

GREATER LONDON AUTHORITY

Circular Economy: GLA Consultation

Case Details

1	Development Name	100 Chalk Farm Road
2	Applicant	Regal Chalk Farm
3	London Borough	Camden
4	Case Officer	James Cummins

Planning Application: Proposal

Demolition of existing buildings and redevelopment of the site to provide two new buildings of between 6-12 storeys: one containing affordable homes (Class C3) and one (with three cylindrical volumes) containing purpose-built student accommodation with associated amenity and ancillary space (Sui Generis), a ground floor commercial space (Class E) together with public realm, access, plant installation, and other associated works.

Planning Application: Uses - Floorspace

1	Class C3	12280	m ²
2	Class F2	824	m ²
3	Class E	813	m ²
4			m ²
5			m ²
6			m ²
7			m ²
8			m ²
9			m ²
10			m ²
11			m ²
12			m ²
13			m ²
14			m ²
15			m ²
	TOTAL	13917	m²

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Full Application - Circular Economy Statement

GLA STAGE 1

Document Information		Additional Information
1 Date of Review	14/03/2024	
2 Document Title	100 Chalk Farm Road Circular Economy Statement	
3 Author	Whitecode Consulting Ltd	
4 Document Date	Jan-24	
5 Template Submitted (Y/N)	Y	

GLA Stage 1 Comments

No	Title	Description	Action Required
Please provide a revised version of the Circular Economy Statement (written report and/or GLA CE template) that incorporates the additional required information, according to the comments below.			
0	Policy and Guidance	<p>London Plan Policy S17 requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, whilst Policy D3 requires development proposals to integrate circular economy principles as part of the design process.</p> <p>Applicants should follow the London Plan Guidance: Circular Economy Statements (March 2022) to produce a written Circular Economy Statement and populate the template. Applicants should complete the template in full in line with the GLA guidance and submit this as an Excel document with the written report. Applicants should ensure they are familiar with the guidance in preparation for submitting their planning application. The following comments set out how the Applicant's planning application stage Circular Economy Statement submission complies with the policy and guidance.</p>	<p>It is welcomed that the Applicant has provided a Circular Economy Statement, in line with the adopted London Plan Guidance: Circular Economy Statements (March 2022), including the completed CE template and an accompanying written report.</p> <p>Please refer to the below for detailed comments.</p>
1	Development Details	The Applicant has partially provided description of the development.	The Applicant should provide additional description of the development proposals to convey scale and massing, including at least one image and typical plans to illustrate.
1	Development Details	The Applicant has partially provided details of the proposed development in the template, including gross internal floor area (GIA).	The Applicant should provide clarification with respect to the GIA breakdown provided in the GLA CE template where it is understood that the development proposes Sui Generis, Class C3 and Class E floorspace.
2	Design Approach	The Applicant has defined the design approach for the existing site.	The Applicant should provide additional detail per the comment in Row 30 below.
2	Design Approach	The Applicant has partially defined the design approach for the new buildings, infrastructure and layers over the lifetime of the development.	The Applicant should further explore how the development is designed for replaceability, in particular with respect to services which it is expected will need to be maintained and replaced throughout the lifetime of the building. The Applicant is should provide further consideration with respect to disassembly, particularly where it will be challenging to remove bathroom modules for reuse.
3	Pre-Redevelopment Audit	The Applicant has partially provided a Pre-Redevelopment Audit assessing the existing site, including any buildings, structures and materials.	The information provided by the Applicant suggests that financial viability is the key limitation to retention of the buildings. The Applicant presents a Building Suitability Assessment in the Refurbishment Feasibility Report, which is welcomed. The Applicant should provide some additional information to detail why the constraints identified could not be addressed by a scheme where structural retention is prioritised.
3	Pre-Demolition Audit	<p>The Applicant has provided a Pre-Demolition Audit to define an inventory of the materials in the building to be managed upon demolition and identify components of the building which can be reused or recycled.</p> <p>The Applicant has not included:</p> <ul style="list-style-type: none"> Assessment of the embodied carbon impacts of demolition and explained how any negative impacts will be mitigated and offset. Opportunities for reuse and recycling either within the proposed development or off-site nearby/locally or further afield. 	<p>The Applicant should:</p> <ul style="list-style-type: none"> Provide an assessment of the embodied carbon impacts of demolition and explain how any negative impacts will be mitigated and offset. Identify opportunities for the reuse and recycling of materials either within the proposed development or off-site nearby/locally or further afield. - The Applicant should further consider whether there are any specific opportunities for reuse or recycling.
4	Design Principles	The Applicant has summarised the key commitments in the Circular Economy Design Principles by Building Layer.	Nothing further is required.
4	Design Principles	Many of the commitments are considered standard practice. The template states that the response should consider where the Applicant seeks to go beyond standard practice.	The Applicant should consider key circular economy commitments that go beyond standard practice.
5	Bill of Materials	The Applicant has completed the Bill of Materials including metrics through module stages A to D.	<p>It is noted that the material intensity of the frame is very low, whilst for the external fabric is very high. The Applicant should review and provide clarification, and revision as necessary.</p> <p>The Applicant should demonstrate further consideration as to materials and components designed for disassembly. In particular, it would be expected that key elements of plant would be capable of being disassembled for replacement.</p> <p>The Applicant should ensure that the Bill of Materials presented in the GLA CE template is aligned with the information provided in the WLCA per Section 1.2.1 of the GLA guidance, the Applicant should ensure that any updates are reflected across both reporting submissions. It is noted that currently the material intensity in the CES is 1,462 kg/sqm GIA compared to 1,565 kg/sqm GIA in the WLCA.</p>
5	Bill of Materials	The Applicant has partially confirmed that reused or recycled content will be 20 per cent by value for the whole building and provided supporting calculations.	It is requested that the Applicant provide the OneClickLCA calculation except as supporting evidence. Where it is currently indicated that compliance is not met with the 20% reused and/or recycled content target at the current stage. The Applicant is strongly encouraged to set out key opportunities which will be explored through detailed design in order to address this.
6	Recycling and Waste Reporting	The Applicant has partially provided overall waste estimates and relevant cross references in the Recycling and Waste Reporting table.	<p>The Applicant should ensure that relevant cross references are provided in the Recycling and Waste Reporting table in the GLA CE template.</p> <p>It is noted that the SWMP includes estimates of demolition waste only, the Applicant should provide clarification as to how the construction waste estimate has been determined at this stage.</p> <p>It is noted that the municipal waste estimate is very high. Per the comment in Row 42 below, the Applicant should provide an Operational Waste Management Plan at this stage which defines the waste storage allocations for the development.</p>
6	Recycling and Waste Reporting	The Applicant has provided a breakdown of waste management routes in the Recycling and Waste Reporting table which demonstrates compliance with London Plan Policy S17 targets for diversion of 95% (by weight/tonnage) construction and demolition waste from landfill and 95% (by weight/tonnage) beneficial reuse of excavation waste.	Nothing further is required.
7	Operational Waste	The Applicant has not provided an Operational Waste Management Plan to demonstrate how the proposed development will achieve the relevant targets and meet requirements of London Plan Policies D3, S17 and D6.	The Applicant should provide an Operational Waste Management Plan demonstrating how the proposed development will achieve the relevant targets and meet requirements of London Plan Policies D3, S17 and D6. The Applicant should refer to Section 4.8 of the LPG with respect to OWMP requirements.
7	Operational Waste	The Applicant has included a commitment to meet or exceed the London Plan Policy S17 municipal waste recycling target of 65% (by weight/tonnage) by 2030 or business waste recycling target of 75% (by weight/tonnage) by 2030.	The Applicant is strongly encouraged to include these commitments in the Operational Waste Management Plan to support implementation.
8	Circular Economy Targets	The Applicant has provided a commitment to targets for demolition waste, excavation waste, construction waste, municipal waste and reused/recycled content in line with GLA policy.	Nothing further is required.
8	Circular Economy Targets	The Applicant has provided a brief explanation of how performance against each of the key policy targets will be secured through design, implementation and monitoring.	Nothing further is required.
9	Post-Construction Report	The Applicant has acknowledged acceptance for a Planning Condition to submit a Post-Construction Report to the relevant local authority and the GLA at circularconomystatements@london.gov.uk	Nothing further is required.
10	End-of-life strategy	The Applicant has partially provided an End-of-Life Strategy, including how this will be communicated to future building owners, managers and occupiers and how the building information will be stored.	The Applicant should provide some additional information to describe the end-of-life scenarios for key components and materials, demonstrate how reuse will be maximised and how this will be facilitated by the design.
11	Supporting Documentation	<p>The Applicant has provided the following supporting information as an appendix to the written report:</p> <ul style="list-style-type: none"> Appendix A: WLC and CE workshop meeting minutes Appendix B: Resource waste management plan Appendix C: Operational waste management plan Appendix D: Pre-demolition audit Appendix E: Waste carrier details and landfill capacity Appendix F: Lean design options Appendix G: Scenario modelling for adaptability 	<p>The provision of this information is welcomed.</p> <p>The Applicant is strongly encouraged to incorporate the construction stage GLA waste targets within the SWMP, particularly where the SWMP currently references only 80% construction waste diversion from landfill and 90% demolition waste diversion from landfill (by weight), which does not demonstrate compliance with GLA targets.</p> <p>It is strongly encouraged that the Applicant provide the following additional supporting information as a minimum:</p> <ul style="list-style-type: none"> Cut and fill calculations and/or Excavated - Materials Options Assessment