

Statement of Community Involvement

Consultation Statement

July 2016



The Statement of Community Involvement (SCI) was published in draft for public consultation for a one month period from 29th March to the 29th April 2016.

This consultation statement explains the consultation that was undertaken to inform the SCI. It identifies who responded to the formal public consultation, the issues raised and how these have been addressed in the final version of the SCI.

The following methods were used to consult on the SCI:

Website. The draft SCI was made available on the City Corporation's website, with links to the document provided from the Planning Consultations page as well as from the Planning Policy landing page to ensure maximum exposure. A web link to the location of the document and invitation to comment was sent to interested parties.

In advance of the formal public consultation, the City Corporation published an updated Local Plan Bulletin on its website in February 2016. The Local Plan Bulletin drew attention to the fact that the SCI was being updated and that consultation would take place during March and April 2016.

Inspection copies. A copy of the SCI was made available at the Built Environment Enquiries Desk at the Guildhall and at the Guildhall, Barbican, Artizan Street and Shoe Lane public libraries.

Notifications. Letters and emails containing information about the SCI and inviting comments were sent to relevant specific and general consultation bodies. The City Corporation maintains a database of all those who have expressed an interest in planning policy, and letters or emails were also sent to all those on the list.

Nine responses were received to the consultation. The following table summarises the comments received and explains how they have been taken into account in finalising the SCI.

Summary of Comments and Responses

Comment received	City of London response
<p>Savills</p> <p>Para 3.8 seems to be saying that any application that accords with the development plan, receives no more than 4 objections and includes no major planning issues is decided under delegated powers. However, para 3.9 seems to be saying that all major applications are considered by P&T Committee.</p> <p>So what about a major application that accords with the development plan, receives no more than 4 objections and includes no major planning issues – is it decided under delegated powers as per 3.8 or does it go to P&T Committee as per 3.9?</p>	<p>Officers have delegated powers to make decisions on major applications where the criteria are met but such applications would normally be of “broad public interest” and thereby require a Committee decision. The relevant SCI paragraphs have been clarified.</p>
<p>Shirley Watson - Individual</p> <p>We appreciate the commitment of the City of London to engage with its residents and the outcomes. I do not wish to comment on the detail of the draft document other than to say it appears to provide an on-going commitment to informing and involving residents in the Planning activities of the City. This commitment is something that is valued by us and in which we seek to be involved where appropriate. We previously attended the residents' public consultation meetings at Guildhall and City of London School and found these most informative, also we appreciate the publication that keeps us informed on new initiatives and issues affecting residents of the City. Recently my husband attended the 'display' at Shoe Lane library regarding</p>	<p>Support and comments noted.</p>

<p>Fleet Street improvements.</p> <p>Also, as a former employee of a major business In the City with involvement in property management and corporate social responsibility policies, I suggest that for major companies, you should aim to communicate with both the Head of Property and the Head of CSR as this should ensure that your 'messages' reach the right audience to get engagement on the built environment and the people issues affecting employees and employers.</p>	<p>The consultation database aims to communicate with the most appropriate person within City organisations, using contact details provided by the organisations themselves.</p>
<p>Natural England</p>	
<p>We are supportive of the principle of meaningful and early engagement of the general community, community organisations and statutory bodies in local planning matters, both in terms of shaping policy and participating in the process of determining planning applications.</p> <p>We regret we are unable to comment, in detail, on individual Statements of Community Involvement but information on the planning service we offer, including advice on how to consult us, can be found at: https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals.</p> <p>We now ask that all planning consultations are sent electronically to the central hub for our planning and development advisory service at the following address: consultations@naturalengland.org.uk. This system enables us to deliver the most efficient and effective service to our customers.</p>	<p>Support and comments noted.</p>

<p>Land Securities</p>	
<p>We welcome the opportunity to comment upon a revised Statement of Community Involvement (SCI). The most recent draft SCI positively builds upon the consultation in 2012 and, if adopted, would benefit future consultations across the City.</p> <p>In responding to the latest draft SCI, we make reference to our response to the 2012 consultation. We would, therefore, be grateful if our consultation response dated 28 September 2009 is read in conjunction with this letter for completeness.</p> <p>We are pleased to note that the City of London undertakes to publish consultations on its website, but would encourage the City to further embrace social media to ensure that consultation is as far reaching as possible. We would welcome initiatives to exploit all avenues to maximise participation in consultations.</p> <p>We welcome the City's clarification at 2.8 of who will be consulted on planning policies. However, 2.8 does not include reference to land owners. Given the nature of ownership in the City and the impact of planning policy upon land owners, we would strongly encourage the City to consider extending 2.8 to include landowners. We also recommend that this applies to CIL and planning applications.</p> <p>We welcome the offer of pre-application advice and negotiation.</p>	<p>Support noted.</p> <p>Comment noted. Paragraph 2.41 already identifies the aim to use the City Corporation's social media accounts to publicise consultation. The City Corporation will endeavour to make further use of this medium in future consultations.</p> <p>A mention of landowners will be added to paragraph 2.8 and other paragraphs, where relevant. Landowners who have requested to be notified are already included on the planning policy database, which will be used for consultations on planning policy documents and on any future review of the CIL Charging Schedule.</p> <p>Details of the charges for pre-application advice are</p>

<p>However, there continues to be no detail about any plans to charge for this service. We would welcome some clarity from the City on this point.</p>	<p>available on the planning application pages of the City of London website.</p>
<p>Port of London Authority</p>	
<p>Overall, the PLA support the positive involvement of the City's communities, and Stakeholders in the production and evolution of Planning Applications and Policies, which affect the Borough and those that live within it. Section 2 (Consultation on Planning Policies) considers those key community members and stakeholders who should be consulted on the preparation of planning policy documents.</p> <p>A list of authorities is provided under section 2.7, although the PLA do not appear to be included (unless we fall under those considered under section 2.8). As the Statutory Harbour Authority, it is considered paramount that we are included as key stakeholders in the planning policy process and should be key consultees in emerging Policies. After all, there are many river and transport related policies which we would need to have detailed input into. The PLA are keen to ensure that the River Thames continues to be recognised as key to London's future development and success and should be utilised as an asset where practicable. The River is home to a large number of Safeguarded Wharves, including within the City of London Walbrook Wharf.</p> <p>Early consultation on Policy would ensure that the aims and objectives of the PLA, and as set out in the draft Thames Vision, are upheld. The Thames Vision is about planning for the river's future, so that we can make the most of its potential, for the benefit of all. The Vision seeks to consider all Thames uses together: trade, travel, leisure and</p>	<p>Support noted.</p> <p>The list provided in paragraph 2.7 relates to organisations covered by the statutory duty to co-operate, which are prescribed by Local Plan Regulations. A minor change is proposed to the final version of the SCI to clarify this point. The PLA does fall under 'General Consultee Bodies' as mentioned in paragraph 2.8 of the SCI.</p> <p>Noted. The City Corporation will consult and engage with the PLA throughout the preparation of the Local Plan review.</p>

<p>pleasure.</p> <p>PLA involvement with relevant Supplementary Planning Documents (SPDs) is also requested where practicable.</p> <p>Section 3 (consultations on planning applications) considers those key communities and stakeholders who will be involved within the consultation of Planning Applications. It is pleasing to see that the PLA are listed as one of the Bodies to be consulted on applications (where practicable). Although, it is also considered beneficial, from the PLAs point of view, to be involved in planning proposals at pre-application stage. This would help build and improve PLA relations with developers and ensure that any concerns raised are ironed out (as far as possible) before the formal submission of a planning application. We would also be able to inform what studies and reports should accompany a planning application e.g. Marine Ecology or Navigation Risk Assessment. The PLA would welcome early input, especially with major development and those projects that could affect the river regime.</p> <p>The PLA would also welcome updates regarding the progress of those planning applications we have had direct involvement in and be informed of the outcome of planning decisions where we may have raised issue, requested further information of conditions.</p>	<p>Noted. The City Corporation will consult and engage with the PLA on relevant SPDs.</p> <p>Initial pre-application discussions are often confidential and therefore the City Corporation is unable to involve outside bodies at this time. However, prospective applicants are advised and encouraged to contact the PLA at an early stage of any pre-application proposals which affect the river.</p> <p>Consultees will be notified of decisions on planning applications on which they have commented.</p>
<p>Surveyor to the Fabric of St Paul's</p>	
<p>The Dean and Chapter of the Cathedral Church of St Paul in London have taken a great interest in your public consultation on its review of the City of London's Statement of Community Involvement and would like to comment with the following.</p>	

<p>We have noted that in the 2012 SCI Document, Annex A, the Cathedral School, Dean and Chapter, and the Surveyor to The Fabric are bodies to be consulted on planning policies. Additionally, in Annex B, the Surveyor to The Fabric is to be consulted on planning applications when relevant. As a central institution, the Cathedral should continue to be acknowledged in this way.</p> <p>The Dean and Chapter of the Cathedral Church of St Paul should be listed on the Consultation Database (SCI, p7, 2.28) and also on the list of organisations which is now on the City Corporation’s website (p7, 2.9). We note that there is no website address of the Consultation List, given in the document and would request confirmation of where this list can be found.</p> <p>On (p25, 3.19) it states, ‘The City Corporation consults specific organisations in accordance with the statutory requirements and other bodies when appropriate’. Under the heading Historic Buildings, The Surveyor to the Fabric is to be consulted, however, the Dean and Chapter do not form part of this list. The Cathedral Church of St Paul should also be listed not only as a religious organisation and heritage body, but also as a business. Who decides what bodies are ‘appropriate’ to consult?</p>	<p>The Dean and Chapter of the Cathedral Church of St Paul will be added to list of stakeholders consulted on Planning Applications under Annex B. The Planning Consultation Database will be amended to ensure that the Dean & Chapter are included.</p> <p>The website link to the list of bodies consulted is reproduced below: http://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-policy/Pages/Statement-of-Community-Involvement.aspx</p> <p>The link will be added to the SCI</p> <p>Noted. The decision on which bodies are appropriate to consult is taken by the case officer based on the nature of the application proposal. The Dean and Chapter of the Cathedral Church of St Paul will be added to the lists.</p>
<p>Barbican Association</p>	
<p>I write on behalf of the Barbican Association as Chair of the Planning Sub-committee. We appreciate the opportunity for consultation and make the following points on the document.</p>	

<p><u>On the 'comments' sections - 3.2 onward:</u></p> <p>The document does not state that all comments received on applications will be published on the planning portal. We ask that this be added.</p> <p>Problem: - We are named as formal consultees on the planning portal but the BA comments are never posted in that slot so it looks as though we never respond. We have alerted the CoL about this on many occasions and now formally ask that this problem is corrected, thank you.</p> <p><u>On public speaking at meetings</u></p> <p><i>“3.5 Public speaking at Committee. When an application is considered by the Planning & Transportation Committee, individuals and persons representing organisations may speak at the Committee meeting, subject to current guidelines. A copy of the guidelines is kept available for inspection from the Committee Clerk and on the City Corporation’s website. Everyone who has made comments on an application being considered by the Committee will be advised of the date and the arrangements for public speaking at the Committee”</i></p> <p>We ask that there is a sentence in the document that states that we be consulted on any changes to the guidelines. The current rules on expecting objectors to share time and not overlap on points present practical difficulties to non-corporate groups like residents (but not only residents) and therefore severely disadvantages them, particularly if separate non-corporate groups are representing different</p>	<p>Agreed. This will be added.</p> <p>Notification that consultee comments have been received will be included in the Consultee Comments section of Public Access on the City of London Website.</p> <p>The guidelines on public speaking are set out in the Planning Protocol. The guidance on speakers 'sharing time' is not unique to the City of London and operates in a similar fashion in a number of London Boroughs. The Protocol allows the Chairman of the Committee, at his/her discretion, to allow limited additional time if there is considered to be an exceptionally wide range of issues.</p>
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<p>interests.</p> <p><u>On the 'decision' section</u></p> <p>There is nothing in the document about publishing the way in which Council members vote despite this being normal procedure in other Local Authorities.</p> <p><i>3.10. Issue of decisions - Decisions on planning applications will be issued within two working days of the decision being made.</i></p> <p>The document states that the planning procedure is an open process and the way that members vote is clearly an important part of transparency that also informs the electorate.</p> <p>We ask that the document includes a statement to say that the way in which Council members vote will be published.</p> <p><u>On Appendix A</u></p> <p>We ask to be listed as a formal consultee in Appendix A – on both policies and applications.</p>	<p>Meetings of the Planning & Transportation Committee are open to the public and votes are taken by a show of hands, enabling the public to see how Members are voting. Recording of votes only happens if a Member specifically requests it.</p> <p>The Barbican Association will be included on the list of consultees for planning applications. It is already on the planning policy consultee list.</p>
<p>Historic Royal Palaces</p>	
<p>Thank you for consulting Historic Royal Palaces of the City's draft Statement of Community Involvement, as part of the public consultation process. We should be grateful if you would take the following comments into account.</p>	

We note that the draft is a comprehensive, but generic, document, as we would expect. We welcome the inclusion of Historic Royal Palaces in the list of organisations that will be consulted 'where relevant' on the City's policies (para 2.8 – 2.9 and Annexe A) and planning applications (para 3.19 and Annexe B). The exact circumstances which would determine when or whether any particular body is consulted are not given, however. Presumably, it will be in relation to the location and nature of the development proposed, at the offices' discretion.

It would be very helpful, therefore, if you could provide classification of the circumstances in which Historic Royal Palaces would be consulted, particularly in the absence of a formally agreed buffer zone to the Tower of London World Heritage site (WHS). The simplest criterion we can suggest would be that Historic Royal Palaces should be consulted if Historic England is consulted in connection with the Tower WHS. Notifying Historic Royal Palaces of development affecting the 'Outstanding Universal Value' of the WHS is, in effect, the same as notifying a relevant organisation of proposed development affecting the setting of a designated heritage asset. This would consolidate the notification procedures already in places relating to the WHS.

Once adopted, such a protocol should ensure that Historic Royal Palaces is notified of development adjacent to (eg within 800m of) the Tower WHS, and within the designated views, viewing corridors and backgrounds identified in the *Tower of London WHS Management Plan 2010*. As you know, Historic Royal Palaces is already a statutory consultees for applications affecting the Mayor's London View Management Framework (LVMF) protected view 25A.1-3 from the

Noted. The decision on when HRP will be consulted on planning applications is taken by the case officer based on the nature of the application and the potential impact on the Tower of London and its setting.

<p>Queen's Walk.</p> <p>We should be very happy to meet the relevant City offices to discuss the above, if that would be helpful.</p>	
<p>Environment Agency</p>	
<p>We are pleased to see that we are named as a consultee in the Local Plan and planning application process. In addition to written consultation, we would be happy to attend any meeting with the Planning Policy Team where appropriate.</p>	<p>Support and comment noted.</p>