

GLA Planning

# Whole Life-Cycle Carbon Assessments LPG

## Consultation summary report

March 2022

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**Greater London Authority**

**March 2022**

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## 1. Introduction

On 19 October 2020, the Greater London Authority (GLA) launched a consultation on the Mayor's draft Whole Life-Cycle Carbon (WLC) Assessment London Plan Guidance (LPG) and WLC assessment template. The consultation closed on 15<sup>th</sup> January 2021. An online seminar was held during the consultation, attended by 243 people.

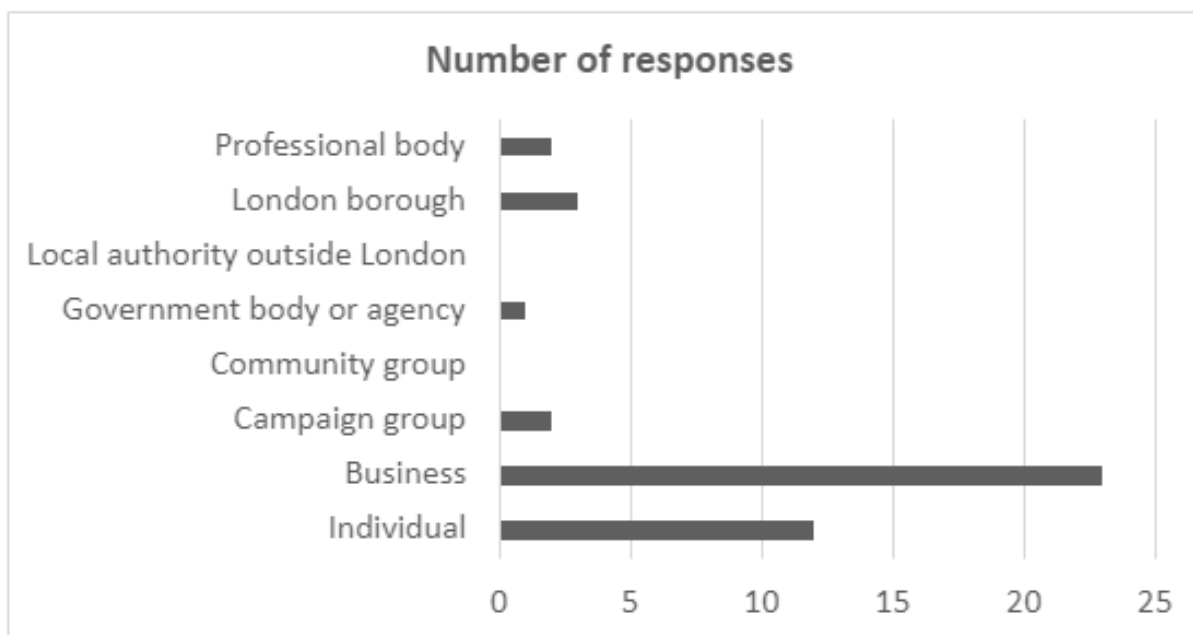
Fifty written responses were received. This document provides a summary of the consultation responses received. The Mayor would like to thank everyone who took part for engaging with the guidance.

## 2. Who took part?

### Formal consultation survey

Respondents were asked what type of organisation they represent or whether they were responding as an individual. Forty-three respondents answered this question.

Respondent type	Number	Percentage
Individual	12	28%
Business	23	54%
Campaign group	2	5%
Community group	-	-
Government body or agency	1	2%
Local authority outside London	-	-
London borough	3	7%
Professional body	2	5%
<b>Total</b>	<b>43</b>	



Respondents were also asked equality monitoring information in order to assess how representative survey respondents were compared to the demographics of Londoners. The number of responses received on those questions was limited and therefore the relevant analysis has not been included in this consultation summary report.

### Other engagement

Other engagement was undertaken prior to the formal consultation, including:

- Technical meetings with London boroughs
- Technical meetings with industry representatives
- A technical seminar with Planning Inspectors and members of the public

Equality monitoring information was not collected for these engagements.

## 3. Consultation feedback and GLA response

As part of the engagement on the draft guidance, respondents to the formal consultation survey were asked to submit responses to specific questions, which are summarised here.

This section also includes responses through the **other engagement channels** noted above. However, the key issues that arose from these were also raised in response to the formal consultation survey so, to avoid repetition, **are marked with a \*** within this report.

### 3.1. Overall approach

#### Q1 To what extent do you agree or disagree with the approach set out in the draft guidance?

Forty-three respondents answered this question. Eighty-six per cent agreed with the approach set out in the guidance and eleven per cent somewhat or strongly disagreed.

Response	Number	Percentage
Strongly agree	19	44%
Somewhat agree	18	42%
Neither agree or disagree	1	2%
Somewhat disagree	4	9%
Strongly disagree	1	2%
<b>Total</b>	<b>43</b>	

### 3.2. Process and methodology

#### Q2 To what extent do you agree or disagree that the process and methodology in the guidance is clear?

Forty-three respondents answered this question. Seventy-nine per cent agreed with the process and methodology and fourteen per cent somewhat disagreed.

Response	Number	Percentage
Strongly agree	8	19%
Somewhat agree	26	60%
Neither agree or disagree	3	7%
Somewhat disagree	6	14%
Strongly disagree	0	0%
<b>Total</b>	<b>43</b>	

### Q3 Please tell us if you have any comments on the process and methodology and/or if you have any suggestions for how this could be improved.

Thirty-six respondents provided comments. Respondents suggested that:

- More guidance is needed on the best available data sources, particularly when Environmental Product Declarations (EPDs) are not available.
- There is a lack of data available for mechanical, electrical and plumbing engineering (MEP) products, but CIBSE's TM65 document provides a consistent approach that the guidance should reference.
- Refurbishment, instead of new construction, should be prioritised where it is appropriate by including the carbon emissions from pre-construction demolition in the assessment, as well as the carbon savings from the retention of existing buildings, structures and materials.\*
- Standardised assumptions for the life-cycle modules with a lower carbon impact – for example, modules B2 and B3, should be provided in the guidance, allowing applicants to focus attention on modules with a higher carbon impact.
- Clarity is needed on the scope of assessment for shell only and shell and core buildings, including the scope of fixtures and fittings and services that should be included.
- The guidance should confirm that planning conditions should be secured for the WLC post-construction assessment and example wording provided.
- A requirement for a third party review could be introduced.
- Clarification is needed on whether the guidance applies to infrastructure projects.

#### GLA response

We have reviewed the suggestions on improving the list of **data sources** and have updated the guidance accordingly.

References to the **CIBSE TM65** document have been included in the updated guidance.

The WLC policy is intended to prioritise **refurbishment and the retention of existing buildings, structures and materials** where this is appropriate, as explained in the guidance. However, we agree that this could be made clearer by including a requirement for developers to fully consider options for retaining existing buildings before substantial demolition is proposed and capturing pre-construction demolition emissions in the assessment. The guidance and assessment template have been updated accordingly.

**Standardised assumptions** can be helpful, but they do not take into account the individual circumstances of a development. For example, emissions from module B1

can be very high for developments where, for example, refrigerant leakage is expected. The GLA would therefore expect this and other sources of emissions to be considered carefully for each development. The guidance has been updated with further information on how to calculate carbon emissions for different modules, including modules B2 and B3.

The **scope of the assessment** should be aligned with what is included in the project brief and cost plan. We have updated the guidance to confirm this. In addition, we have provided an indicative list of elements that we would expect to be included as a minimum.

The guidance has been updated to confirm that **local authorities should secure post-construction assessments by condition or through a legal agreement with the planning applicant**. Draft wording has been shared with local authorities and is available on our website.

As stated in the guidance, the GLA scrutinises all WLC assessments submitted with referable applications, similar to our scrutiny of energy statements. However, we expect planning applicants to submit high quality data and undertake due diligence to ensure it is accurate. **Third party review** is an important aspect of this and applicants will now need to confirm via the updated template that the submission has been quality assured by a third party.

**Infrastructure projects** that are referred to the Mayor should also comply with the WLC policy and guidance with reference to the PAS 2080 – carbon management in infrastructure framework. This has been referenced in the updated guidance.

### 3.3. Grid decarbonisation

#### Q4 To what extent do you agree or disagree with the approach to grid decarbonisation?

Forty-two respondents answered this question. Forty-eight per cent agreed with the approach and forty-three per cent disagreed.

Response	Number	Percentage
Strongly agree	7	17%
Somewhat agree	13	31%
Neither agree or disagree	4	10%
Somewhat disagree	10	24%
Strongly disagree	8	19%
<b>Total</b>	<b>42</b>	



**Q5 If you disagree with our approach to grid decarbonisation, please tell us why and if you have any ideas for how it could be improved.**

Thirty-two respondents provided comments. Respondents suggested that:

- The principle of requesting two assessments (one based on the current status of the electricity grid and a second based on its expected decarbonisation) was generally supported, but many felt that the approach was too complicated and may not be possible to implement. Respondents suggested that to reduce the reporting burden only one assessment should be required.
- As Standard Assessment Procedure (SAP) is intended for operational emissions not embodied emissions, it would be more appropriate for module B6 only to use SAP emission factors.
- The decarbonisation assumptions used for Assessment 2 should be updated in the guidance regularly, with several respondents suggesting alternatives to the proposed use of the Future Energy Scenarios 2050 'steady progression'.
- Heat will be decarbonised, not just electricity, and this needs to be accounted for in the assessment, with more detailed guidance on how to calculate the decarbonised values.

**GLA response**

We recognise the impact that a decarbonising electricity grid will have on WLC assessments. However, we agree with many of the issues raised on the complexity of the proposed approach and, in response, we have simplified it. Specifically, the guidance (and assessment template, where necessary) have been updated as follows:

- **Applicants now only need to provide Assessment 1.** In reporting module B6, this should align with the emissions reported in the energy strategy and using the same carbon emission factors in line with the Energy Assessment Guidance (EAG).
- **Assessment 2 will no longer be required.** We accept that requiring this additional assessment at this time would result in complex manual workarounds and that instead accounting for the decarbonisation of the electricity grid should be built into the available software tools. Industry is seeking to address this issue and any updates will be considered as part of future guidance updates. Applicants wishing to account for long-term grid decarbonisation in their WLC assessment should discuss and agree their proposed approach with the GLA.
- The **decarbonisation of heat** over time is complex and uncertain and is largely dependent on decisions national government will make in the coming years. There is currently no clear guidance on how to account for the decarbonisation of heat in decision-making and so we do not think it is appropriate to request it at this time.

### 3.4. Whole life-cycle carbon assessment template

#### Q6 To what extent do you think that the whole life-cycle carbon assessment template is clear and easy to use?

Forty-two respondents answered this question with fifty per cent agreeing that the template is very, or somewhat, easy to use. Twenty-three per cent thought it was difficult to use.

Response	Number	Percentage
Very easy	8	19%
Somewhat easy	16	38%
Not sure	8	19%
Somewhat difficult	9	21%
Very difficult	1	2%
<b>Total</b>	<b>42</b>	

#### Q7 Please tell us if you have any comments on how the template could be improved and/or what additional or alternative things could be included.

Thirty-one respondents provided a response. Respondents suggested that:

- Improvements could be made to make the template more user-friendly and reduce the reporting burden, including clearer guidance on the steps to follow to complete it.
- A worked example of the template could be provided as well as technical webinars.
- The requirement set out in the guidance for a minimum of 95 per cent of the cost to be allocated to each building element category should be integrated into the template with the addition of a separate tab for the Quantity Surveyor to provide quality assurance. In addition, clarity is needed on what the 95 per cent cost includes, for example – materials, transport of the materials.
- An accurate calculation of module D is challenging at planning stage and further guidance is needed.\*
- As material quantities in kilograms are not always available, for example – concrete is typically measured in m<sup>3</sup>, this needs to be accounted for in the guidance.

- The template should require refrigerant leakage and assumptions to be reported separately as the impact can be significant.

### GLA response

The template has been designed to **reduce the reporting burden** as far as possible, but it is important that all life-cycle stages are captured to allow for the full carbon impact of the development to be understood. We have taken on board a number of suggestions to make the template more user-friendly, such as removing the requirement to produce two assessments (see Grid Decarbonisation section for further information). The changes have been listed in the template.

Provision of a **worked example of the template** will be kept under review as more assessments are received. At this early stage there are a limited sample available and there is the potential that providing a worked example could limit ambitions in reducing WLC emissions if this were treated as a minimum standard or set approach. The template provides an email address that applicants can use for queries and which has also been added to the guidance document. We will consider what additional support applicants may need on an ongoing basis.

The **minimum 95 per cent cost requirement** has been integrated into the template and the guidance has been updated to confirm the scope of the assessment. The guidance also now recommends that, as part of the third-party review of the submitted WLC assessment, a Quantity Surveyor should approve the information submitted to fulfil the 95 per cent cost requirement.

Applicants should use the information from their Circular Economy Statement to report against **module D**. The guidance has been updated to make this clearer.

The mass of each material is required to ensure a common metric is used to report the **quantity of materials** and allows a material intensity (kg/m<sup>2</sup> GIA) to be estimated also. Where materials are measured in alternative metrics, such as m<sup>3</sup>, these should be converted into kilograms by applying material densities.

The template now includes a new row to disclose what assumptions have been made relating to **refrigerants** including refrigerant type, initial charge, assumed leakage rate, end of life recovery rate and Global Warming Potential (GWP).

### Q8 To what extent do you agree or disagree with the reporting requirements at each planning stage: pre-application, application submission and post-construction?

Forty-one respondents answered the pre-application element of this question. Fifty-four per cent of respondents agreed with the pre-application stage reporting requirements and twenty-four per cent disagreed.

Forty-one respondents answered the application submission element of this question. Sixty-eight per cent agreed with the application submission stage reporting requirements and twenty per cent disagreed.

Forty respondents answered the post-construction element of this question. Eighty-five per cent of respondents agreed with the post-construction stage reporting requirements and thirteen per cent somewhat disagreed. No one strongly disagreed.

Response	Pre-application	Application submission	Post-construction
Strongly agree	14 (34%)	10 (24%)	16 (40%)
Somewhat agree	8 (20%)	18 (44%)	18 (45%)
Neither agree or disagree	9 (22%)	5 (12%)	1 (2%)
Somewhat disagree	6 (14%)	7 (17%)	5 (13%)
Strongly disagree	4 (10%)	1 (3%)	0 (0%)
<b>Total</b>	<b>41</b>	<b>41</b>	<b>40</b>

### Q9 Please tell us if you have any comments on the reporting requirements for the pre-application stage?

Thirty-one respondents provided comments. Respondents suggested that:

- The list of principles should be reduced so that it is less prescriptive. Additional guidance on how to use them should be provided including confirmation of whether applicants have a choice as to which principles to apply.
- The information sought at pre-application should also be requested at subsequent stages to allow for progress to be monitored.
- The information being requested is too detailed as design details will not be available at this early stage. It was also suggested that asking for commitments to specific materials at this stage, which may only be selected purely due to EPD availability at the time, would prevent applicants from choosing newer, better materials later on in the design and construction process.
- As pre-application submissions can't be enforced because the pre-application process is voluntary; how will the GLA ensure the requested information is submitted?

## GLA response

The **list of principles** serves as a checklist for design teams, encouraging them to consider WLC in its entirety starting from the earliest stages of design and throughout the project. No principles have been removed as each has a function and there was no general agreement among respondents as to how the list could be narrowed down. However, further guidance has been provided on how the principles should be used from the earliest stages and throughout detailed design to identify where further carbon savings can be found.

The guidance has been updated to encourage applicants to **utilise the principles** before submitting a WLC assessment, at pre-application stage and throughout the assessment process as the design of the development progresses.

**A detailed assessment is not required at pre-application stage** and it is not expected that the final materials that will be used will be known at this stage. The information submitted will be based on estimates and assumptions that may be altered as the design progresses and as an understanding of the WLC opportunities are identified and acted upon. Applicants are not prevented from selecting newer, lower carbon materials later down the line.

**The pre-application process is voluntary** and therefore this stage of the WLC assessment will only be required for developments utilising the pre-application process. Any planning application that doesn't go through the pre-application process is encouraged to use the WLC principles to support the development of their WLC assessment in the earliest stages of design and at the planning application submission post-construction stages.

## Q10 Please tell us if you have any comments on the reporting requirements for the application submission stage?

Thirty-one respondents provided comments. Respondents suggested that:

- The level of information requested is too detailed as design is usually not sufficiently progressed at this point meaning the assessment will be based on estimates and assumptions that will change as the project progresses.
- The guidance should advise planners and design teams of the inevitable variations that will result between different stages of the assessment as design progresses and decisions on materials, for example, are taken. It should note that the reported predictions should not be used to formulate conditions and legal requirements.
- It can be difficult to decide the end use of a building and therefore assumptions could be provided to standardise this, along with case studies to share best practice.\*

- The full list of expected lifespans (that is – Table 9 of the Royal Institution of Chartered Surveyors Professional Statement: Whole Life Carbon assessment for the built environment (RICS PS)) for all building elements and components should be included in the reporting requirements, including at post-construction stage.
- The guidance needs to provide further information on sources of data for default values.
- Further guidance is needed for different application types, for example – for an outline masterplan application that will be developed in phases the design details for individual plots will not be available.

### GLA response

We will continue to require a **complete WLC assessment** against the criteria set out in the guidance and the template. Planning applicants have been submitting WLC assessments to us since summer 2020 and this indicates that enough information is available to make assumptions and estimates to inform the assessment. The guidance has been updated to confirm that assumptions and estimates made at planning stage can be expected to change as the design develops.

We agree that **planners and design teams** should be aware that results are likely to change throughout each stage of the assessment and that conditions (or legal agreements) should not enforce these predictions. It is widely recognised that WLC assessment and reporting is at the early stages of adoption and consistency between tools and assessment methods are needed. The GLA's policy is intended to support this necessary evolution of WLC assessment over time. As stated above, the guidance has been updated to recognise that variations between stages are to be expected.

The Circular Economy Statement will contain the required information to inform the assumptions about the **end use of a building**. Planning applicants should refer to the associated guidance. The WLC guidance has been updated to make this link clearer.

The guidance already specifies that, prior to the post-construction stage, Table 9 of the RICS PS should be used to estimate **lifespans for building elements and components** unless specific lifespan values for building elements and components are available. This has been confirmed in the guidance and the template has been updated to clarify where lifespan information should be inserted.

We have updated the guidance to include more information on the best sources to use to obtain **default values** and the template has been updated to allow applicants to record the source of the values used.

The guidance has been updated to provide information on how and when to submit a WLC assessment for **other types of planning application**.

### Q11 Please tell us if you have any comments on the reporting requirements for the post construction stage?

Thirty-two respondents provided comments. As the information requirements at this stage are similar to the application submission stage many of the same issues were raised and so we have not repeated those here. Respondents also suggested that:

- They were supportive of the proposal to require a post-construction stage submission and recognised the multiple benefits in doing so, including understanding the performance gap between design and reality and the benefits of having data that will improve industry understanding of how to design to reduce WLC emissions.\*
- Explicit requirements could be introduced about which building materials or products (as a minimum) must be accompanied by Type III externally verified EPDs. Such a requirement will drive change in the industry and facilitate the collation of robust datasets for the post-construction stage assessments.
- The GLA should explain what it will do with the data submitted. It will be a highly valuable resource for the construction industry to use and learn from across the UK and it should be shared publicly.\*

### GLA response

We are encouraged to see the level of **support for the post-construction stage assessment**. The comments received indicated a strong understanding among respondents of the importance of this part of the assessment.

We understand the request for more explicit requirements on **building products which should be accompanied by an EPD**. However, this would be too prescriptive to set out in practice. Ideally all products would be accompanied by an EPD, however we know that EPDs are lacking in some areas (in particular for MEP elements) and so we encourage applicants to identify EPDs for as many products as possible. Where they aren't available the revised hierarchy of acceptable data sources that we have set out in the updated guidance should be followed.

The **data submitted** at pre-application and planning stages will be available publicly on local authority planning portals as is the case for all planning application-related documents. The post-construction data will be stored securely by the GLA. We understand the benefits of sharing the data and we are in discussions with industry about how this might be done.

### 3.5. Benchmarks

#### Q12 To what extent do you agree or disagree with the proposed benchmarks in the guidance?

Thirty-nine respondents answered this question. Sixty-two per cent agreed with the benchmarks and fifteen per cent somewhat disagreed. No one strongly disagreed.

Response	Number	Percentage
Strongly agree	7	18%
Somewhat agree	17	44%
Neither agree or disagree	9	23%
Somewhat disagree	6	15%
Strongly disagree	0	0%
<b>Total</b>	<b>39</b>	

#### Q13 Please tell us any comments you have on the proposed benchmarks and suggestions you have for additional or alternative benchmarks.

Thirty-four respondents answered this question. Respondents suggested that:

- Benchmarks are needed for the full range of residential uses, including houses and flats and could also be developed for: shell and core developments, module D and for mixed-use typologies.
- Further information is needed on the project data underpinning the benchmarks, for example – building height, structural system, basement levels etc. and where assessment boundaries are drawn.
- The benchmarks should be informed by more data, though there was a general understanding that there is currently a lack of data available and the WLC policy will be a valuable tool in filling this data gap.
- It will be important to keep the benchmarks under review as data availability increases and for there to be consistency with other initiatives that have been progressing work in this area since the draft guidance was published.\*
- Different software tools and the varying quality of EPDs will affect WLC results and their comparison to the benchmarks. To address this, software tools should be harmonised.
- The benchmarks should be based on Net Internal Area (NIA) not GIA (Gross Internal Area) to align with RICS and should align with the latest carbon emission factors.
- The guidance should confirm whether carbon sequestration is included in the benchmarks.



- Further clarity is needed on whether the benchmarks hold any planning weight, and whether planning permission will depend on meeting the benchmarks either now or in the future.\*

## GLA response

**The benchmarks have been updated**, including re-naming the ‘apartment/hotel’ benchmark a ‘residential’ benchmark. Benchmarks for shell and core developments and for module D have not been provided due to a lack of available data at the current time. Benchmarks have also not been developed for mixed-use typologies due to the wide variety of potential developments that this category could contain. Explanation has been provided in the guidance on how shell only and mixed-use developments are treated against the benchmarks.

The **project data underpinning the benchmarks** is based on shell and core and CAT A finishes. This has been confirmed in the guidance. While we appreciate that this will create some inconsistency in how developers with a shell only scope, for example, report against the benchmarks, this does not put them at a disadvantage and will be noted during the review process.

As part of their consultation response Cundall (who we commissioned to produce the original benchmarks) have, in conjunction with the London Environment Transformation Initiative (LETI), identified **additional project data** which has been used to update the original benchmarks. Following a review of the data underpinning the updated benchmarks we have decided to adopt them in the updated guidance.

We understand the importance of **keeping the benchmarks under review**. We intend to do so, but to allow industry time to adapt to the updated benchmarks and guidance we don’t anticipate that this will be needed for at least 2-3 years. We will continue to work closely with industry and other initiatives and organisations that are developing benchmarks during this time.

The GLA does not have control over the development of **software tools** and does not consider it appropriate to mandate one particular tool. There is work to do to create more consistency between tools and we encourage software tool developers along with industry to address this challenge. We have already begun to see this happen since the draft guidance was published. Quality standards exist for EPDs and carbon data and the updated hierarchy of data sources in the guidance clarifies what data we consider to be appropriate.

The data underpinning the benchmarks uses **GIA**, therefore the benchmarks also use GIA to ensure consistency. Carbon emission factors are defined within the software tools and EPDs used. We do not have control over these factors but encourage the latest available carbon factors to be used.

**Sequestered carbon** is included in the combined module A-C benchmarks. This has been confirmed in the guidance.

**The WLC benchmarks are not policy targets.** However, our expectation is that the data gathered can be used to inform targets in the future to drive performance. We would expect most developments to be able to meet, and ideally exceed the WLC benchmarks. However, there may be exceptions and this will be reviewed case by case.

### 3.6. Omissions and further comments

#### Q14 Are there any omissions or areas where additional guidance would be helpful?

Thirty-one respondents answered this question. The following omissions were noted:

- A definition of Modern Methods of Construction (MMC) should be provided, along with information on how it should be estimated.
- The WLC policy should be applied to major developments as soon as possible as these developments account for significant carbon emissions.\*
- Guidance is needed on the calculation of emissions for modules B1, B7 and D to standardise the process.
- A mandatory list of MEP elements that should be reported against should be included in the guidance.
- The role of boroughs needs to be clarified and training and support should be provided to boroughs, particularly those that intend to apply the WLC policy to non-referable developments.\*

#### GLA response

A **definition of MMC** has been included. MMC is one potential solution that developers can use to reduce embodied carbon, however we do not require any estimates of the proportion of a development that uses MMC as it will not be suitable for all types of development. Applicants could provide this as part of the assessment and we have allowed for that in the template.

As stated in the guidance, we encourage local authorities to request WLC assessments for **major development** applications. However it is important that local authorities have sufficient resource to be able to assess WLC assessments and recognise this is a fast-moving area in which new research, tools and approaches are being developed. We have not set specific requirements for how non-referable developments could meet the guidance to allow local authorities to take their own approaches.

Further information on how to calculate the emissions associated with **modules B1, B7 and module D** has been included in the guidance.

A suggested (but not exhaustive) **list of MEP elements** has been included in the guidance.

**Boroughs** will be expected to ensure that WLC assessments are submitted as part of referable applications and that a post-construction WLC assessment is secured through a condition or a legal agreement. Where possible we would also encourage boroughs to review the information submitted. The GLA will be reviewing WLC assessments for referable applications, similar to the review we undertake of energy strategies. Boroughs that are intending to require WLC assessments from non-referable applications will need to scrutinise the information submitted in addition to securing the post-construction assessment through a condition or legal agreement and storing the information received. We hold regular workshops for local authorities on the Mayor's energy and carbon policies and intend to hold a specific session on WLC assessments.

### Q15 Do you have any further comments to make on the guidance?

Thirty-six respondents answered this question. Respondents suggested that:

- London is leading the way through the development of the WLC policy and guidance and respondents expect that developers and architects will use this policy to materially reduce carbon from construction and the built environment. It was suggested that the approach we have developed could be followed by other UK regions and councils.\*
- If a project performs well on the WLC this should reduce the carbon offset payment needed to reach operational net zero carbon.
- Additional guidance documents relating to historic buildings should be referenced in the guidance.
- Planning applicants will incur additional costs in completing the assessment process and this should be recognised.
- Information should be provided on how this document be applied locally for non-referable major planning applications and in the development of Local Plans.

### GLA response

We are keen to ensure our **leadership on reducing WLC emissions** is replicated in other regions and will continue to engage with other UK authorities and councils on how our approach can be replicated elsewhere.

As explained in the guidance, the net zero carbon target is based on operational carbon emissions only. **Offset payments** should therefore not be waived based on performance against the WLC policy, which does not currently include formal targets.

Reference to the guidance documents relating to **historic buildings** has been included.

The WLC requirement is established in London Plan policy and should be factored into the **costs of the planning application process** by the planning applicant. The assessment process and guidance has been developed to ensure the assessment

process is as streamlined and cost-effective as possible taking into account stakeholder engagement, including as part of this consultation.

As stated in the guidance, we encourage WLC assessment for **major applications** and the guidance can be used for this purpose. We would also encourage inclusion of policies that require the calculation and reduction of WLC emissions via a WLC assessment in Local Plans.

#### **4. Equality Impact Assessment (EqIA)**

The EqIA undertaken for the Whole Life-Cycle Carbon policy showed no impact and no responses to the consultation identified any equality impacts.

#### **5. Next steps**

There was a significant level of interest in the development of the WLC policy at pre-consultation stage and throughout the consultation and we would like to thank everyone who took the time to contribute. All views that were shared with us have been considered in the development of the final WLC guidance document and we have aimed to summarise the key points raised in this report.

For the latest information on the WLC policy, guidance and assessment template please visit the GLA's WLC webpage: <https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance>. For any queries please email: [ZeroCarbonPlanning@london.gov.uk](mailto:ZeroCarbonPlanning@london.gov.uk).

## Appendix 1 Summary of engagement

### Informal and/or early engagement

Activity Type	Participation	Representation
Workshops	Industry professionals including energy consultants and mechanical engineers, developers, housing associations, BRE, UKGBC	39 attendees
Webinar	London boroughs	50 attendees (approx.)
Technical seminar	Planning Inspectors (PINs), public	30-40 attendees (approx.)

### Formal engagement

Date	Activity Type	Participation	Representation
13 Oct – 15 Jan 2021	Consultation survey and written responses	All	50 responses
17 Nov 2020	Webinar	All	243 attendees

