

GREATER LONDON AUTHORITY

REQUEST FOR MAYORAL DECISION – MD2962

Title: London Plan Guidance – Whole life carbon and circular economy

Executive summary:

This Mayoral Decision form seeks the Mayor's agreement to the adoption of two London Plan Guidance (LPG) documents that provide additional guidance relevant to the implementation of specific policy areas in the London Plan as follows:

- Whole Life-Cycle Carbon (WLC) assessments (Policy SI 2 – minimising greenhouse gas emissions)
- Circular Economy (CE) statements (Policy SI 7 – reducing waste and supporting the CE).

This will help boroughs, developers and other stakeholders and help ensure the delivery in practice of key London Plan objectives.

Decision:

That the Mayor approves the Circular Economy Statements and Whole Life-Cycle Carbon Assessments LPG documents for adoption as further guidance to the London Plan 2021, taking into account the accompanying Equality Impact Assessments and consultation reports.

Mayor of London

I confirm that I do not have any disclosable pecuniary interests in the proposed decision and take the decision in compliance with the Code of Conduct for elected Members of the Authority.

The above request has my approval.

Signature:



Date:

16/3/22

- 2.5. The technical detail set out in the WLC LPG is critical to the implementation of the London Plan policy to reduce greenhouse gas emissions and will help to embed consideration of WLC in the design of buildings. This will contribute to the Mayor's commitment to making London a zero-carbon city.

Circular Economy Statements LPG

- 2.6. A CE is defined as one where materials are retained in use at their highest value for as long as possible and are then reused or recycled, leaving a minimum of residual waste. CE statements are intended to demonstrate how a development will incorporate CE measures into all aspects of the design, construction and operation process, therefore encouraging development that is designed to eliminate waste, conserve resources, and manage waste sustainably at the highest value.
- 2.7. The CE Statements LPG explains how to prepare a CE statement as required by Policy SI 7 of the London Plan for development proposals that are referable to the Mayor.
- 2.8. A key aspect of this guidance concerns approaches to reusing and demolishing existing buildings. The guidance sets out a hierarchy, with retention and retrofit of existing buildings at the top and demolition at the bottom. A 'decision tree' sets out a series of questions for a proposed scheme, which inform the approach to retention and/or demolition. A crucial question asks whether the existing building (or parts of it) is suited to the requirements for the site, and the guidance explains that, where disassembly or demolition is proposed, applicants should set out how the options for retaining and reconstructing existing buildings have been explored and discounted, and show that the proposed scheme would be a more environmentally sustainable development.
- 2.9. This aspect of the guidance reflects the balance that needs to be struck when considering the most sustainable approach to designing a development where there are existing buildings: on the one hand, the importance of keeping embodied carbon in situ; on the other hand, the need to accommodate Good Growth through sustainable patterns of development. It is right to want to reduce demolition and reuse buildings wherever possible but there are situations where insisting on this would fail to optimise a site – for example, a low-density retail park close to public transport. The guidance recognises that different approaches will need to be taken on different sites; and allows an opportunity for applicants to justify the approach proposed.

Templates

- 2.10. Both the WLC Assessments LPG and CE Statements LPG require the submission of a spreadsheet by applicants. Templates have been created for this (Appendix G and Appendix H) and these contain some technical calculations. Following adoption of the guidance, situations may arise where these templates require technical updates, and these may in turn require minor changes to the relevant part of the LPG. Given the limited nature of such changes, the decision to make these changes would be expected to be taken under the General Delegation rather than through a further Mayoral Decision.

3. Equality comments

- 3.1. The Mayor and the GLA are subject to the public sector equality duty, as set out in section 149 of the Equality Act 2010. The London Plan and its policies plan for growth on the basis of its potential to improve the health and quality of life of all Londoners, to reduce inequalities and to make the city a better place to live, work and visit. It uses the opportunities of a growing and changing city to plan for a better future, and for planning decision to be focused on improving London, transforming the city over time. It plans not just for growth, but for Good Growth – sustainable growth that works for everyone.
- 3.2. Objective GG1 of the London Plan – building strong and inclusive communities – makes it clear that Good Growth is inclusive growth. This objective underpins the policies in the Plan, which will help to address inequality in a broad range of different ways. The London Plan 2021 was subject to an

- 4.6. Consultation on the draft guidance was held between 13 October 2020 and 15 January 2021. Details of the consultation are set out in the consultation reports attached at Appendix C and Appendix D.

Engagement – Whole Life-Cycle Carbon Assessments LPG

- 4.7. Engagement on the WLC Assessments LPG included workshops at an early stage with developers and housing associations, professional bodies and industry professionals. A webinar was also held with boroughs, and the approach was presented at a technical seminar in the run-up to the London Plan EiP. This was open to members of the public and those involved in the EiP, including the panel of Planning Inspectors. These various sessions informed the development of the draft guidance. A webinar was held during the formal consultation, attended by over 240 people.
- 4.8. There was strong overall support for the WLC LPG, with 86 per cent of respondents to the consultation survey agreeing or strongly agreeing with the approach set out in the draft guidance.
- 4.9. The main issues raised by respondents related to obtaining accurate data for different modules and stages of assessment, the scope of assessments, securing requirements to report the data, verification of data and the complexity of assessing grid decarbonisation. The guidance has been updated in response to these issues, including updates to the processes and reporting requirements. Suggested wording has also been made available to help boroughs secure the post-construction assessment as part of legal agreements.

Engagement – Circular Economy Statements LPG

- 4.10. Engagement on the CE Statements LPG included a number of technical meetings with specialist consultants prior to the formal engagement. During formal engagement, three webinars were held, attended by around 100 people in total.
- 4.11. There was strong overall support for the CE Statements LPG. All respondents to the consultation survey agreed with the high-level principles set out in the guidance.
- 4.12. The main issues raised were around the timing of information at different stages in the planning process and suggesting further clarity around the processes involved and the specific information required for CE statements. There were also various comments made about the way the guidance seeks to prioritise reuse over demolition, with the general thrust being a desire to ensure reuse and minimise waste. The guidance has been updated to reflect many of the suggestions made, including making the requirements at different stages clearer and amendments to the 'decision tree' that guides approaches to reuse and demolition.

5. Financial comments

- 5.1. The decision has no direct financial implications.

6. Legal comments

- 6.1. There is no statutory power that expressly deals with the development of the LPG in the Greater London Authority Act 1999 (as amended) (the GLA Act). However, the LPG is developed in accordance with the general power in section 30 of the GLA Act,¹ which gives the GLA the power to do anything that it considers will further any one or more of its principal purposes, namely promoting economic development and wealth creation in Greater London; promoting social development in Greater London; and promoting the improvement of the environment in Greater London. The LPG will further all three principal purposes to some extent, in particular promoting social development and the improvement of the environment. In addition, section 34 of the GLA Act

¹ <https://www.legislation.gov.uk/ukpga/1999/29/part/II>

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will either be published within one working day after it has been approved or on the defer date.

Part 1 – Deferral

Is the publication of Part 1 of this approval to be deferred? NO

Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under the FoIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form – NO

ORIGINATING OFFICER DECLARATION:

Drafting officer to
confirm the
following (✓)

Drafting officer:

Rob McNicol has drafted this report in accordance with GLA procedures and confirms the following:

✓

Sponsoring Director:

Phil Graham has reviewed the request and is satisfied it is correct and consistent with the Mayor's plans and priorities.

✓

Mayoral Adviser:

Jules Pipe has been consulted about the proposal and agrees the recommendations.

✓

Advice:

The Finance and Legal teams have commented on this proposal.

✓

Corporate Investment Board

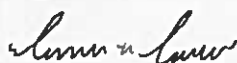
This decision was agreed by the Corporate Investment Board on 14 March 2022

✓

EXECUTIVE DIRECTOR, RESOURCES: Enver Enver on behalf of David Gallie

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

Signature



Date

14/3/22

CHIEF OF STAFF:

I am satisfied that this is an appropriate request to be submitted to the Mayor

Signature



Date

13/3/22