

GREATER LONDON AUTHORITY

Circular Economy: GLA Consultation

Case Details

1	Development Name	Whitewebbs
2	Applicant	Tottenham Hotspur Football Co Ltd
3	London Borough	Enfield
4	Case Officer	

Planning Application: Proposal

Change of use of former golf course (Use Class F2) to provide a football training centre (Sui Generis) and parkland (Use Class F2), comprising of football pitches and associated infrastructure; change of use, modification and extension of the existing Northern Clubhouse building to provide football training centre and associated uses (Sui Generis); restoration and enhancement of parkland landscape, including new footpaths; reinstatement of historic carriageway in Whitewebbs Wood; modifications of existing Southern Clubhouse to form a replacement cafe and public toilets, alongside a part change of use to include a flexible community space (Use Class F1/F2/Class E); demolition of existing grounds maintenance building and construction of replacement grounds maintenance building; construction of gatehouse; hard and soft landscaping works to include land reprofiling; new vehicular and pedestrian access, including formation of a link to land to the east, and modifications to existing vehicular and pedestrian access and parking; restoration of Whitewebbs Pond; and associated works.

Planning Application: Uses - Floorspace

1	F2	4291	m ²
2	Sui Generis	0	m ²
3			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			m ²

GLA STAGE 1

Document Information

1	Date of Review	16/07/2024
2	Document Title	Former Whitewebbs Park Golf Course Enfield, London Circular Economy Assessment
3	Author	WSP
4	Document Date	Mar-24
5	Template Submitted (Y/N)	Y

Additional Information

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	London Plan Policy SI7 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. 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.	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. Please refer to the below for detailed comments.
1	Development Details	The Applicant has partially provided description of the development.	The scope of the Application is unclear based on the information provided. The Applicant should provide some clarification with respect to the extent of the proposals. The Applicant should provide some 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 confirm that a full breakdown of GIA by use type has been provided where it is noted that Sui Generis is stated as zero.
2	Design Approach	The Applicant has defined the design approach for the existing site.	Please refer to the comments in Rows 30 and 31 below.
2	Design Approach	The Applicant has defined the design approach for the new buildings, infrastructure and layers over the lifetime of the development.	Nothing further is required.
3	Pre-Redevelopment Audit	The Applicant has not provided a Pre-Redevelopment Audit assessing the existing site, including any buildings, structures and materials.	The Applicant should provide a Pre-Redevelopment Audit assessing the existing site, in line with the minimum submission requirements of the GLA guidance. This should provide evidence for the Applicant's responses to the Circular Economy Design Approaches decision tree for the existing site and demonstrate that insitu retention has been fully explored in the first instance.

3	Pre-Demolition Audit	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.	The Applicant should: • Provide an explanation of considerations for developing the site and provide justification for the proposed demolition in line with the strategy set out in the Design Approach table of the template. - <i>Please refer to the comment in Row 30 above.</i> • Provide an assessment of the embodied carbon impacts of demolition and explain how any negative impacts will be mitigated and offset. • Provide a summary of the key components and materials present in the existing buildings, with an estimate of the associated embodied carbon and whether they are suitable for reclamation. • Identify opportunities for the reuse and recycling of materials either within the proposed development or off-site nearby/locally or further afield. • Explain how the value of existing building elements or materials can be recovered. • Provide a schedule of practical and realistic providers who can act as brokers for each of the reclaimed items. • Provide target reuse and reclamation rates. - <i>The Applicant is encouraged to provide separate reuse and recycling rates with respect to components and materials.</i>
4	Design Principles	The Applicant has partially summarised the key commitments in the Circular Economy Design Principles by Building Layer.	The Applicant should ensure that the Circular Economy Design Principles table captures the measures and commitments as set out in the written report, including project specific detail, with a focus on where the development goes beyond standard practice. For example, retention of existing buildings and structures, use of CLT, disassembly techniques for CLT structure. The Applicant should further consider how waste will be designed out in use (i.e. through maintenance and replacement cycles).
5	Bill of Materials	The Applicant has completed the Bill of Materials including metrics through module stages A to D.	As far as possible at this stage the Applicant should provide full details of FFE and external works in the Bill of Materials. The Applicant is strongly encouraged to demonstrate further consideration of design for disassembly in the Bill of Materials, particularly with respect to MEP where it is expected that this will be designed for disassembly to facilitate ease of replacement and maintenance.
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 not clear how the 2% reused and recycled content by value has been determined. The Applicant should provide additional detail within the calculation in line with the methodology in Appendix 3 of the LPG. If determined from the WLC software it would be requested that a screenshot of the calculation in the software be provided as supporting evidence. Where it is noted that the figure currently stated does not demonstrate compliance with the GLA Policy target for a minimum of 20% reused and/or recycled content 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.	The Applicant should provide an estimate of the overall construction and municipal / industrial waste arising and provide relevant cross reference. It is accepted that this will be a high-level estimate at this stage. Typically, these are cross referenced from the Site Waste Management Plan (please refer to Row 52) and Operational Waste Management Plan (please refer to Row 42) respectively. It is noted that the excavation estimate is very high. The Applicant should review and provide clarification, including revision as necessary. The Applicant should note that excavation waste should be reported in tonnes. The Applicant should also provide clarification where the excavation waste estimate provided in the Bill of Materials differs from the Recycling and Waste Reporting table.

6	Recycling and Waste Reporting	The Applicant has partially provided a breakdown of waste management routes in the Recycling and Waste Reporting table which demonstrates compliance with London Plan Policy SI 7 targets for diversion of 95% (by weight/tonnage) construction and demolition waste from landfill and 95% (by weight/tonnage) beneficial reuse of excavation waste.	The Applicant should provide a breakdown of the expected waste management routes for construction waste and operational waste. The Applicant is strongly encouraged to further explore the breakdown of waste management routes to demonstrate how residual value will be maximised in line with the Circular Economy and Waste Hierarchies. This should be explored particularly with respect to the excavation waste where it is understood from the SWMP that the majority of this material will be reused on-site as part of the site fill.
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, SI 7 and D6.	The Applicant should provide an Operational Waste Management Plan in line with the minimum submission requirements of the LPG. This should demonstrate how the proposed development will achieve the relevant targets and meet requirements of London Plan Policies D3, SI 7 and D6. The Applicant should refer to Section 4.8 of the LPG for further details.
7	Operational Waste	The Applicant has included a commitment to meet or exceed the London Plan Policy SI7 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 the commitments to meet or exceed the London Plan Policy SI 7 municipal waste recycling target of 65% (by weight/tonnage) by 2030 or business waste recycling target of 75% (by weight/tonnage) by 2030 within 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 partially provided a brief explanation of how performance against each of the key policy targets will be secured through design, implementation and monitoring.	The Applicant should provide some additional information in the Circular Economy Targets table to describe how each of the policy targets will be secured, considering key actions post planning (through detailed design and construction), including the questions 'who, what, when, and how?'
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 circulareconomystatements@london.gov.uk	Nothing further is required.
10	End-of-life strategy	The Applicant has not 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 an End-of-Life Strategy as per the GLA's Guidance, including how this will be communicated to future building owners, managers and occupiers and how the building information will be stored.
11	Supporting Documentation	The Applicant has provided the following supporting information as an appendix to the written report: • Bill of Materials and EoL Scenarios • Pre-Redevelopment / Pre-Demolition Audit • Municipal / Operational Waste Management • Structural Optioneering • Circular Economy Workshop Presentation Slides	The provision of this information is welcomed. It is strongly encouraged that the Applicant provide the following additional supporting information as a minimum: • Scenario modelling demonstrating adaptability

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Full Application - Circular Economy

GLA POST STAGE 1

Date of Applicant's Response	06/05/2025	Date of GLA Response	Date of Applicant's Response
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Applicant's Stage 1 Response		GLA Post Stage 1 Response	
Description	Description	Description	Description
Please see revised CES report and spreadsheet.			
The planning application clearly describes the proposal through the description of development. Further details are set out within the supporting application documentation. Notably, given the scale of development proposed, a "Navigating the Planning Submission" has been prepared to assist all parties in navigating the suite of supporting documentation.			
Please see GIA breakdown in updated Circular Economy Template.			
Please see the Pre-Redevelopment Audit produced by WSP with the relevant diagram in Figure 2 on Page 3 of this report.			

Please see the Pre-Redvelopment Audit which includes the following:

- Overview of the sites and key constraints (page 4)
- Summary of the existing buildings and material construction (page 6-8)
- Carbon analysis of 3 development options: retain and retrofit, retain and extend and demolish and rebuild (page 9-11)

Please see the Pre-demolition Audit for the following information:

- Summary of the key components and materials present in the existing buildings, with an estimate of the associated embodied carbon and whether they are suitable for reclamation: Present on page 8, 10, 12
- Provide target reuse and reclamation rate: Present on page 8, 10, 12

The Circular Economy Principles table has been reviewed and the following was considered, as included in the report:

- Repetition of structural slabs to allow for reuse of formwork on other levels.
- The façade will be reviewed regarding extracting materials at end of life for recycling and reuse. In particular, any metal componentry or sheets.
- Interior finishes will be designed with layer independence to enable dismantling at the end of the service life.
- Plastic-free components and building materials are

Due to the stage of the design % assumptions have been included in line with RICS for the FFE and external work. These will be updated in the detailed design stage when further information is available.

In line with the MEP services, the design for disassembly has been reviewed and updated in the CES spreadsheet.

Please see updated calculations. Due to the limited data available at the time, the % total recycled content by value is 53.6% but this is only based on 2% of the projects buildings material value. However, this will be upated at the next stage to include a larger propertion of the projects materials by value and the figures will be managed to stay in line with the 20% recycled content by value target.

The muncipal waste routes expected with bin provisions are included in Table 4.1 (p.9) of the OWMP. Likely construction waste types included in Table 4.1 (P.10) of SWMP and anticipated construction waste split across the north and south clubhouse buildings can be found on p10-11 of the SWMP.

The excavation waste has been revised by the waste consultant and updated in the GLA spreadsheet. The calculations are based on the information provided by the client. In line with the CE goals the project will aim to divert 95% of the excavation waste to a beneficial use.

An overview of the breakdown of the waste management routes for the excavation waste for the northern clubhouse (p. 10, SWMP) and southern clubhouse (p.11, SWMP) alongside the cut and fill waste processing is included on p.12 of the SWMP.

Additionally, the waste onsite will be processed, classified and effectively disposed of can be seen on pages 10-12 of the OWMP and 12-14 of the SWMP. With best practice principles to reduce waste included on page 7 of the SWMP.

Please see the OWMP produced by JNP Group which includes all relevant targets i.e. recycle 65% of municipal waste and 75% of business waste by 2030 (p.6 of the OWMP).

This target is included as part of the OWMP on page 7. Both of these goals are included as part of the Circular Economy Strategy, please refer to report.

Noted, further considerations will be included in the and these changes have been included in the updated Circular Economy Spreadsheet.

Further details are expected to be developed during the later stages of design, with the appropriate specialist contractor input. Sustainability fit out guide is expected to be used as the basis for green contract mechanism between landlord and tenants - this will include information about operational energy performance and it also sets out the requirements to adhere to the suggested waste streams for different materials following the Circular Economy Hierarchy.

In regards to adaptability demonstrated within the project please refer to Section 4.4. (p11-12) please see some examples below:

There is a mix of elements that may be considered in relation to layer independency, as follows: the Glulam frame and CLT Floor and Roof system, the brick façade elements, and the timber exterior cladding. The specification of this material independence ensures flexibility in the design. In line with this the following layers have been identified as follows in line with individual lifespans.

The structural frame was arranged in a regular grid to efficiently support the CLT floor. Whilst the MEP Services and superstructure have been designed to allow for future adaptation through allowing for levels to be removed/replaced and service risers being accessible for development.

Statement

Applicant's Post Stage 1 Response

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