

Updated West London Waste Plan

Circular Economy Topic Paper

Final v3.0

December 2025

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This Topic Paper was drafted in November 2025 reflecting the national, regional, and local policy context at that time. It will be updated as necessary to take into account any policy changes prior to publication of the Regulation 19 (submission) version of the updated West London Waste Plan, to ensure it reflects the most up-to-date position at that time.

Abbreviations and Glossary

Abbreviations

BIM	Building Information Modelling
BREEAM	Building Research Establishment Environmental Assessment Method
C&D	Construction and Demolition (waste)
CE	Circular Economy
CE Statement	Circular Economy Statement (London Plan SI7/LPG requirement)
EPR	Extended Producer Responsibility
GLA	Greater London Authority
GHG	Greenhouse Gas
LACW	Local Authority Collected Waste
LPA	Local Planning Authority
MMC	Modern Methods of Construction
MSW	Municipal Solid Waste
NPPF	National Planning Policy Framework
NPPW	National Planning Policy for Waste
OPDC	Old Oak and Park Royal Development Corporation
RWS	Resources and Waste Strategy (2018)
SWMP	Site Waste Management Plan
WLCA	Whole Life-Cycle Carbon Assessment
WLC	Whole Life-Cycle Carbon
WLWA	West London Waste Authority
WLWP	West London Waste Plan
WPP	Waste Prevention Programme for England (2023)

Glossary

Circular Economy	The circular economy is a model of production and consumption which involves designing out waste and pollution and keeping products and materials in use with the aim of limiting the leakage of resources.
Climate Emergency	Declaration made by each LPA setting carbon neutrality for their own activities by 2030 as an ambition.
Greenhouse Gases	A greenhouse gas is a gas which absorbs reflected solar energy. This has the effect of making the Earth's atmosphere warmer. Solar energy enters the Earth's atmosphere and reaches its surface. Some of that energy is reflected back into space, however greenhouse gases absorb this reflected energy back to the Earth. Carbon dioxide, methane and nitrous oxide are amongst gases considered to be greenhouse gases.
Life Cycle Assessment (LCA)	Life Cycle Assessment involves an analysis of the impact provision of a product or service may have on the environment both in terms of pollution and resource depletion. It provides a framework for measuring the relative impact of different options to facilitate decision making on options.
Local Plans	Prepared by local planning authorities (LPA), Local Plans guide decisions on future development proposals for the area under the LPA's jurisdiction. They set out policies to be used in decision making which are supported by a vision for how the local planning authority would like the area to develop.
'R1' Recovery status	The formula in the revised Waste Framework Directive to determine whether a waste incineration operation is to be classed as 'recovery' or disposal under the waste hierarchy. For municipal waste incinerators this is based on a calculation of a plant's efficiency in converting the calorific value of waste burnt to energy. Plants operating at or above the stipulated formula thresholds can be classified as 'recovery operations' if they complete the R1 application process. Incinerators operating below the threshold are classed as 'disposal'.
Sustainability Appraisal (SA)	Sustainability Appraisals assess whether planning policy documents promote sustainable development. SAs consider the social, environmental and economic aspects of the effect of proposed planning policy.

1. Executive Summary

- 1.1 This Topic Paper provides background and context to application of the principles of a more circular economy as they relate to the Draft updated West London Waste Plan (WLWP), particularly underpinning the proposed Draft Policy WLWP6: Circular Economy and Resource Efficiency. It explains what a circular economy is, its benefits and links to climate change, and how the emerging updated WLWP can help facilitate a transition to a more circular approach via support for more sustainable approaches to waste related development. The paper also outlines the implications of a more circular approach to land use and the built environment and highlights the role land-use planning policy can play in supporting this transition.
- 1.2 The circular economy model offers an alternative to the traditional 'take, make, use, dispose' linear economy by minimising the use of resources and designing out waste and keeping essential input resources in use for as long as possible. Embracing these principles can result in environmental benefits, greater resource security, and economic opportunities (for example, an estimated 450,000 new jobs in the UK by 2035 from circular economy growth). A more circular economy may also help mitigate climate change by reducing greenhouse gas emissions associated with producing and disposing of goods. In West London, most of the planning authorities in West London have declared Climate Emergencies (aiming for net-zero carbon by 2030) and the West London Waste Authority (WLWA) has a dedicated Circular Economy team¹ to drive reuse, repair, and recycling initiatives. This clear local commitment provides a strong foundation for implementing circular economy principles.
- 1.3 The updated WLWP's vision anticipates waste being treated as a valuable resource, with materials kept in circulation through re-use, repair, and high-quality recycling for as long as possible and the establishment of a network of Circular Economy Hubs in West London that will foster innovation in waste prevention, material exchange, and repair. Draft Policy WLWP6 translates this Vision into requirements for waste related developments to support the transition to a low carbon circular economy and to embed circular design principles within expanded and new waste management facilities.

¹ https://cdn2.assets-servd.host/westlondon-waste/production/assets/resources/Archive/WLWA-Annual-Report-2021_Final-Harrow.pdf

2. Introduction

2.1 The prevailing linear economic model of ‘take, make, use, dispose’ is widely understood to be unsustainable, as it drives resource depletion, waste generation, and environmental degradation. In contrast, a circular economy offers a restorative, regenerative model that seeks to minimise resource use and waste and keeps necessary resources in use. It entails decoupling economic growth from the unbridled consumption of resources, and is underpinned by three core principles:

- **Design out waste and pollution** – products, processes and developments should be planned to prevent waste generation and avoid environmental harm from the outset.
- **Keep products and materials in use** – maximise the useful life of goods through reuse, repair, remanufacturing, and recycling so that materials remain circulating in the economy for longer (thereby reducing demand for virgin resources).
- **Regenerate natural systems** – wherever possible, enhance and restore ecosystems (for example through composting biodegradable materials and improving soil health) rather than simply extracting resources.

2.2 By adopting these principles, it is considered possible to achieve economic growth and innovation while greatly reducing unsustainable resource consumption and environmental degradation. For example, keeping materials in use and recovering value from waste can create new markets and jobs. A 2021 report by Green Alliance² estimated that shifting the UK economy towards a more circular model could create around 450,000 jobs by 2035 in sectors like remanufacturing and recycling. At the same time, using resources more efficiently can reduce costs for businesses and consumers in the long run.

2.3 Where it results in reducing resource use including energy inputs, the circular economy approach has a particular relevance to tackling climate change. The waste sector itself accounts for roughly 4% of UK greenhouse gas emissions (see Climate Change Topic Paper), plus emissions arise from the production of goods and construction materials that often become waste. In major cities, building construction and refurbishment contribute around 11% of greenhouse

² *Levelling up through circular economy jobs* Green Alliance Policy Insight August 2021 https://green-alliance.org.uk/resources/Levelling_up_through_circular_economy_jobs.pdf

emissions (largely due to the production of materials used such as cement, steel and glass), and up to 15% of those construction materials may be wasted during the building process³. Moving to a more circular economy helps reduce these emissions by reducing the need to constantly produce new raw materials which are often energy-intensive and environmentally degrading. Essentially, for every tonne of material kept in use (through reuse, repair or recycling), emissions from extracting and creating a tonne of new material are eliminated (less emissions generated in converting the existing material to a suitable quality to substitute) .

- 2.4 In West London, the declaration of Climate Emergencies by each LPA in 2019 involved commitments to ambitious carbon reduction goals including achieving net-zero emissions for council activities by 2030. Given circular approaches are generally lower carbon, the contribution that an early transition to a more circular economy can make towards meeting carbon reduction goals for west London should not be underestimated.
- 2.5 The West London Waste Authority (WLWA), which arranges the management of Local Authority Collected Waste (LACW), has also adopted a 2030 net zero target and is working jointly with the west London boroughs on broader sustainability initiatives. WLWA has established a dedicated Circular Economy team⁴ to drive innovation in waste reduction with a focus on keeping materials in use for longer through reuse, repair, remanufacturing and recycling efforts. This institutional support for more circular practices provides a strong platform for the updated West London Waste Plan (WLWP) to build upon.
- 2.6 The draft emerging updated WLWP seeks to embed circular economy thinking into the management of waste across West London, contributing to carbon reduction goals and resource security. The Vision sees West London's waste being managed as a valuable resource, with land and infrastructure used efficiently to keep materials circulating via re-use, repair and high-quality recycling for as long as possible. It envisages a future of 'zero waste to disposal,' where waste is minimised and any residual waste is processed in high-efficiency, low-carbon facilities with energy recovery only as a last resort.
- 2.7 The draft emerging updated WLWP Vision also proposes the creation of Circular Economy Hubs across West London through partnerships between

³ *Completing the Picture: How the Circular Economy Tackles Climate Change* Ellen MacArthur Foundation (2021)
<https://content.ellenmacarthurfoundation.org/m/3eac8667edd240cc/original/Completing-the-picture-How-the-circular-economy-tackles-climate-change.pdf>

⁴ <https://westlondonwaste.gov.uk/circular-economy-hub>

authorities, businesses and communities. Such hubs facilitate waste prevention, material exchange, repair and re-manufacturing activities, driving green enterprise and job creation while educating and engaging residents.

- 2.8 To implement this, Draft Policy WLWP6 requires all proposals for waste related development to demonstrate how they support the transition to a low-carbon circular economy (by managing materials at the top of the waste hierarchy) and how circular economy principles have been integrated into their design, construction and operation. The subsequent sections of this Topic Paper provide the policy context supporting the approach taken in the draft updated WLWP.

3. National, Regional and Local Drivers for Circular Economy

- 3.1 Making the economy more circular is an objective across all levels of policy – nationally, through London-wide planning policy, to local west London initiatives. This section sets out the relevant policy framework.

Key Policy Context

- 3.2 The UK Government and the Mayor has introduced a planning policy aimed at moving towards a more circular and resource efficient economy. Key measures are outlined below.

National Planning Policy Framework (2024) (NPPF)

- 3.3 The NPPF provides high-level guidance for land-use planning in England. While it does not explicitly reference the circular economy, its overarching emphasis on sustainable development aligns closely with circular economy principles. The NPPF’s environmental objective includes ‘using natural resources prudently, minimising waste and pollution’ and mitigating climate change.

The NPPF supports the transition to a low-carbon future by encouraging reuse of existing resources (including the conversion of existing buildings) and the use of renewable materials and energy. This provides policy support to schemes that reuse buildings or materials over those that would generate more waste. Additionally, the Government has indicated (in the context of climate adaptation policy) that it intends to further review the NPPF to ensure it fully supports net-zero and climate objectives. This could lead to even stronger integration of circular economy concepts (like reuse and resource efficiency) in national land-use planning policy in the near future.

National Planning Policy for Waste (2014) (NPPW)

- 3.4 The NPPW is the national policy document that specifically concerns planning for waste management in England. It explicitly promotes a ‘sustainable and efficient approach to resource use and management’. While the NPPW was written before the term ‘circular economy’ was in common use, its principles are very much in line with promoting a more circular approach. For example, the NPPW directs waste planning authorities to drive waste management up the waste hierarchy and to consider the integration of waste management facilities with other land uses where possible.
- 3.5 The NPPW also supports development that incorporates design features to minimise waste creation and to use recycled and secondary materials in construction. The NPPW also highlights the need for adequate waste infrastructure (recycling, composting, etc.) and co-location of facilities to reduce transport impacts. As noted in the WPP, the NPPW expects planning authorities to ensure that non-waste developments include arrangements that

maximises reuse and recovery of goods, materials and resultant waste generated. Together, the NPPF and NPPW establish that the land-use planning system has a responsibility to encourage resource efficiency and waste reduction – effectively supporting more circular approaches in both general development and waste-specific contexts.

The London Plan 2021

- 3.6 The London Plan includes a strong focus on the circular economy. Policy SI7 ‘Reducing Waste and Supporting the Circular Economy’ introduces a requirement that a Circular Economy Statement be submitted in support of strategic development proposals (those of potential significance deemed to be referable to the Mayor⁵) as part of a planning application. These Statements must demonstrate how the development will incorporate circular economy principles throughout its lifecycle, from design, construction methods, how materials will be reused or recycled during construction and eventual demolition, and how waste will be managed during the development’s use phase.
- 3.7 The London Plan sets out specific principles to guide the design process, such as ‘building in layers’ (so that building components can be easily maintained or replaced), ‘designing out waste’ (planning for standardised components and reuse of materials), ‘designing for longevity and adaptability’, and ‘designing for disassembly’. Ultimately, new buildings in London are expected to be conceived and planned with their entire life cycle and end-of-life in mind, ensuring materials use is minimised and those used are recovered and reused.
- 3.8 The London Plan also encourages London local planning authorities to apply these principles to smaller developments and Local Plans are encouraged to require Circular Economy Statements for developments below the strategic referral threshold.
- 3.9 The Mayor’s target for London to be a net zero-carbon city by 2030 underpins these policies, as more circular construction and waste reduction will contribute towards hitting climate targets. In addition to Policy SI7, the London Plan includes targets for waste recycling (aligned with the London Environment Strategy (see below)) and policies to ensure London can manage the equivalent amount to its own waste.

⁵ As defined by the [Town and Country Planning \(Mayor of London\) Order 2008](#)

- 3.10 Policy GG6 ('Increasing Efficiency and Resilience') in the London Plan expects planners and developers to 'support the move towards a low carbon circular economy' as part of making London a zero-carbon city.
- 3.11 The London Plan 2021 is currently being reviewed with an intention to adopt an updated Plan by 2027.

Other Policy Context

- 3.12 Other policy and legislation aimed at moving towards a more circular and resource efficient economy are outlined below.

Environment Act 2021

- 3.13 This Act provides powers and duties to reduce waste and improve resource efficiency. Notably, it introduces Extended Producer Responsibility (EPR) schemes (making producers financially responsible for 100% of the end-of-life management costs of certain products, starting with plastic packaging), a Deposit Return Scheme (DRS) for single-use drink containers, charges for single-use plastics, and requirements for more consistent recycling collections across England. It also mandates the creation of electronic waste tracking, further action on 'waste crime', and new resource efficiency product standards and labelling to inform consumers about products' recyclability and durability. These measures are largely aimed at designing in the use of materials that are recyclable, in line with circular economy principles.

Resources and Waste Strategy 2018 (RWS)

- 3.14 The RWS was a landmark strategy that set out the previous Government's vision for sustainable waste management. It was the first to explicitly embrace the concept of a circular economy in national policy. The RWS's core message is to move away from the linear 'take-make-dispose' model towards a more circular approach where resources are kept in use at their highest value for as long as possible and only a minimal amount of residual waste remains.
- 3.15 The RWS established several strategic ambitions and targets, including:
- To work towards all plastic packaging placed on the market being recyclable, reusable or compostable by 2025;
 - To work towards eliminating food waste to landfill by 2030;
 - To eliminate avoidable plastic waste by the end of 2042;
 - To double resource productivity⁶ by 2050; and

⁶ Defined as 'economic output per unit of resource used'. See Appendix 2 for further discussion.

- To eliminate avoidable waste of all kinds by 2050.

3.16 The central role waste management plays in the material cycle as part of more circular economy is illustrated in Figure 1 below.

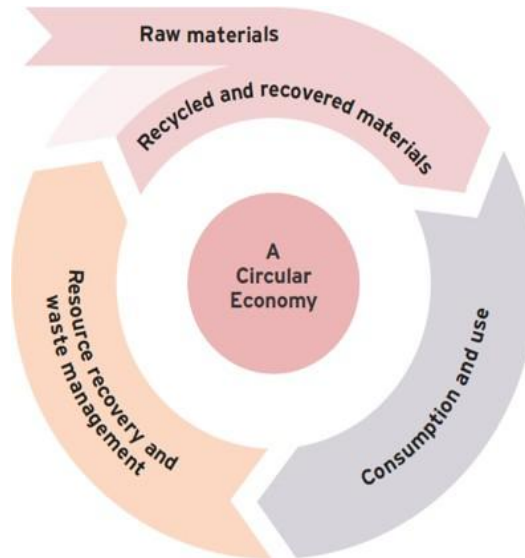


Figure 1: Circular Economy
Source: *Resources and Waste Strategy, DEFRA, 2018*

Net Zero Strategy

3.17 Published in 2021, this related to the achievement of net zero in carbon emissions as a whole including committing to working towards the near elimination of biodegradable municipal waste to landfill from 2028, and providing free separate food waste collections for all households from 2025.

Waste (Circular Economy) (Amendment) Regulations 2020

3.18 These regulations transposed the EU Circular Economy Package into UK law, updating several waste-related directives and setting new legally binding targets. Importantly, the regulations formalised targets to recycle 65% of municipal waste by 2035 and to send no more than 10% of municipal waste to landfill by 2035, aligning with EU goals. The regulations also strengthened requirements for separate collection of recyclables and put greater emphasis on waste prevention and reuse. By incorporating these targets into UK law, the Government has shown its commitment to improving recycling rates and reducing reliance on landfill, critical steps toward a more circular economy.

Waste Prevention Programme for England (2023) (WPP)⁷

- 3.19 The updated Waste Prevention Programme for England ('Maximising Resources, Minimising Waste') is a cross - departmental government strategy focusing on the upstream reduction of waste. It outlines priorities to keep products and materials in circulation at high value through increased reuse, repair, and remanufacturing, hence reducing the overall amount of waste produced.
- 3.20 The WPP identifies three cross-cutting themes for action:
1. Designing out waste (for example, encouraging eco-design standards and expanding EPR schemes),
 2. Systems and services for reuse (such as take-back schemes, repair services, leasing models, etc.), and
 3. Data and information (like developing materials databases and product passports to track and improve resource use).
- 3.21 It also identified the following seven key sectors to target for waste prevention:
- construction;
 - textiles;
 - furniture;
 - electronics;
 - vehicles;
 - plastics & packaging; and
 - food.
- 3.22 The WPP identifies the planning system as having a specific role in waste reduction, noting that the National Planning Policy for Waste (NPPW) expects local planning authorities to ensure developments maximise reuse and recovery of waste materials and minimise off-site disposal. The WPP also acknowledges that Chapter 2 of the National Planning Policy Framework (NPPF) promotes sustainable use of resources and waste minimisation as part of sustainable development and so embeds waste prevention considerations into plan making and land-use decision taking.

Circular Economy Strategy (England)

- 3.23 The UK Government is preparing England's first 'Circular Economy Strategy' intended to set out how resources will be kept in use for longer and waste designed out, with a draft strategy due for public consultation in the coming months. It is understood the strategy will sit alongside, and help deliver, the wider reforms mentioned above.
- 3.24 The strategy will set out:
- The Government's vision for a more circular economy;
 - Potential new targets intended to galvanise action across the economy;

⁷ <https://www.gov.uk/government/publications/waste-prevention-programme-for-england-maximising-resources-minimising-waste>

- Roadmaps for priority sectors including the built environment setting out interventions to be made; and
- Collaborative delivery with local places, academia, industry, investors and civil society;

The strategy is being prepared with support from a ‘Circular Economy Taskforce’⁸ established in November 2024.

Environmental Targets and Strategies

- 3.25 Following on from commitments in the 25-Year Environment Plan and the UK Net Zero Strategy, the previous Government set long-term targets related to resource efficiency. The first revisions of the 25-yr Environment Plan was the Environmental Improvement Plan 2023. This recommitted to the elimination of avoidable waste by 2050 and doubling of resource productivity by 2050.
- 3.26 A binding target to halve residual waste per person by 2042 (from 2019 levels) was introduced and enshrined in law through the Environmental Targets (Residual Waste) Regulations 2023. This means that by 2042, the average residual waste (waste that isn’t reused or recycled) per capita should be no more than 287 kg a year, compared to 574 kg in 2019. Interim targets for 2028 expect significant reductions in total residual waste and residual municipal waste by material such as glass and plastic. Achieving these targets will require improvement of recycling collection systems nationwide.

London Environment Strategy (2018)

- 3.27 The Mayor’s Environment Strategy sets out a vision for London’s environment and includes a dedicated chapter on waste. The strategy embraces the goal of transitioning to a low-carbon circular economy citywide and sets targets such as achieving 65% municipal waste recycling by 2030 and ensuring zero biodegradable or recyclable waste goes to landfill by 2026 (ahead of national targets). To achieve these objectives, the Strategy anticipates reductions in waste arisings and increases in reuse and repair activities. It expects London’s waste collection and disposal authorities (the boroughs and WLWA in West London) to prepare waste reduction plans showing how they will contribute to the Mayor’s targets by moving waste up the waste hierarchy.

London Climate Emergency and Green Recovery Initiatives

- 3.28 In 2018, the London Assembly and Mayor declared a Climate Emergency, with the Mayor committing London to become net-zero carbon by 2030. Achieving

⁸ <https://www.gov.uk/government/groups/circular-economy-taskforce>

this will require significant reductions in emissions including indirect ones such as those resulting from consumption. Circular economy measures (e.g. reducing emissions from construction materials through material reuse, cutting waste incineration emissions by increasing recycling and making more efficient use of existing heat) are part of the climate action toolkit.

- 3.29 'London Councils' (the umbrella body for the boroughs) has also been promoting collaborative approaches to climate change, and in its 2019 'Joint Statement on Climate Change' it agreed to find practical solutions to deliver carbon reductions that also improve Londoners' wellbeing. One aspect of this is supporting the circular economy to curb emissions from resource use. The Mayor's programmes, such as the London Circular Economy Route Map⁹ and funding for local circular economy projects (through initiatives such as Advance London and ReLondon) provide guidance and support to implement more circular practices in areas like plastics, food, textiles, and the built environment. These initiatives complement policy by creating partnerships and knowledge sharing for more circular innovation across the city.

Local Plans and Priorities in West London

- 3.30 At the local level, the seven west London planning authorities and the West London Waste Authority are actively supporting the shift towards a more circular approach through their strategies and policies as summarised below.

⁹ *London's Circular Economy route map* LWARB <https://relondon.gov.uk/wp-content/uploads/2021/02/LWARB-ReLondons-circular-economy-route-map-for-London.pdf>

Local Plans and Climate Strategies

- 3.31 Each west London LPA has an adopted Local Plan (some are in the process of being updated) that includes policies on sustainable design, waste management, and climate change. Many of these local policies implicitly or explicitly support circularity principles (see Appendix 1). For example, the London Borough of Ealing (which aims to be carbon neutral by 2030) expects development proposals to incorporate energy efficiency, use renewable energy, and adopt circular principles, including reducing embodied carbon in construction. The emerging Ealing Local Plan sets requirements for major developments to demonstrate net-zero operational energy and minimised embodied emissions, aligning with the idea of reusing materials and designing buildings for efficiency. Similarly, the Local Plans of the London Boroughs of Hounslow and of Harrow have policies promoting on-site recycling, reuse of construction materials, and integration with district heating (for example so that Energy from Waste facilities can supply heat more efficiently).
- 3.32 The London Borough of Richmond upon Thames has embedded circular economy objectives into its local plan framework. Policies in RuT's adopted Local Plan require proposals for development to reduce carbon emissions and incorporate circular principles, with particular emphasis on reusing materials and sustainable construction practices. In practical terms, this means new developments in RuT are expected to use recycled or low-impact materials, provide facilities for recycling and composting, and to be designed in ways that facilitate future adaptability or deconstruction. The Council also has a Climate and Nature Strategy (2025-2030) which promotes circular economy principles and development of local reuse and recycling infrastructure, alongside carbon reduction targets which includes commitments to minimise waste and eliminate single-use plastics in its operations.

West London Waste Authority (WLWA) Initiatives

- 3.33 WLWA is the statutory body responsible for ensuring that LACW collected by or on behalf of the west London boroughs is appropriately managed. As such WLWA plays a key strategic role in driving innovation in waste management in west London. In collaboration with Ealing Council, WLWA has set up a Circular Economy Hub at the Stirling Road site in Acton to provide an exemplar and focus for initiatives. This builds on provision of Reuse and Recycling Centres with facilities for residents to drop off items for reuse, partnering with repair charities and social enterprises.

- 3.34 WLWA is also working with the boroughs on joint procurement and initiatives to cut plastic waste, boost food waste collections, and educate residents on waste prevention.¹⁰

Old Oak and Park Royal Development Corporation (OPDC)

- 3.35 OPDC is the local planning authority for the large regeneration area at Old Oak/Park Royal (straddling parts of LB of Brent, Ealing, and Hammersmith & Fulham). OPDC has its own [Sustainability Charter](#) aligned with the Mayor's targets. OPDC emphasises circular and low-carbon development in its Local Plan which includes specific circular economy objectives such as delivering best-practice circular design in new construction, prioritising waste minimisation and resource sharing, and utilising the industrial area of Park Royal to create synergies for material exchange between businesses. The OPDC area could host significant circular economy facilities (like material recovery parks or re-manufacturing hubs) to serve west London.
- 3.36 The national, regional, and local drivers form a supportive framework for the updated West London Waste Plan and inclusion of Draft Policy WLWP6 discussed in Section 7 below.

¹⁰ [WLWA Circular Economy Plan Update](#)

4. Circular Economy and Climate Change

- 4.1 Addressing climate change and transitioning to a more circular economy are closely linked. The circular economy plays a key role in reducing greenhouse gas (GHG) emissions by targeting the environmental impact of products and resources beyond the energy sector. Policies promoting a more circular approach minimise resource consumption and waste generation, cutting emissions associated with virgin material extraction by encouraging reuse and recycling and helping lower emissions from waste treatment methods like landfilling and incineration.
- 4.2 While 75% of global GHG emissions come from burning fossil fuels to produce energy, the remaining 25% result from providing goods and services and managing associated waste¹¹. A circular economy would reduce these product-related emissions through longer product lifespans, increased recycling, and reduced reliance on virgin materials.
- 4.3 The built environment contributes significantly to emissions, with buildings responsible for c.19% of global energy-related carbon output. Retrofitting existing structures and using circular construction practices preserve embodied carbon and cut emissions from new material production, though retrofitting can have limitations. Using low-carbon and recycled materials, along with designing buildings for future disassembly (Design for Deconstruction), further reduces emissions associated with new buildings plus avoids construction waste. Prefabrication supports circularity by minimising the production of waste at the site of erection and facilitating material recovery in a central location where a critical mass of material can accumulate for collection. It can also provide a feedback loop to manufacturers to adjust sizing in production to enable direct use without offcuts/wastage.
- 4.4 More circular waste management, prioritising prevention, reuse, and recycling, yields the highest emissions reductions. Preventing waste avoids emissions altogether, reuse extends product lifespans reducing inputs to manufacture replacements, and recycling existing materials saves significant energy compared to extracting new raw materials; landfilling and incineration typically produce higher emissions. Diverting biodegradable waste from landfill and maximising recycling further reduce methane and offset emissions from virgin material production. Promoting materials exchange and reuse, such as

¹¹ *Where Do Emissions Come From? 4 Charts Explain Greenhouse Gas Emissions by Sector* World Resources Institute 2021 <https://www.wri.org/insights/4-charts-explain-greenhouse-gas-emissions-countries-and-sectors>

reclaiming building materials or refurbishing goods, eliminates waste and carbon emissions.

- 4.5 The separate WLWP Climate Change Topic Paper includes further details on the relationships between the management of waste and climate change.

5. Circular Economy, Land Use and the Built Environment

- 5.1 Implementing circular economy principles in land use planning and development is leading to changes in how buildings and infrastructure are designed, constructed, and managed. Embedding circularity into development in west London, an area facing pressures of population growth, housing demand, and infrastructure renewal, can help achieve more sustainable growth. Key implications and approaches are discussed below.

Optimising existing infrastructure and buildings

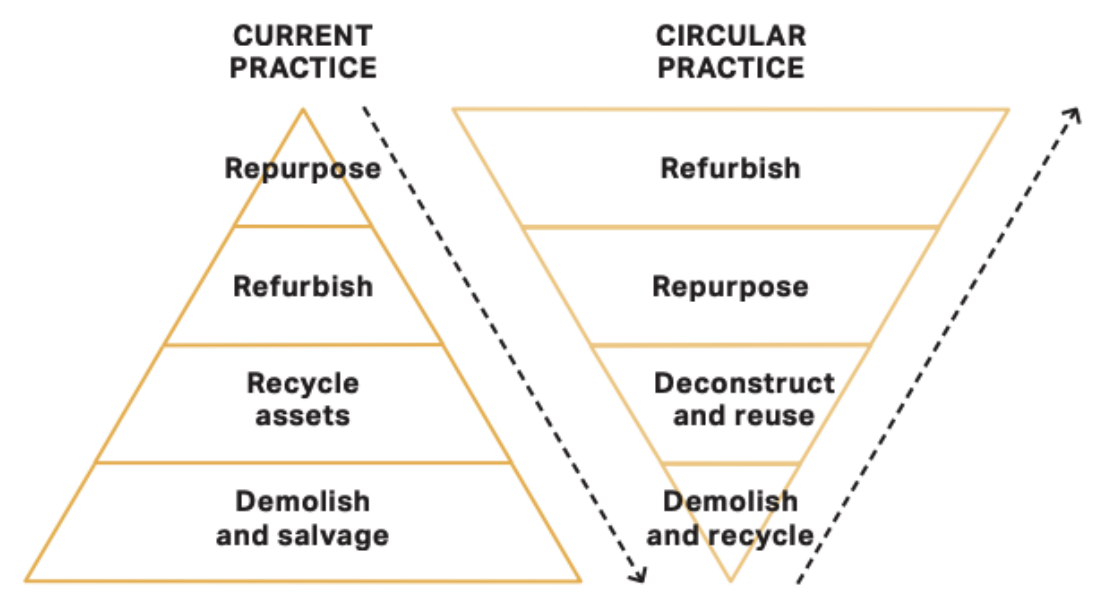
- 5.2 A more circular approach prioritises making the best use of what we already have, including land itself. This means adapting and reusing existing structures wherever possible instead of demolishing them or building on greenfield sites. By promoting adaptive reuse (converting buildings for new uses) and retrofitting (upgrading old buildings), the need for new construction and production of associated demolition waste are avoided.
- 5.3 In planning terms, this could involve policies that encourage brownfield redevelopment and refurbishment of vacant buildings, as well as flexibility to allow buildings to change use more easily. In west London's context, with many old industrial sites and commercial buildings, there is an opportunity to creatively repurpose structures (for example, converting an old warehouse into a community hub including recycling and repair rather than demolishing it).

Designing for longevity and adaptability

- 5.4 When new buildings are built, they should be designed to last and to be adaptable beyond its initially conceived use. This involves architectural and engineering choices that allow buildings to serve multiple purposes over their life or to be modified with minimal waste. For example, using modular construction and standardised components can make it easier to replace or upgrade parts of a building (such as facade panels or interior layouts) without major demolition. High-quality functional design also ensures that buildings remain useful and desirable for longer, reducing the chance of premature demolition. West London's planning policies can promote longevity by requiring developers to demonstrate how their designs could be adapted in future (e.g. sufficient floor-to-ceiling heights that allow conversion of ground-floor retail to other uses, or structural supports arranged to permit internal reconfiguration). The London Plan's circular design principles – building in layers, designing for flexibility – are applicable here.

Shifting from demolition to deconstruction

5.5 In a circular economy, demolition should be the last resort. Instead, when a building does reach its end-of-life, the aim is to deconstruct it carefully so that materials and components can be salvaged for reuse. This is a significant change from traditional practices where buildings are knocked down and mostly crushed for recycling. The land-use planning system can facilitate this by requiring pre-demolition audits and material management plans to be provided for larger redevelopment proposals, identifying what can be reuse/recycled and recovered. Additionally, planning conditions can require that certain high-value elements such as steel beams, bricks, architectural features be set aside for reuse. As an example, if a large commercial building in west London is being redeveloped, the developer could be required to catalogue all reusable materials and, where feasible, incorporate them into the new building or make them available to the market. Not only does this reduce waste, but it also preserves the ‘embodied carbon’ of those materials. This approach is consistent with that set out in the GLA’s London Plan guidance on Circular Economy Statements¹². The following diagram shows how development industry strategies must change to move toward a more circular economy:



Source: Design for a Circular Economy Primer, GLA¹³

¹² https://www.london.gov.uk/sites/default/files/circular_economy_statements_lpg_0.pdf

¹³ https://www.london.gov.uk/sites/default/files/design_for_a_circular_economy_web_1.pdf

Using resilient, sustainable materials

- 5.6 The choice of construction materials has long-term implications for circularity. The use of durable materials that can withstand wear and weathering mean buildings last longer and need fewer replacements and so waste is reduced. The use of non hazardous, recyclable materials ensures that when a building is eventually taken apart, its components can be more readily reused or recycled.
- 5.7 Planning policies can encourage or require the use of materials with certain sustainability certifications, recycled content, or those that are more readily reused or recycled. For example, specifying that developers use a certain percentage of recycled aggregate in concrete, or avoid composite materials that cannot be easily separated for recycling.

Reducing construction waste through modern methods

- 5.8 A more circular approach to construction means minimising surplus materials and off cuts that end up as waste. Modern methods of construction (MMC) such as prefabrication and modular building can help achieve this. In factory settings, materials can be cut to exact size and any surplus material can be recycled or reused more easily than on a busy construction site (retaining quality). Building Information Modelling (BIM) technology allows precise planning of material needs, reducing over-ordering.
- 5.9 Planning authorities can encourage MMC by supporting planning applications that use these techniques (they often also have benefits in terms of speed and reduced site disruption). Some London boroughs have expressed support for modular construction in principle due to these efficiency gains.

Eliminating hazardous materials

- 5.10 Avoiding using materials that are harmful or that impede reuse and recycling will reduce waste. For example, certain plastics or composites can contaminate recycling streams, and hazardous substances like materials containing persistent organic pollutants result in materials becoming unusable. While building regulations control many hazardous substances, land-use planning can reinforce this by encouraging safer alternatives and by rejecting proposals that would introduce materials which may be difficult to manage as wastes. Ensuring proper removal and treatment of hazardous elements prevents pollution and allows other materials to be recycled without contamination risk.

Providing for reuse and recycling within developments

- 5.11 All developments (especially larger ones) should include facilities that enable occupants to recycle and reduce waste. This can range from simple measures like adequate space for segregated waste storage (recycling bins, food waste caddies) in every new housing development (already required by Local Plans in West London) to more innovative features. For example, a housing scheme might include a 'reuse room' or exchange space where residents can swap unwanted items (books, furniture, etc.), or a repair workshop space as part of community amenities. Communal laundries in apartment blocks reduce the total number of appliances needed, designing out waste in the process.
- 5.12 Commercial or industrial developments could provide shared facilities like pallets or container reuse systems. Temporary materials exchanges associated with large construction sites can allow one project's waste to be another's material (for example, clean excavated soil from one site used for landscaping at another).

Regenerative design and green infrastructure

- 5.13 A broader aspect of circular land use is designing developments to work with natural systems. This means integrating green infrastructure (parks, green roofs, rain gardens) to mimic natural cycles, improving biodiversity, and using renewable energy, water recycling and sustainable urban drainage features on-site. Such features ensure that developments contribute positively to the environment (regenerating natural capital) rather than simply consuming resources. For example, incorporating solar panels, rainwater harvesting, and urban food growing spaces supports circularity, with sunlight and water being renewable inputs, and resulting organic waste being composted for use on local gardens/allotments.

Efficient land use and co-location

- 5.14 The efficient use of land avoids additional land (potentially greenfield) being needed for development. Higher-density development in appropriate locations, mixed-use development that allows synergies (for example, co-locating a waste facility next to an industrial area that can use the waste outputs or waste heat) all have a part to play. The draft emerging updated WLWP supports co-location of waste uses with other industrial uses as a strategic objective. An example of this is recycling plastics within a facility in an industrial cluster where manufacturers use the recycled plastic resin, thus forming a mini supply chain locally. Land use planning can designate such 'industrial symbiosis' zones or at least not segregate complementary uses unnecessarily.

- 5.15 Additionally, making use of derelict or underused land (e.g. restoring old landfill sites or contaminated land for new uses) essentially ‘recycles’ land and avoids the need to develop undeveloped land. protecting the soil resource on greenfield sites.

Supporting circular economy infrastructure

- 5.16 Planning can help ensure provision for venues/locations for repair cafes, maker-spaces, recycling facilities, re-use warehouses, local composting facilities, and material aggregation centres. Some of these land use types might not be explicitly covered in local plans e.g. on high streets and within industrial warehouses, and some facilities may be a hybrid of uses. For example, a Circular Economy Hub might involve a site that has a re-use shop, training centre for repair skills, and areas for sorting materials for redistribution. The West London Waste Authority’s aspiration to set up a network of such hubs will rely on boroughs and be supported by local planning policy including the WLWP including that which supports co-location of mutually beneficial uses.

Challenges to Implementation

- 5.17 While there are clear benefits, there are challenges and barriers to incorporate more circular practices into development. A key challenge is economics - currently, reclaiming certain materials for reuse can be more costly than using new materials due to labour costs. For example, cleaning mortar off old bricks to allow their reuse can be labour intensive and so more expensive than buying new bricks, unless there is sufficient scale and demand. This can make developers hesitant unless there are incentives or requirements. Similarly provision of space for such activities within constrained construction sites may be problematic.
- 5.18 The lack of established supply chains for secondary materials and limited availability of reclaimed products can also deter developers. There may also be regulatory hurdles (warranty providers or insurers sometimes have reservations about reused materials) and knowledge gaps (designers may not be trained in circular methods).
- 5.19 To overcome the challenges, a combination of policy ‘push’ and market ‘pull’ is required. Planning policy can provide the push (e.g. requiring circular economy statements, setting targets for material reuse), while emerging circular business models and potentially Government incentives (like lower VAT on refurbishment vs new build, or grants for circular innovation) could provide the pull. Community engagement is also key, as moving to communal or shared facilities (like shared laundries or tool libraries) can require a cultural shift in terms of how people view ownership and convenience. Nonetheless, as

awareness grows and more examples demonstrate benefits, these challenges can be addressed.

6. How Planning Policy Can Support a Circular Economy

6.1 The land-use planning system offers a powerful mechanism to support achievement of the transition outlined above. By setting the right conditions on development, planning authorities can ensure that circular economy principles are translated into real actions on the ground. In west London, Local Plans and the updated West London Waste Plan have important roles to play. This section examines how planning policy tools can facilitate transition to a more circular economy. The following section details the measures proposed in the Draft emerging updated WLWP.

Circular Economy Statements and Assessments

6.2 One of the most direct mechanisms is requiring developers to explicitly justify how circular principles have been considered in applications for planning permission. As noted above, the London Plan 2021 requires Circular Economy Statements for referable (large-scale) developments. These statements require developers to demonstrate how materials will be kept in use at the design stage and associated waste minimised. The statements cover matters such as material choices, construction methods, how the structure might be dismantled or repurposed, and plans to minimise and manage waste produced during operation. By front-loading these considerations, opportunities for incorporating more circular approaches can be identified early (when changes are easier to make). The statements are reviewed as part of the planning decision, meaning a project can be refused or conditioned if the approach is considered to be inadequate. Many developments, including regeneration schemes will fall under this requirement. Local planning authorities can choose to apply similar requirements to smaller developments, for example, a borough could require a Circular Economy Statement for any proposal involving demolition of a building above a certain size, even if not referable to the Mayor. This is encouraged by the London Plan. In order for policy to be effective, LPAs need to have a clear understanding of what measures are achievable so that developers can be guided effectively and this can be provided via local planning policy development and implementation.

6.3 In addition to Circular Economy Statements, Whole Life-Cycle Carbon Assessments (WLCAs) are also required by the London Plan for major applications. These assessments account for the carbon emissions of a development over its entire life (including material extraction, construction, use, and end-of-life). There is overlap between WLCAs and circular economy, for example, if a building is designed for reuse of components, its whole-life carbon reduces. Planning policy can link these two matters as circular design is often a means to achieve lower carbon outcomes.

Demolition controls and reuse requirements

- 6.4 Nationally, there is growing support for demolition activity to be scrutinised via the planning system. The House of Commons Environmental Audit Committee (EAC) in 2022 recommended that pre-demolition audits be required for any planning application involving demolition. The EAC suggested that developers should have to explain why a building cannot be retained or repurposed and compare the carbon impacts of demolition vs. retrofit. A requirement of this kind would fundamentally change how redevelopment is approached with demolition being considered as a last resort. Construction is a topic of focus for the task force supporting the development of the Circular Economy Strategy for England and so it is possible that related measures may be proposed for inclusion in the Strategy when it is published for consultation. The relatively recent reversal of the original Secretary of State's refusal of permission for the proposed redevelopment of the landmark Marks & Spencer store in Oxford Street may be seen as something of a step back in the application of policy on this matter¹⁴.
- 6.5 Temporary reuse of buildings that would extend their life prior to their demolition for redevelopment can also be encouraged. Changes to permitted development rights in recent years make it easier to change the use of a building by not requiring express planning permission to be obtained.
- 6.6 In its emerging Local Plan, the London Borough of Ealing is proposing that proposals for major development involving demolition should undertake carbon optioneering to determine the best approach to building form and reuse.

Site Waste Management Plans (SWMPs)

¹⁴ The Secretary of State (Secretary) at the time, Michael Gove, called in and rejected the Proposal despite the local authority resolving to grant planning permission in 2021. The key reasons for Gove's rejection of the proposal were due to the negative impacts of the Proposal on nearby heritage assets and embodied carbon from demolition. Gove considered that the existing building should be refurbished rather than demolished. Gove's decision was subsequently challenged and quashed by the High Court in March 2024 on the basis that it was unlawful, the developer succeeding on five out of the six grounds contended. The High Court concluded that Gove had made a number of errors, failed to give adequate reasons and made decisions without sufficient evidential basis.

Importantly, the High Court clarified that the relevant provisions of the National Planning Policy Framework (NPPF) do not create a strong presumption in favour of repurposing and reusing buildings. The court also found that Gove had incorrectly assessed the London Plan policy relating to the issue of embodied carbon, which only applies to operational carbon in the redevelopment and not embodied carbon in the existing building.

The High Court remitted the decision to the Secretary, now Angela Rayner, for redetermination. In December 2024 Rayner accepted the Proposal and granted planning permission for the demolition of three existing buildings and the construction of a ten-storey redevelopment.

- 6.7 Site Waste Management Plans detail how a developer intends to manage waste arising during the course of a construction project, estimating quantities of waste by type, how materials will be segregated, what its ultimate fate is to be (recycling, landfill, etc.), and measures to ensure all facilities used are legally compliant. These often include commitments to achieving targets for recycling rates and/or landfill diversion. For example, a SWMP might set a target that ‘at least 95% of construction waste by weight will be diverted from landfill’.
- 6.8 While SWMPs ceased to be a legal requirement after 2013 with the Government of the time preferring to place reliance on voluntary compliance, many LPAs still ask for them to be submitted via application validation requirements or through planning conditions. In west London, OPDC is an example of an authority requiring submission of SWMPs with planning applications. One issue is that often the identity of facilities to be used may only be determined once a contractor is appointed to deliver the project (post planning permission being granted), so it may not always be possible for a complete SWMP to be submitted at the time of the application.

Encourage retention and refurbishment in policy

- 6.9 Local Plans can include policies that favour refurbishment over redevelopment. While demolition of a structurally sound building (especially if it has no historic protections) cannot be prohibited, a planning policy presumption that retention is preferred can be included in a Local Plan. In west London, the recently adopted Richmond Upon Thames Local Plan provides an example of this in Policy 2 that states: *‘Development in the borough will prioritise the use of previously developed land, including the reuse and conversion of existing buildings to minimise embodied carbon with a presumption in favour of refurbishment.’* However this should be read in the context of the High Court decision on the interpretation of the NPPF, reported in footnote 15 above.’

Waste planning policies enabling circular infrastructure

- 6.10 Waste Local Plans (like the updated WLWP) are primarily intended to ensure sufficient capacity exists for the management of waste that may arise within a Plan area over the Plan period. By generally recognising the need for such facilities and supporting their development in compliance with certain requirements, the emerging updated WLWP can guide prospective developers towards suitable locations for investment into such infrastructure. In addition such plans advance the circular economy by prioritising the development of facilities which manage waste in accordance with the waste hierarchy.

6.11 The current adopted West London Waste Plan (2015) includes policies relating to non-waste development seeking to promote more sustainable practices. Since then, the LPAs party to the emerging updated WLWP have prepared and included policies in their own Local Plans with more up to date requirements applying to all forms of development and the London Plan was updated (in 2021) to address these aspects. The section below sets out the approach proposed in the emerging updated WLWP.

Planning conditions and obligations

6.12 LPAs can use planning conditions or Section 106 (S106) agreements to secure outcomes in new development consistent with circular economy principles. For example, an LPA might approve a new development including a condition that requires that building materials with a minimum % of recycled content be used.

6.13 Via S106 agreements, an LPA might seek contributions to local circular economy initiatives as a way of offsetting the environmental impact of a particular development, for example, a developer could contribute funds to upgrade a local reuse centre or to an apprenticeship programme to develop local repair skills.

Education through land-use planning

6.14 The land-use planning process itself can provide education in more circular practices. As well as providing information in Local Plans, LPAs can produce Supplementary Planning Documents (SPDs) or guidance on implementing more circular principles into development. This may include practical guidance on writing Circular Economy Statements, including case studies, for example, of projects that have successfully reused structures, and checklists for designing out waste.

7. The Draft Updated West London Waste Plan's Approach

- 7.1 The draft emerging updated WLWP (Regulation 18) embraces the need for land-use planning to facilitate a more circular approach in west London. This is set out in several elements of the Draft emerging updated Plan as set out below.

Vision and Strategic Objectives

- 7.2 The draft emerging updated WLWP's Vision for 2042 explicitly anticipates circular economy principles being fully integrated into the design and operation all new waste related development in west London. The vision envisages a future network of Circular Economy Hubs and near zero disposal of waste to landfill i.e. elimination of residual waste.
- 7.3 Strategic Objective 1 in the draft emerging updated WLWP (Regulation 18) expects best use be made of existing waste management infrastructure and supports the co-location of waste uses with other industries to enable synergies and circular solutions to emerge. Strategic Objective 2 is explicitly concerned with encouraging facilities that contribute to the achievement of a Circular Economy to come forward. This includes supporting local reuse and remanufacturing hubs and ensuring new waste management capacity produces high-quality secondary materials that can go straight back into reuse or recycling processes. Therefore, the emerging updated plan is specifically concerned with securing the resource value of waste is maximised. Strategic Objectives 3 and 4 also complement circular economy principles by focusing on decarbonising waste transport and delivering high quality waste management facilities that operate in accordance with best practice.

Draft Policy WLWP6: Circular Economy and Resource Efficiency

- 7.4 Proposed Draft Policy WLWP6 is dedicated to ensuring that planning applications for waste management facilities follow circular principles. As summarised earlier, Policy WLWP6 requires waste-related development proposals in west London to satisfy two key tests:
- A. how the proposed development will support the transition to a low-carbon circular economy by managing materials at the highest achievable level of the waste hierarchy (preference to prevention, reuse, then recycle, etc.) in line with the London Environment Strategy and local sustainability targets; and
 - B. how circular economy principles have been incorporated into all aspects of the proposed development's design, construction, and operation.

- 7.5 This essentially means any proposed development must apply resource efficiency as a key design principle. For example, under Part A, an application for a new recycling facility might need to show that it maximises reclamation of high quality materials and perhaps has a plan to accept items for reuse (not just recycling), thus allowing waste to be managed further up the waste hierarchy. Under Part B, that facility's building should be designed perhaps using a modular approach that allows for reconfiguration as needs evolve to process different waste streams in the future.
- 7.6 The supporting text to the policy notes that Policy WLWP6 provides the framework for securing the land, facilities, and infrastructure needed to meet local needs for the management of waste in accordance with more circular principles. It also notes this policy should be read alongside other relevant policies (London Plan, local plan policies, etc.) to ensure a coherent and comprehensive approach is taken.
- 7.7 By including this policy, the west London local planning authorities (WLLPA) are explicitly tying planning permission for waste related development to the delivery of more circular outcomes. This is therefore a clear example of emerging planning policy facilitating circularity.

Other draft WLWP policies supporting circularity

- 7.8 While WLWP6 is the draft emerging updated WLWP's headline policy incorporating circular principles into proposed waste related development, other draft policies will also make an important contribution. For example, policy WLWP1 safeguards most existing waste sites so that capacity is retained reducing/eliminating the need for new waste development on greenfield sites. Policy WLWP5 encourages beneficial use of inert waste (for example, using excavated soils in restoration projects) which is aligned with the more circular use of excavation material. The draft emerging updated plan's concern with mitigating climate change includes ensuring the potential of energy produced by waste management facilities being maximised thereby improving efficiency of use of the calorific value of waste and displacing the need for other sources of energy to be utilised (which may be higher carbon such as gas boilers).
- 7.9 In addition if a specific need is demonstrated, Policy WLWP2 allows additional capacity to be developed, provided impacts are acceptable. Policy WLWP 2 also specifically supports the development of Circular Economy Hubs in principle.

Monitoring and partnership

- 7.10 The draft emerging updated WLWP proposes inclusion of monitoring indicators, some of which would track progress towards more circular outcomes e.g. recycling rate improvements, number of reuse facilities, tonnages of residual waste reduced. This, together with the use of updated local validation lists, would help ensure the plan is implemented with a focus on circularity in mind.
- 7.11 The draft emerging updated WLWP recognises that LPAs alone can't deliver circularity across the whole economy, but through collaboration with other entities, they can create an enabling environment. For example, LPAs can grant permission for the use of land for a new Circular Economy Hub, but its successful operation might involve the active engagement of WLWA, social enterprises and local businesses.
- 7.12 In conclusion, this Circular Economy Topic Paper demonstrates that the emerging updated West London Waste Plan is not just about managing waste, but about rethinking waste as a resource and applying the land-use planning system to help create a more circular approach for the benefit of local communities and the environment.

Appendix A – Local Plans in West London and How They Promote a Circular Economy (Position at November 2025)

Brent

Local Plan Documents:

- [Brent Local Plan 2019-2041 \(adopted February 2022\)](#)
- [Sustainable Environment and Development SPD \(2023\)](#)

Policies on Circular Economy: Brent's Local Plan supports sustainable design and climate action. It sets high standards for sustainable construction and refers to London Plan policies.

Brent's **Sustainable Environment and Development SPD** embeds circular-economy principles through London Plan Policy SI7 and related guidance, requiring Circular Economy Statements for referable applications and encouraging smaller schemes to apply CE approaches. It sets a clear hierarchy: Retain/repair, partial retention and refurbishment, disassembly and re-use, remanufacture, and only then demolition, and expects schemes to design for longevity, adaptability, disassembly and waste minimisation. The SPD links CE outcomes to Whole Life-Cycle (WLC) carbon assessment so that material choices, end-of-life scenarios and 'Bill of Materials' are aligned. The SPD also identifies when Site Waste Management Plans and other waste/circular-economy documents are required.

Ealing

Local Plan Documents:

- [Ealing Core Strategy \(adopted 2012\)](#)
- [Ealing Development Management DPD \(Adopted 2013\)](#)
- [Ealing Draft Local Plan \(Regulation 19\)](#)

Policies on Circular Economy: The existing Local Plan encourages sustainability but doesn't refer to the circular economy directly. It includes general aims to cut waste and promote recycling, and requires recycling facilities in new developments. Specific circular measures like material reuse or adaptable design aren't highlighted. The new draft Local Plan, introduces much clearer circular economy requirements. Draft Policy SI 7 (Reducing Waste and Supporting the Circular Economy – Ealing LPA – local variation) will require all major developments (not just those referable to the Mayor) to submit a Circular Economy Statement. These must show how waste will be reduced, materials reused or recycled, and buildings designed for long-term use or easy dismantling. The new plan also promotes designing buildings to be flexible and reused in future. Policy WLC (Whole Life-Cycle Carbon) requires WLC

assessments for major schemes and mandates carbon optioneering where demolition is proposed, explicitly expecting consideration of a 'retrofit-first' and reuse-led approach. Policy ECP (Embodied Carbon) sets building-type-specific embodied-carbon limits to drive material efficiency and reuse.

Ealing also commits to partnering with WLWA to deliver a Circular Economy Hub at Stirling Road, Acton, supporting reuse/repair ecosystems that keep resources in circulation locally.

Relevant Policies: Emerging Ealing Local Plan - Draft Policy S1.7 (Reducing Waste and Supporting the Circular Economy - Ealing LPA - local variation); Policy WLC (WLC: Whole Life Cycle Carbon Approach - Ealing LPA - local policy); Policy ECP (Embodied Carbon).

Harrow

Local Plan Documents:

- [Harrow Core Strategy \(adopted 2012\)](#)
- [Harrow Development Management Policies \(Adopted July 2013\)](#)
- [LB Harrow New Local Plan 2021-2041 Proposed Submission \(Regulation 19\)](#)

Policies on Circular Economy: Harrow's New Local Plan (Proposed Submission, Nov 2024) embeds circular-economy principles in a dedicated chapter on 'Managing Waste and Supporting the Circular Economy. Policy CE1 ('Reducing and Managing Waste') requires all proposals (excluding householder applications) to make on-site provision for segregated recycling and organics, and for major developments to 'promote circular economy outcomes and aim to be net zero-waste'. Policy CE2 'Design to Support the Circular Economy' requires the application of circular economy principles in new development and submission of a Circular Economy Statement in line with London Plan Policy SI7. Industrial land policies further secure space for circular-economy infrastructure: Policy LE3 protects Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS), explicitly supports 'secondary materials, waste management and aggregates', resists any net loss of industrial floorspace, and restricts non-industrial uses (including directing use classes E(g)(ii)/(iii) to non-industrial areas). Co-location in LSIS is only supported via the Local Plan or an agreed Masterplan, and residential uses are not supported in SIL, together safeguarding land needed for reuse, recycling and recovery activities.

Relevant Policies: Emerging Harrow Local Plan – Policy CE1 (Waste and Circular Economy); Policy CE2 (Design to Support the Circular Economy); Policy LE3 (Industrial Land)

Hillingdon

Local Plan Documents:

Hillingdon Local Plan

- [Local Plan: Part 1 – Strategic Policies \(2012\)](#)
- [Local Plan Part 2: Development Management Policies \(2020\)](#)

A full plan review is underway.

Policies on Circular Economy: Although written before the term ‘circular economy’ was widely used, Hillingdon’s policies strongly support its principles. Policy EM11 (Sustainable Waste Management) requires all developments to plan for managing waste from the design stage through construction and operation. It promotes reusing materials and recycling during construction.

The plan supports management of waste in accordance with the waste hierarchy, energy recovery from waste where appropriate and protects existing waste sites. Strategic objective (SO13) commits to sustainable waste management. The plan also promotes sustainable construction and retrofitting through policies EM1 (Climate Change Adaptation and Mitigation) and EM8 (Land, Water, Air and Noise).

Relevant Policies: Local Plan Part 1 – Policies EM1; EM8; EM11; Strategic Objective SO13.

Hounslow

Local Plan Documents:

- [Hounslow Local Plan \(2015\)](#)
- [Hounslow Local Plan 2020-2041 \(Regulation 19\)](#)
- [Hounslow Climate Change Mitigation & Adaptation SPD 2025](#)
- [Hounslow Character, Sustainability and Design Codes SPD 2024](#)

Policies on Circular Economy: Hounslow’s current Local Plan includes basic policies on sustainable design and waste but does not mention the circular economy. The emerging new Local Plan embeds circular-economy outcomes through its

environmental quality policies. Policy EQ2 (Sustainable Design and Construction) requires all developments to apply London Plan principles and to 'reuse and recycle construction materials at the highest value level possible (in line with circular economy principles)', alongside measures such as SuDS, urban greening and energy planning. Major schemes must submit a sustainability statement and all applications complete a sustainability checklist; referable schemes must also demonstrate how Circular Economy and Whole Life-Cycle Carbon (WLCA) principles have been incorporated, in line with London Plan policy and guidance. Policy EQ1 (Energy and carbon reduction) complements this by driving on-site performance, 'Be Seen' energy monitoring and (where necessary) carbon offsetting to further incentivise design choices that minimise embodied and operational carbon. Policy EQ7 (Sustainable Waste Management) expects all development to incorporate suitable on-site arrangements for waste management.

Hounslow's Climate Change Mitigation & Adaptation SPD elaborates what is expected concerning the implementation of related policies. It explicitly signposts London Plan SI7 and the circular economy transition (designing out waste; keeping materials at highest value; designing for future adaptation and eventual deconstruction/reuse), and it lists the Circular Economy Statement and WLCA as additional requirements for GLA-referable applications, with a borough sustainability checklist to ensure early consideration of materials, adaptability and end-of-life. In addition, Hounslow's Character, Sustainability and Design Codes SPD sets out further guidance on embedding circular economy principles within scheme design at Part A2 'Common Considerations' under the Resources & Lifespan section.

Relevant Policies: Emerging Hounslow Local Plan – Policy EQ1 (Energy and carbon reduction); Policy EQ2 (Sustainable Design and Construction); Policy EQ7 (Sustainable Waste Management)

Richmond upon Thames

Local Plan Documents: [Richmond Local Plan \(2024–2040\)](#)

Policies on Circular Economy: Richmond's recently adopted new Local Plan embeds circular-economy principles through strategic Policy 6 'Employment and Circular Economy Sector' and 7 'Waste and the Circular Economy'.

Richmond's Local Plan Policy 6 protects industrial land and promotes its intensification to support green industries and circular economy businesses. The policy encourages flexible light-industrial spaces, co-location of compatible uses, and innovation in reuse, repair, and remanufacturing. It aims to create local jobs, strengthen supply chains, and foster partnerships that keep materials circulating within the borough, contributing to carbon reduction and resource efficiency. Policy 7

requires all proposals must adopt a circular approach that prioritises reuse/retrofit of existing buildings, designs for durability, disassembly and reuse, and specifies low impact, recycled and locally sourced materials. Major schemes (10+ homes or >500 m² non-residential GIA) must submit a Circular Economy Statement in line with GLA guidance and undertake a Whole Life-Cycle Carbon (WLCA) assessment to demonstrate whole-life carbon savings, with site waste management plans required for major/engineering works and other high waste developments.

Employment policies resist the loss of industrial land, support intensification and flexible light-industrial workspace, and explicitly promote opportunities to develop the local circular economy sector, helping keep materials, repair and remanufacturing activity within the borough.

Relevant Policies: Richmond Local Plan – Policy 6 Employment and Circular Economy Sector; Policy 7 - Waste and the Circular Economy

Old Oak and Park Royal Development Corporation (OPDC)

Local Plan Documents:

[OPDC Local Plan 2018 – 2038 \(adopted 2022\)](#)

Policies on Circular Economy: OPDC’s adopted Local Plan (June 2022) includes a dedicated circular economy policy - Policy EU7 (Circular and Sharing Economy), which expects major development proposals to be designed and constructed in a way that enables disassembly and re-use, promotes leasing/rental models for building systems, products and materials, incorporates sharing models in design, construction and operation, and uses circular principles to shape the design and implementation of energy, water and waste infrastructure. Major development proposals are expected to demonstrate this through the submission of a circular and sharing economy statement within Sustainability Statements. Pre-demolition audits may be also used to help demonstrate consistency with policy. OPDC’s wider strategy supports reuse and shared use of materials and infrastructure.

Policy EU6 (Waste) requires major development proposals to follow the waste hierarchy; it also seeks on site segregation (including bio-waste), resident/user engagement to meet the Mayor’s 65% municipal waste recycling target, support for anaerobic digestion and/or other bio-waste and additional recycling if relevant and appropriate, and use of consolidation plus rail/water to move construction and waste arisings (Policy T8). Policy EU8 (Sustainable Materials) supports the use of

sustainable materials that reduce embodied-carbon and are sourced from secondary/recycled materials, responsible sourcing and local procurement.

Relevant Policies: OPDC Local Plan – Policy EU6 (Waste); Policy EU7 (Circular and Sharing Economy); Policy T8 (Transport); Policy EU8 (Sustainable Materials).

Appendix B – National Resource Productivity Data

Resource productivity in England measured as Gross value added (GVA) £s per kg of raw material consumption (excluding fossil fuels) has improved in both the long term (2001 to 2020) and short term (2015 to 2020). Comparing the values for 2001 and 2020 shown in Figure AB.1 below indicates that resource productivity has improved by at least a third.

The trendline on Figure AB.1 below suggests that resource productivity over the period has improved by over a third i.e. each £ of GVA from economic activity has been generated using only a two thirds of resource input required to generate that £ as required at the beginning of the century.

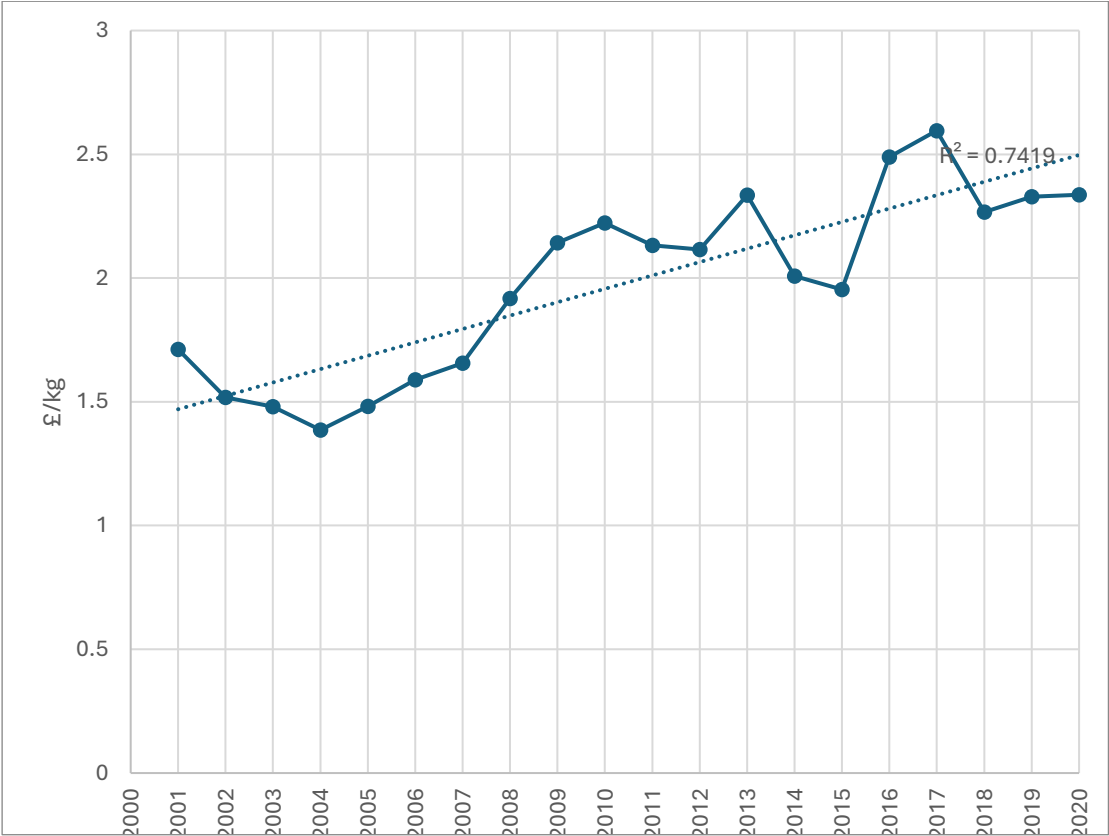


Figure AB.1 Raw material consumption in England 2001-2020 (Regional gross value added by industry)

Source: Defra <https://oifdata.defra.gov.uk/themes/resource-use-and-waste/J2/>

Noting that the above relates to material inputs to generate a unit GVA, this does not actually account for any improvement in efficiency in the actual use of these materials that may result in a reduction in their wastage, and hence waste production. And in fact every additional £s worth of GVA generated should only be taken to account for between no more than two thirds of the rate of growth indicated by GVA itself.