which requires reduced demand in terms of energy and travel need, and resource efficiency, both of which relate to circular economy principles.

3. Context and Evidence

- 3.1. The introduction of policy S10 in the new Local Plan is needed because circular economy principles present a real opportunity in terms of reducing resource and energy consumption, and minimising waste and emissions.

4. Issues and Options Consultation

- 4.1. The topic of 'circular economy' was not specifically consulted on at the Issues and Options Consultation.
- 4.2. However, this policy has been introduced because of the decision taken by the Central Lincolnshire authorities to deliver a net zero carbon Central Lincolnshire.
- 4.3. A circular economy is based on the principle of maximising the use of materials and resources through recycling, reusing and repairing as much possible, which will help reduce energy use and carbon consumption via reduced demand for 'new' goods. Circular economies can therefore help to preserve resources and reduce the environmental impacts of production and use of the earth's natural materials. A circular economy can also have positive local economy benefits, as it can be job creating in a local area to serve the circular economy, rather than a consumption economy which relies on imports from outside the area (including international). Therefore the benefits of including this policy are multifaceted.

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. Various comments were received in relation to this policy: most comments were in broad support, or were quite generic in nature.
- 5.3. Concerns raised included that the policy is too broad and vague; that the policy needs flexibility in relation to feasibility and viability in order to comply with the NPPF (specifically paragraph 16b); and concern about the introduction of such policy before the Future Homes Standard.

6. Proposed Approach in Proposed Submission Local Plan

- 6.1. The proposed policy approach to be taken forward in the Proposed Submission Local Plan is a policy which particularly supports, in principle, proposals that demonstrate their compatibility with, or furthering of, a strong circular economy in the local area. The proposed policy in the Proposed Submission Draft Local Plan remains unaltered from the earlier Draft Local Plan consulted on in 2021.
- 6.2. In response to the concerns about the viability and feasibility of implementing such a policy, no amendments have been made in response to this as the policy already offers flexibility, given that it does not set out specific, detailed requirements that proposals must fulfil. Rather, it simply expresses that particular support will be given to proposals that demonstrate their compatibility with, or the furthering of, a strong circular economy.
- 6.3. While the policy could go further, in terms of setting more specific requirements, it is felt that, on balance with the other policy requirements on the Local Plan, it would not be reasonable to seek specific, measurable, outputs in relation to the circular economy at this time.

- 6.4. While the policy itself remains unaltered, the supporting introductory text to the policy has been amended and expanded, in order to provide further context and explanation for the policy. The examples given in the policy introduction highlight how circular economy principles can be used to reduce carbon in development proposals and the built environment.

7. Reasonable Alternative Options

- 7.1. Two alternative policy approaches were considered, and appraised as part of the Sustainability Appraisal process: these options were:
- Option 2: a policy requiring demonstration of how proposals contribute to the circular economy principles
 - Option 3: no local policy and instead rely on national policy and guidance as set out in the NPPF and NPPG.
- 7.2. Policy option 3 was discounted because its effects in relation to the 15 Sustainability Appraisal objectives are likely to be negative or neutral.
- 7.3. Policy options 1 and 2 scored quite similarly, with a neutral score for the majority of Objectives, yet some positive scoring against various Objectives.
- 7.4. In some instances, policy option 2 scored more favourably than option 1 (the preferred policy approach), with potential for significant positive effects rather than minor positive effects: policy option 2 scored more favourably against the Objectives relating to Pollution, Waste, Climate Change Effects and Energy, and Local Economy. The more favourable scoring was awarded in these instances as the policy *requirement* for contribution to circular economy principles is likely to result in more positive impacts than a policy *supporting* proposals which demonstrate circular economy principles.
- 7.5. Despite policy option 2 scoring better overall, policy option 1 has been identified as the preferred policy approach to be taken forward because:
- Both policy options scored similarly overall
 - In instances where option 2 has scored 'significant positive', the score awarded was mixed (+ / ++), compared to a positive (+) score for option 1: the potential for significant effects is not guaranteed
 - The Local Plan as a whole places multiple and varying requirements on applicants. Given the negligible difference in predicted impact between policy options 1 and 2, it is felt that option 1 does not place undue burden on applicants.

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.