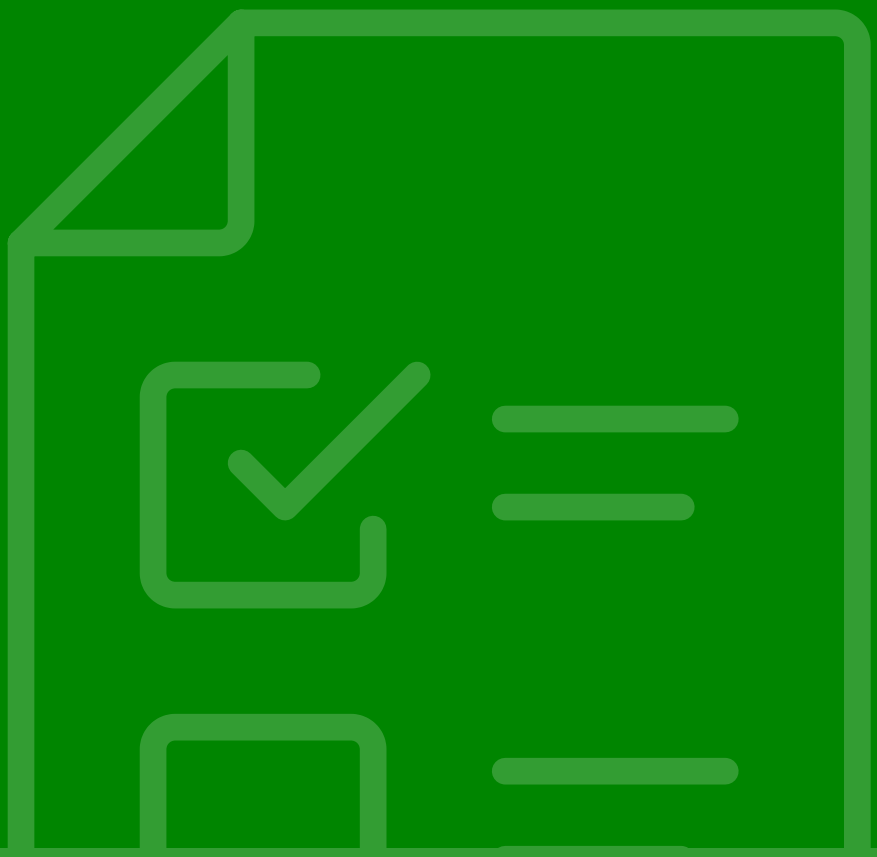
CIRCULAR ECONOMY POLICY COMPLIANCE CHECKLIST

Major Planning Applications



City of Westminster

ZERO CARBON 2040
Westminster Climate Action

In the context of Westminster's commitment to reach net zero carbon by 2040, applicants should give early consideration to how to minimise both operational and embodied carbon emissions.

RIBA, LETI, and UKGBC have published a number of guidance documents helping designers to reduce their embodied carbon footprint, incorporating circular economy design principles through early considerations, retaining building layers at their highest value.

Relevant policy:

City Plan 2019-2040, Policy 38 (D) Sustainable Design and (F) Promoting Excellence in Contemporary Design.

London Plan 2021, Policy SI 2 Minimising greenhouse gas emissions, and Policy SI 7 Reducing waste and supporting the circular economy.

Purpose of this checklist

This checklist has been prepared to ensure that all requirements in line with the above policy and as set out within GLA **Circular Economy Statement** and **Whole life carbon assessment** guidance are met at the time of submitting a planning applicaiton. It is expected to be form part of all major applications and all applications referable to the Mayor, and in addition to GLA's Circular Economy and Whole life Carbon reporting template. Small schemes, refurbishment or retrofit projects are also encouraged to adhere to the main Circular Economy principles and submit a statement in support to their application.

How to use this document

Applicants are encouraged to use this checklist throughout all stages of the application process (pre-, outline and/or detailed planning) to ensure completeness, depth, breadth and consistency of their circular economy approach. It is intended to show level of commitment for the proposal. Planning officers will also use this to guide at full planning application to assess policy compliance.

Criteria	Description	Yes/No – Explanation
1. Circular Economy targets	• If existing structures are present both pre demolition and pre reclamation audits have been done before any demolition/ redevelopment (including façade retention schemes) is considered? (See Figure 1)	☐ Yes ☐ No

Criteria	Description	Yes/No – Explanation
2. Circular Economy design approaches	• The London Plan Policy SI 7(A) targets should be set as a minimum level of compliance with that part of the policy. Have you considered recycled and reused content targets? Provide an explanation for the targets you are committing to.	☐ Yes ☐ No
	• London Plan Policy SI 7 requires the management of excavation waste to be focused onsite or within local projects. Where partial or complete demolition is proposed, the materials already on-site should be reviewed for their potential retention and inclusion into the proposed scheme before off-site options are considered. To maximise the potential for the reuse of materials on-site, an area for the potential processing and storing of these materials should be identified on or close to the development site. Outline the considerations given to the above points.	
	• Have you considered on site opportunities for direct re use? If these have been exhausted, show how you have considered off site management of materials, including London Waste map or Excess Material Exchange platform. Local sourcing of materials is strongly encouraged. Please provide explanation how and where these points are addressed.	
	• Provide target for reused and target for recycled content for each building layer.	
	• Set out any ways in which you have strived to achieve best practice and go beyond the minimum standard as set out by the London Plan Policy SI 7(A) targets, such as by committing to percentage of re used materials on site; separating reused and recycled targets; and committing to higher targets for recycled content?	

Criteria	Description	Yes/No – Explanation
3. Circular Economy design principles	• Have you considered the six Circular Economy design principles[1] and how did they inform the design of the development and the proposed approach.	☐ Yes ☐ No
	• Could you confirm that you have completed the CE design approaches table in the relevant tab of the CE statement template spreadsheet. Confirm which of the CE design approaches listed in the table are being adopted for the existing building and new development, and provide an explanation for the approach chosen.	
	• Set-out how the proposal retains and refurbishes a building that might otherwise be demolished?	
	• Where adaptability is selected as a design approach, information should be submitted showing how the building can be adapted for different uses.	
	• At pre-application stage demonstrate how the 'Circular economy principles' as described by the GLA CE statement guidance will be adopted and explain why?	
	• Have you outlined how the proposal will design out waste (in terms of how waste materials will be reduced, treated as a resource, and managed) at each module stage.	

The Six CE design principles are:
1. building in layers
2. designing out waste
3. designing for longevity
4. designing for adaptability or flexibility
5. designing for disassembly
6. using systems, elements or materials that can be
7. reused and recycled

Criteria	Description	Yes/No – Explanation
4. Circular Economy design principles by building layer	• For all applications, complete the 'Circular Economy Design principles by building layer' table on the GLA's Circular Economy reporting template. • Indicate the commitments against each design principle. For example, if a commitment is shown to design for disassembly or replaceability, highlight the building layers or elements that will be designed for disassembly or replaceability. Be clear on the metric used to quantify or monitor this performance, as opposed to high-level statement (e.g. prefabricated modules can be disassembled).	☐ Yes ☐ No
5. Pre-redevelopment audit and pre-demolition audit	• A pre-redevelopment audit is a tool for understanding whether existing buildings, structures and materials can be retained, refurbished, or incorporated into the new development. The audit should be carried out early on (at pre-application stage) and should inform the design. • If there are existing buildings on a site, a third-party, independently verified or peer-reviewed pre-redevelopment audit is strongly encouraged, including analysis that fully explores options for retaining existing structures, materials and the fabric of existing buildings into the new development; and the potential to refurbish buildings before considering substantial demolition. • Complete and submit a pre-redevelopment audit as supporting evidence to CE statements, where a robust in-depth assessment has not already been completed. • Outline in a pre-redevelopment audit an explanation of the existing buildings on the site and brief description of state of their repair. Details should include: the building's age, key materials, photos of typical internal spaces and facades, and site plans. • If substantial demolition is proposed, the pre-demolition audit should include the following core information:	☐ Yes ☐ No

Criteria	Description	Yes/No – Explanation
	a. An explanation as to why it is proposed that the building(s) be demolished. Applicants should explain the different considerations for developing the site. This should go beyond simply saying that the buildings are of 'low quality'. Justification for demolition should be provided, in line with the approach set out in sections 2.4.3 to 2.4.5, above. An assessment of carbon impacts should be highlighted and, where relevant, the WLC assessment should be cross-referenced. It should be explained how any negative impacts resulting from demolition, such as the loss of embodied carbon in existing buildings, would be mitigated and offset. b. A summary of the key components and materials present in the existing buildings, with an estimate of the quantities and associated embodied carbon and whether they are suitable for reclamation. c. An explanation and drawings that show the extent of the proposed demolition and whether any parts of the building are being considered for retention. • Where possible, the following best practice information should also be included: a. how the value of existing building elements or materials can be recovered b. the amount of demolition waste (cross-reference the Recycling and Waste reporting table – refer to section 4.9 for further details) c. a schedule of practical and realistic providers who can act as brokers for each of the reclaimed items; d. target reuse and reclamation rates. • Applicants should justify reasons for adopting less preferred approaches or moving down the hierarchy of CE design approaches in Figure 3 (London Plan Figure 3.2), and the decision trees in Figures 4 and 5. Refer to sections 2.4.3 to 2.4.5 and 4.6.8 for further information.	
6. Whole Life Carbon	• Have you considered upfront carbon competitive benchmarks such as LETI Band B? • Have you considered Whole Life Carbon competitive benchmarks, such as RIBA 2030 Band B?	☐ Yes ☐ No

Don't let your waste go to waste

We are strong advocates for reusing waste materials instead of simply discarding them. In fact, we support the use of Enfield's Excess Material Exchange platform, as well as other alternatives that encourage retention and incentivise re-use. Let's work together to promote sustainability and create a cleaner, healthier world for future generations.

Join Enfield Excess Material Exchange. They help connect sellers to buyers, save money, and reduce waste. From construction materials to packaging supplies. Visit their website for more information about how you could save money while reducing waste.