



## Planning and Transportation Committee

**Date:** THURSDAY, 11 MAY 2023  
**Time:** 10.30 am  
**Venue:** LIVERY HALL - GUILDHALL

**Members:**

Deputy Randall Anderson	Alderman Ian David Luder
Brendan Barns	Antony Manchester
Emily Benn	Deputy Brian Mooney
Ian Bishop-Laggett	Deputy Alastair Moss
Deputy Michael Cassidy	Alderman Jennette Newman
Deputy Simon Duckworth	Deborah Oliver
Mary Durcan	Deputy Graham Packham
John Edwards	Alderman Susan Pearson
Anthony David Fitzpatrick	Judith Pleasance
Deputy John Fletcher	Deputy Henry Pollard
Dawn Frampton	Ian Seaton
Deputy Marianne Fredericks	Hugh Selka
Jaspreet Hodgson	Luis Felipe Tilleria
Amy Horscroft	Shailendra Kumar Kantilal Umrada
Deputy Shravan Joshi	William Upton KC
Deputy Edward Lord	Alderman Sir David Wootton
Deputy Natasha Maria Cabrera Lloyd-Owen	

**Enquiries:** Zoe Lewis  
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**Ian Thomas**  
**Town Clerk and Chief Executive**



# AGENDA

## Part 1 - Public Agenda

1. **APOLOGIES**

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

3. **ORDER OF THE COURT OF COMMON COUNCIL\***

To receive the order of the Court of Common Council dated 27 April 2023, appointing the Committee and approving its Terms of Reference.

**For Information**  
(Pages 7 - 8)

4. **ELECTION OF CHAIRMAN**

To elect a Chairman in accordance with Standing Order No. 29.

**For Decision**

5. **ELECTION OF DEPUTY CHAIRMAN**

To elect a Deputy Chairman in accordance with Standing Order No. 30.

**For Decision**

6. **MINUTES**

To agree the public minutes and summary of the meeting held on 7 March 2023.

**For Decision**  
(Pages 9 - 22)

7. **APPOINTMENT OF SUB-COMMITTEES**

Report of the Town Clerk.

**For Decision**  
(Pages 23 - 30)

8. **OUTSTANDING ACTIONS**

Report of the Town Clerk.

**For Information**  
(Pages 31 - 34)

9. **APPOINTMENTS TO THE CRIME AND DISORDER SCRUTINY COMMITTEE**

To appoint the Chairman and Deputy Chairman, or their representatives, as Members of the Crime and Disorder Scrutiny Committee.

**For Decision**

10. **CHARGES FOR PROPERTY SEARCHES**

Report of the Planning & Development Director.

**For Decision**  
(Pages 35 - 40)

11. **ADOPTION OF STATEMENT OF COMMUNITY INVOLVEMENT AND DEVELOPER ENGAGEMENT GUIDELINES**

Report of the Planning and Development Director.

**For Decision**  
(Pages 41 - 128)

12. **LOCAL IMPLEMENTATION PLAN FUNDED SCHEMES 2023/24**

Report of the Executive Director, Environment.

**For Decision**  
(Pages 129 - 134)

13. **CITY FUND HIGHWAY DECLARATION: 120 FLEET STREET, LONDON, EC4A 2BE**

Report of the City Surveyor.

**For Decision**  
(Pages 135 - 142)

14. **MIPIM PROPERTY CONFERENCE 2023\***

Report of the Executive Director of Environment/City Surveyor.

**For Information**

15. **ENVIRONMENT DEPARTMENT HIGH-LEVEL BUSINESS PLAN 2023/24\***

Report of the Executive Director, Environment.

**For Information**

16. **PUBLIC LIFT AND ESCALATOR REPORT\***

Report of the City Surveyor.

**For Information**

17. **PUBLIC REPORT OF ACTION TAKEN\***

Report of the Town Clerk.

**For Information**

18. **TO NOTE THE DRAFT MINUTES OF THE STREETS AND WALKWAYS SUB-COMMITTEE - 7 MARCH 2023\***

**For Information**

19. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

20. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

21. **EXCLUSION OF THE PUBLIC**

MOTION – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.

**For Decision**

**Part 2 - Non-public Agenda**

22. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 7 March 2023.

**For Decision**  
(Pages 143 - 144)

23. **REPORT OF NON-PUBLIC ACTIONS TAKEN\***

Report of the Town Clerk.

**For Information**

24. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

25. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

# Agenda Item 3

LYONS, Mayor	<b>RESOLVED:</b> That the Court of Common Council holden in the Guildhall of the City of London on Thursday 27 <sup>th</sup> April 2023, doth hereby appoint the following Committee until the first meeting of the Court in April, 2024.
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## PLANNING & TRANSPORTATION COMMITTEE

1. **Constitution**  
A Ward Committee consisting of,
  - four Aldermen nominated by the Court of Aldermen
  - up to 31 Commoners representing each Ward (two representatives for the Wards with six or more Members regardless of whether the Ward has sides) or Side of Ward.

2. **Quorum**  
The quorum consists of any nine Members.

3. **Membership 2023/24**

### ALDERMEN

- 1 Jeanette Newman
- 2 Ian Luder
- 7 Susan Pearson
- 6 Sir David Wootton

### COMMONERS

2	Deborah Oliver.....	Aldersgate
11	Randall Keith Anderson, Deputy .....	Aldersgate
2	Shailendra Kumar Kantilal Umradia.....	Aldgate
2	Ian Bishop-Laggett.....	Bassishaw
2	Luis Felipe Tilleria .....	Billingsgate
6	Shravan Joshi, M.B.E., Deputy.....	Bishopsgate
1	Simon D'Olier Duckworth, O.B.E., D.L., Deputy.....	Bishopsgate
2	The Hon. Emily Sophia Wedgwood Benn.....	Bread Street
1	Hugh Selka.....	Bridge and Bridge Without
2	Antony Geoffrey Manchester..... (Candlewick has paired with Bridge and Bridge Without for this appointment)	Broad Street Candlewick
2	Mary Durcan.....	Castle Baynard
10	Graham David Packham, Deputy .....	Castle Baynard
10	Alastair Michael Moss, Deputy.....	Cheap
2	Michael John Cassidy, C.B.E., Deputy.....	Coleman Street
2	Amy Horscroft .....	Cordwainer
6	Ian Christopher Norman Seaton, M.B.E .....	Cornhill
6	Natasha Maria Cabrera Lloyd-Owen, Deputy .....	Cripplegate
1	Dawn Frampton .....	Cripplegate
21	James Henry George Pollard, Deputy. ....	Dowgate
5	John Ernest Edwards.....	Farringdon Within
2	Brendan Barnes .....	Farringdon Within
7	William Upton, K.C.....	Farringdon Without
3	Charles Edward Lord, O.B.E., J.P Deputy .....	Farringdon Without
9	Judith Lindsay Pleasance.....	Langbourn
2	Anthony Fitzpatrick .....	Lime Street
3	John William Fletcher, Deputy... ..	Portsoken
25	Brian Desmond Francis Mooney, Deputy.....	Queenhithe
16	Marianne Bernadette Fredericks, Deputy .....	Tower

2	Jaspreet Hodgson.....	Vintry
	(Walbrook has paired with Broad Street for this appointment).....	Walbrook

4. **Terms of Reference**

To be responsible for:-

- (a) All functions of the City as local planning authority [relating to town and country planning and development control] pursuant to the Town and Country Planning Act 1990, the Planning (Listed Building and Conservation Areas) Act 1990 and Compulsory Purchases Act 2004, the Planning Act 2008 and all secondary legislation pursuant to the same and all enabling legislation (including legislation amending or replacing the same).
- (b) Making recommendations to Common Council relating to the acquisition, appropriation and disposal of land held for planning purposes and to exercise all other functions of the local planning authority relating to land held for planning (or highways) purposes, and making determinations as to whether land held for planning or highways purposes is no longer required for those purposes, other than in respect of powers expressly delegated to another committee.
- (c) All functions of the Common Council as local highway, traffic, walkway and parking authority (other than in respect of powers expressly delegated to another committee) and the improvement of other open land under S.4 of the City of London (Various Powers) Act 1952.
- (d) All functions under part II of the City of London (Various Powers) Act 1967 including declaration, alteration and discontinuance of City Walkway (other than in respect of the promotion of works to the Barbican Podium, which shall not include any declaration, alteration or discontinuance of City Walkway ["City Walkway regulatory functions"] in connection with such works, all City Walkway regulatory functions to remain the responsibility of Planning and Transportation Committee).
- (e) All functions relating to the construction, maintenance and repair of sewers in the City, including public sewers (on behalf of Thames Water under an agency arrangement).
- (f) All functions of Common Council as Lead Local Flood Authority in relation to the Flood and Water Management Act 2010.
- (g) All functions relating to the Stopping Up of highway (including as local planning authority and highway authority).
- (h) All functions relating to street naming and numbering under the London Building Acts (Amendment) Act 1939.
- (j) All functions relating to building control under the Building Act 1984, Building Regulations 2000-10 and London Building Acts 1930-82.
- (k) All functions and powers of the City Corporation of providing assistance to the Building Safety Regulator under Section 13 of the Building Safety Act 2022, where the Building Safety Regulator is acting as the Building Control Authority under section 91ZA and 91ZB of the Building Act 1984.
- (k) The setting of building control charges under the Building (Local Authority Charges) Regulations 2010.
- (l) Updating and approving the Planning Protocol.
- (m) Response to and resolution of dangerous structures under the London Building Acts (Amendment) Act 1939.
- (n) All functions relating to the City of London Corporation's commemorative blue plaques.
- (o) All functions relating to the Local Land Charges Act 1975.
- (p) The appointment of the Chief Planning Officer & Development Director.
- (q) The appointment of the Director of Environment (in consultation with the Port Health and Environmental Services Committee).
- (r) The appointment of such Sub-Committees as is considered necessary for the better performance of its duties including a Planning Applications Sub-Committee, Streets & Walkways Sub-Committee and a Local Plans Sub-Committee.



**PLANNING AND TRANSPORTATION COMMITTEE**

**Tuesday, 7 March 2023**

**Minutes of the meeting of the Planning and Transportation Committee held at the Guildhall EC2 at 10.30 am**

**Present**

**Members:**

Deputy Shравan Joshi (Chairman)	Alderman Ian David Luder
Ian Bishop-Laggett	Alderman Bronek Masojada
Deputy Keith Bottomley	Deborah Oliver
Deputy Michael Cassidy	Deputy Graham Packham
Mary Durcan	Ian Seaton
John Edwards	Alderman Sir David Wootton
Deputy Marianne Fredericks	Alderwoman Susan Pearson
Deputy Natasha Maria Cabrera Lloyd-Owen	

**Officers:**

Tim Fletcher	- Town Clerk's Department
Zoe Lewis	- Town Clerk's Department
Gemma Stokley	- Town Clerk's Department
Fleur Francis	- Comptroller and City Solicitor's Department
Joanne Hill	- Environment Department
Gillian Howard	- Environment Department
Kerstin Kane	- Environment Department
Sam Lee	- Environment Department
Paul Monaghan	- Environment Department
Gwyn Richards	- Environment Department
Rob McNicol	- Environment Department
Gordon Roy	- Environment Department
Ian Hughes	- Environment Department

Prior to the start of the meeting, the Chair set out the procedure for discussion to enable a rounded and representative debate and adequate time to properly consider the items. He reminded Members of the Standing Order around the conduct of debate at Committee and asked that Members confine their speeches to the matter under discussion and avoid being repetitious. The Chairman requested that Members limit their contribution to one comment and if the need arose to raise a new point, they would join the end of the list of remaining speakers. Priority would be given to those who had not yet contributed to the debate. The Chairman reminded Members to have respect for each other when speaking.

1. **APOLOGIES**

Apologies for absence were received from Deputy Alastair Moss (Deputy Chairman), Deputy Randall Anderson, Brendan Barns, Emily Benn, Deputy John Fletcher, Jaspreet Hodgson, Amy Horscroft, Alderman and Sheriff Alastair King, Deputy Edward Lord, Judith Pleasance, Deputy Henry Pollard, Shailendra Umradia and William Upton KC.

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

There were no declarations.

3. **MINUTES**

The Committee considered the public minutes of the meeting held on 10 January 2023 and approved them as a correct record.

**Matters Arising**

A Member asked for information on the Member Training Programme and was advised this would be considered under Item 13 of the agenda.

4. **BANK JUNCTION IMPROVEMENTS (ALL CHANGE AT BANK): TRAFFIC MIX AND TIMING REVIEW UPDATE**

The Committee considered a report of the Executive Director, Environment which provided an update on the progress of the review of the traffic mix and timing restrictions at Bank Junction.

Members were informed that work was in progress and was scheduled to be completed in Spring 2024. Members were advised that the report set out four traffic mix options that had been investigated using 2022 traffic flows. This indicated that the option to reintroduce all traffic was likely to have significant traffic implications and therefore would not be feasible. However, further investigations should continue for the other three options. The Officer stated that the remaining three options included taxis, powered two wheelers or a combination of both. The Officer stated that these vehicle types were the only types of vehicles with a definition and signage related to them which could be used to restrict usage if the traffic mix was changed.

Officers advised that the next stage of work would involve traffic modelling assessments, equalities assessments, updates on collisions and the general context of the current situation in terms of the post-pandemic recovery of the area. This work would highlight the benefits and likely impacts of each of the options. A further report would be presented to the Committee in May 2023. This report would set out findings and make recommendations on which options could proceed for further design and public consultation.

The Chairman stated that the scenarios for the traffic mix were shown in Paragraph 9 on Page 21 of the Officer's report and reiterated the Officer recommendation that the option of general traffic across Bank Junction should not be put forward for further investigation.

A Member commented that although there was signage for cyclists to dismount, many did not. He asked Officers if there could be two lanes for cyclists going east-west so cyclists had more space. Officers would provide the Member with a written response.

A Member requested that the report back to the Committee in May 2023 include full reasons for the options outlined and if there were any difficulties e.g., with the reintroduction of black taxis, this be fully explained.

The Chairman of the Streets and Walkways Sub-Committee advised that it was important to minimise disruption and publicise the outcome of the works.

A Member commented that the modelling was based on 21 bus routes, but the Number 11 would not be coming into the City. An Officer stated that the 21 bus services were bus routes through the modelled area as a whole and not necessarily buses through Bank Junction. The traffic modelling was based on the bus services in operation when the traffic count was undertaken. If bus routes changed, this would be taken into account in future modelling.

A Member asked Officers to clarify whether there were plans for one or more of the bus routes being temporarily diverted down London Wall to be diverted on a permanent basis. The Officer stated that she was not aware of any bus services being permanently diverted but she would check and provide a written response.

A Member suggested that On-Street Parking Reserve (OSPR) funding could be used to provide more resources to deliver the ambitious project more quickly e.g., with more staffing and more out of hours work. The Chairman advised that the Priorities Board would be meeting quarterly to determine budgets for OSPR funds and Community Infrastructure Levy (CIL) distribution, and it was anticipated that this would provide a more efficient process for the utilisation of funds.

An Officer stated that this item would be discussed at the Streets and Walkways Sub-Committee later in the day and all Members of the Committee could be provided with an update following the discussion.

An Officer responded to points made by Members. He advised that work was taking place to improve signage and there were engineering challenges on site as there was an extreme lack of depth due to London Underground structures. Hand diggers had to be used and the public had to be allowed to continue to move through the space. In addition, there was a deadline to complete as much as possible before the Lord Mayor's Show.

A Member referred to an original vision to take all traffic out of Bank Junction and suggested taking traffic out of Bank Junction at weekends. The Chairman stated that timings would be part of the review and consultation.

A Member requested that, although not a legal requirement, socio-economic inequality should be added to the equalities impacts of each option. An Officer stated that the incorporation of this would be discussed with the Equalities consultant.

A Member asked the likely cost if the modelling had to be undertaken again. An Officer advised that if the modelling had to be done using the previous methods, including data collection and staffing costs, would cost £400,000 to £500,000. Officers were working with TfL to see if there were other methods that could be used to reduce the costs.

**RESOLVED** - That the Committee

- 1) Note the contents of the report;
- 2) Approve that no further work on the option of introducing general traffic into Bank at all times be undertaken, based on paragraphs 14-17 of the report;
- 3) Note the complexities of the work moving forward as explained in paragraphs 18 -19 and 22-26 of the report;
- 4) Note the updated indicative programme of work in Appendix 1 of the report.

**5. BUILDING CONTROL CHARGES REPORT - 2023/24**

The Committee considered a report of the Executive Director, Environment which outlined the findings of the Building Control's review into previous fees and charges increases and the recommendations for revised fees for 2023/24.

An Officer reported that this was the Annual Report to Committee to reset the building control charges taken for applications under building regulations. He informed Members that under CIPFA guidance, charges set should equate to the costs to provide the service. The current charge was £115 per hour and the revised figure was £126. However, as the guidance stated that over a five-year period there should be a zero budget and as the service had run at a deficit of £342,000 since 2018/19, it was proposed to increase the charge by 20% to £152 per hour.

An Officer informed the Committee that many large schemes lasted several years and therefore setting a 20% surcharge now would enable the five-year deadline to be met. As there was an annual report to Committee, if the requirement was being exceeded, and with the Committee's agreement, the surcharge could be dropped at a later date.

A Member asked whether the costs, for schemes that would take a number of years, were set at the start of the scheme or at the time the work was undertaken. An Officer reported that the estimated fees were based at the rate at the time the estimate was given. However as of April 2023, a quarterly review of fees would be introduced for large schemes.

Following a question from a Member, an Officer advised that the fees undertaken through the hub approved by Committee in January 2023 would be at the rate approved by Committee.

A Member asked if the fee had been benchmarked and was advised that all London councils had submitted hourly rate figures to the Building Services Regulator. The City's figures were broadly in the middle of the figures provided.

In response to a Member's question about how fees were estimated, an Officer stated that every project surveyor completed timesheets and records had been kept for several years. When a project of a certain value was submitted, it was possible to use these records to ascertain the number of hours it was expected to take.

In response to a Member's question, an Officer stated that the City of London Corporation had a statutory duty to enforce building regulations and would continue to do this until each job was complete. Public safety was the number one objective.

The Chairman commented on positive feedback from the market about the service provided by the District Surveyors.

**RESOLVED** - That the Committee approve Option 3 and agree a new "City of London Building Regulations Charges Scheme No 6: 2023", and a "Building Control Miscellaneous Charges No 5: 2023" based on a new rate of £152 per hour.

6. **DRAFT HIGH-LEVEL BUSINESS PLAN 2023/24 - ENVIRONMENT DEPARTMENT**

The Committee considered a report of the Executive Director, Environment which presented the high-level Business Plan for the Environment Department for 2023/24.

An Officer stated that the report set out the key areas of work for 2023/24 and the way in which services would support the Corporate Plan, other key strategies and policies. The Officer advised that more strategies and policies might be introduced during the year and the Business Plan could be amended accordingly.

Members requested that the Sporting Strategy and Small and Medium (SME) Strategy be referenced as forthcoming strategies. An Officer confirmed they would be referenced and the strategies would be incorporated into the Business Plan once approved.

A Member asked about data collection in relation to the Whole Lifecycle Carbon Planning Advice Note (PAN). An Officer stated that monitoring had begun of schemes approved over the last two years. Members were advised that post-completion data was the most relevant data but there was currently no post-completion data as none of the monitored schemes had yet been completed. Officers would provide planning stage data on the schemes approved to date. A

Member commented that going forward there should be more of a focus on performance monitoring of Whole Life Carbon PAN.

In response to a Member's question, an Officer informed the Committee that Local Plans Sub-Committee meetings were being arranged. A Member commented that she hoped there would be continuation in the membership of the Local Plans Sub-Committee. The Chairman advised that whilst the membership of both the Grand Committee and the Local Plans Sub-Committee could change, having oversight of the Local Plans at the Grand Committee would provide continuation of the work of the Local Plans Sub-Committee.

A Member queried whether the Blackfriars Bridge parapet refurbishment and repainting project had received funding from Bridge House Estates. An Officer would look into this and report back to Committee Members.

A Member requested that details on income generation, specific performance targets and baselines be included in the Business Plan. An Officer stated that targets had not been included as the Plan was being prepared in advance. However, once the figures for 2022/23 were available, they could be shown and these would be provided to Committee Members. The Chairman stated that some income streams would require a change in policy so the principles could be included with the details included at a later stage.

A Member requested a report back on consolidation centres. An Officer stated that there was currently just one consolidation centre at 22 Bishopsgate and there would be a report back to the Committee.

In response to a Member's question about whether the strategy of the City or Business Improvement Districts (BIDs) led, the Chairman asked that the reference to aligning BID strategic priorities on page 79 of the Officer's report be nuanced to indicate that the City's strategy led.

**RESOLVED** - That the Committee:

- 1) Note the factors taken into consideration in compiling the Environment Department Business Plan;
- 2) Approve, subject to the incorporation of changes outlined above, the high-level Business Plan 2023/24 which covers the service areas for which the Planning and Transportation Committee is responsible.

**7. LONDON WALL CAR PARKS JOINTS AND WATERPROOFING**

The Committee considered a report of the Executive Director, Environment which requested reapproval at Gateway 3/4 to carry out essential waterproofing and repair works to the highway structure in order to maintain structural integrity, utility and asset value.

A Member commented that although it was important to review, it should be noted that there were financial implications to the associated slippage. An Officer responded that without the slippage, some of the costs would have been incurred in the current year, whereas they were now fully incurred in the current year. There was a direct cost as a result of the delay. In addition, the delay had

meant the Bank Junction works now had to be completed before the work could commence.

**RESOLVED,** That the Committee

- 1) Note the total estimated cost of the project at £2,384,000 (excluding risk);
- 2) Grant delegated authority to the Chief Officer to appoint the successful contractor at Gateway 5 and to instruct the Comptroller and City Solicitor to enter into contract, subject to tendered works costs remaining within the £2,200,000 estimate provided by this report (or to instruct under the new highways term contract subject to satisfactory agreement of costs and the same proviso).
- 3) Approve a total Costed Risk Provision of £240,000 for use following Gateway 5, subject to tender costs remaining within budget, for expenditure against identified sums from the project risk registers against specified risks at the construction stage and to be drawn down to the Assistant Director Engineering.

**8. TRAFFIC ORDER REVIEW**

The Committee considered a report of the Executive Director, Environment which updated the Committee on progress of the review of all traffic orders in the City being undertaken as a result of the motion that was passed at the Court of Common Council meeting in April 2022.

Members were informed that Stage 1 of the review was to compile a list of all permanent and experimental traffic orders. This was completed in September 2022 and comprised over 1,500 measures introduced by a traffic order. Stage 2 of the review was to assess the orders against the outputs from the data collected and assessed against relevant City of London Corporation policies such as the Transport Strategy. The methodology in relation to Stage 2 was agreed by the Planning and Transportation Committee and Court of Common Council in September and October 2022. Stage 3 would look to implement any modifications that were identified. The Streets and Walkways Sub-Committee was tasked with scrutinising the detail and they agreed the scoring and ranking system as well as to expand Stage 2 to include a) a desktop study which scored and ranked the 1,299 traffic orders in scope and b) a more detailed site assessment as well as further work on 78 of the poorest scoring/performing orders. Following the site visits recommendations had been made to amend or consider amending 36 orders. Officers also identified an additional 32 orders which could benefit from being amended.

An Officer informed Members that if the Planning and Transportation Committee and Court of Common Council agreed, a new programme would be established to assess the merits of these of the recommendations and where appropriate changes could be delivered as part of existing or planned projects or by using underspend from the review. If additional funding was required, this would follow the usual bidding process.

The Chairman commented on the extensive volume of work involved in this review. He stated that it was testament to the Streets and Walkways

Department that out of 1,200 orders reviewed by the external consultant, only 32 were identified as orders that would benefit from alteration. The Chairman stated that this showed the thorough work of Officers.

A Member commented that this was a high-quality report and that the programme should be considered for nomination for an award once implemented. He suggested using funding reserves to achieve early results in a cost-effective way.

A Member congratulated Officers on the comprehensive piece of work. He commented that although he would like the work on Fleet Street to happen soon, it could not take place while the works currently being undertaken on Fleet Street were taking place as it would increase disruption. He suggested that the proposal to introduce a no right turn at the junction of Fleet Street and Whitefriars Street should be frozen until after the building works so that it could be considered in detail in light of the road layout and usage that would arise after the major developments had been completed. He raised concern that introducing it now would cause short term closures.

An Officer informed the Committee that the way in which traffic would move around the Salisbury Square development would be part of a holistic review so if it was agreed as part of this review to introduce a no right turn at the junction of Fleet Street and Whitefriars Street, it would not be implemented until the development was completed.

A Member requested that Ward Members be involved in the consultation before any proposals were implemented. An Officer advised that the recommendations in the report were recommendations for further consideration and were not necessarily the recommendations that would be implemented. He confirmed that Ward Members would be consulted and the traffic order changes would require a formal statutory consultation process.

A Member stated that a meeting had taken place between the clerk of a concerned livery company and Officers and he thanked Officers for attending. An Officer confirmed that contact with the livery company had been maintained.

A Member congratulated those involved in the work. She stated that the motion was passed by the Court of Common Council as a result of concern about how the streets in the City were working. This review proved the streets were working well and Officers were correctly applying Traffic Management Orders. She informed the Committee that some of the servicing and off-street delivery areas identified as successes were in The Minories and Aldgate High Street. There was an extended pavement for use when busy but also provision for off-street unloading and unloading during peak times.

A Member raised concern that in Mincing Lane and the surrounding streets, the safety of cyclists was not being reviewed. An Officer stated that the contraflow was implemented some time ago as a result of cyclists using the streets in this way. The contraflow helped facilitate them and improve safety. Data had suggested it had made an improvement and there was not a set of accident



issues related to contraflow cycling. However, Officers would address concerns raised and would carry out engagement if Members or the general public requested further discussion about how the contraflow cycling operated and any improvements that could be made. Officers stated that they would consider Mincing Lane in more detail.

A Member raised concerns about signage and suggested that Member input could be useful. An Officer stated that Officers could look into specific examples. He further stated that some signage was governed by statute and there were sensitivities around the positioning of signage as there had to be a balance between the signage required for traffic and space for pedestrians moving around footways.

**RESOLVED,** That the Committee

- 1) Note the outcome of the review, including the recommendations for the 78 traffic orders and measures that were the subject of Stage 2b detailed investigations (Appendix 1).
- 2) Note that officers have identified an additional 32 traffic orders and measures that could benefit from amendments to improve the way they support delivery of Transport Strategy outcomes (Appendix 5).
- 3) Note that implementation of any modifications identified (Stage 3) will be taken forward through a new programme or within existing and planned projects, subject to funding and approvals.
- 4) Agree to allocate the remaining unspent amount of £300,000 towards the delivery of changes to the traffic orders identified in Stage 3 of the review that are not being progressed as part of existing or planned projects. Where additional funding beyond this allocation is required, it will be subject to the usual process.
- 5) Agree not to proceed any further with the review of TfL's traffic orders and measures on the Transport for London Road Network.

9. **WHOLE LIFECYCLE OPTIONEERING PAN\***

This item was withdrawn from the agenda and replaced with an item for decision to be considered under Agenda Item 19.

10. **PUBLIC LIFT AND ESCALATOR MONTHLY REPORT\***

The Committee considered a report of the City Surveyor which outlined the availability and performance of publicly accessible lifts and escalators monitored and maintained by City Surveyors.

**RESOLVED** - That Members note the report.

11. **RISK MANAGEMENT UPDATE REPORT\***

The Committee considered a report of the Executive Director, Environment providing them with assurance that risk management procedures in place within the Environment Department were satisfactory and that they met the requirements of the corporate Risk Management Framework.

The Committee considered the key risks managed by the service areas of the Environment Department which fell within their remit.

**RESOLVED** - That Members note the report and the actions being taken by the Environment Department to monitor, mitigate and effectively manage risks arising from their operations.

12. **PARKING METER SURPLUS REPORT\***

The Committee received a report of the Chamberlain which informed Members of action taken in respect of any deficit or surplus in its On-Street Parking Account for the year 2021/22 before submission to the Mayor for London.

**RESOLVED** – That Members note the contents of the report before submission to the Mayor for London.

13. **PLANNING AND TRANSPORTATION COMMITTEE MEMBER TRAINING PROGRAMME\***

Members considered a report of the Executive Director, Environment which set out a series of training opportunities for Members of the Planning and Transportation Committee to ensure members had access to the most up to date information on key aspects of the planning system and transportation issues.

**RESOLVED** – That Members note the report.

14. **OUTSTANDING ACTIONS\***

The Committee received a report of the Town Clerk setting out its list of Outstanding Actions.

A Member requested that in future agendas, that the Outstanding Actions be moved to the main agenda pack after the minutes and that the document be kept updated. The Member asked for an update on the Supplementary Planning Documents (SPD). An Officer advised that this was taking longer to update than expected due to the complexity of issues being explored with the consultant. It was intended to submit a report to the July 2023 Committee. The Chairman requested that this report include details of the reasons the consultants had been unable to keep to the timeframes.

**RECEIVED.**

15. **MINUTES OF THE STREETS AND WALKWAYS SUB-COMMITTEE\***

The Committee received the draft public minutes and non-public summary of the Streets & Walkways Sub Committee meetings on 17 January 2023 and 14 February 2023.

**RECEIVED.**

16. **MINUTES OF THE PLANNING APPLICATIONS SUB-COMMITTEE\***

The Committee received the draft public minutes and public summary of the Planning Applications Sub-Committee meetings on 22 November 2022, 13 December 2022 and 31 January 2023.

**RECEIVED.**

**17. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

Dockless Cycles

A Member requested an update on the issues relating to dockless cycles. An Officer informed the Committee that this was an item on the Streets and Walkways Sub-Committee agenda later in the day and an Officer would be attending that meeting for the discussion. He stated that Members could be provided with an update following the Streets and Walkways Sub-Committee meeting.

Monitoring Climate Change in Planning Applications

A Member referenced a 2019 Committee report on the monitoring of buildings once completed e.g., in relation to BREAMM and requested an update report. An Officer confirmed that the 2019 report was a monitoring report on climate change in planning applications. Members could be provided with an update on how BREEAM requirements were being met and there could be a wider discussion on how applications were meeting climate aspirations. This could be discussed at the Local Plan Sub-Committee and then be reported to the Grand Committee in July 2023.

**18. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

National Planning Policy Framework

An Officer informed the meeting that the Government had recently consulted on changes to the National Planning Policy Framework as part of the wider planning reforms. A response on this had been submitted under delegated powers before the deadline of 2 March 2023. A draft response had been circulated to all Members of the Committee.

**19. CONSULTATION RESPONSES AND FINALISATION OF THE PLANNING ADVICE NOTE: WHOLE LIFE-CYCLE CARBON OPTIONEERING**

The Committee considered a late, separately circulated, report of the Executive Director, Environment, which provided information on the consultation responses received for the Whole Life-Cycle Carbon Optioneering Planning Advice Note. It set out the consultation engagement undertaken, the type of responses received and the subsequent changes that were made to the Planning Advice Note in response to the received comments and feedback.

An Officer stated that a threshold had been introduced for the optioneering requirement for all major applications and for other applications that were proposing to demolish more than 50% of the existing building. Applicants would be asked to use the optioneering exercise to demonstrate how the scheme evolved to become the planning application scheme. Applicants would not be challenged on the optioneering calculations when assessing the planning application scheme as the calculations were only used to compare the options

with each other. The optioneering results were based on less detail than the planning application scheme so it would not necessarily be possible to compare the optioneering results with the planning application scheme. Third party verification had been introduced with optioneering results required to be independently assessed to ensure high quality and robust schemes developed.

An Officer stated that work had taken place on the Planning Advice Note following consultation and changes had been made to the structure and layout. Officers had worked to improve the flow and navigation of the Planning Advice Note and align it more with the design of other City of London policy documents recently published. An Officer stated that the planning advice note was based on the GLA Guidance but was at a less detailed level, consistent with the conception stage of the exercise which took place at the pre-application stage.

An Officer stated that the options chosen depended on the opportunities and constraints of the site. She stated that the baseline option had been amended to 'minor refurbishment' rather than the 'do nothing option' because it was important, as a minimum, to extend a building's lifetime.

An Officer stated that collecting data would have limited purpose beyond comparing the results of the options with each other. Post completion data would be important in comparing schemes and creating standards in the long term. Carbon reduction opportunities were being considered in relation to every scheme.

A number of Members stated that they were impressed with the quality of the documents and the responses to questions.

In response to a Member's question about the average lifecycle of a building in the City, an Officer stated that this was not monitored.

A Member asked if the options would contain sufficient information for Members to compare them at Committee meetings. An Officer stated that two dashboards had been developed. One of the dashboards was about the planning application scheme and the other was about options. Both dashboards would form part of the Committee reports members would receive. The information would also include assumptions made with the options and evaluation of each option against different environmental issues and the wider planning balance of the scheme. An Officer stated that as the optioneering took place at the pre-application stage there would be little detail e.g., in relation to materials, as these decisions were taken relatively late in the process. The information in the optioneering was based on nominal figures and all the information was the same across all the options.

In response to a Member's question about third party verification, an Officer stated that the Whole Lifecycle Carbon Guidance required third party verification.

In response to a Member's question, an Officer stated that the change of use between different schemes could not be introduced through the Planning

Advice Note as the Local Plan, Adopted Local Plan and the forthcoming City Plan would take precedence. It could be considered as part of the retrofit first approach being explored through the Local Plan Sub-Committee.

The Chairman stated that this substantial piece of work took sustainability aims and ambitions and put them at the heart of the built environment policy. This work would put the City of London Corporation in a leading position in setting the bar for sustainability criteria. The Chairman requested that the name of the document be simplified.

**RESOLVED**, That the Committee agree the adoption of the Whole Life-Cycle Carbon Optioneering Planning Advice Note (Appendix 2 – WLC PAN Pre-Design Version).

20. **EXCLUSION OF THE PUBLIC**

**RESOLVED** – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.

Item Nos	Paragraph No(s)
23	3
24	3
25	3
26	3
27-28	3

21. **NON-PUBLIC MINUTES**

The Committee considered the public minutes of the meeting held on 10 January 2023 and approved them as a correct record.

22. **DOMINANT HOUSE FOOTBRIDGE FUTURE OPTIONS**

The Committee considered and approved a non-public Gateway 5 report of the Director of the Built Environment.

23. **NON-PUBLIC MINUTES OF THE STREETS AND WALKWAYS SUB-COMMITTEE MEETING ON 17 JANUARY 2023\***

The Committee received the draft non-public minutes of the Streets & Walkways Sub Committee meeting on 17 January 2023.

24. **PARKING METER SURPLUS REPORT - NON-PUBLIC APPENDIX\***

The Committee considered a non-public appendix to the public report.

25. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

There were no questions raised in the non-public session.

26. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

There were no additional, urgent items of business for consideration in the non-public session.

**The meeting closed at 12.25 pm**

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Chairman

**Contact Officer: Zoe Lewis**  
**[zoe.lewis@cityoflondon.gov.uk](mailto:zoe.lewis@cityoflondon.gov.uk)**

# Agenda Item 7

<b>Committee(s)</b> Planning and Transportation Committee	<b>Dated:</b> 11/05/2023
<b>Subject:</b> Appointment of Sub Committees	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	3, 8 & 10
<b>Does this proposal require extra revenue and/or capital spending?</b>	N
<b>If so, how much?</b>	N/A
<b>What is the source of Funding?</b>	N/A
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	N/A
<b>Report of:</b> The Town Clerk	<b>For Decision</b>
<b>Report author(s):</b> Zoe Lewis, Governance and Member Services Manager	

## Summary

The purpose of this report is to ask Members to consider the appointment of the Planning and Transportation Committee's Sub-committees, and to approve their respective compositions and terms of reference.

The Planning and Transportation Committee appoints two sub-committees as follows:-

- Streets and Walkways Sub Committee
- Local Plan Sub Committee

For ease, details of the composition and terms of reference of the Sub-committees are set out in full in Appendix A.

The Planning and Transportation Committee also has a Planning Applications Sub-Committee. However, this is not appointed to given that the membership and the Chairmanship and Deputy Chairmanship mirrors that of the Planning and Transportation Committee.

## Recommendation(s)

It is recommended that:-

- a) The Committee appoints the Streets and Walkways Sub-Committee for the ensuing year and approves its terms of reference detailed at Appendix A to this report;
- b) The Committee appoints the Local Plans Sub-Committee for the ensuing year and approves the terms of reference detailed at Appendix A to this report; and
- c) The Committee approves the Planning Applications Sub-Committee terms of reference detailed at Appendix A to this report.

## **Main Report**

### **Current Position**

1. This report considers the appointment, terms of reference and composition of the Planning and Transportation Committee's sub-committees.
2. Each of the Committee's proposed sub-committees are considered in turn below. Details of their terms of reference and proposed composition are set out in Appendix A of this report.

### **Planning Applications Sub-Committee**

3. At its meeting on 19 July 2022 the Planning Committee resolved to constitute a Planning Applications Sub-Committee to determine planning applications and applications for listed building consent. This was subsequently agreed by Policy and Resources Committee and then by Court of Common Council on 13 October.
4. The Planning Applications Sub-Committee was established to address the issues of (i) allowing Planning and Transportation Committee to major on strategic and policy issues; and (ii) planning application decisions on land or buildings for which Planning and Transportation Committee has responsibility.
5. The membership, Chairmanship and Deputy Chairmanship of the Planning Applications Sub-Committee is the same as that of the Planning and Transportation Committee. This ensures that the Planning Applications Sub-Committee fully benefits from the training and knowledge of the Planning and Transportation Committee particularly regarding the strategic and policy framework to be applied in deciding planning applications.
6. As the membership, Chairmanship and Deputy Chairmanship of the Planning Applications Sub-Committee is the same as that of the Planning and Transportation Committee, appointments are not made to it. However, the terms of reference are set out at Appendix A for completeness and it is requested that these be approved.

### **Streets and Walkways Sub-Committee**

7. The Sub-Committee was originally formed in 2004 and has acted fairly independently of the Grand Committee since then. The Terms of Reference have always included responsibility for such things as traffic engineering and management, street scene enhancements, the Riverside Walkway, and road safety matters.
8. It should be noted that the Sub-Committee continues to have power to act in those matters, in order to avoid potentially delaying projects by requiring the Grand Committee's approval as well, when they often involve tight timescales in terms of completion or use external funding.



9. Expressions of interest are sought from **seven Members of the Planning and Transportation Committee** who wish to serve on this Sub Committee.
10. The Sub Committee meets every 5-6 weeks and has met eight times since it was last appointed in April 2022.

#### Chairman and Deputy Chairman of the Sub-Committee

11. In previous years, the Sub-Committee elected its own Chairman and Deputy Chairman at its first meeting following the first meeting of the new Grand Committee. However, under the new Standing Orders as agreed at the Court of Common Council meeting on 27 April 2023, the Chair and Deputy Chair of a Sub-Committee shall be the Chair and Deputy Chair of the appointing Committee, or their nominee(s), subject to the support of the wider Committee Membership. Policy & Resources Committee can approve exceptions to this practice. The proposed composition of Sub-Committees shall not be increased solely to avoid a ballot for contested vacancies without the consent of the appointing Committee.
12. The Committee is therefore requested to agree the membership and the Terms of Reference of the Streets and Walkways Sub Committee for the ensuing year, (at Appendix A), with power to act.

#### **Local Plans Sub-Committee**

13. The Committee first appointed this Sub Committee in October 2004 with the specific task of considering the Local Development Framework (LDF), which replaced the Unitary Development Plan as the spatial planning strategy for the City. It was later agreed that this Sub-Committee would also be suitable for considering details of the traffic-related Local Implementation Plan (LIP) as well. Its Terms of Reference are simply to consider those types of documents in detail and make recommendations to the Grand Committee.
14. Expressions of interest are sought from **five Members of the Committee** who wish to serve on this Sub Committee.
15. This Sub Committee meet when necessary to progress the Local Plan or LIP. The Sub-Committee has met three times since it was last appointed in April 2022. Membership of the Sub-Committee presents the opportunity to be involved in the early stages of deciding the many policies upon which the City's entire planning strategy is based.
16. As agreed at the Court of Common Council meeting on 27 April 2023, the Chair and Deputy Chair of a Sub-Committee shall be the Chair and Deputy Chair of the appointing Committee, or their nominee(s), subject to the support of the wider Committee Membership. Policy & Resources Committee can approve exceptions to this practice. The proposed composition of Sub-Committees shall not be increased solely to avoid a ballot for contested vacancies without the consent of the appointing Committee.

17. Recently, questions arose relative to the status of the 'ex-officio' Members of this Sub-Committee. Ex-officio Members are those who have been appointed to a body by virtue of the position or office that they hold. The status of the two Members concerned here is therefore not that of an ex-officio - they are Members/individuals appointed as representatives of the Policy and Resources Committee and the Port Health and Environmental Services Committee respectively. They are, therefore, full members of Local Plans Sub Committee and the terms of reference have been updated to reflect this position.
18. On Officer advise, the terms of reference have been simplified to remove reference to the Transport Strategy and remove reference to the Local Development Framework and UDP which dated from 2004. References to the Local Plans Working Group have also been removed as this no longer exists.
19. The Committee is requested to agree for the ensuing year the membership of the Sub Committee that considers the City's Local Plan and Local Implementation Plan.

## **Appendices**

**Appendix A** – composition and terms of reference of the Planning and Transportation Committee's sub-committees.

**Contact:**

**Zoe Lewis**

Governance and Member Services Manager, Town Clerk's Department

E: [zoe.lewis@cityoflondon.gov.uk](mailto:zoe.lewis@cityoflondon.gov.uk)

**(A) Planning Applications Sub-Committee**

**Composition**

1. The Planning Applications Sub-Committee comprises –
  - a) Four Aldermen nominated by the Court of Aldermen;
  - b) Together with up to 31 Commoners representing each Ward (two representatives for the Wards with six or more Members regardless of whether the Ward has sides) or Side of Ward.
2. The Members of the Planning and Transportation Committee are automatically appointed as Members of the Planning Applications Sub-Committee.

**Terms of Reference**

3. To determine all planning and listed building consent applications not delegated to officers under the Scheme of Delegation, with all other functions within the Terms of Reference of the Planning and Transportation Committee not delegated to officers continuing to be exercised by that Committee or any other Sub-committees to which it delegates functions.

**(B) Streets and Walkways Sub-Committee**

**Composition**

4. The Streets and Walkways Sub-Committee comprises –
  - a) The Chairman and Deputy Chairman of the Grand Committee along with seven other Members;
  - b) Together with four Members representing the Finance, Police and Open Spaces, City Gardens and West Ham Park and Port Health and Environmental Services Committees.
5. The 2022/23 Membership comprised the following Members –

Deputy Graham Packham (Chairman of the Sub Committee)
John Edwards (Deputy Chairman of the Sub Committee)
Deputy Randall Anderson
Deputy Marianne Fredericks
Deputy Shravan Joshi
Deputy Edward Lord
Deputy Alastair Moss
Alderswoman Susan Pearson
Judith Pleasance

Ian Seaton
Alderman Ian David Luder (Open Spaces and City Gardens Committee)
Paul Martinelli (Finance Committee)
Oliver Sells KC (Port Health and Environmental Services Committee)

### **Terms of Reference**

6. The Sub-Committee is responsible for:-

- (a) traffic engineering and management, maintenance of the City's streets, and the agreement of schemes affecting the City's Highways and Walkways (such as street scene enhancement, traffic schemes, pedestrian facilities, special events on the public highway and authorising Traffic Orders) in accordance with the policies and strategies of the Grand Committee;
- (b) all general matters relating to road safety;
- (c) the provision, maintenance and repair of bridges, subways and footbridges, other than the five City river bridges;
- (d) public lighting, including street lighting;
- (e) day-to-day administration of the Grand Committee's car parks
- (f) all matters relating to the Riverside Walkway, except for adjacent open spaces; and
- (g) to be responsible for advising the Grand Committee on:-
  - (i) progress in implementing the Grand Committee's plans, policies and strategies relating to the City's Highways and Walkways; and
  - (ii) the design of and strategy for providing signposts in the City
- (h) Those matters of significance will be referred to the Grand Committee to seek concurrence.

### **(C) Local Plans Sub-Committee**

#### **Composition**

7. The 2022/23 Membership comprised the following Members –

Deputy Shравan Joshi (Chair of the Grand Committee and Sub Committee)
Deputy Alastair Moss (Deputy Chairman of the Grand Committee)
Randall Anderson
John Edwards
Deputy Marianne Fredericks
Martha Grekos (until her resignation in February 2023)
Jaspreet Hodgson
Deputy Natasha Maria Cabrera Lloyd-Owen

Alderman Ian David W Luder
Deputy Graham Packham
Alderman Susan Pearson
William Upton KC
Deputy Christopher Hayward (Policy and Resources Committee)
Elizabeth Anne King (Port Health and Environmental Services Committee)

### **Terms of Reference**

8. To provide guidance and make recommendations on changes to the City of London Local Plan to the Grand Committee.

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**PLANNING AND TRANSPORTATION COMMITTEE – OUTSTANDING ACTIONS**

Item	Date	Action/ Responsible Officer	Progress Update and Date to be progressed/completed
1	6 March 2020 2 June 2020 23 June 2020 14 July 2020 8 Sept 2020 6 Oct 2020 27 Oct 2020 17 Nov 2020 15 Dec 2020 5 Jan 2021 26 Jan 2021 16 Feb 2021 24 Feb 2021 9 March 2021 30 March 2021 22 April 2021 12 May 2021 8 June 2021 29 June 2021 20 July 2021 7 Sept 2021 21 Sept 2021 26 Oct 2021 16 Nov 2021 14 Dec 2021 11 Jan 2022 1 Feb 2022 22 Feb 2022 26 April 2022 17 May 2022 7 June 2022 1 July 2022 19 July 2022	<p align="center"><b><u>Daylight/Sunlight – Alternative Guidelines</u></b></p> <p align="center"><b>Chief Planning Officer and Development Director</b></p> <p>A Member argued that the Committee should separate out the desire for Member training and the desire for alternative guidelines on daylight/sunlight and requested that a report be brought to Committee setting out how the City of London Corporation might go about creating alternative guidelines, including timescales, if Members were so minded and the legal implications of this.</p>	<p><b>UPDATE (11 May 2023)</b></p> <p>Officers have been meeting with industry experts to discuss the potential for a planning advice note on daylight/sunlight matters in the context of the new BRE Guidance and the use of Radiance assessments. Officers will be going out to tender to instruct consultants to develop a planning advice note and it is anticipated that this will be procured before summer recess.</p>

	20 Sept 2022 11 Oct 2022 1 Nov 2022 10 Jan 2023 7 March 2023 11 May 2023		
1a)	5 March 2020 30 March 2021 22 April 2021 12 May 2021 8 June 2021 29 June 2021 20 July 2021 7 Sept 2021 21 Sept 2021 26 Oct 2021 16 Nov 2021 14 Dec 2021 11 Jan 2022 1 Feb 2022 22 Feb 2022 26 April 2022 17 May 2022 7 June 2022 1 July 2022 19 July 2022 20 Sept 2022 11 Oct 2022 1 Nov 2022 10 Jan 2023 7 March 2023 11 May 2023	<p style="text-align: center;"><b><u>Radiance Studies</u></b></p> <p style="text-align: center;"><b>Chief Planning Officer and Development Director</b></p> <p>A Member referred to a training session that had taken place for the Committee earlier this morning, and in which a consultant had expressed a view that radiance studies were the best way for laymen to assess the impact of developments on daylight where there was a genuine concern about this issue. The consultant felt that, in appropriate cases, the applicant should be asked to provide a radiance study.</p> <p>In view of this, the Member asked Officers to undertake, when future applications were received in which daylight will be an issue, to ask the applicant to prepare a radiance study to be provided to this Committee so that Members could make an informed assessment of the issue.</p>	<p><b>UPDATE (11 May 2023)</b></p> <p>Officers have been meeting with industry experts to discuss the potential for a planning advice note on daylight/sunlight matters in the context of the new BRE Guidance and the use of Radiance assessments. Officers will be going out to tender to instruct consultants to develop a planning advice note and it is anticipated that this will be procured before summer recess. Member training has been scheduled for the P&amp;T Committee in October on Daylight/Sunlight which will coincide with the development of the planning advice note.</p>



<p>2</p>	<p>17 Nov 2020 15 Dec 2020 5 Jan 2021 26 Jan 2021 16 Feb 2021 24 Feb 2021 9 March 2021 30 March 2021 22 April 2021 12 May 2021</p>	<p style="text-align: center;"><b><u>Member Training</u></b></p> <p style="text-align: center;"><b>Chief Planning Officer and Development Director / Director of the Built Environment</b></p> <p>A Member questioned whether there would be further training provided on Daylight/Sunlight and other relevant planning matters going forward. She stated that she was aware that other local</p>	<p><b>UPDATE: (11 May 2023):</b> New Committee Members are provided with training on key aspects. A programme of wider Member training is being implemented in 2023. The first of the recordings to be sent to Members is Material Planning Considerations and there will be a Q&amp;A on this topic prior to the 11 May 2023 Planning and Transportation Committee meeting.</p>
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	<p>8 June 2021 29 June 2021 20 July 2021 7 Sept 2021 21 Sept 2021 26 Oct 2021 16 Nov 2021 14 Dec 2021 11 Jan 2022 1 Feb 2022 22 Feb 2022 26 April 2022 17 May 2022 7 June 2022 1 July 2022 19 July 2022 20 Sept 2022 11 Oct 2022 1 Nov 2022 10 Jan 2023 7 March 2023 11 May 2023</p>	<p>authorities offered more extensive training and induction for Planning Committee members and also requested that those sitting on the Planning Committee signed dispensations stating that they had received adequate training.</p> <p>The Chair asked that the relevant Chief Officers consider how best to take this forward. He also highlighted that the request from the Town Clerk to all Ward Deputies seeking their nominations on to Ward Committees states that Members of the Planning &amp; Transportation Committee are expected to undertake regular training.</p>	
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3.	<p>11 Jan 2022 1 Feb 2022 22 Feb 2022 26 April 2022 17 May 2022 7 June 2022 1 July 2022 19 July 2022 20 Sept 2022 11 Oct 2022 1 Nov 2022 10 Jan 2023 7 March 2023 11 May 2023</p>	<p style="text-align: center;"><b><u>Sustainability SPD</u></b></p> <p style="text-align: center;"><b>Chief Planning Officer and Development Director</b></p> <p>A Member questioned whether the production of a Sustainability SPD could feature on the list of outstanding actions.</p> <p>The Chief Planning Officer and Development Director stated that he would be liaising with his sustainability officers to provide a more targeted timeline around the production of the Sustainability SPD and agreed to include this information in the list of outstanding actions.</p>	<p><b>UPDATE (11 May 2023):</b></p> <p>The Sustainability SPD is being developed and will be brought to the Committee in July 2023, before public consultation.</p>
4.	<p>22 Feb 2022 26 April 2022 17 May 2022 7 June 2022 1 July 2022 19 July 2022 20 Sept 2022 11 Oct 2022 1 Nov 2022 10 Jan 2023 7 March 2023 11 May 2023</p>	<p style="text-align: center;"><b><u>Update to Statement of Community Involvement</u></b></p> <p style="text-align: center;"><b>Chief Planning Officer and Development Director</b></p> <p>The Chief Planning Officer agreed that now would be an appropriate time to fundamentally review the DBE Users Panel and look again at how best to engage with all stakeholders given that DBE no longer existed as a department with a new, wider Environment Department with a wider remit now established. He reported that work on this was already being undertaken at present and that a key element of this would be a review of the Statement of Community Involvement. It was hoped that Officers would be in a position to report back to Committee on this in Autumn 2022 as to future options around receiving feedback about how engagement with various stakeholders could be improved.</p>	<p><b>UPDATE (11 May 2023):</b></p> <p>The Statement of Community Involvement is on the agenda for 11 May Planning and Transportation Committee meeting.</p>

<b>Committee(s):</b> Planning & Transportation	<b>Dated:</b> 11/05/2023
<b>Subject:</b> Charges for Property Searches	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	6,9
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>No</b>
<b>If so, how much?</b>	<b>£0</b>
<b>What is the source of Funding?</b>	<b>N/A</b>
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	<b>N/A</b>
<b>Report of:</b> Gwyn Richards, Planning & Development Director	<b>For Decision</b>
<b>Report author:</b> Peter Shadbolt, Head of Planning Policy	

## Summary

HM Land Registry is responsible for maintaining a register of land charges that records prohibitions, restrictions and obligations affecting land. Prospective purchasers can request additional information that could affect the future use or development of a property from the local authority, through a process known as Con29 and Con29O enquiries. Local authorities are allowed to make a charge for providing this information, on a cost recovery basis.

Responsibility for property searches in the City of London rests with the Planning & Development Service. Fees are applied to each Con29 and Con29O enquiry, with income allocated to central risk. These fees have not been increased since 2009. In 2022/23, fees for Con29 and Con29O enquiries to the City Corporation generated an income of £106,209, a figure which no longer fully covers the full cost of delivering the property search function going forward. An increase in fees for property searches of 10%, in line with the February rate of CPI, is therefore recommended, to be applied from 1 June 2023.

## Recommendation(s)

Members are asked to:

- Agree the increase in fees for Property Searches, as set out in Appendix 1.

## **Main Report**

### **Background**

1. Every local authority in England and Wales, with the exception of the county councils, is required to hold a local land charges register that records prohibitions, restrictions and obligations affecting land within their administrative area. Under the Infrastructure Act 2015 responsibility for the 331 registers was transferred to HM Land Registry (HMLR) in a phased approach. The City Corporation transferred its register to HMLR in 2018.
2. Outside of the HMLR register, prospective purchasers can request additional information from the local authority, using a process known as Con29 and Con29O enquiries. The format of these enquiries and response is set out by the Law Society.
3. Con29 enquiries may provide information that could affect future use or development of the property or impose financial burdens. This could include:
  - decisions
  - anything waiting for approval
  - proposed road building
  - transport systems
  - rights of way
4. The CON29O process is used for optional questions for local authorities, covering for example:
  - completion notices
  - noise abatement
  - land maintenance notices
5. Under the Local Authorities (England) (Charges for Property Searches) Regulations, 2008, local authorities are allowed to charge for providing responses to Con29 and Con29O enquiries, provided that they have regard to the cost to the authority of answering questions about the property.
6. Appendix 1 sets out the City's current fees for Con29 and Con29O enquiries. These fees have not been amended since 2009.

### **Current Position**

7. The City Corporation's property services function lies within the Policy & Strategy Section of the Planning & Development Service of the Environment Department. It is discharged by the City's Land Charges Officer. Con29 and Con29O enquiries cover a range of issues and responses are required not just in relation to planning policy and planning decisions, but also Community Infrastructure Levy and s106 planning obligations, environmental health and transport considerations. The Land Charges Officer therefore works closely with colleagues across the City Corporation to provide responses to enquiries.

8. Operating costs for the property services function are met out of the Planning & Development Local Risk budget. Income from searches is, however, allocated to Central Risk. Table 1 sets out the number of Con29 enquiries received in the past 3 years, together with the income received. Income will vary from year to year, with income in some years exceeding the cost of provision and in others falling below the cost of provision.

**Table 1: Con29/Con29O enquiries and income**

	<b>Con29/29O Enquiries</b>	<b>Actual Income</b>
2020/21	658	£76,941
2021/22	767	£114,375
2022/23	623	£106,209

9. In 2022/23, the cost of providing the property search function within the Policy & Strategy section of the Planning & Development Service, including staff costs, on-costs and managerial oversight, was approximately £99,000.
10. Property searches are currently managed through the use of an in-house computer system, which will need to be updated to ensure that it remains compliant with City Corporation IT requirements and/or replaced with an external 3<sup>rd</sup> party system, incurring an annual licence fee. It is estimated that between £10,000 and £20,000 will need to be set aside in 2023/24 to fund this software upgrade.
11. Taken together, Policy & Strategy section staff costs for providing property searches, combined with IT costs, exceed the average income received over the past 3 years. Additional staff costs incurred within the CIL/s106, environmental health and transportation teams to enable the Con 29/29O enquiries to be answered have not been separately calculated, but it is likely that the total cost to the Environment Department of providing the property search function is greater than the fee income received by the City Corporation.

## **Proposals**

12. Given that income from property searches is not currently covering the cost of providing the service, an increase in fees is considered necessary. It is recommended that fees be increased broadly in line with the rate of the Consumer Price Index, which has stood at over 10% since September 2022. It is therefore recommended that an increase of 10% be applied, with effect from 1 June 2023. For illustration, had fees in 2022/23 been raised by 10%, total projected income for the year would have increased to approximately £117,000 based on actual income received for 2022/23 of £106,209.
13. Details of the revised fee structure are set out in Appendix 1, alongside the current fee structure.
14. It is also recommended that property search fees are reviewed annually and adjusted as necessary to ensure that income is aligned with the cost of service provision.

## **Corporate & Strategic Implications**

Strategic implications – The proposed increase in property search fees will ensure that this key service to the City’s property owners and developers can continue, meeting Corporate Plan objectives 6 and 9.

Financial implications – the proposed increase in fees of 10% will mean that the cost to the City Corporation of providing the property search function will continue to be met on a cost recovery basis, averaged over several years. This will likely generate an additional £11,000 per annum to meet the increased costs forecast in 2023/24.

Resource implications - none

Legal implications – none

Risk implications - none

Equalities implications – The proposed increase in fees will not impact on people protected by existing equality legislation.

Climate implications - none

Security implications - none

## **Conclusion**

15. The City Corporation provides information to prospective property purchasers through Con29 and Con29O enquiries. This service is provided within the Policy & Strategy section of the Planning & Development Division of the Environment Department. A fee is charged for this service, on a cost recovery basis. City Corporation fees have not increased since 2009. All fee income is allocated to Central Risk.

16. The current cost of providing the property search function, including staff and on-costs across the Environment Department and IT system costs, will now exceed the average annual fee income and an increase in fees of 10%, broadly in line with CPI, is therefore recommended.

## **Appendices**

- Appendix 1 – Current and Proposed Property Search Fees

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## Appendix 1

### Current and proposed property search fees

<b>Type</b>	<b>Current Fee</b>	<b>Proposed Fee</b>
CON 29	£133.20 (£111 + VAT)	£146.52 (£122.10 + VAT)
CON 290	£7.20 per question (£6 + VAT)	£7.92 per question (£6.60 + VAT)
Each parcel of land added to a CON29/CON290	£36 (£30 +VAT)	£39.60 (£33 + VAT)
Each question added by a solicitor to a CON29/ CON290	£36 (£30 +VAT)	£39.60 (£33 + VAT)

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<b>Committee</b> Planning & Transportation Committee	<b>Dated:</b> 11/05/2023
<b>Subject:</b> Adoption of Statement of Community Involvement and Developer Engagement Guidelines	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	3,9
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>N</b>
<b>If so, how much?</b>	<b>£0</b>
<b>What is the source of Funding?</b>	
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	n/a
<b>Report of:</b> Gwyn Richards, Planning & Development Director	<b>For Decision</b>
<b>Report author:</b> Peter Shadbolt, Head of Planning Policy	

## Summary

The City Corporation is required to prepare a Statement of Community Involvement (SCI) setting out how it intends to consult the public when preparing planning policies and deciding planning applications. A draft SCI, updating the previous version from 2016, was approved for public consultation by this Committee at its meeting on 11 October 2022.

The Committee also considered and agreed for consultation draft Developer Engagement Guidelines, a non-statutory document which sets out how the City Corporation expects developers to consult with local communities prior to, and following, the submission of a planning application.

This report sets out the responses to the consultation on the SCI and Developer Engagement Guidelines, the revisions proposed to these documents and recommends their adoption.

## Recommendation(s)

Members are asked to:

- Adopt the revised Statement of Community Involvement and Developer Engagement Guidelines

## **Main Report**

### **Background**

1. The Statement of Community Involvement (SCI) sets out how the City Corporation will consult the public in preparing planning policy documents and deciding planning applications for planning permission and related consents. The current SCI was adopted by the Planning & Transportation Committee at its meeting on 5 July 2016.
2. The SCI sets out how the City Corporation will consult and engage on planning matters. It does not set out, or provide guidance on, how developers should consult and engage with the public and stakeholders.
3. At its meeting on 11 October 2022, this Committee approved a draft revision to the SCI for public consultation. At the same meeting, the Committee approved draft Developer Engagement Guidelines for consultation. The Developer Engagement Guidelines have been prepared as a non-statutory Planning Advice Note and sets out the City Corporation's expectations for how developers and applicants should engage with the local community and other stakeholders at an early stage in the formulation of development proposals and throughout the planning phases of development.

### **Current Position**

4. Public consultation on the draft SCI and Developer Engagement Guidelines commenced on 9 December 2022. It was scheduled to run for 8 weeks until 3 February 2023, but subsequently extended until 3 March 2023 to encourage as many responses as possible. The 2 documents were made available on the City Corporation's website, at City libraries and the Guildhall Planning Reception and sent to those organisations and individuals on the City Corporation's planning consultation database. Developers have also been encouraged to apply the principles set out in the Developer Engagement Guidelines through pre-application discussions in advance of formal adoption of the Guidelines.
5. Response to the consultation was limited, with only 11 individual or organisations responding to the SCI and 10 to the Developer Engagement Guidelines. A number of these individuals and organisations commented on multiple parts of the documents. It should be noted that, although the SCI is a statutory document, there is no legal requirement to publicly consult on revisions and so, although the response was limited, in undertaking the consultation, the City Corporation was going beyond the statutory requirements. The number of responses received on both documents is also suggestive of a broad level of support for the measures set out. In particular, the muted response from the development industry does suggest a broad level of acceptance of the requirements within the Developer Engagement Guidelines, in particular.
6. Responses received to the two documents are set out in the Consultation Statement attached at Appendix 1.

## **Proposals**

7. The Consultation Statement sets out how the consultation on the SCI and the Developer Engagement Guidelines was undertaken, the comments received on both documents and the proposed response.
8. Comments were received from 11 individual and organisations to the consultation on the SCI and from 10 for the Developer Engagement Guidelines. Comments were largely very supportive of the changes to the SCI and the drafting of the new Developer Engagement Guidance, with both documents seen as delivering an improvement in the way that the City Corporation consults on planning matters. A number of comments suggested changes to both documents and these changes have been carefully considered and incorporated where they would improve the delivery of engagement or clarify how the City Corporation and developers should engage. In addition, a number of detailed wording changes have been suggested and these have been incorporated wherever possible. The attached Consultation Statement at Appendix 1 details the consultation undertaken, the comments received and the proposed response to these comments. Appendix 2 sets out proposed changes to the SCI as track changes and Appendix 3 sets out proposed changes to the Developer Engagement Guidance.

## **Corporate & Strategic Implications**

Strategic implications – The SCI and the Developer Engagement Guidelines will ensure that all the City’s communities can engage with the City Corporation and developers in the exercise of planning responsibilities and the form of new development. This meets statutory requirements and good practice as outlined in the national Planning Practice Guidance. It will contribute towards the development of the City Plan and will contribute directly to meeting the three key objectives of the Corporate Plan.

Financial implications - None

Resource implications - None

Legal implications - The SCI is a statutory document and will be a material consideration in consultation on planning policy matters and planning applications. The Courts have found that a SCI is capable of creating a legitimate expectation (i.e. a statement or promise of a public body) that the contents of it will be complied with and that this will be upheld by the Courts.

Risk implications - None

Equalities implications – The draft SCI and the Developer Engagement Guidance have been considered through an Equalities Impact Assessment Screening, which identified no equalities implications. The changes made following consultation do not raise any additional implications.

Climate implications - None

Security implications - None

## **Conclusion**

9. The City Corporation has a statutory duty to prepare and keep up to date a Statement of Community Involvement (SCI). The SCI sets out how the City Corporation will engage and consult with the City's varied communities on both planning policy matters and planning applications. The City Corporation consulted on a draft revision to the adopted SCI between December 2022 and March 2023.
10. Alongside the SCI, the City Corporation consulted on proposed Developer Engagement Guidelines, which set out the City Corporation's expectations for how developers and applicants should engage with the local community and other stakeholders at an early stage in the formulation of development proposals and throughout the planning phases of development.
11. Responses to the consultation have been considered and, where appropriate, amendments incorporated into both documents. The Planning & Transportation Committee is asked to adopt both the SCI and the Developer Engagement Guidelines.

## **Appendices**

- Appendix 1 – Consultation Statement
- Appendix 2 – Statement of Community Involvement 2023
- Appendix 3 – Developer Engagement Guidelines 2023

## **Background Papers**

Approval of draft revised Statement of Community Involvement and Developer Engagement Guidance for public consultation – Report to Planning & Transportation Committee, 11 October 2022.

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# Statement of Community Involvement

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Consultation Statement

May 2023



The Statement of Community Involvement (SCI) and Developer Engagement Guidelines were published in draft for public consultation between 9 December 2022 and 3 March 2023.

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

The following methods were used to consult on these documents:

**Website.** The draft SCI and the draft Developer Engagement Guidelines were made available on the City Corporation's website, with links to the document provided from the website consultation page as well as from the Planning Policy landing page. 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, information on the intention to review and consult on a revised SCI and guidance for developers was included in the Outstanding Issues agenda item on the public agenda for the Planning & Transportation Committee. The first notification appearing in February 2022.

**Inspection copies.** Copies of the SCI and Developer Engagement Guidelines were made available at the Guildhall and at the Barbican, Artizan Street and Shoe Lane public libraries.

**Notifications.** Emails containing information about the SCI and Developer Engagement Guidelines and inviting comments were sent to relevant specific and general consultation bodies and to all those individuals and organisations on the Planning Consultation Database.

**Press Release.** A press release was issued highlighting the approval for consultation of the SCI and Developer Engagement Guidelines, encouraging all of the City's communities to respond.

Responses were received from 11 individual and organisations to the consultation on the SCI and from 10 for the Developer Engagement Guidelines. A number of these individual or organisations made comments on several areas of the documents. The following table summarises the comments received and explains how they have been taken into account in finalising the two documents. In addition, detailed comments were received on the wording of the documents. These detailed wording changes have been accepted and only identified in the attached table where they required a change to the meaning or intent of the documents.

# Summary of Comments and Responses

## Statement of Community Involvement

Respondent	Comment	City Corporation Response
City Property Association	CPA considers that early and effective engagement with relevant stakeholders prior to the submission of any planning application is key to positive, sustainable development. CPA very much supports revisions to the SCI to encourage meaningful community engagement, with a stronger focus on the use of digital technology in this area.	Support noted
Chapter of the Cathedral Church of St Paul in London	Paragraph 3.5: Is it possible for St Paul's to provide comment on this statement of common ground, or be actively involved if it appears the Cathedral have value to add? This is especially of importance in relation to considerations pertaining to heritage values, where – as recognised in Conservation Principles 'heritage is a shared resource' and heritage values should be debated and agreed by public, stakeholders and experts jointly.	The City Corporation is required to prepare statements of common ground with identified Duty to Co-operate (DTC) bodies when preparing the City Plan. These statements are statutory documents to be signed with named bodies and are published on the City Corporation's website. Other bodies, including the Cathedral, are welcome to provide comments on these statements as part of their response to the City Plan.
Chapter of the Cathedral Church of St Paul in London	Welcome the breadth of the consultation techniques set out in Table 1. However, it is important that these engagements are well publicised and of sufficient duration. When Chapter meets monthly, we have our	Table 1 sets out the minimum requirements for consultation, normally as set out in statutory regulation. As set out in paragraph 3.11 of the SCI, the City Corporation will normally exceed these

	internal governance timelines that are not always able to respond to short timescales of less than 6 weeks.	consultation periods and, where possible, allow limited extensions of time where this will facilitate a response from stakeholders.
Chapter of the Cathedral Church of St Paul in London	Table 3 notes that the consultation period for an SPD is a minimum of 6 weeks. Given the density of information included in such documents (as is required), could this period be extended?	The statutory requirement for consultation on SPDs is a minimum of 4 weeks, so the 6 week period already provides a longer period for consultation. However, as set out in para 3.11, the City Corporation will normally consult for longer periods.
Chapter of the Cathedral Church of St Paul in London	The SCI states ‘Prospective applicants are also strongly encouraged to undertake early pre-application consultation with the local community to enable the local community to comment on and help shape development proposals before a planning application is formally submitted to the City Corporation.’ Is there any way in which to which to explicitly link this to the City’s own list of consultees, referenced above? We also understand that there is no statutory requirement for applicants to undertake pre-application discussion. We would therefore welcome the language of this section to be reinforced to reflect the importance of timely engagement with a constructive outlook (as is mentioned at paragraph 4.9) – this could obviously be more ‘developer centric’ highlighting the positive benefits of this type of engagement in terms of crafting a successful application. We also ask if a failure to consult could be explicitly defined as a material consideration in decision making,	<p>Agree, the SCI would benefit from clarification that early engagement should be with other key stakeholders and statutory consultees. Add reference to para 4.7 and insert additional paragraph after 4.9.</p> <p>More detailed guidance for applicants is set out in the Developer Engagement Guidance which is published alongside the SCI.</p> <p>As there is no statutory requirement for pre-application consultation, failure to enter into such engagement cannot be a material consideration in determining the application. However, both the SCI and the Developer Engagement Guidance do</p>



	including grounds for refusal. Linked to this, the advice provided at 4.11 setting out that the City’s pre-application advice to prospective applicants is very helpful. While we are naturally part of this conversations, we would welcome formal acknowledgement in this process.	highlight the importance that the City Corporation attach to early pre-application engagement with the local community and key stakeholders
Chapter of the Cathedral Church of St Paul in London	We strongly welcome the ‘consultation statement’ mentioned at 4.12, especially as a means of providing comment on an application once it has been submitted to ensure our conversations with developer, and their outcomes, are accurately reported.	Support noted
Chapter of the Cathedral Church of St Paul in London	We note Para 4.15 and the role of COLAG and the CAAC. Where relevant, St Paul’s will always be glad to be included in conversations of both these bodies and to offer evidence into their deliberations.	COLAG and CAAC provide advice to the City Corporation, but inclusion at meetings is a matter for these bodies to determine. The City Corporation is, however, happy to forward comments from the Chapter to the relevant meetings of these groups and will encourage them to engage with the Chapter, where necessary
Chapter of the Cathedral Church of St Paul in London	List of consultees. As noted above, we welcome the inclusion of the Dean and Chapter of St Paul’s, and The Surveyor’s Office of St Paul’s, within both lists of consultees. We have agreed a standard address for these bodies by e-mail. Following consideration it is proposed to remove the Friends of St Paul’s from the consultation lists, as this group will be consulted internally and any comments will be captured in the preparation of a co-ordinated response from the Cathedral	Comments noted. Friends of St Paul’s will be removed from the list

Natural England	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. We regret we are unable to comment, in detail, on individual Statements of Community Involvement	Support noted
Diocese of London	<p>Thank you for the opportunity to respond to this consultation. It is important that the widest range of community groups and stakeholders are consulted on planning issues.</p> <p>Reading the document and the list of consultees it appears to have all the churches and the DAC as well as the London Diocesan Fund and the Church Commissioners in relation to Appendix A – Planning Policy. They all need to be retained. However, the Diocese is not represented in Appendix B – Planning Applications, except for the Dean and Chapter of St Paul’s. The list of church bodies in Appendix A should be transposed into Appendix B to be consulted where development impacts on a church and the Diocese of London Fund consulted in all cases which impact on a church or church property.</p>	Agree changes to Appendix B
Environment Agency	Thank you for consulting EA on the Statement of Community Involvement and Developer Engagement Guidance. We are pleased to see that we are listed as a Statutory Consultee in the process.	Support noted

<p>Historic England</p>	<ol style="list-style-type: none"> <li>1) Support the general aims and approach to the draft Statement of Community Involvement. We welcome the acknowledgement of Historic England as a statutory consultee under duty to co-operate at 3.17 and Appendix A as a specific consultation body.</li> <li>2) With regards to neighbourhood planning, we would welcome notification of proposed neighbourhood planning areas as well as consultation on draft plans.</li> <li>3) We would welcome consultation at an informal level, in addition to the requirements of the legislation, where issues may benefit from our early involvement.</li> </ol>	<ol style="list-style-type: none"> <li>1) Support noted</li> <li>2) The SCI indicates that the City Corporation will consult on draft neighbourhood areas with key stakeholders, general and specific consultation bodies, duty to co-operate bodies and those on the consultation database. This includes Historic England.</li> <li>3) An additional paragraph has been added after para 4.9 highlighting the need for pre-application discussion with statutory and other key stakeholders, The City Corporation will continue to engage on an informal basis with Historic England and other consultees and stakeholders, where appropriate.</li> </ol>
<p>Port of London Authority</p>	<p>The PLA welcomes that the PLA is highlighted as a transport body under the 'General Consultation Bodies' in appendix A of the SCI.</p>	<p>Noted</p>
<p>Surrey County Council</p>	<p>No comment</p>	<p>Noted</p>
<p>TfL</p>	<p>Although there is no reference to consultation with TfL in the main document, we note that TfL is listed as a specific consultation body (and Duty to Cooperate body) for planning policy consultations in appendix A and as a consultee for planning applications in appendix B which is welcomed.</p>	<p>Noted</p>

Barbican Association	Number of detailed comments on specific wording in the SCI to improve legibility and understanding.	Where these suggested changes do not materially impact on the meaning or interpretation of the SCI, the changes have been accepted.
Barbican Association	Para 2.6: What will be the basis for deciding “scale and time” and how will this be adapted for different decisions. Does para 2.6 relate to City Corporation’s own proposals or to all consultations? Proportionate should apply generally not just to planning applications.	This will be determined on a case by case basis in line with the City Corporation’s assessment of impact. Amend wording to clarify that this relates to all proposals, not just planning applications
Barbican Association	Para 2.12: Can City Corporation confirm that this 3D modelling platform is a proper decision-helping tool and that the interpretation of “impact of buildings on their surroundings” is made objectively and not subjectively? Will City Corporation commit to enabling all interested stakeholders to use the technology and give a date by which this will be achieved?	The SCI explains that 3D modelling can help the interpretation of the impact of development. It allows for objective assessment of a number of parameters, e.g. strategic and local views, and also subjective assessment of impacts on the local and wider character of an area. The City Corporation is committed to exploring how this modelling can be made more widely available for local community use to better understand the potential impacts of development.
Barbican Association	Para 3.10 and 3.11: How will selection of consultation methods be determined?	As the SCI indicates, the selection of consultation methods will be made by the City Corporation through a judgement as to the most appropriate methods and techniques to be used. The City Corporation is happy to use further methods suggested by stakeholders

		where this can be accommodated and additional wording will be added to reflect this.
Barbican Association	<p>Table 1:</p> <ol style="list-style-type: none"> <li>1) Consultation and engagement techniques: How will 'appropriate' be determined when considering techniques, focus groups and which stakeholders to consult?</li> <li>2) Should remember that not all stakeholders will be online.</li> <li>3) Focus Groups, meetings etc – All comments which determine policy creation should be publicly available.</li> <li>4) Consultation platform - Who will manage the "online consultation platform"? Also the use of that or City Corporation's website seems to exclude certain stakeholders.</li> </ol>	<ol style="list-style-type: none"> <li>1) See response to comment on paragraph 3.10 and 3.11.</li> <li>2) The City Corporation is keen to ensure that everyone has a meaningful opportunity to comment on planning policy. The techniques outlined in Table 1 include a range of non-digital means of communication.</li> <li>3) The SCI indicates that notes will be circulated to attendees and, where consultation has taken place as part of a formal consultation, these notes will be published and made publicly available</li> <li>4) The consultation platform will be managed by the City Corporation and operated alongside the City's website. As set out above, the City Corporation will continue to make information available to those stakeholders and the local community who cannot access digital consultation methods.</li> </ol>
Barbican Association	Table 2: Plan making stages – who are the other advisory groups and how is membership of the Conservation Area Advisory Committee determined and where are membership and contact details made public?	'Other advisory groups' is a generic reference to cover potential additional groups to CAAC and COLAG.

		Information about CAAC will be made available on the City Corporation's website
Barbican Association	Para 3.19: Health Impact Assessment - Does this include issues arising from having to live with a development? What post development enquiries has City Corporation made of residents who were concerned with having to live with that development? How are HIA impacts enforced against developers?	HIAs provide a systematic framework to identify the potential impacts of a development proposal on the health and wellbeing of the population and highlight any health inequalities that may arise. Where significant impacts are identified, measures to mitigate the adverse impact of the development should be provided as part of the development or will be secured through conditions or a Section 106 Agreement.
Barbican Association	Table 4: Neighbourhood Planning – what is meant by a 'valid application'?	The statutory requirements for a valid application for a neighbourhood area and forum are set out in legislation and within the online Planning Practice Guidance
Barbican Association	Para 4.7:  1) how is 'substantial public interest' defined? 2) Delegated authority should never be used to determine any applications by or on behalf of City Corporation. 3) Also where representations are made on a representative basis, the number of people so represented must be counted against the threshold.	1) Substantial <u>is</u> defined on a case by case basis, taking into account interest and comments expressed at pre-application stage and officer/Member assessment of likely impact/local interest 2) The determination of planning applications submitted by the City Corporation is undertaken in accordance with the national Planning Practice Guidance and the Town and

		<p>Country Planning General Regulations 1992.</p> <p>3) The threshold relates to the number of individual objections, not comments on behalf of representative organisations.</p>
Barbican Association	<p>Para 4.15:</p> <p>1) Neighbour notification periods – Why can these sometimes be shorter than 21 days? On what basis would this be decided and who by?</p> <p>2) Para 4.15: Site visits – visits to neighbouring premises where there is a concern. This is something that Planning Officers have ignored in the immediate past without valid reason</p> <p>3) Para 4.15: presentations – COLAG and CAAC - Please publish terms of reference and membership and contact details for these two advisory bodies. They can hardly be described as independent and external if no one can find out any information about them</p>	<p>1) National guidance requires neighbour consultation should normally be for 21 days. Consultation for shorter periods will depend upon the nature of the application and whether this is a reconsultation. The notification period will be determined by officers and clearly set out in consultation notifications.</p> <p>2) Officers will normally try to accommodate requests for visits to neighbouring properties, as set out in the SCI.</p> <p>3) Information on COLAG is set out on the City Corporation’s website. Information about CAAC will be made available on the website</p>
Barbican Association	<p>Para 4.35:</p> <p>1) consultation on revised proposals - Is it not possible to clarify what are and what are not “material changes”?</p> <p>2) speaking at committee - The time available for speaking for or against each application should be</p>	<p>1) There is no statutory definition of material or non-material, as these will depend on the context of the proposed development.</p> <p>2) The time available is set out in the City’s Planning Protocol available on</p>

	<p>relevant to the number of public comments both supporting and objecting to each application. The application form requires 14 days' notice but the this is not always possible when the agenda is only determined seven days ahead of the Committee.</p>	<p>the website. The time allocated ensures that both objectors and supporters have an equal opportunity to comment, with the total time available ensuring that comments can be made whilst continuing to allow for the proper functioning of the Committee within reasonable time periods. The 14 day requirement is a requirement for speakers to have commented on the application at least 14 days before the Committee. Request to speak should be received at least 5 working days before the Committee</p>
<p>Barbican Association</p>	<p>Para 4.37:</p> <ol style="list-style-type: none"> <li>1) publication of committee reports – Six days is insufficient to absorb reasons for recommendations etc and respond accordingly.</li> <li>2) There is no reference to the recent practice of providing details of presentations to Members by both applicants and objectors, including transcripts of discussions. Can this not be included in the planning process as set out above?</li> <li>3) As the officer's report to Committee is both a guidance and recommendation, that is the most relevant document for objectors and applicants alike and it should be published at least 14 days before the</li> </ol>	<ol style="list-style-type: none"> <li>1) The 6 day notice reflects statutory requirements for the publication of committee agendas and papers in advance of the Committee.</li> <li>2) Additional wording has been added to refer to making presentations publicly available.</li> <li>3) The timescales for publication reflect the statutory requirements for making documents available.</li> </ol>



	relevant Committee meeting to enable issues arising from it to be responded too.	
Barbican Association	Para 4.44: Planning appeals – should mention right of call in by either the Secretary of State or Mayor of London.	The SCI sets out how the City Corporation will consult on planning policies and applications. Information about other statutory options available to objectors is set out in the national Planning Practice Guidance and legislation
Barbican Association	Para 4.7 Enforcement - Please give information on the number of enforcement notices issued per year - it's a bit of transparent information that is helpful - eg you have already said that 90% of applications are dealt with by delegated powers and that less than 1% of decisions are appealed	Information on planning application numbers and enforcement notices issued is available from Live Tables published on the Gov.uk website
Barbican Association	Glossary  Suggested additional and amended definitions for: applicant, development management, heritage assets, local plan, local development scheme, local planning authority, London plan, neighbourhood development order, planning obligation, SPD, stakeholder	These suggested amendments have been accepted

## Developer Engagement Guidelines

Respondent	Comment	City Corporation Response
City Property Association	The CPA also supports the development of the detailed DEG, which will provide a valuable resource for developers, the local authority and the community in guiding engagement.	Support noted
City Property Association	The list of groups at paragraph 2.5 is referenced “as a minimum” to engage with when undertaking community engagement. The reference to “as a minimum” is not considered appropriate, because the level of community engagement is linked to the nature and scale of the development proposed. It will not always be appropriate or necessary to engage with all of the groups set out in paragraph 2.5. Suggest that “As a minimum.....” is omitted from paragraph 2.4. Such a deletion would be appropriate given the reference to “for example” in paragraph 2.3 and “recommended” in paragraph 2.5.	Accept that groups to be consulted will vary according to the nature of the development, additional wording has been added to clarify this point and the normal expectation that the list of groups on para 2.5 should be consulted
City Property Association	Paragraph 3.1, reference is made to planning applications being submitted at the end of RIBA Stage 3. Notwithstanding the RIBA guidance, often in reality planning applications are submitted earlier, even around the end of RIBA Stage 2. The DEG should look to set guiding principles, rather than requirements, as the specifics for each project will vary on a case-by-case basis. Providing the relevant detail at application stage should be about considering the relevant site issues and responding to those, as opposed to meeting a requirement for a specific level of detail (noting that the	Accept that RIBA stages are guidance. Agree to change ‘should happen’ to ‘could happen’. Additional text on RIBA stages is considered unnecessary as addition of ‘could’ above allows for flexibility. Developers and applicants will also be aware of the status of the RIBA stages as guidance.

	<p>RIBA Stages themselves are guidance for best practice). Suggest paragraph 3.1 is amended:          “Table 1 sets out a framework to aid developers and applicants to plan what information and activity could happen when. Reference to the relevant RIBA stages is provided as guidance only and is not an absolute requirement. Each development will be different, and timing and information may vary depending on what is relevant and proportionate to the scheme.”</p>	
<p>City Property Association</p>	<p>The CPA broadly supports the approach to engagement (paras 4.6-4.17), but the Guidance must acknowledge that there must be flexibility in the approach and there is no one size fits all approach. Early engagement with local stakeholders must for example be balanced against any early engagement with the local planning authority and other statutory consultees. This is particularly the case where early discussions are often influenced by technical and complex assessments, and confidential contractual or financial matters. These considerations of early pre-application engagement must be acknowledged in the Guidance, such that the appropriate strategy can be formulated.</p>	<p>Agree, text should be changed to provide for more flexibility and reference early engagement with the LPA and other statutory stakeholders</p>
<p>Chapter of the Cathedral Church of St Paul in London</p>	<p>The draft Developer Engagement Guidance prepared by the City is gratefully received by the Cathedral. Constructive, timely engagement with those wishing to develop in the setting of St Paul’s is key to a potentially positive outcome.</p>	<p>Support <a href="#">n</a>Noted</p>

<p>Chapter of the Cathedral Church of St Paul in London</p>	<p>Timing of Consultation – Too often we are consulted much too late in the development process. By this time, prospective applicants’ schemes are often too developed, and so not likely to make fundamental design changes often required to limit impacts. Additionally, the timing of consultation is often so close to the application that it is unclear what purpose the consultation serves, other than as a ‘box ticking’ exercise</p>	<p>Comments noted. The purpose of the Developer Engagement Guidance is to set out the City Corporation’s expectations for how developers will liaise with stakeholders at an early stage in the development of design proposals all the way through to completion</p>
<p>Chapter of the Cathedral Church of St Paul in London</p>	<p>Content of Consultation – We receive a wide spread of information at pre-application consultation and understand that this will be of varied resolution at different stages in the design development process. However, too often we are provided with limited, edited versions of assessment (such as views, for instance) that do not adequately show the whole picture. Often, we are also provided with limited information on the process of design, so we cannot comment on alternate, less harmful options of proposals. Very occasionally, we are presented with such limited information that it proves impossible to provide meaningful comment. When this also occurs very late in the development process, it is difficult to understand how consultation serves anything other than a ‘box ticking exercise’ for any less than conscientious applicant. Given the above, the contents of the Developer Engagement Guidance appear to be based on sound principles that respond to many of our concerns over the current development process. In particular, the focus on ‘proactive engagement’ referenced at paragraph 2.1 is a positive move, hopefully encouraging applicants to view</p>	<p>Support noted</p>

	consultation as an embedded, valuable part of the design process.	
Chapter of the Cathedral Church of St Paul in London	A further issue with consultations is the very variable skills by which developers understand and appraise heritage significance and impacts. If both the City, GLA and HE can do more to require developers to more faithfully recognise universal heritage values, so that there is 'constructively rational' conversation with common terms and understandings, many of our meetings would be better focused.	Comments noted. The Guidance sets out the City's expectations and the requirement to consult with the City and key stakeholders at an early stage, where matters such as heritage expertise can be considered.
Chapter of the Cathedral Church of St Paul in London	The focus on who to consult is welcome. As the Cathedral falls into a number of categories within paragraph 2.5, can specific mention be made of the List of Consultees (which includes multiple bodies in St Paul's). If there was any way to make this more concrete, rather than advisory, this would also be welcome.	Reference to the City's list of specific and general consultees has been added to para 2.5
Chapter of the Cathedral Church of St Paul in London	Section 3 'when to engage', the 'community engagement strategy' prepared by an applicant could also clearly link with the List of Consultees. It would also be useful if stakeholders to be consulted, such as the Cathedral, were able to have eyes on a timetable for consultation at an early part of the process. While Table 3.1 of the engagement strategy runs through the RIBA stages, we would suggest that perhaps the iterative nature of consultation as part of design is stressed further within this section, similarly to how it referenced in the later 'approach to engagement' section.	Add reference to the list of potential consultees set out in para 2.5.  Add reference to the timing of engagement and consultation Add reference to iterative nature of the RIBA stages

<p>Chapter of the Cathedral Church of St Paul in London</p>	<p>The report also directly relates to our concerns above with Section 4, 'timing of engagement' and Section 5 'methods of engagement'. Early engagement is welcome and should ensure we have input to the project at an appropriate time to affect the outcome. As an external stakeholder it would be useful if the 'engagement timeline' described in this section was shared with the Cathedral as part of the 'Communication Engagement Strategy' published as part of pre-application discussion, as suggested at paragraph 4.2. We also note that agreement of a community engagement strategy with pre-application is not a requirement for non-major development. In these cases, we would further encourage the City to ensure the developer team engage with the Cathedral, as even "minor" developments have the potential to affect the Grade I listed building and setting, if not carefully considered. It would be useful to have chance to comment on these schemes at pre-application stage and to ensure that this is captured in this guidance.</p>	<p>Para 4.1 already refers to the need to include a timeline for engagement in the Community Engagement Strategy.</p> <p>The DEG document is intended to provide guidance for developers on how to engage with stakeholders. The guidance acknowledges that the approach taken will vary according to the size and nature of development, but it is not limited to major development</p>
<p>Chapter of the Cathedral Church of St Paul in London</p>	<p>This draft guidance could, however, benefit from a clearer definition of what material should be presented at engagement, i.e. proportionate to the stage of the project but with enough information for stakeholders to provide meaningful comment. As noted above, heritage significance is a vital benchmark as understood in the NPPF and Conservation Principles. While much of this information is outlined in the 'approach to engagement' section of the report we feel this could contain more detail. We would also suggest that all material required to</p>	<p>Reference to the need to provide sufficient information to enable meaningful feedback has been added to para 4.6 and para 5.4</p> <p>Add reference to feedback including specific comments from stakeholders in Table 2</p>

	<p>be presented at the consultation meeting is agreed beforehand between the design team and the stakeholder. We also feel that failure to achieve this could be more clearly referenced in the 'barriers to information' section at paragraph 5.4. We recognise that the role of the Cathedral in these discussions will be, by its nature, 'consultative'. However, we would welcome acknowledgement that our input would also feed into 'collaborative' and 'feedback' methods of engagement referenced at Table 2 to ensure our comments are captured by the applicant team.</p>	
<p>Chapter of the Cathedral Church of St Paul in London</p>	<p>We welcome the notion that 'where no amendments [to the scheme] have been made, this should be explained and justified'. We would encourage that stronger language is used in this instance, as too often we have seen 'no changes' justified by 'our assessment demonstrates that there will be limited impact'. More qualitative language would be helpful.</p>	<p>The existing wording is considered to be sufficient. Developers are asked to explain and justify why amendments suggested have not been made. Para 6.3 sets out that the developer SCI will be considered in any officer report to Committee and this would include justification for making, or not making, changes to the scheme following engagement</p>
<p>Chapter of the Cathedral Church of St Paul in London</p>	<p>Post-application submission engagement. The Cathedral does not usually get notified, or involved, when a discharge of condition application is made. However we obviously welcome providing comment on updated plans within a live application, or subsequent section 73 applications. Matters such as lighting, planting, BMUs and similar are frequently addressed in conditions, and can</p>	<p>The DEG is intended to provide guidance to developers on early engagement with stakeholders, The City's Statement of Community Involvement address in detail how the City Corporation will consult on planning applications and changes to approved permissions. The DEG does,</p>

	<p>have impacts on Heights or Setting. Can we also ensure that there is explicit reference to the St Paul's Depths and a requirement to consult with appropriate information: the technical evaluation of Depths applications does require longer timeframes.</p>	<p>however set out an expectation that developers will continue to engage with stakeholders post the submission of an application.</p> <p>The requirement to consult the Cathedral on St Paul's Depths will be set out in the City Plan.</p>
Natural England	<p>Natural England have no comments to make on this consultation.</p>	<p>Noted</p>
Bevis Marks Synagogue	<p>1. In general, the Synagogue welcomes the Guidance, and particularly the greater emphasis it places on developers engaging with the community.</p> <p>2. Para 2.5 refers to engagement with "immediate neighbours". This ought to be widened to refer to all building owners/occupiers likely to be affected. Other parts of the text should be amended to similar effect - for example, para 4.10.</p> <p>3. Para 4.9 (which refers to alternative options for the site being explored, and the re-use of existing buildings being considered) is particularly welcomed.</p> <p>4. The Synagogue welcomes the requirement for applicants to continue to engage with stakeholders post application.</p>	<p>1) Support noted</p> <p>2) The first bullet point under 2.5 indicates that developers should consult with 'workers, businesses and landowners in the local area' Local area is to be defined according to the potential impact of a development, as advised by the City Corporation. Agree wording could be added to para 4.10</p> <p>3) Support noted</p> <p>4) Support noted</p>
Environment Agency	<p>Thank you for consulting us on the Statement of Community Involvement and Developer Engagement</p>	<p>Noted</p>



	Guidance. We are pleased to see that we are listed as a Statutory Consultee in the process.	
Port of London Authority	Thank you for consulting the Port of London Authority (PLA) on the City of London's Statement of Community Involvement (SCI) & Developer Engagement Guidance documents. I have now had the opportunity to review the consultation documents and can confirm the PLA has no comments to make.	Noted
Surrey County Council	Thank you for consulting Surrey County Council, please note that we do not have any comments to raise.	Noted
Transport for London	Although we welcome the reference in table 2 to TfL as an example of a statutory body that developers should arrange to meet, it would be helpful if the guidance could make potential developers aware of the pre application consultation services offered by TfL for developments that are expected to have strategic transport impacts.	Noted. The Guidance will be amended to reference statutory consultee pre-application services
Barbican Association	Number of detailed comments on specific wording in the SCI to improve legibility and understanding.	Where these suggested changes do not materially impact on the meaning or interpretation of the DEG, the changes have been accepted.
Barbican Association	Para 1.5: successful engagement reducing risk of legal challenge - Unless the application positively takes into account the concerns of stakeholders this won't be the case.	The DEG encourages applicants and developers to undertake meaningful early engagement with stakeholders which should reduce the risk of future challenge
Barbican Association	Para 2.2: 1) Are there any examples of where residents groups have made a significant contribution to planning and development?	1) Consultation reports on the City Plan, other planning policy documents and planning applications set out how

	2) Need to engage with hard to reach and disengaged groups – how are these to be defined?	resident comments have been considered 2) This will depend upon the location and nature of the development and will vary across the City. The City Corporation can provide advice on potential groups to be approached as part of early engagement
Barbican Association	Para 2.5: reference to Culture Mile – does this still exist?	Delete reference to Culture Mile
Barbican Association	Footnote 3: link to Planning Protocol - Is this the latest version? Who monitors the Protocol? What is the sanction where a member is in breach?	Footnote updated to refer to 2022 version of the Planning Protocol. Compliance is monitored on an ongoing basis. Member responsibilities are set out in the Member Code of Conduct which is available on the City Corporation’s website
Barbican Association	Para 3.1 Table: RIBA 0 - Will all “stakeholders” be identified at this point? RIBA 2 -is the text correct, it is the same as RIBA 1 RIBA 2 – re: Opportunity for planning officers to attend and visit events, talks, workshops, and meetings, How and when is this ever done. Why aren’t stakeholders advised of this service? Is this a new opportunity being offered? RIBA 4 – re officers notified on amended plans. Surely amended plans would be submitted anyway? RIBA 5 – re notification of changes – stakeholders should be notified of the submission of applications to discharge conditions, not just published on the weekly list	RIBA 0: This should include identification of key stakeholders, but this list may vary as the detail of the consultation is further developed. RIBA 2: Amend text to reflect RIBA stage 2 - Architectural Concept approved by the client and aligned to the Project Brief RIBA 2: reference is to providing the opportunity for planning officers to attend consultation and engagement meetings and sessions. RIBA 4: this is for clarification.

	<p>RIBA 5 – add “Consultation with local stakeholder groups should continue through demolition construction and fit out, including over the Code of Deconstruction and Construction with involvement of Environmental Health and planning officers as necessary”</p> <p>RIBA 6 – add “In large developments facilitate communication of local stakeholders with building management to ensure consultation on the way the building is operated does not cause nuisance to local stakeholders and complies with all permissions and conditions”</p> <p>RIBA 7 – publication of post-engagement report, Who will receive a copy?</p>	<p>RIBA 5: How the Corporation consults on the discharge of conditions is set out in the SCI.</p> <p>RIBA 5: add reference to the need to continue consultation through demolition, construction and fit out.</p> <p>RIBA 6: add reference to ongoing engagement with occupiers</p> <p>RIBA 7: add reference to need to provide report to the City Corporation and key stakeholders</p>
Barbican Association	<p>Para 4.10: Why are benefits “actual” and adverse impacts “potential”? Delete ‘any potential’</p> <p>Para 4.10: re reference to tackling climate change, Development rarely tackles climate change, if at all, as it always creates additional CO2 emissions.</p>	<p>Remove ‘potential’</p> <p>Change to ‘how it will impact on climate change’</p>
Barbican Association	<p>Para 4.15: engagement summary. It is perhaps too much to request a “statement of honesty” as to the minimum that is acceptable to Applicants and planning officers at the outset. In order to save time and stress in the planning process.</p>	<p>By making the engagement summary available, local communities will be able to judge the extent to which previous comments have been taken on-board. A separate ‘statement of honesty’ would not add anything substantive to this process.</p>
Barbican Association	<p>Para 4.19: add at end of para Those with their own charters should submit a comparison between the requirements of this charter and the actual consultations with the planning application.</p>	<p>Additional wording has been added to para 4.19 indicating that developers should set out how they have implemented their charters when</p>

		undertaking consultation and engagement exercises
Barbican Association	Para 5.5 re: planning officers can advise on whether impacts are likely to be significant and the degree of engagement that would be expected. Is this always objective? What a planning officer may think and what a stakeholder may think is often totally opposed.	The level of engagement necessary for non-major and changes of use will vary between schemes. Officers will use their professional expertise and knowledge of the City to advise when and where developers should undertake local community engagement
Barbican Association	Table 3: The issue of determining significance could be eased if City Corporation devised a robust system of notifying stakeholders who had already engaged of all post-decision submissions. Stakeholders would then know about them and could add their own judgements about significance to those of the officers and seek consultation with the applicants and make representations to the planning department.	The City Corporation's SCI sets out how the City Corporation will consult on planning applications and discharge of conditions.
Barbican Association	Table 4: 1) pre-engagement strategy - Applicants should pay for a City Corporation appointed communications consultant to conduct the engagement  2) opportunity for officers to attend meetings: When does this ever happen?  3) share and discuss consultation responses - This discussion should be recorded and published with the Committee papers.	1) There is no statutory requirement for pre-application consultation, so it is not possible to impose requirements for a developer to fund a City Corporation appointed consultant. 2) The DEG sets out a clear expectation that officers should be notified of, and given the opportunity to attend, events and meetings 3) Section 6 sets out the City's expectation is that the developer should produce a SCI setting out how

		consultation has been undertaken and how this has influenced the development which is applied for. This SCI will be publicly available and reference to the engagement included in reports to the Planning Applications Sub-Committee
Barbican Association	Para 6.1: success of engagement. How is this judged? How can objectivity be guaranteed?	The SCI will be publicly available as a submitted document with a planning application. Stakeholders will be able to review and judge for themselves how successful any engagement has been.
Barbican Association	Para 6.2 – justification for no changes - How is this judged?	Justification is a matter for the developer. Stakeholders will be able to review and come to a view on the merits of any justification.
Barbican Association	Post application engagement – how can this be guaranteed? There should be a robust system for notifying stakeholders of all post-decision applications	The City Corporation’s SCI sets out how the City Corporation will consult on planning applications and post-decision applications
Barbican Association	Para 6.5 add at end of para: “Such engagement is required by the City’s Code of Deconstruction and Construction.”	Add reference to the Code of Practice for Deconstruction and Construction Sites.

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## Draft Statement of Community Involvement

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## 1. Introduction

- 1.1. The City of London Corporation is the local planning authority for the City of London. This means we are responsible for deciding planning applications and writing the Local Plan ([City Plan](#)) for the City of London. We also produce other planning documents and carry out other work related to the planning system.
- 1.2. This document is our Statement of Community Involvement (SCI). It sets out how we will engage with ~~all of the City's communities and stakeholders~~ ~~the public, developers, and other interested people~~ in the planning process and ensure consultations are effective, inclusive and open and accessible for everyone.
- 1.3. The SCI sets out our approach to public consultation in two areas of planning:
  - **Plan Making.** The City Corporation prepares plans and policies that shape the City and guide its planning decisions. ~~The public~~ ~~Stakeholders and all of the City's communities~~ are integral to how these plans and policies are prepared and are involved throughout the preparation of these policies.
  - **Planning Applications (Development Management).** The City Corporation decides a range of applications, including those for planning permission, listed building consent and advertisement consent. An important part of the development management process is to provide advice and information and to seek and hear the views of all of those with an interest in proposed development.
- 1.4. The SCI sets out the standards of consultation and engagement that the City [of London](#) Corporation aims to achieve in performing its statutory planning function [as a local planning authority](#). It is intended to provide a clear explanation for how and when stakeholders will be involved in the preparation of planning policies and in the determination of planning applications.
- 1.5. The City Corporation have also prepared a developer engagement guidance document, available on our website, that provides guidance for developers on how they should engage with City communities from the earliest stages of a development through to completion.
- 1.6. The City Corporation will update this SCI at least every five years.

## 2. Principles of Engagement

- 2.1. The City Corporation's consultation and engagement is guided by the following principles. We expect developers and agents to follow the same principles in undertaking consultation on development schemes.
- 2.2. **Accessibility:** our documents will use plain English. Technical jargon will be avoided wherever possible. Where technical language is unavoidable, we will explain what it means. We will ensure that consultations are accessible to all in a range of different formats, including large print or audio format, where required.
- 2.3. **Inclusivity:** the City Corporation aims to ensure that there is fair and equal access for all to the planning process. We will proactively engage with all groups in a way that suits their needs. ~~Participants~~ ~~Stakeholders~~ will be able to express their views free of judgement with knowledge that their contribution will be considered in decision making.
- 2.4. **Variety of methods:** the City Corporation will use a range of methods for consultation, adjusting processes according to the audience, where possible. We will always be open to new ways and methods for participation.
- 2.5. **Clear and informative:** ~~participants~~ ~~stakeholders~~ will be provided with all the information they need when they are consulted so that they can offer informed views. This includes the consultation aims, methods to be used and the timetable for responding.
- 2.6. **Proportionate scale and time:** we will tailor the consultation to fit the ~~the scale of the consultation will be proportionate to the~~ scale and impact of the ~~decision following the consultation proposal~~. Where we are consulting on several documents, consultation periods and closing dates will be co-ordinated as far as practical.
- 2.7. **Early engagement:** the stages of consultation will be planned and timetabled before consultation begins. We will publish, and keep up to date, a Local Development Scheme outlining the timetable and process for the preparation of planning policy documents. We will also publish developer engagement guidance, setting out the principles, processes, and methods that developers and agents should use to engage with local communities at an early stage of ~~the~~ design of ~~the~~ development.
- 2.8. **Continuous engagement:** we will endeavour to engage on a continual basis but may be limited by statutory consultation processes and timescales set out in legislation. Where time limits exist, these will be clearly set out in consultation material and on the City Corporation's website.
- 2.9. **Feedback:** We will acknowledge the receipt of all comments on planning policy consultations. Following consultation on policy documents, we will publish a report outlining the comments received and how these have been taken into account in taking the policy documents forward. Comments received on planning applications will be considered in determining applications. Committee

Reports to the Planning Applications Sub-Committee will set out how these comments have been considered. Comments will be included in an appendix to the Committee Report and published on the City Corporation's website.

## Digital Engagement

- 2.10. The City Corporation is committed to improving consultation techniques to reach out to all of the City's communities.
- 2.11. We are investigating whether an online digital consultation platform could be used to enhance consultation, its accessibility and inclusivity. Initially, such a platform could provide a variety of means by which [City communities stakeholders](#) can participate in planning policy consultations and provide an opportunity for feedback on consultation outcomes.
- 2.12. The City Corporation currently uses an interactive 3D modelling platform which demonstrates the impact of buildings on their surroundings and can assist in making more informed evaluations. We will look to enhance this technology, including its wider availability [to all interested stakeholders](#), to make it easier for local communities to understand the impacts of planning policy and planned development.
- 2.13. The [City of London's Corporation's](#) Environment Department provides quick response (QR) codes on planning application site notices. These are barcodes that can be used via a smart device camera as a quick and easy means to access information on planning applications.

### 3. Plan Making

#### Introduction

- 3.1. The City Corporation has a statutory duty to prepare planning policies that shape the development of the City. These policies ensure that planning is co-ordinated with the City Corporation's Corporate Plan and wider plans and strategies and provide the basis for decisions on planning applications.
- 3.2. The key planning policy documents prepared are:
  - **City Plan:** this is the City Corporation's Local Plan. It contains the City Corporation's vision for planning the City and includes strategic and Development Management policies.
  - **Supplementary Planning Documents (SPDs) and Planning Advice Notes (PANs):** these explain the policies of the City Plan in more detail where this is needed.
- 3.3. A list of the policy documents and the timetable for their preparation is set out in the Local Development Scheme, which is available on the City Corporation's website. This is regularly reviewed to keep it up to date so that [the public stakeholders](#) are aware of the opportunities to participate. We will also publish a City Plan [Newsletter/Bulletin](#) on the website from time to time, providing updated information on planning policy preparation.
- 3.4. The City Corporation will consult and engage [the City's communities stakeholders](#) throughout the preparation of all planning policy documents. Planning legislation sets out minimum requirements for consultation and we will seek to exceed these requirements where possible.

#### Who is Consulted on Planning Policy Documents?

- 3.5. In preparing planning policy documents the City Corporation must meet a range of statutory responsibilities, in terms of who and how it consults.
  - **Duty to Co-operate:** this is a legal duty on local planning authorities and other public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters. These public bodies are set out on the City Corporation's website.
  - **Statement of Common Ground:** as part of the wider Duty to Co-operate, strategic policy-making authorities, including the City Corporation, have a separate statutory requirement to co-operate with each other, and other [public](#) bodies, in the preparation of strategic planning policy. These authorities should produce, maintain, and update one or more statement(s) of common ground, throughout the plan-making process. A [Statement of Common Ground](#) is a written record of the progress made by strategic

policy-making authorities during the process of planning for cross-boundary matters. It documents where effective co-operation is and is not happening and is a way of demonstrating at examination that plans are deliverable over the plan period and based on effective joint working across local authority boundaries.

- 3.6. The City Corporation will meet these statutory requirements and prepare and agree Statements of Common Ground where relevant and publish these, along with an annual report on how it has met the Duty to Co-operate, on the City Corporation's website.
- 3.7. Separately, the City Corporation is required by legislation to consult a range of ~~stakeholders individuals and organisations~~. These are defined in national regulations and comprise:
- **Specific consultation bodies:** statutory authorities such as neighbouring boroughs, the Mayor of London, government agencies and utilities providers;
  - **General consultation bodies:** including interest and amenity groups, residents' associations, property, trade and business associations, voluntary organisations whose activities benefit the City and bodies that represent issues of race, ethnicity, gender, age, sexual orientation, disabilities and those with caring responsibilities; and
  - Residents, businesses and landowners located in the City.
- 3.8. A full list of the specific and general consultation bodies is available on the City Corporation's website at:  
<https://www.cityoflondon.gov.uk/services/planning/planning-policy/other-planning-policy-documents>

## Consultation Techniques

- 3.9. The tables below provide further information on how we will consult during formal public consultation on the City Plan, other local planning policy documents and the Community Infrastructure Levy (CIL). An engagement strategy will be produced, setting out how and when engagement will take place.
- 3.10. All consultations will be conducted to provide equal and inclusive access to information, ensuring documents are available in accessible and inclusive formats and that the timing of consultations does not disadvantage any particular ~~stakeholder individuals or groups~~. The methods used for consultation will be selected as appropriate according to the consultation subject and audience. Where the local community suggest alternative or additional consultation methods, these will be carefully considered and used, where possible.
- 3.11. Table 1 outlines the range of consultation methods that will be used. This is not intended to be a comprehensive list of all consultation methods and we will adopt other methods and channels as appropriate, as well as responding to

individual requests to provide information or attend meetings. [We will ensure that consultations are publicised widely through our website, our consultation portal, press releases and by direct notification to those stakeholders on our database. Consultation will, as a minimum, meet statutory requirements and will be extended, wherever possible, to ensure as many stakeholders as possible have the opportunity to comment.](#)

<b>Consultation and engagement technique</b>	<b>Detail</b>
Website	The City Corporation website includes pages dedicated to planning policy and is kept up to date with regard to ongoing and planned consultations. <a href="https://www.cityoflondon.gov.uk/services/planning/planning-policy">https://www.cityoflondon.gov.uk/services/planning/planning-policy</a>
Digital consultation platforms	The City Corporation is investigating the use of a digital consultation platform to provide greater public access to information and enable responses to be submitted in a more effective and simple way.
City Plan Bulletin	This will be published from time to time on the City Corporation's website and provide up to date information on progress on the City Plan and other policy documents.
Leaflets and summaries	These will be produced where it is considered necessary and made available in public lending libraries in the City, the Guildhall reception, via direct mail, or on the City Corporation website during the course of consultation with details about the consultation and how to contribute.
Information displays	Display boards and/or posters will be used to publicise consultation at the Guildhall, public lending libraries in the City, community centres or other appropriate places.
Focus groups and workshops	These will be held, where necessary, to actively seek comments during the course of consultations and outside of formal consultation periods to inform policy development. Focus groups and workshops will be tailored to the consultation/issue under consideration and will be held at times and at locations convenient to the participants.  A note will be taken of all meetings and circulated to attendees. Where undertaken as part of the formal consultation on a plan, these notes will also be published on the City Corporation's website and included in a published consultation statement.
Meetings, Events and Webinars	Public meetings, events and webinars will be arranged when appropriate and according to the issues on which views are being sought. Meetings and events will be held in locations that are accessible to the <a href="#">community</a>

Consultation and engagement technique	Detail
	<p><a href="#">stakeholders</a> being consulted and webinars, where held, will be at convenient times for the intended audience. The number of meetings, events and webinars will vary and may be held on a number of different days and at different times to ensure that <a href="#">all stakeholders</a> <del>the local community</del> have an opportunity to attend in person or remotely and express their views.</p> <p>Requests from <a href="#">stakeholders</a> <del>local community groups and others</del> for meetings to discuss planning policy issues will be considered favourably, subject to reasonable advance notice being given to the City Corporation.</p> <p>Notes will be taken of the issues raised in these meetings and, where part of the formal consultation on the City Plan, a summary note will be published on the City Corporation's website.</p>
Advisory groups	<p>The City Corporation will consider whether standing advisory groups are required, drawing together interested parties and experts, to provide ongoing advice on specific planning policy matters. Membership will be inclusive and relevant to the subject matter that the group will provide advice upon.</p>
Direct email and Mailshots	<p>The <a href="#">City Corporation's</a> Planning &amp; Development Service has a database of individuals and organisations that have an interest in City planning policy to inform people on the stages of consultation. Anyone can be added to this database subject to written consent and can be removed upon request. Details of consultations and consultation events will be emailed to those individuals and organisations on this mail list.</p> <p>The Planning Policy Team can also be contacted at any time to answer any questions or comments at:  <a href="mailto:LocalPlan@cityoflondon.gov.uk">LocalPlan@cityoflondon.gov.uk</a></p> <p>Consultation responses can be sent to:  <a href="mailto:PlanningPolicyConsultations@cityoflondon.gov.uk">PlanningPolicyConsultations@cityoflondon.gov.uk</a>  <a href="#">Planning policy consultations</a></p>
Telephone	<p>Information on any aspect of the City Plan can initially be obtained by calling the City Corporation's Contact Centre: 020 7332 1710.</p>
Surveys and other information gathering	<p>These can be a way of collecting feedback on draft policies and proposals. Where surveys are used, a mix of structured questions and responses and open questions with text boxes will be used to enable a full range of responses to be gathered. They will be conducted</p>

<b>Consultation and engagement technique</b>	<b>Detail</b>
	through an online consultation platform, or via the City Corporation's website.
Members	Information on draft and emerging policies will be made available through formal Committee and Sub-Committee meetings and through Member newsletters or direct email to Members. Members of the Planning & Transportation Committee will be notified of the start of each consultation, Consultation information will also be made available through Ward meetings and newsletters, where feasible.
Resident Associations/Groups	<p>Information will be made available to residents through regular liaison meetings with resident associations or groups, or the City Residents Meeting, or through direct email to associations/groups, or through consultation material within residential estates or buildings.</p> <p>Occasionally, the City Corporation will contact, by letter, all occupiers of residential addresses to notify them of policy consultation.</p>
Business Associations/Groups	Information will be made available to business and developers through regular liaison meetings, direct email, or liaison through representative bodies, including the City Property Association and the various City Business Improvement Districts.
Media	The City Corporation will issue press releases providing information on public consultation through national, London-wide, City of London and professional press, as appropriate. The City Corporation will also make use of its social media channels to provide information on emerging policy and consultations.

*Table 1 consultation and engagement techniques*

## **City Plan Preparation**

3.11.3.12. Review of the City Plan will involve several stages of preparation during which the public will be consulted. These are set out in Table 2.



<b>Plan making stage</b>	<b>Minimum Consultation Requirement</b>
<p><b>Issues and options – (Regulation 18)</b> The issues which the plan needs to address are identified and alternative options for the policies are considered</p>	<ul style="list-style-type: none"> <li>• Consult for minimum of 6 weeks</li> <li>• Make documents and evidence base available on website and through the online consultation portal</li> <li>• Make documents available for inspection at the Guildhall and City public lending libraries during opening hours for the length of consultation period</li> <li>• Consult general and specific consultation bodies</li> <li>• Consult those on the Planning Policy mailing list</li> <li>• Consult Duty to Co-operate bodies</li> <li>• Seek views of the Conservation Area Advisory Committee and Access Group and other advisory groups</li> <li>• Publish City Plan Bulletin</li> <li>• Arrange public meetings as appropriate, including focus groups and workshops</li> <li>• Arrange displays at appropriate locations</li> <li>• Consult on the Integrated Impact Assessment</li> </ul>
<p><b>Draft City Plan</b> Preferred options are selected, and policies drafted</p> <p>Non-statutory consultation on draft plan</p>	<ul style="list-style-type: none"> <li>• As above</li> <li>• Issue summary of comments received at Issues and Options stage</li> <li>• Make all documents and evidence base prepared since Issues and Options available</li> </ul>
<p><b>Publication of a City Plan (Regulation 19) -</b> The City Plan is published and finalised for a last stage of consultation prior to formal submission to the Secretary of State</p>	<ul style="list-style-type: none"> <li>• As above</li> <li>• Publish the City Plan and supporting documents and evidence base on the City Corporation website and consultation portal, detailing where and when they can be inspected</li> <li>• Publish a statement setting out who was consulted on earlier stages of plan preparation, how and summary of issues raised and how they were taken into account</li> <li>• Publish information on how to respond to the consultation through a 'statement of representations procedure'</li> <li>• Contact those that have made representations at previous stages</li> <li>• Inform other appropriate bodies</li> <li>• Publish the Integrated Impact Assessment</li> </ul>

<b>Plan making stage</b>	<b>Minimum Consultation Requirement</b>
<b>Submission</b>	<ul style="list-style-type: none"> <li>• The City Plan, the public's comments on it at all stages, and the evidence base supporting the Plan, are submitted for Examination to the Secretary of State who appoints a planning inspector.</li> <li>• All submitted information is made available on the City Corporation website.</li> </ul>
<b>Examination</b>	<ul style="list-style-type: none"> <li>• The City Plan and public comments are examined by the planning inspector who will hold a series of public meetings and then issue a report on the City Plan, identifying what changes, if any, are required.</li> <li>• A Programme Officer will be appointed to manage the examination, including issuing invitations to those people/organisation invited by the Inspector to attend the public hearings</li> <li>• The City Corporation will publish information about the examination and any further documentation from participants and the Inspector, on the City Corporation's website.</li> <li>• If the Inspector requires major changes (modifications) to the City Plan for it to be acceptable, these will be subject to a further period of public consultation. Consultation will accord with the requirements set out above.</li> </ul>
<b>Adoption – Adopt the City Plan (with alterations)</b>	<ul style="list-style-type: none"> <li>• The City Corporation will make the inspector's report, the City Plan and Integrated Impact Assessment available on the City Corporation's website and for inspection at the Guildhall and public lending libraries in the City.</li> <li>• Inform those who made representations on the City Plan and others who asked to be notified of progress.</li> <li>• Send an adoption statement to those who made comments.</li> <li>• Keep supporting documents on website for inspection for 6 weeks following the adoption statement.</li> </ul>

Table 2 City Plan making stages

[3.12.3.13.](#) At each public consultation stage, we will acknowledge responses within five working days of receipt and will consider further engagement where requested.

## Supporting Documents

[3.13.3.14.](#) There are a range of documents that contribute to, explain, and justify planning policy which will be published alongside policy documents. These include the evidence base justifying the proposed policy approach, information

on previous consultations and consultation responses, and information on consultation events and how to respond to the consultation.

## **Integrated Impact Assessment**

3.14.3.15. An Integrated Impact Assessment (IIA) is a method for assessing the predicted impacts of emerging planning policy before policies are agreed and finalised. An IIA includes a Sustainability Appraisal and Habitats Regulation Assessment, Equality Impact Assessment, and a Health Impact Assessment. Details of the various elements of these documents are set out below.

## **Sustainability Appraisal and Habitats Regulation Assessment**

3.15.3.16. A Sustainability Appraisal (SA) will assess the social, environmental, and economic impact of policies. The SA will incorporate the requirements for Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA). A SEA ensures the integration of environmental considerations in the preparation of plans and programmes with the aim of promoting sustainable development. A HRA examines the impact of planning policy on the nature conservation management of a site.

3.16.3.17. Consultation with statutory consultees (Environment Agency, Natural England and Historic England) and key stakeholders including the Mayor of London and neighbouring boroughs will be undertaken on the scope of the SA. A full SA report will be issued with the City Plan documents and will include a non-technical summary of information within the main report, providing a clear and accessible overview of the SA and HRA process and findings.

## **Equality Impact Assessment**

3.17.3.18. The purpose of an Equalities Impact Assessment (EqIA) is to ensure that policies promote equality in line with the City of London Corporation's Public Sector Equality Duty. All planning policy documents will be subject to an EqIA to assess the impact on people belonging to groups with protected characteristics. When developing policies and plans the documents will be screened to determine any significant equalities issues. If the screening identifies significant equalities issues, a full EqIA will be carried out to identify the nature of changes required and possible mitigation measures.

## **Health Impact Assessment**

3.18.3.19. A Health Impact Assessment (HIA) seeks to ensure that health and wellbeing are properly considered in planning policies and plans. The HIA can identify ways to promote health benefits and indicate where policy should be changed to reduce possible harmful effects.

## Supplementary Planning Documents

3.19.3.20. Supplementary Planning Documents (SPDs) explain the policies contained in the City Plan in more detail, where this is necessary. These may relate to a development site or a specific planning policy issue. They do not introduce new policies but can be used to provide further information on how to implement policies in the City Plan. SPDs are a material consideration in decision-making.

3.20.3.21. Consultation involves publishing a draft of the SPD and a Sustainability Appraisal/Strategic Environmental Assessment screening to determine whether a full assessment is required. Since the SPD will provide further guidance to policies in the adopted City Plan, a full assessment is normally only required in exceptional circumstances.

3.21.3.22. Following consultation on an SPD, the City Corporation will consider the comments received before amending the guidance (if necessary) and adopting the SPD.

Preparation stage	Minimum Consultation Requirement
<b>Draft SPD</b>	<ul style="list-style-type: none"> <li>• Consultation for a minimum of 6 weeks</li> <li>• Publish on the City <a href="#">of London</a> Corporation website and consultation portal</li> <li>• Make documents available for inspection at the Guildhall and public lending libraries in the City during normal opening hours for the length of consultation period</li> <li>• Consult general and specific consultation bodies</li> <li>• Consult Duty to Co-operate bodies</li> <li>• Consult those on the City Plan consultation database</li> <li>• Seek views from the <a href="#">City of London</a> Conservation Area Advisory Committee (<a href="#">CAAC</a>) and <a href="#">City of London</a> Access Group (<a href="#">COLAG</a>) and other advisory groups as appropriate</li> <li>• Arrange meetings, presentations and other discussions if appropriate.</li> </ul>
<b>Adopt SPD</b>	<ul style="list-style-type: none"> <li>• Publish the SPD and adoption statement on the City Corporation website</li> <li>• Publish a consultation statement setting out who was consulted, how they were consulted and a summary of issues raised and how they have been taken into account</li> <li>• Send an adoption statement to all those individuals and organisations who commented on the draft and/or preliminary consultation and to those that requested notification</li> <li>• Keep the SPD and public consultation supporting documents on website for inspection for <a href="#">3 three</a> months following formal adoption</li> </ul>

*Table 3 Supplementary Planning Document preparation stages*

## Planning Advice Notes

[3.22-3.23.](#) Planning Advice Notes (PAN) provide technical advice for applicants, for example setting out the specific type of evidence necessary to support a planning application. PANs can vary considerably in their substance, and there are no statutory requirements for how to consult on them. Consultation on PANs will therefore vary according to the nature and content of the PAN.

## Neighbourhood Planning

[3.23-3.24.](#) Neighbourhood Plans and Neighbourhood Development Orders were introduced in the Localism Act 2011 giving communities the statutory power to shape the development of their area. In the City of London there are no Parish Councils and the responsibility for preparing Neighbourhood Plans and Orders

rests with local Neighbourhood Forums not the City [of London](#) Corporation. [Further information on Neighbourhood Forums can be found on the City's website.](#)

3.24.3.25. The City Corporation will provide support and technical advice on the processes for preparation of a Neighbourhood Plan or Order and share any background information, in accordance with statutory provisions. Initial consultation on Neighbourhood Plans and Orders will be undertaken by the relevant body responsible for making the Plan or Order. The City Corporation will undertake consultation in accordance with the minimum standards set out in Table 4 below.

Preparation stage	Minimum Consultation Requirement
<b>Application to designate a <del>n</del>Neighbourhood <del>p</del>lanning <del>f</del>orum</b>	<p>Upon receipt of a valid application to nominate a <del>n</del>Neighbourhood <del>f</del>orum:</p> <ul style="list-style-type: none"> <li>• Consult for a minimum of 6 weeks</li> <li>• Publish on the City Corporation website and consultation portal</li> <li>• Make documents available for inspection at the Guildhall and public lending libraries in the City during normal opening hours for the length of consultation period</li> <li>• Consult general and specific consultation bodies</li> <li>• Consult Duty to Co-operate bodies</li> <li>• Consult those on the City Plan consultation database</li> </ul>
<b>Designation of a <del>n</del>Neighbourhood <del>f</del>orum</b>	<p>Publish notification of designation of <del>the</del> <del>N</del>eighbourhood <del>f</del>orum:</p> <ul style="list-style-type: none"> <li>• on City Corporation website</li> <li>• at the Guildhall and public lending libraries in the City during normal opening hours</li> <li>• notify general and specific consultation bodies</li> <li>• notify Duty to Co-operate bodies</li> <li>• notify those on the City Plan consultation database</li> <li>• notify individuals and organisations who made comments on designation</li> </ul>
<b>Application to designate a <del>n</del>Neighbourhood <del>p</del>lanning <del>A</del>rea</b>	<p>Upon receipt of a valid application to designate a <del>N</del>eighbourhood <del>p</del>lanning <del>A</del>rea:</p> <ul style="list-style-type: none"> <li>• Consult for a minimum of <del>six</del>6 weeks</li> <li>• Publish on the City Corporation website and <del>or</del> consultation portal</li> <li>• Make documents available for inspection at the Guildhall and public lending libraries in the City during normal opening hours for the length of consultation period</li> <li>• Consult general and specific consultation bodies</li> <li>• Consult Duty to Co-operate bodies</li> <li>• Consult those on the City Plan consultation database</li> </ul>

Preparation stage	Minimum Consultation Requirement
<b>Designation of Neighbourhood Planning Area</b>	Publish notification of designation of <del>forum</del> <u>the Neighbourhood Planning Area</u> : <ul style="list-style-type: none"> <li>• on City Corporation website</li> <li>• at the Guildhall and public lending libraries in the City during normal opening hours</li> <li>• notify general and specific consultation bodies</li> <li>• notify Duty to Co-operate bodies</li> <li>• notify those on the City Plan consultation database</li> <li>• notify individuals and organisations who made comments on designation</li> </ul>
<b>Publicising a Neighbourhood Plan or Neighbourhood Development Order</b>	As soon as possible after receiving a <u>Neighbourhood Plan</u> or <u>Neighbourhood Development Order</u> proposal: <ul style="list-style-type: none"> <li>• Consult for a minimum of <del>six</del> <u>six</u> weeks</li> <li>• Publish on the City Corporation website and <del>for</del> <u>consultation portal</u></li> <li>• Make documents available for inspection at the Guildhall and public lending libraries in the City during normal opening hours for the length of consultation period</li> <li>• Consult <u>General</u> and <u>Specific</u> <u>Consultation</u> bodies</li> <li>• Consult Duty to Co-operate bodies</li> <li>• Consult those on the City Plan consultation database</li> <li>• Consult any organisations or individuals identified in the Neighbourhood Plan or Order Consultation Statement</li> </ul>



Preparation stage	Minimum Consultation Requirement
<p><b>Examination of Neighbourhood Plan or Neighbourhood Development Order &amp; Referendum</b></p>	<ul style="list-style-type: none"> <li>• The Plan or Order and any consultation comments are sent to an independent inspector for public examination.</li> <li>• If modifications are required to the Plan or Order by the Inspector, re-consultation may be required by the neighbourhood forum.</li> <li>• Following receipt of the Inspector's report, the City Corporation will publish the report on its website.</li> <li>• If the Inspector recommends that the Plan or Order be put to Referendum, the City Corporation will hold a referendum open to anyone on the electoral role within the Neighbourhood Plan area.</li> <li>• If the City Corporation proposes to make a decision which differs from that recommended by the examiner, it will notify: <ul style="list-style-type: none"> <li>• the qualifying body</li> <li>• anyone whose representation was submitted to the examiner and</li> <li>• any consultation body that was previously consulted.</li> </ul> </li> <li>• These bodies will have 6 weeks to make representations and, following this period, the City Corporation will give notice of its decision within five weeks.</li> <li>• At referendum, if more than 50% of respondents to the referendum vote in favour of adopting the Neighbourhood Plan or Order, the City Corporation will formally adopt the Plan. This decision and the Neighbourhood Plan or Order will be: <ul style="list-style-type: none"> <li>• published on City Corporation website</li> <li>• at the Guildhall and public lending libraries in the City during normal opening hours</li> </ul> </li> <li>• The City Corporation will: <ul style="list-style-type: none"> <li>• notify General and Specific consultation bodies</li> <li>• notify Duty to Co-operate bodies</li> <li>• notify those on the City Plan consultation database</li> <li>• notify individuals and organisations who made comments on the draft plan</li> <li>• send the decision notice to the body that made the draft plan</li> <li>• notify anyone who asked to be notified of the outcome of the examination</li> </ul> </li> </ul>

Table 4 Neighbourhood Planning Preparation Stages

## Planning Contributions

~~3.25.~~3.26. Planning contributions ensure that development contributes to improving the City's infrastructure, environment and facilities. Planning contributions include the Community Infrastructure Levy (CIL) and planning obligations or ~~s~~Section 106 agreements. The City Corporation publishes on its website an Annual Infrastructure Funding Statement which sets out financial contributions received, what CIL or ~~s~~Section 106 ~~funding~~ ~~has~~ ~~been~~ used to fund and future spending priorities.

## Planning Obligations (Section 106 Agreements)

~~3.26.~~3.27. These are legal obligations entered into by developer and the City Corporation to mitigate the impacts of development. Individual obligations are negotiated for each development site, identifying the mitigation required and how this mitigation will be achieved. ~~Section~~ 106 agreements are also used to deliver affordable housing and training, education and skills provision. Details are set out in the Planning Obligations ~~\_SPD~~Supplementary Planning Document, published on the City Corporation's website at <https://www.cityoflondon.gov.uk/services/planning/planning-policy/development-contributions-community-infrastructure-levy-and-planning-obligations>

~~3.27.~~3.28. The Planning Obligations SPD is subject to formal consultation as set out in Table 3 above.

## Community Infrastructure Levy (CIL)

~~3.28.~~3.29. The Community infrastructure Levy (CIL) is a charge on new development used to pay for improvements in existing infrastructure or the delivery of new infrastructure needed to support the development of the area in accordance with the City Plan. The CIL operates through a charging schedule which will be periodically reviewed. Table 5 below sets out the minimum level of consultation that will be undertaken in preparing the CIL charging schedule. Although not required, the City Corporation will also undertake early pre-draft CIL consultation, ~~particularly with the City's development industry~~, on the viability information underpinning the CIL proposals.

## Community Infrastructure Levy Neighbourhood Fund

~~3.29.~~3.30. The Community Infrastructure Levy Neighbourhood Fund (CILNF) supports local community projects in the City of London. 15% of CIL is reserved for this Fund. Public consultation is carried out on a regular basis to understand community priorities for the allocation of monies from this ~~CILNFund~~. The ~~CILNFund~~ and consultation are managed within the City Corporation by the Central Grants Unit. The Central Grants Unit will undertake occasional consultation on community funding priorities to inform changes to the ~~CILNF Neighbourhood Fund~~ structure and funding regime. This consultation will take place over a minimum ~~4~~~~six~~-week period, with information published on the City Corporation website and information sent to consultees on the City Plan consultee database, plus other interested parties identified by the Central Grants

Unit. Information on the CILNF is available on the City Corporation's website at: <https://www.cityoflondon.gov.uk/about-us/working-with-community/community-infrastructure-levy-neighbourhood-fund>

<b>Preparation stage</b>	<b>Consultation Requirement</b>
<b>Draft Charging Schedule</b>	<ul style="list-style-type: none"> <li>• Publish for a minimum of 6 weeks on the Corporation's website and consultation portal</li> <li>• Consult general and specific consultation bodies</li> <li>• Consult Duty to Co-operate bodies</li> <li>• Consult residents, businesses, voluntary groups and landowners who may be interested</li> <li>• Arrange meetings, presentations, group discussions if appropriate</li> </ul>
<b>Examination</b>	<ul style="list-style-type: none"> <li>• The draft Charging Schedule, statement of consultation, copies of representations and evidence base are submitted to an Inspector for examination.</li> <li>• Submission documents are made available on the City Corporation website.</li> <li>• Notify persons who requested to be notified of submission, plus all those who made representations, all Duty to Co-operate, Specific and General Consultees and persons on the City Plan consultee database.</li> <li>• Publish details of the examination on the City Corporation website and notify all persons who made representations.</li> <li>• Publish the Inspector's report on the City Corporation website and notify persons who asked to be notified of publication.</li> </ul>
<b>Approval</b>	<ul style="list-style-type: none"> <li>• Publish approved CIL Charging Schedule on City Corporation website.</li> <li>• Make CIL Charging Schedule available at the Guildhall and public lending libraries in the City during normal opening hours</li> <li>• Notify Duty to Co-operate, specific and general consultees, persons on the City Plan consultation database and persons who specifically asked to be notified of adoption.</li> </ul>

Table 5 Community Infrastructure Levy stages

## 4. Development Management

### Introduction

- 4.1. Determining **planning applications** (Development Management) is an integral part of the planning process. It puts development plans and policies into action to achieve sustainable development. Development Management includes the process by which planning applications (including applications for full planning permission, listed building consent, advertisement consent and prior approval) are decided.
- 4.2. Development Management includes **pre-application engagement** and the provision of **pre-application advice** by the City Corporation to prospective applicants for planning permission. This engagement and advice aims to shape development and address key planning issues well in advance of a planning application being submitted. There is no mandatory requirement for a developer or other applicant to enter into pre-application consultation with the City Corporation, but it is strongly encouraged – the City Corporation believes that early engagement leads to better development proposals and increases the likelihood of a proposal complying with the City Plan.
- 4.3. Prospective applicants are also strongly encouraged to undertake early pre-application consultation with the local community and key stakeholders in a positive and timely fashion to enable ~~the local community~~ these groups to input to, to comment on and help shape development proposals before a planning application is formally submitted to the City Corporation.
- 4.4. Development Management can include monitoring compliance with approved planning applications (and the associated approved plans) and **planning enforcement** when unauthorised development takes place. The City Corporation has an Enforcement Plan SPD Supplementary Planning Document, which explains how these duties are carried out  
<https://www.cityoflondon.gov.uk/assets/Services-Environment/supplementary-planning-document-enforcement-plan.pdf>
- 4.5. If an applicant (whether an individual, business, public body or other organisation) submits a planning application, this is assessed against the policies in the City Plan and London Plan, National Planning Policy Framework (NPPF) and legislation, supplementary guidance (set out in adopted City of London SPDs Supplementary Planning Documents and Mayoral London Plan Guidance) and other material considerations before a decision is made.
- 4.6. It is important that communities and stakeholders who may be affected by development proposals are involved and are able to have their say on planning applications. The views of local residents, businesses, organisations and community groups can help the City Corporation to seek improvements or amendments to development proposals and ensure any impacts are dealt with.

## Development Management Stages

4.7. Consultation and public involvement in considering planning applications takes place at a number of stages:

- **Pre-Application Stage** – developers and [other](#) applicants are strongly encouraged to enter into meaningful engagement with local communities, through a range of appropriate methods and techniques. This is the stage where the local community can have the greatest influence on development proposals. The best way for residents and local stakeholders to get involved at this stage is to attend pre-application events when they are held or engage with developers [and applicants](#) through social media or through surveys when they make these options available, and to discuss any concerns with City Corporation local ward Members. The City Corporation has prepared separate guidance for developers [and applicants](#) on the format, timing and shape of community engagement.

The City Corporation also strongly encourages developers and applicants to enter into pre-application discussions with [key stakeholders, making use of pre-application advice services offered by these stakeholders, and with the City Corporation's Planning Team](#) prior to the submission of a planning application. See paragraphs 4.8 to 4.12 below.

- **Planning Application Stage** – when a planning application is submitted, the City Corporation will undertake formal public consultation, with residents, consultees and other stakeholders invited to make comments on the submitted proposals. At this stage, comments received are taken into account as part of the consideration and determination of the planning application. See paragraphs 4.13 to 4.34 below.
- **Decision Making Stage** – for large developments schemes [\(See Table 6\)](#), or where there is substantial public interest in a development proposal, a planning application is likely to be referred to the City Corporation's Planning Applications Sub-Committee for determination. Where more objections have been received to a planning application than the agreed threshold, the application will also be determined by the Planning Applications Sub-Committee. At the time of adopting this SCI, the threshold is 10 or more objections, but this may from time to time be amended through the City Corporation's published Scheme of Delegation, which is available on the City Corporation's website. [Stakeholders Members of the local community](#) who have made representations regarding a planning application have the option to address the Committee to express their views or the views of the local community on the development proposed. See paragraphs 4.35 to 4.43 below.

## Pre-Application Advice, Consultation and Engagement

4.8. The City Corporation is committed to early and ongoing consultation engagement on planning applications. This means working with developers, [local](#) residents and other stakeholders from the earliest possible stage in the

development process until the submission of an application to shape and guide development proposals that are most suitable to their context. The pre-application process requires respect and understanding for stakeholders' interests, open, accessible and reasoned communication, and informative and meaningful engagement.

4.9. Prospective applicants should engage with the local community at the earliest possible stage in the design and development of their proposals. Such engagement should be proportionate to the nature and the scale of any proposed development. Whilst there is no statutory requirement for applicants to carry out pre-application consultation for most forms of development, if undertaken successfully, early consultation is more likely to result in a development that will receive greater support from stakeholders. Successful pre-application engagement can also significantly speed up the planning application process as well as ease the understanding of planning considerations and ultimately reduce the likelihood of an application being delayed, refused or potentially legally challenged.

4.9.4.10. Prospective applicants should also engage in pre-application discussions and engagement with key stakeholders and statutory consultees. Where these consultees offer a formal pre-application advice service, applicants are strongly encouraged to make use of this service to avoid potential delay and objection later in the development process.

4.10.4.11. The City Corporation offers a pre-application advice service for prospective applicants, providing professional planning advice before a planning application is submitted. For most types of planning application there is a charge for this service, but for some development types, prospective applicants can obtain pre-application advice free of charge, including obtaining pre-application advice from the City Corporation's Duty Planner service. Details of the City Corporation's pre-application advice charges can be found on the City Corporation's website at: <https://www.cityoflondon.gov.uk/services/planning/pre-planning-application-advice>

4.11.4.12. As part of the pre-application advice service, the City Corporation can advise prospective applicants on good practice for wider community engagement, including the timing, length and extent of any consultation, and appropriate engagement methods. The City Corporation has prepared [Early Community Developer](#) Engagement Guidance, setting out the principles, processes and methods that ~~developers~~ prospective applicants should use to engage with local communities from an early stage of the design of a development.

4.12.4.13. The prospective applicant ~~/ developer~~ must have regard to any responses received as part of their pre-application consultation process. The City Corporation will expect ~~prospective applicants / developers~~ to submit a consultation statement as part of their formal planning application submission. This document should clearly set out the pre-application engagement that has been undertaken and how this has influenced the development of the proposal that has been submitted as a formal planning application.

## Planning Applications

4.13.4.14. There are ~~several many~~ different types of planning applications, depending upon the nature of the proposed development (including applications for planning permission, listed building consent, advertisement consent and prior approval). For each of these different application types there are different statutory requirements for the City Corporation, as the Local Planning Authority, to notify residents and consult stakeholders.

4.14.4.15. In most cases, we will publicise the submission of a valid planning application through one or more of the following ways:

- **Weekly list:** Weekly lists of new applications received by the City Corporation are published on the City Corporation's website ~~at:~~ <https://www.planning2.cityoflondon.gov.uk/online-applications/search.do?action=weeklyList>
- **Site notice:** A public notice is displayed on or near the site as soon as possible following receipt of all valid and relevant applications for planning permission, listed building consent, works to trees with details of the application received and where further detail can be seen. Site notices will be removed as soon as possible following determination of the application, normally after 2 weeks.
- **City Corporation Website:** Details of current applications and the weekly list are available on the City Corporation's website. Anyone can submit comments on any valid planning application via the website: <https://www.cityoflondon.gov.uk/services/planning/view-or-comment-on-a-planning-application>

4.15.4.16. The following methods of consultation and engagement are additionally used in appropriate cases:

- **Local newspaper:** When required by ~~g~~Government regulations, a notice will be placed in a local newspaper following validation of the application.
- **Neighbour notification:** In some circumstances letters are sent to owners and occupiers of buildings where development proposals may affect them, e.g. neighbouring residential buildings and public buildings such as churches. The City Corporation will use address information from the Local Land & Property Gazetteer (LLPG) to inform neighbours. The LLPG does not contain names of occupiers and is maintained as an input to the National Land & Property Gazetteer which provides address information on a consistent basis across the country. The City Corporation will consult residents in other local authorities who are considered to be affected by development proposals. Normally, neighbours will have 21 days to comment although sometimes there will be a shorter response period.

- **Consultation with other bodies:** The City Corporation consults specific organisations in accordance with statutory requirements and other bodies when appropriate. A large-scale proposal could affect a wide geographical area or have an impact on many people. A list of people and organisations consulted on planning applications by the City Corporation is available on the website and is kept up to date. A letter or email is sent to consultees inviting their comments and in some cases copies of the application and documents are sent to those consulted. Comments can be submitted through the City Corporation's website, or by email or letter.
- **Site visits:** Application sites are visited by planning officers. Neighbouring premises may be visited if a neighbour asks for assistance in understanding a proposal or wishes to demonstrate ~~a concern~~ their views. Where appropriate, Members of the City Corporation's Planning Applications Sub-Committee may carry out a site visit prior to the Committee's formal consideration of the application.
- **Presentations:** City Corporation officers present relevant applications to meetings of the Conservation Area Advisory Committee (CAAC) and the City of London Access Group (COLAG), which are external independent bodies, in order that these bodies may be briefed when making observations on applications. These two groups have been established to advise the City Corporation on particular aspects of both planning policy and planning applications:
  - The City of London Conservation Area Advisory Committee is consulted on relevant applications within and affecting the City's conservation areas.
  - The City of London Access Group (COLAG) advises on making the City's environment accessible to all, including people with disabilities.

4.16.4.17. The site notice, press notice and / or neighbour notification letter will explain where the application can be viewed and how to make comments (further details on viewing applications are included in paragraphs 4.23 to 4.27 below).

4.17.4.18. **Availability of Viewing applications to view** - All letters and public notices state that an application has been made and include a brief description of the proposal, details of where the application can be viewed online and how to contact the Environment Department.

## Statutory Consultation Requirements

4.18.4.19. The statutory requirements for consultation on planning applications are set out in national legislation (The Town and Country Planning (Development Management Procedure) (England) Order 2015). These requirements vary according to the type of development proposed but include notification to specified bodies and the general public. Publicising a planning application requires a notice to be displayed on or near the site, information to be provided



on the City Corporation's website and a notice to be published in the local press (in the case of major applications or listed buildings and applications within a conservation area). Table 6 and 6a set out the minimum requirements that the City Corporation will meet in publicising planning applications in accordance with the statutory requirements. Where feasible and appropriate to the application, we will undertake additional consultation to that set out in Tables 6 and 6a.

<b>Type of development</b>	<b>Website</b>	<b>Site Notice</b>	<b>Press Notice</b>
<b>Strategic Development*</b> - 150 or more residential units - 100,000 square metres or more of non-residential floor space - Buildings exceeding 150m in height - Any development where the application is accompanied by an Environmental Statement submitted under the current Environmental impact Assessment Regulations - Includes changes of use where the above apply	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>
<b>Major Development</b> - 10 or more residential units or a residential area of more than 0.5 hectares - 1,000 square metres of non-residential floorspace, or a non-residential site area of more than 1 hectare - Includes changes of use where the above apply	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>
<b>Minor Development</b> - Less than 10 residential units - Less than 1,000 square metre of new floor space - Sites of less than 1 hectare - Householder development - Includes changes of use where the above apply - Telecommunications apparatus that is not permitted development	<b>Yes</b>	<b>No</b>	<b>No</b>
<b>Minor Development where no additional floorspace is created</b> - Except telecommunications apparatus and changes of use - e.g. new shopfronts	<b>Yes</b>	<b>Yes</b>	<b>No</b>
<b>Applications for development or demolition that would affect the character or appearance of a Conservation Area or the setting of scheduled ancient monument</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>
<b>Departures from the Development Plan</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>

Type of development	Website	Site Notice	Press Notice
<b>Any application affecting a public right of way or footpath/way</b> Excluding pavement crossovers, new / revised vehicular or pedestrian accesses	Yes	Yes	Yes
<b>Applications for Listed Building Consent</b>	Yes	Yes	Yes
<b>Advertisement Consent</b> a) Signage on shop fronts or business b) Free-standing advertisements c) Large scale advertisement hoardings	Yes	No	No
<b>Prior Approval - Telecommunications</b>	Yes	Yes	Yes
<b>Applications to vary or discharge conditions attached to a listed building consent.</b>	Yes	Yes	Yes

Table 6 Consultation requirements for planning applications

\*Strategic Development refers to planning applications that must be referred to the Mayor of London before a decision can be made. The full definition of applications of potential strategic importance (PSI) is set out in the Mayor of London Order 2008 (as amended). In the City of London this is development of 150 or more new homes, 100,000 square metres or more of floorspace, or buildings exceeding 150 metres in height.

Type of Development	Consultation Requirement
<b>Applications for variation or removal of planning conditions.</b>	Refer to requirements for original application.
<b>Applications for minor material amendments</b>	Refer to requirements for original application.
<b>Applications for non-material amendments (e.g. technical amendments)</b>	By definition no consultation would be necessary.
<b>Applications for Reserved Matters after the grant of outline planning permission</b>	Refer to requirements for original application.
<b>Lawful Development Certificates</b>	A legal determination for which no consultation would be necessary.

Table 7.6a Consultation requirements for planning applications

## Planning Application Consultation Period(s)

4.19-4.20. National Legislation (The Town and Country Planning (Development Management Procedure) (England) Order 2015) stipulates that Local Planning Authorities (including the City of London Corporation) allow a minimum of 21 days for any comments to be made on planning applications. There are a few exceptions:

- The consultation period is extended to 30 days for applications accompanied by an Environmental Statement or Environmental Impact Assessment that has been submitted under the Environmental Impact Assessment Regulations 2017.
- The period should be extended when it includes bank or public holidays – by the equivalent number of days – for example, notifications over the Easter holiday period would be extended by two days.

4.20-4.21. Notification periods must strike an appropriate balance between allowing sufficient time for comments to be made and ensuring decisions are made in a timely manner. Although comments can be submitted at any time during the consultation period, the City Corporation encourages consultees to provide comments as soon as possible after the start of the consultation. This allows any points raised to be considered at the earliest opportunity.

4.21-4.22. There may be exceptional circumstances in which it may not be possible for the City Corporation to undertake consultation in the ways set out above. In these exceptional circumstances we will:

- be led by national planning guidance;
- extend the formal consultation period from 21 days to 28 days to give the local community more time to make a comment on a planning application;
- where planning officers cannot go on site to put up a site notice, neighbourhood letters will be sent to premises in close proximity of the site, or a site notice will be put up by the applicant;
- where a planning officer ~~cannot~~ is unable to carry out a site visit, the applicant may be asked to carry out a virtual/video site visit and to take photos from specific areas of the site;
- Use satellite photography to assess the site.

## How to Comment on a Planning Application

4.22-4.23. We welcome comments on planning applications. Comments do not necessarily have to be written in a particular style or format to be considered but they must be made in writing. Anyone can submit written comments on any planning application, provided it is within the application consultation period.

4.23-4.24. We recommends ~~that people~~ take the time to look at the details of an application before commenting on it. Information on planning applications can be found via the City of London's website at:

<https://www.cityoflondon.gov.uk/services/planning/view-or-comment-on-a-planning-application>

4.24.4.25. The quickest way to comment on planning applications is to submit comments online via [Public Access](#)

4.25.4.26. If you are unable to provide comments online, you can email the Planning Team at [Planning Comments](#).

4.26.4.27. We prefer to receive any comments either online or via email because they are the quickest and most effective way for comments to be received and considered, but if those options are ~~not un~~available to you, you can write to us ~~at~~ [written comments can be sent to:](#)

The Environment Department  
City of London  
PO Box 270  
Guildhall  
London EC2P 2EJ

4.27.4.28. Copies of planning applications, the plans and any other documents submitted with it, can be viewed online at [Public Access](#)

4.28.4.29. This information is also available for inspection by appointment at the Guildhall by contacting: [plans@cityoflondon.gov.uk](mailto:plans@cityoflondon.gov.uk) -or telephone 020 7332 1710.

4.29.4.30. When making comments, it is important that the application reference ~~is~~ included ~~is~~ at the top of the email or letter. Comments should state whether they are in support of, or are an objection to, to the development proposed and include the name and address of the person commenting.

4.30.4.31. All comments must be available for public inspection (Local Government Access to Information Act 1985). They are published on the City Corporation's website and are available for inspection, by appointment, at the Guildhall. As comments are not confidential, they should not include information that the consultee does not want to be publicly available. Any defamatory remarks will be removed before the comment is published.

4.31.4.32. We cannot take into account comments that do not include a name and address when considering an application nor can the comments be reported. For the purposes of data protection, the City Corporation will not reveal the email address, telephone number or signature of private individuals (see [privacy notice](#)).

4.32.4.33. Anyone commenting on an application can ask for their name and address to be removed from comments published on the City Corporation's website and the planning report to the Planning Applications Sub-Committee, but comments will be anonymous and that may affect the weight the Members give them.

4.33.4.34. When considering a planning application, we can only take account of certain issues that are legally allowed to influence a planning decision, ~~these are~~

known as material considerations. Consultees are welcome to make comments on other aspects of a planning application, but to influence the planning process comments should aim to address material considerations, which include:

- Planning policies, including: the National Planning Policy Framework (NPPF), the London Plan, The City of London [Local Plan \(City Plan\)](#) and Supplementary Planning Documents (SPDs). [These](#) can also include emerging planning policy documents that have been through at least one round of public consultation and engagement;
- Relevant planning history including previous planning decision, including appeal decisions;
- Residential amenity including loss of natural light and overshadowing; loss of privacy and overlooking;
- Noise, smells and other disturbances that could arise as a result of a proposed development;
- Design, appearance and materials proposed;
- Layout and density of development;
- Traffic, servicing, highway safety and parking;
- Loss of trees or other nature conservation and biodiversity considerations;
- Energy efficiency and carbon emissions, including operational carbon and whole life cycle carbon;
- Impacts on air quality and other microclimate considerations;
- Impacts on [listed buildings-heritage assets](#) and conservation areas;
- Contaminated land;
- Impact on the provision of social infrastructure;
- Capacity of physical infrastructure, such as public drainage and water.

[4.34.4.35.](#) For questions regarding the details of a planning application, the City Corporation provides the following services:

- **Enquiries office** - A public counter service is provided where information may be obtained in person on appointment between 9.30am and 4:30pm Monday to Friday.
- **Duty Planning officer** - A planning officer is available to give general advice without an appointment between 9.30am and 4:30pm, Monday to Friday.
- **Website ([www.cityoflondon.gov.uk/plans](http://www.cityoflondon.gov.uk/plans))** - The City Corporation's website contains information on town planning in the City of London, including planning policy documents, application forms, advice on what information is needed with applications and records of planning applications previously submitted.

## When Comments on Planning Applications Have Been Made

[4.35.4.36.](#) When comments on planning applications have been made, the City Corporation, undertakes to provide the following:

- **Acknowledge** all comments on applications in writing or by email within three working days of receipt. People making representations will be notified of the name of the Case Officer and their contact details. Comments made on

planning applications will be published on the City Corporation's online planning application system.

- **Consultation on revised proposals.** Comments are conveyed to applicants and, where material changes to the proposals are made, we will re-consult on the revised proposals.
- **Committee and Delegated Reports.** When an application is referred to the Planning Applications Sub-Committee, a summary of all relevant comments or objections are included in the report. In the case of delegated decisions, the comments are summarised in the report and held on the planning file.
- **Public speaking at Committee.** When an application is considered by the Planning Applications Sub-Committee, individuals and persons representing organisations may speak at the Committee meeting, subject to current guidelines. These guidelines are published on the City Corporation's website and are available from the Committee Clerk. Everyone who has made written comments on an application being considered by the Committee will be advised of the date and the arrangements for public speaking at the Committee.

## Making Decisions on Planning Applications

[4.36-4.37.](#) As part of the determination of a planning application, and following public consultation, a planning officer will write a report setting out their recommendation. A formal decision would then be taken on the planning application, either under delegated powers (by the Planning & Development Director or other nominated senior officer) or by the City Corporation's Planning Applications Sub-Committee. Over 90% of planning applications in the City of London are normally decided under delegated powers.

[4.37-4.38.](#) Larger development schemes or planning applications with outstanding policy conflicts are considered by the Planning Applications Sub-Committee. Planning applications must also be decided by the Sub-Committee if the City Corporation receives more objections to the development proposed than the agreed threshold. At the time of adopting this SCI, this is 10 or more objections. The Planning Applications Sub-Committee normally meets on a three-weekly cycle. Agendas and committee reports are available from the Town Clerk six working days before the meeting and can be viewed on the City Corporation's website. [Copies of presentations from applicants, supporters and objectors will be made publicly available.](#)

[4.38-4.39.](#) Planning officers will make recommendations on planning applications based on planning policy documents, material considerations, responses from the consultation on the application, including from ~~stakeholders the public~~ and other City Corporation services, and any other relevant guidance at national and local level. Planning officers will not generally respond to individual comments or objections but will address the key issues and public comments in their report. The officer's report will set out how the planning application has been assessed and how any comments received following consultation have been addressed and taken account of.

~~4.39.4.40.~~ If a planning application is required to be considered by the Planning Applications Sub-Committee, all those who have made a comment on the application will be notified by email (where provided) of the date and time of the Committee meeting. All Planning Applications Sub-Committee meetings are held in public and are accessible to all. The City Corporation provides the opportunity for anyone who has made a written comment on the application to address the Committee, although the number of speakers and the time given to speak is limited.

## Informing People of Decisions on Planning Applications

~~4.40.4.41.~~ It is important that planning decisions are open and transparent. Decisions on planning applications are usually made by the Planning Applications Sub-Committee, the Planning & Development Director or other officers with delegated powers.

~~4.41.4.42.~~ **Issue of decisions** - Decisions on planning applications will be issued within two working days of the decision being made or, where Section 106 Agreements are required, upon completion of the Section 106 Agreement.

~~4.42.4.43.~~ **Notification of decisions** - People and organisations that comment on an application will be notified of the decision, in writing or by email, within three days of the decision being issued.

~~4.43.4.44.~~ **Weekly list of applications determined** – This is available on the City Corporation's website at: <https://www.planning2.cityoflondon.gov.uk/online-applications/search.do?action=weeklyList>

## Planning Appeals

~~4.44.4.45.~~ If an application is refused, the applicant has a right to appeal against this decision or against conditions attached to a planning permission. Due to pre-application discussions less than 1% of applications in the City of London are refused in a normal year and consequently few appeals are lodged. Where an appeal is lodged, those people and organisations notified of the original application and other people who made observations on the original planning application will be notified of the appeal in accordance with the relevant government regulations.

## Planning Enforcement

~~4.45.4.46.~~ The City Corporation can use its Planning Enforcement powers to resolve breaches of planning control but to do so it must firstly know about any breaches and secondly understand the level of harm caused. As such, local [communities](#) ~~people~~ play an essential role in this aspect of the planning system.

4.46.4.47. Anyone who thinks that development may have been undertaken without planning consent or has been undertaken or operated outside of the consent given, can report the development to the City Corporation's Planning Enforcement Team for investigation. Up-to-date details of how to report can be found online.

4.47.4.48. The City Corporation's published Planning Enforcement [SPD Supplementary Planning Document](#) sets out how investigations are prioritised and responded to, based on the level of harm caused. Residents and local businesses are encouraged to contact the City Corporation with any information related to unauthorised development and its impacts. ~~You can report a~~ suspected breach of planning control [can be reported](#) by completing a Planning Enforcement Investigation Form (available on the City Corporation's website) and sending it to the [Planning Enforcement Team](#).



## Glossary

**City Plan:** The Local Plan for the City of London, prepared by the City Corporation.

**Community Infrastructure Levy (CIL):** A statutory charge payable on new development that is used to help fund the provision of infrastructure in the City.

**Conservation Area:** An area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance.

**City Plan:** ~~The Local Plan for the City of London, prepared by the City Corporation.~~

**Departure from the Development Plan:** Where a planning application proposes a development which is contrary to one or more of the strategic policies in the City's Local of London's City Plan.

**Development Management:** The process of deciding whether or not to grant planning permission and other related consents.

**Heritage asset:** A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. Designated heritage assets include World Heritage Sites\*, Scheduled Monuments, Listed Buildings\*, Registered Parks and Gardens, Registered Battlefields and Conservation Areas that are 'designated' under the relevant legislation. Non-designated heritage assets are those which have a heritage interest but have not been formally designated.

**Local Plan:** The strategic framework for development in an area or borough produced A plan for the future development of a local area drawn up by the Local Planning Authority in consultation with the local community. A local plan can consist of either strategic or non-strategic policies, or a combination of both .

**London Plan:** The statutory spatial development strategy for Greater London. It is drawn up by the Mayor of London is responsible for the planning strategy for the whole of Greater London, known as the London Plan.

**Minor Material Amendment:** There is no statutory definition of a 'minor material amendment' to a planning permission but it is likely to include any amendment where its scale and/or nature results in a development which is not substantially different from the one which has been approved.

**Non-Material Amendment:** There is no statutory definition of a 'non-material' amendment. Whether or not the proposed amendment(s) are 'non-material' rather than 'material' will depend on the specific details of the existing planning permission, and consideration of the proposed amendment within the context of the overall development (and any other 'non-material' amendments that have been previously made). An amendment that is non-material in one context may be material in another it is up to the City Corporation as local planning authority to be satisfied that any amendment(s) sought are 'non-material'.

**National Planning Policy Framework (NPPF):** National planning policy for which the central government is responsible

**Neighbourhood Forum:** Community groups that are designated [by the Local Planning Authority](#) to produce a neighbourhood plan.

**Neighbourhood Plan:** A plan prepared by a Neighbourhood Forum for a [designated particular](#) neighbourhood area

**Neighbourhood Development Order:** [An order made by the Local Planning Authority](#) ~~This is prepared by~~ [through which](#) a Neighbourhood Forum ~~and can~~ grants planning permission for specific types of development in a particular area.

**Planning Advice Note (PAN):** Advice from the City Corporation on planning matters, normally advice on how to address technical or other information requirements for planning applications.

**Planning Obligation:** [An agreement entered into under section 106 of the Town and Country Planning Act](#) ~~These are legal obligations~~ between the developer and the City to mitigate against the impacts of development.

**Section 106 Agreements:** Legally binding agreements between the City and a developer which set out planning obligations to include financial and non-financial obligations.

**Supplementary Planning Document (SPD):** These provide more detailed advice on the interpretation of planning policy set out in the City Plan.

# Developer Engagement Guidance

City of London Corporation Planning Advice Note

Page 107

~~Draft document~~

~~October 2022~~ May 2023

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# 1. Introduction

## Purpose of this Guidance

- 1.1. This guidance aims to ensure applicants and developers communicate and engage positively and meaningfully with the City's communities and stakeholders. It sets out the City of London Corporation's (the City Corporation) expectations from early planning stages through to completion of development, including the information Applicants are expected ~~to provide~~ to demonstrate how the engagement they have undertaken has positively influenced and contributed to the evolution of their development proposals. [References to 'developers' in this document includes applicants, their agents and developers.](#)
- 1.2. The City Corporation strongly endorses the view expressed in the National Planning Policy Framework (July 2021, paragraph 39) that early engagement in the planning and development process has significant potential to improve the efficiency and effectiveness of the planning application system for all parties.
- 1.3. We believe that targeted and meaningful pre-application engagement with local communities and other stakeholders will help to deliver high quality, sustainable development, that contributes to creating and maintaining a vibrant and thriving City of London.
- 1.4. Well timed and well executed engagement can reduce conflict and build trust by allowing communities to have their say at early and important stages of the development process, as well as provide developers with insight, local knowledge and experiences of the local area and site. It gives an opportunity to develop mutual respect and understanding of developers' objectives and the needs and aspirations of local communities.
- 1.5. Successful engagement can clarify understanding of planning considerations and ultimately reduce the likelihood of objections, an application being delayed, refused or subsequently legally challenged. This can assist the City Corporation as Local Planning Authority to make more timely and positive decisions and could speed up the planning application process.

## 2. Who to Engage

- 2.1. Applicants and developers are encouraged to engage with a broad range of stakeholders and anyone who would be affected by the proposed development; statutory bodies, interest groups and the local community. Engagement should be inclusive and with as diverse a cross section of the community as possible, upholding the values of equality, diversity and inclusion. Inclusive engagement is proactive engagement – actively seeking to understand the different communities and groups that would be interested in or affected by the development and facilitating their involvement in the engagement process.
- 2.2. The City of London has many active community and residents' groups, amenity societies and other interest groups who are regularly involved in consultation or community engagement and have made a significant contribution to planning and development in the Square Mile. However, applicants and developers should ensure that engagement is not limited to established groups and reaches as many of the people who would be affected by the proposed development as possible, including members of the local community who have been less engaged or disengaged. The City Corporation can provide advice to applicants and developers on potential groups to be involved in early engagement.
- 2.3. In areas of the City of London that are characterised by a mixture of uses, engagement should be focused to include both residential and non-residential occupiers and groups that represent both local residential, commercial or other non-residential interests. For example, residents' associations, Business Improvement Districts (BIDs), schools, further and higher educational establishments, community, faith and cultural groups. In all cases applicants and developers should ensure that their community engagement is inclusive and does not put in place barriers to participation.
- 2.4. The list of groups included in community engagement will vary according to the nature of the proposed development but normally As a minimum, the groups identified in the list below should be included when undertaking community engagement. Applicants and developers should also seek advice from local community groups and the City Corporation's planning team, who may be able to assist in identifying additional community stakeholders, their particular interests and needs, and how best to engage with them.

2.5. Recommended groups for inclusion in community engagement include:

- Local communities including residents, workers, businesses and landowners in the local area<sup>1</sup> of the development site, having particular regard to how those groups who do not normally get involved in consultation can be engaged
- All immediate neighbours to the development proposal
- Amenity societies
- Community, residents' and tenants' groups and associations
- Ward Councillors
- Business Improvement Districts (BIDs)
- Youth forums and groups
- Local faith and cultural groups
- Special interest groups (for example 'friends of' groups, conservation groups)
- Local Landmarks, Visitors, tourists, and workers (particularly for development within the City's Principal Shopping Centres, ~~the Culture Mile~~ and other relevant areas).

Developers are advised to have regard to the list of specific and general consultees published on the City Corporation's website in support of the Statement of Community Involvement when identifying potential groups for community engagement.

2.6. In addition to community engagement, applicants and developers are encouraged to engage with the City Corporation's planning officers through its pre-application advice service, and to consult other relevant statutory and non-statutory consultees.<sup>2</sup>

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<sup>1</sup> The 'local area' should be determined having regard to the scale and potential impact of the proposed development and not defined by a set distance from the development site. Applicants / developers are encouraged to seek advice from officers when unsure whether the scope of consultation is appropriate to the scale and form of the development proposed.

<sup>2</sup> NPPG table of statutory consultees at planning application stage: <https://www.gov.uk/guidance/consultation-and-pre-decision-matters#Statutory-consultees-on-applications>

## Engaging with Members of the City of London Corporation

- 2.7. Developers are encouraged to let ward members know about the scheme and to engage with them appropriately and at an early stage. Ward members should be offered options as to how developers should engage with them. Some may welcome a meeting to understand a scheme, others will prefer to come to public meetings, and others may prefer to receive information in writing or electronically.
- 2.8. The roles of ward members, including any positions on City of London Corporation committees, should be respected.
- 2.9. Where a meeting is held between a ward member and developer, developers ~~should~~must prepare a note of the meeting and provide a copy of this to the ward member and the Planning & Development Director. Any such notes will be made available on the public planning register on submission of a planning application.
- 2.10. Members who sit on the Planning and Transportation Committee are involved in determining planning applications. It is important that all parties take care when engagement between developers and Members of the Committee take place. ~~They~~Members are bound by a code of conduct and are obliged to consider all planning applications objectively on the basis of evidence of relevant planning issues presented to them at Committee. Members of Committee must take care not to indicate they have made up their mind on an issue before they have heard and/or read all the evidence, and should make clear that any views expressed are personal and provisional. Further guidance on their role is set out in the City Corporation's Planning Protocol.<sup>3</sup>
- 2.11. Where a meeting is arranged between a member and an applicant, the member should ask for an officer to attend and make a record of the meeting.

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<sup>3</sup> <https://www.cityoflondon.gov.uk/assets/About-us/planning-protocol-2020.pdf> <https://www.cityoflondon.gov.uk/assets/about-us/plans-and-policies/planning-protocol-october-2022.pdf>





### 3. When to Engage

3.1. Developers and applicants should engage with the local community at the earliest possible stage in the design and formulation of their development schemes, and throughout the process of seeking planning permission and undertaking construction. Table 1 sets out a framework to aid developers and applicants to plan what information and activity ~~should~~ could happen when. This is intended to be an iterative process and ~~E~~each development will be different, and timing and information may vary depending on what is relevant and proportionate to the scheme. Where possible developers should liaise with stakeholders on the timing of consultation and engagement events.

No	RIBA Stage	Core planning tasks (as set out in the RIBA plan of work 2020)	Engagement Expectations
0	<b>Strategic definition</b> (The best means of achieving the client requirements confirmed)	Strategic appraisal of planning considerations	Produce and agree scope of community engagement strategy with City Corporation Planning officers, <u>having regard to the list of potential consultees identified in paragraph 2.5</u>
1	<b>Preparing and briefing</b> (Project brief approved by the client and confirmed that it can be accommodated on the site)	Pre-application advice	Notify identified stakeholders of community engagement strategy and share with City Corporation planning officers
2	<b>Concept design</b> <del>(Project brief approved by the client and confirmed that it can be accommodated on the site)</del> <u>(Architectural Concept approved by the client and aligned to the Project Brief)</u>	Pre-application advice	Events, workshops, talks, meetings with <u>various identified</u> stakeholders  Pre-application meeting with officers to explain what form of engagement has been undertaken so far, what the results and how this is influencing the development of the scheme.

No	RIBA Stage	Core planning tasks (as set out in the RIBA plan of work 2020)	Engagement Expectations
			Opportunity for planning officers to attend and visit events, talks, workshops, and meetings
3	<b>Spatial co-ordination</b> (Architectural and engineering information spatially coordinated)	Pre-application meetings and submit planning application at end of stage 3	Follow up events, workshops, talks, meetings with <del>various-identified</del> stakeholders to feed back the impact of engagement process on the development of the scheme  Submit developer statement of community involvement  Inform stakeholders of next key milestones (submission, committee dates, decision)
4	<b>Technical design</b> (All design information required to manufacture and construct the project completed)	Discharge pre-commencement planning conditions	Material changes resulting from design development to parts of the scheme that were influenced by stakeholders should be reconsulted with those stakeholders. Planning officers should also be notified.
5	<b>Manufacture and construction</b> (Manufacturing, construction and commissioning completed)	Comply with planning conditions related to construction	Material changes resulting from the construction stage to parts of the scheme which were influenced by stakeholders should be reconsulted with those stakeholders. Planning officers should also be notified.

No	RIBA Stage	Core planning tasks (as set out in the RIBA plan of work 2020)	Engagement Expectations
			<p>Inform stakeholders of changes to their environment as a result of construction, for example noise and dust disturbance, road changes that may affect their journeys.</p> <p><u>Consultation with stakeholders should continue through demolition construction and fit out.</u>  <u>Developers should c</u>Comply with guidance set out in in Section 2 of the City of London's Code of Practice for Deconstruction and Construction Sites.</p>
6	<b>Handover</b> (Building handed over, aftercare initiated and building contract concluded)	Comply with planning conditions as required	<u>In large developments facilitate ongoing communication between local stakeholders and building management</u>
7	<b>Use</b> (Building used, operated and maintained efficiently)	Comply with planning conditions as required	Publish <u>and provide to the City Corporation and key stakeholders</u> post engagement report documenting any further consultation, feedback, and lessons learned.

Table 1

### Timing of Engagement

- 3.2. Developers should programme events, presentations, and consultations to ensure that these are as convenient as possible to the intended audience. Where possible, account should be taken of audience availability during key holiday periods, including Summer, school holidays, religious holidays and festivals. Where it is necessary to carry

out engagement over holiday periods, developers should extend consultation periods to ensure the maximum possible engagement from the local community and other stakeholders.

- 3.3. Events, presentations, and consultations should be programmed to run at different times during the week, recognising that not everyone will work a traditional 5-day week, or have regular week to week working patterns, to allow the maximum possible engagement. Events should also be programmed at different times of the day to allow the maximum possible attendance, including evening/after work hours meetings.
- 3.4. Developers should outline a timeline which highlights key dates for consultation events, key stages in the development process and share when stakeholders can get involved. Advance notice of consultative events and dates should be given several weeks prior to the date to enable stakeholders to plan accordingly to attend or take part. Where key groups or stakeholders are unable to attend a specific meeting, then an alternative date should be proposed, or arrangements made for those groups to be consulted in a different way, for example through online consultation.

## 4. Engagement Approach

### Community Engagement Strategy

- 4.1. Developers should prepare a community engagement strategy, that sets out:
  - How the developer will engage with stakeholders
  - A list of potential stakeholders
  - A timeline for engagement and the likely submission of a planning application and construction of a scheme
  - The methods of engagement that will be used, and how these can be tailored for specific groups
  - How engagement will be facilitated and feedback captured
  - What steps will be taken to ensure engagement will be inclusive and accessible
- 4.2. This strategy should be drawn up at the beginning of the pre-application process and should be published and made available to stakeholders. A copy should be provided to the City Corporation's Planning Team.
- 4.3. ~~Applicants-Developers~~ should notify key stakeholders about the community engagement strategy. This should be used as an opportunity to seek feedback from stakeholders at an early stage about the site and the wider area, to identify how the scheme may be able to support those aspects that stakeholders particularly value, whilst understanding stakeholders' concerns to how those aspects may be lost or harmed.
- 4.4. Community engagement strategies should be proportionate. The extent of engagement, the method of communication, who is involved and what is communicated should correlate with the scale of impact of the proposed development.
- 4.5. All stakeholder engagement must uphold the values of equality, diversity and inclusion. The community engagement strategy should seek to identify the demographics and characteristics of those who would be affected by or have an interest in the proposed development, how they are affected and assess whether, as a

consequence, this disproportionately impacts particular demographics of some people more than others and should use this to inform the approach to engagement.

### **Approach to engagement**

- 4.6. The content of material used for community engagement should be proportionate to the scale of development and appropriate for the phase of engagement. It is accepted that Engagement Strategies with local stakeholders will vary and be developed on a case-by-case basis but **all** will need to be developed alongside engagement with the Local Planning Authority and statutory consultees. Material presented should provide sufficient information to enable stakeholders to provide meaningful feedback and developers should be willing to provide additional information, where feasible.
- 4.7. At an early stage, applicants-developers should work with stakeholders to identify any existing uses, features or characteristics of the site and the wider area that stakeholders value, or any deficits in the area such as a lack of open space, and how the proposed development might ~~be able to support~~affect these.
- 4.8. At this early stage, developers should also share their high-level vision for the proposed development, informed by the policy requirements in the City Plan, and identify any existing uses on the site that could be affected by the development, and identify with stakeholder input any sensitive uses or characteristics in the wider area that might be impacted by the development.
- 4.9. Applicants-Developers should explore any alternative development options for the site with stakeholders and show how they have considered re-use and refurbishment of existing buildings.
- 4.10. As the scheme progresses, developers should set out the proposed site layout, uses, form and function of the development. They should identify ~~the-any~~ positive and ~~any potential~~ adverse impacts of the proposed development, including the impact on the amenity of neighbouring occupiers and communities in the local area, the impact on the local highway network and the public realm, and its contribution to climate resilience, ~~tackling~~ how it will impact on climate change and improving the sustainability of the City's building stock.

- 4.11. Where a development proposal would deliver community uses, social infrastructure, or other uses that are likely to be used particularly by local residents and workers, the engagement should explore the design of these spaces in detail in order to ensure it would meet local needs.
- 4.12. Stakeholders will expect to see how a development will look within its context. At an early stage this may take the form of illustrative sketches. As the scheme progresses, developers should provide visualisations, digital 3D models, images of the development from different views, and – for tall buildings – a physical scale model showing the building in its context.
- 4.13. ~~Applicants-Developers~~ should share information about the s106 and Community Infrastructure Levy contributions (where applicable) and the public benefits that would come about as a result of the development.
- 4.14. ~~Applicants-Developeprs~~ should look ahead to how construction might affect the area and seek feedback from stakeholders on how this can be optimised.
- 4.15. Throughout the engagement, a summary of feedback from earlier engagement should be provided, including revisions to the proposal and how engagement has informed the scheme so far. Details of how feedback can be given during and following engagement events should be provided throughout the process.
- 4.16. Engagement documents and presentations should be written in plain English and the use of technical jargon should be minimised. Where technical language is required, it should be explained using plain English. Material should be made available in a range of different formats to ensure that it is as accessible as possible, including large print and audio formats. All information should be shared with City Corporation Planning Officers prior to initial engagement.
- 4.17. When seeking feedback from engagement, overly prescriptive questionnaires or surveys with closed questions should be avoided.



### **Professional facilitators**

- 4.18. Professional facilitators or communications experts may be appointed to assist with the programme of community engagement. The use of professional facilitators, who are outside of the applicant's development team, can help to ensure that the engagement material, its format, and questions to participants/stakeholders, are more balanced and impartial, which can encourage a co-operative process. Professional facilitators are likely to be of the greatest value when engaging with communities at the earliest stage of a scheme's development.

### **Engagement charters**

- 4.19. In addition to following this guidance, developers who frequently undertake development in the City of London are encouraged to develop and publish their own charter or set of principles for community engagement that sets out their pledges for achieving meaningful, practical, and popular influence over significant development proposals that they may bring forward in the future. Where these charters exist, the developer should set out in their community engagement strategy how these principles have been implemented.

## 5. Methods of Engagement

- 5.1. Methods of communication can take many forms and play different roles in the way that stakeholders receive information on development schemes and set the expectations for their input.
- 5.2. Depending on the scale of development, it is important to include a mix of methods to ensure that communication is inclusive and meets the needs of different audiences, enabling them to participate fully.
- 5.3. Each scheme should have a tailored approach to the form the communication takes. Consideration should be given to the use of professional facilitators to prepare materials, agenda topics/questions and/or to lead on events.

Method of engagement	Form of communication	Examples and uses
Informative	Leaflets, newsletters, notices and notifications on local notice boards and digitally on websites and social media.	Setting out key aspects of a proposed development Advising where further information can be obtained Information about where stakeholder opinions and comments can be made and fed back
Consultative	Interactive digital platforms for example social media, online questionnaires, Public exhibitions, digital tours, 3D models Meetings with individual representatives of statutory and non-statutory bodies, for example Transport for London <del>or</del> <u>and</u> resident groups. <u>Developers should make use of pre-application services provided by statutory consultees, where relevant</u>	Useful for where targeted online consultation is necessary, for example the geographic or demographic profile of a specific group of stakeholders.  Useful for responding to specific concern relayed by a specific group, for example local residents.

Method of engagement	Form of communication	Examples and uses
Collaborative	Forums, workshops and/or exhibitions (Consider live streaming events or recording them, making them available online for those unable to attend, and providing an alternative method of submitting feedback to broaden the reach of these events)	Useful for generating ideas, informal discussions, debates and to explore options and design solutions
Feedback	Use of the above methods, as appropriate	To feedback information on the engagement, <u>including specific comments from stakeholders</u> and changes arising from the engagement

Table 2

### Barriers to Information

- 5.4. When designing engagement approaches, care should be taken to avoid putting in place potential barriers to receiving information and participating. Engagement should make all necessary arrangements so that all stakeholders and members of the community are able to fully participate in the process. There may be a need to provide information in languages other than English, and content should be provided using images and diagrams as well as written text and presented in a way that allows for meaningful feedback. Means of engagement that don't rely solely on access to technology should be used, while also recognising the power for technology to reach larger audiences. Engagement events held at a venue should be fully accessible and inclusive. Using non-traditional venues may help to reach disengaged groups. Venues should be able to support appropriate audio and visual aids.

## Application of Engagement Methods to Different Scales of Development

5.5. The tables below set the City Corporation's general expectations of proportionate means of communication and engagement for different scales of development. For non-major development and change of use, City Corporation Planning Officers can advise on whether impacts are likely to be significant and the degree of engagement that would be expected (as these can vary significantly depending on the specific nature of the proposed development).

### Communication with stakeholders

Method of Communication	Non-major development <small>(less than 1000sqm GIA additional/ new floor space or 10 new residential units)</small>	Change of use <small>(all proposals where no additional/ new floor space proposed)</small>	Major development <small>(1000-9990sqm + GIA additional / new floor space or 10-49 new residential units)</small>	Large major development <small>(10,000sqm + GIA additional / new floor space or 50+ residential units)</small>	Minor material amendments
Leaflets / online communication	(✓) <small>(Where the impact of the proposal or impact of construction would have a significant impact on stakeholders)</small>	(✓) <small>(Where the impact of the proposal or impact of construction would have a significant impact on stakeholders)</small>	✓	✓	(✓) <small>Where changes to the scheme would have a significant impact on stakeholders</small>
Interactive Digital Engagement platform	(✓) <small>(Where the proposal or impact of construction would have a significant impact on stakeholders)</small>	(✓) <small>(Where the impact of the proposal or impact of construction would have a significant impact on stakeholders)</small>	✓	✓	(✓) <small>Where changes to the scheme would have a significant impact on stakeholders</small>

<b>Method of Communication</b>	<b>Non-major development</b> (less than 1000sqm GIA additional/ new floor space or 10 new residential units)	<b>Change of use</b> (all proposals where no additional/ new floor space proposed)	<b>Major development</b> (1000-9990sqm + GIA additional / new floor space or 10-49 new residential units)	<b>Large major development</b> (10,000sqm + GIA additional / new floor space or 50+ residential units)	<b>Minor material amendments</b>
Engage with Ward Councillors			✓	✓	(✓) Where changes to the scheme would have a significant impact on stakeholders
Public events (Exhibitions / Presentations / Workshops)			✓	✓	(✓) Where changes to the scheme would have a significant impact on stakeholders

Table 3

**Communication with officers**

<b>Method of Communication</b>	<b>Non-Major Development</b> (less than 1000sqm GIA additional/ new floor space or 10 new residential units)	<b>Change of Use</b> (all proposals where no additional/ new floor space proposed)	<b>Major Development</b> (1000-9990sqm + GIA additional / new floor space or 10-49 new residential units)	<b>Large Major Development</b> (10,000sqm + GIA additional / new floor space or 50+ residential units)	<b>Minor Material Amendments</b>
Agree community engagement strategy with pre-application			✓	✓	(✓) Where changes to the scheme would have a significant impact on stakeholders

<b>Method of Communication</b>	<b>Non-Major Development</b> (less than 1000sqm GIA additional/ new floor space or 10 new residential units)	<b>Change of Use</b> (all proposals where no additional/ new floor space proposed)	<b>Major Development</b> (1000-9990sqm + GIA additional / new floor space or 10-49 new residential units)	<b>Large Major Development</b> (10,000sqm + GIA additional / new floor space or 50+ residential units)	<b>Minor Material Amendments</b>
Give Planning Officers the opportunity to attend any events	✓	✓	✓	✓	✓
Share and discuss consultation response and data	✓	✓	✓	✓	✓

Table 4

## 6. Planning Applications

### Statement of Community Involvement

- 6.1. Applicants should submit a statement of community involvement (SCI) that sets out details of the pre-application engagement that has been undertaken, the success of the engagement methods used, details of the views expressed and how and to what extent they have shaped the evolution of the scheme. In the cases where views expressed have not influenced or led to changes to the submitted scheme, this should be explained and justified within the SCI.
- 6.2. The SCI should set out:
- How the community engagement strategy was put into practice during the pre-application stage.

- Details of the engagement methods used and demonstrate the reach and inclusivity achieved using the chosen engagement methods.
  - A timeline of when, where and how the community engagement was undertaken, relative to and in parallel with engagement with City Corporation planning officers.
  - A comprehensive schedule of the feedback provided by the members of the community that the applicant developer has engaged with during the pre-application engagement process.
  - How the scheme has been amended to address this feedback, having regard to the need to accord with development plan policies. E.g. You said ..., We did.... Where no amendments have been made, this should be explained and justified.
- 6.3. Where a planning application is presented to the City Corporation's Planning & Transportation Committee Application Sub-Committee for determination, the officer report will set out the engagement that the applicant has undertaken with the local community and how it has contributed to influenced the proposed development. The submitted SCI will be the basis for this information.

### **Post Application Submission Engagement**

- 6.4. The applicant developer should continue to keep stakeholders informed during the consideration of a planning application and should provide updates on any amendments made to the scheme following submission. This sits alongside the City Corporation's own formal planning application consultation processes.
- 6.5. Community engagement should continue after planning permission has been granted, to provide an update on progress of conditions or other agreements, demolition works, construction works and timescales, and completion and opening, aligning with the City Corporation's: Code of Practice for Deconstruction and Construction Sites.

- 6.6. The City Corporation Environmental Health officers can offer more information and Guidance on Engagement during construction works is provided in Section 2 of the City of London's Code of Practice for Deconstruction and Construction Sites.<sup>4</sup>
- 6.7. Applicants and developers should ensure that the engagement principles set out in this guidance are applied to any community engagement undertaken during the planning application process and after planning permission has been granted.

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<sup>4</sup> <https://www.cityoflondon.gov.uk/services/environmental-health/construction-demolition-and-street-works>



<b>Committee(s)</b>	<b>Dated:</b>
Planning & Transportation Resources Allocation Sub Committee	11 May 2023 24 May 2023
<b>Subject:</b> Local Implementation Plan funded schemes 2023/24	Public
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	1, 9, 12
<b>Does this proposal require extra revenue and/or capital spending?</b>	N
<b>If so, how much?</b>	£
<b>What is the source of Funding?</b>	
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	N/A
<b>Report of:</b> Executive Director Environment	For DECISION
<b>Report author:</b> Samantha Tharme, City Operations	

## Summary

This report covers the provision of Transport for London (TfL) Local Implementation Plan (LIP) funding to the City of London Corporation for the year 2023/24.

In current City Corporation allocation for 2023/24 is:

- Corridors and Neighbourhoods: £400,000
- Borough Cycling (Cycleways Network Development): £60,000
- Cycle Training £30,000
- Cycle Parking £66,000

Details of the projects and programmes to be funded through these allocations are provided in Table 1 and Appendix 1.

We are awaiting details of the allocation for Principal Road Renewal.

## Recommendations

Members are asked to:

- Approve the allocations up to the maximum set out in Table 1 (£556k), for the year 2023/24.
- Delegate authority to the Executive Director Environment, in consultation with the Chairs and Deputy Chairs of the Planning & Transportation Committee and of the Streets & Walkways Sub Committee, to allocate any additional funds which are made available by TfL in 2023/24 financial year.
- Approve to spend any funds awarded for Principal Road Renewal for the year 2023/24.

- Delegate authority to the Executive Director Environment to reallocate the TfL grant between the approved LIP schemes should that be necessary during 2023/24 up to a maximum of £150,000.

## **Main Report**

### **Background**

1. This report covers the provision of Transport for London (TfL) Local Implementation Plan (LIP) funding to the City of London Corporation for the year 2023/24.
2. Under Section 159 of the Greater London Authority Act 1999, TfL is empowered to provide grants to London boroughs and the City of London Corporation for the provision of safe, efficient and economically viable transportation facilities and (or) services to, from or within Greater London. In May 2019 the 3-year Local Implementation Plan for the City Corporation was submitted to TfL and approved.
3. In November 2022 we submitted our Annual Spending Submission to TfL. At that point TfL had indicated that our new annual allocation would be in the region of £400k for Corridors and Neighbourhoods and therefore our submission was in line with this allocation. All schemes are in line with the previously approved LIP and the Transport Strategy.

### **Current Position**

4. Funding has been allocated to the City Corporation from the current funding settlement for:
  - Corridors and Neighbourhoods: £400,000
  - Borough Cycling (Cycleways Network Development): £60,000
  - Cycle Training £30,000
  - Cycle Parking £66,000
5. Details of the specific projects and programmes that will be funded through this year's allocation are set out in Table 1 below.

Table 1. Local Implementation Plan – TfL allocations for 2023/24

<b>Project</b>	<b>Summary information</b>	<b>Allocation for 2023/24 from TfL LIP funding £</b>
Strategic Transport programme	Data collection, research and strategic work	50,000
Vision Zero behaviour change	Behaviour change activities including in partnership with the City of London Police	25,000
Healthy Streets minor schemes programme	Programme of smaller scale projects to improve the walking experience, enhance accessibility and reduce road danger (including feasibility investigations and development of the 2024/25 programme).	325,000
Cycle network development	Preliminary design refinement of the Aldgate to Blackfriars Cycleway.  Feasibility design investigations to deliver protected cycle lanes on Moorgate (south of London Wall) and Houndsditch.	60,000
Cycle parking	New cycle parking schemes and making temporary cycle parking permanent.	66,000
Cycle training	To deliver cycle training in line with TfL programme	30,000
<b>Total</b>		<b>556,000</b>

6. In addition to the above, ring fenced funding for Principal Road Renewal is anticipated but the amount is not yet confirmed. This report therefore seeks approvals to spend any amount allocated. Principal Road Renewal allocation in recent years (before covid-19) was usually around £100k.

### **Corporate & Strategic Implications**

7. The LIP funded projects and activities detailed above support delivery of:
- Corporate Plan outcomes 1, 9 and 12
  - The Transport Strategy
  - The Climate Action Strategy
  - Mitigation of Environment Department risk ENV-CO-TR 001 – Road Safety.

### **Conclusion**

8. Members are asked to approve the allocation up to the maximum in the submission as set out in table 1 (£556k) and any allocation for Principal Road Renewal.
9. Given the nature of programming works and the fact that some projects still in feasibility stages it is recommended that approval is given to allow the Executive Director Environment flexibility to make decisions on reallocating funding as necessary during the year, up to a maximum of £150,000.

10. Where appropriate project spending is also subject to the usual Gateway reporting approvals process.

## **Appendices**

Appendix 1: Details of proposed LIP projects and programmes

### **Background papers**

City of London Transport Strategy –

<https://www.cityoflondon.gov.uk/assets/Services-Environment/city-of-london-transport-strategy.pdf>

### **Report author**

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## **Appendix 1: Details of proposed LIP projects and programmes**

### **Corridors and Neighbourhoods**

#### **Strategic Transport programme (£50,000)**

Data collection, research and strategic work for example: The Kerbside Review, EV Infrastructure Action Plan, CoLSAT audit and delivery plan etc.

#### **Vision Zero behaviour change (£25,000)**

Behaviour change activities to support Vision Zero and reduce road danger including City Corporation campaigns and events; support for City of London Police campaigns and engagement.

#### **Healthy Streets Minor schemes (£325,000)**

Healthy Streets minor schemes programme for 2023/24. A series of small-scale improvement measures, such as raised carriageway, kerb build-outs, to improve the quality of the walking environment and reduce road danger at targeted points. This programme also includes feasibility investigations at several locations and development of the 2024/25 programme. The prioritised locations are:

- Coleman St/Masons Avenue – Raised pedestrian crossing link
- Moor Lane by Silk Street – Raised zebra crossing
- Silk St by Milton St – Raised zebra crossing
- New Fetter Lane – Raised zebra crossing, raised junction with Fetter Lane and narrowing of junction
- Furnival Street/Holborn- Raised carriageway
- Tallis Street/Temple Avenue – Raised carriageway
- Fenchurch Street/Lime Street – Junction safety improvements
- Ludgate Hill/Old Bailey – Junction safety improvements
- Fenchurch St/Leadenhall St – Junction safety improvements
- Newgate St/Old Bailey – Junction safety improvements
- Holborn Viaduct/Snow Hill junction – Junction safety improvements

#### **Cycle network development (£60,000)**

- **Bevis Marks**  
Monitoring the impact of the delivered protected cycle lanes and conclude the experiment. Subject to the experiment being a success in terms of safety, pedal cycles volumes and network resilience the measures will be made permanent.
- **Aldgate to Blackfriars via Queen Victoria Street**  
Preliminary design refinement of the Aldgate to Blackfriars Cycleway and progress the scheme proposal through appropriate design check reviews.
- **Moorgate (south of London Wall)**  
Feasibility design investigation to deliver a protect cycle lane. This follows the temporary scheme introduced under the Covid-19 transport measures.
- **Houndsditch**  
Feasibility design investigation to deliver a protect cycle lane.

**Cycle parking (£66,000)**

To deliver new cycle parking in addition to replacing temporary cycle parking (introduced under the temporary covid-19 transport measures) with permanent cycle parking infrastructure

**Cycle training (£30,000)**

To deliver cycle skills training with expert instructors, in line with TfL programme to people who work, study or live in the City of London.

<b>Committee(s):</b> Planning and Transportation Committee – For decision	<b>Dated:</b> 11/05/2023
<b>Subject:</b> City Fund Highway Declaration: 120 Fleet Street, London, EC4A 2BE	<b>Public</b>
<b>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</b>	10 & 12
<b>Does this proposal require extra revenue and/or capital spending?</b>	N
<b>If so, how much?</b>	n/a
<b>What is the source of Funding?</b>	n/a
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	n/a
<b>Report of:</b> City Surveyor CS.142/23	<b>For Decision</b>
<b>Report author:</b> Isobel Tucker	

## Summary

Approval is sought to declare a volume of City Fund owned airspace measuring 433 sq ft, situated at 120 Fleet Street, London, EC4A 2BE, to be surplus to highway requirements to allow its disposal in conjunction with the permitted development.

Redevelopment of the site was approved by Planning and Transportation Committee on 26<sup>th</sup> October 2021 and planning permission was issued on 20<sup>th</sup> May 2022 (21/00538/FULEIA). The building encroaches on City Corporation airspace. River Court Properties Limited is seeking to regularise its use of the airspace.

Before third party interests can be granted in City Fund airspace (held for highway purposes) the affected areas first need to be declared surplus to highway requirements. The terms for the highway disposal, are to be reported separately to Operational Property and Projects Subcommittee as landowner and will be submitted for approval under the City Surveyor’s Delegated Authority, subject to your approval to declare the affected volume of airspace surplus to highway requirements to facilitate the redevelopment of the permitted scheme.

## Recommendation(s)

Members are asked to:

- Resolve to declare a volume of City Fund owned airspace totalling 433 sqft (held for highway purposes), situated around 120 Fleet Street, London, EC4A 2BE, to be surplus to highway requirements to enable its disposal upon terms to be approved under the delegated authority of the City Surveyor SUBJECT TO

the City Surveyor and the Deputy Director of Transportation and Public Realm first determining the relevant ordnance datum levels to suitably restrict the vertical

extent of the leasehold airspace demise and ensure sufficient highway stratum is retained by the City as highway authority.

## **Main Report**

### **Background**

1. 120 Fleet Street is situated at a site on the north side of Fleet Street, located between St Bride Street and Shoe Lane. The site is bounded by Fleet Street to the south, Shoe Lane to the west, St Bride Street to the east and the junction of Shoe Lane, St Bride Street, Stonecutter Street and Little New Street to the north. The site is owned by River Court Properties Limited and is made up of two adjoining buildings, the Grade II\* Listed Daily Express Building (built in 1989) and Rivercourt (built in 2000). The Daily Express building is located in the Fleet Street Conservation Area. Rivercourt is a commercial building which wraps around the Daily Express buildings north and east facades and narrows to the north where it fronts the junction of Shoe Lane and St Bride Street.
2. Redevelopment of the site was approved by Planning and Transportation Committee on 26<sup>th</sup> October 2021 and planning permission was issued on 20<sup>th</sup> May 2022 (21/00538/FULEIA). The proposed development involves an office-led scheme comprising ground and 20 upper storeys (93.15m AOD) which includes demolition of the existing River Court building and a new building arranged over two basement levels, ground floor plus 20 upper storeys comprising commercial, business and service use (Class E). This will accompany alterations to and refurbishment of the existing Grade II\* listed Daily Express building at 120 Fleet Street which include works to physically detach the building from the River Court building, creation of publicly accessible roof garden and change of use and public realm and highway works including the creation of new pedestrian routes through the site at ground floor level.
3. The proposed development would provide a total of 78,456 sq.m GIA of Class E uses including office, retail, commercial and service use. It includes a change of use of Daily Express Building from office to learning non-residential institutions use (Class F1), retail, flexible learning and non-residential institutions and commercial use (Class E).
4. The development includes projections that project into City Corporation owned airspace around the building, a portion of which (433 sq ft) is held by City Fund (highway).

### **Current Position**

5. River Court Properties Limited has approached the City Corporation seeking to acquire a suitable interest in the airspace affected by its approved redevelopment works.
6. In the event of the airspace being declared surplus, its disposal is a matter for the City as landowner and Operational Property and Projects Subcommittee. The City Surveyor will approve under his Delegated Authority.



7. Before the City Corporation is able to dispose of any interests in City Fund (highway) airspace, which is highway, your Committee should first agree it is surplus to highway requirements.
8. The proposed surplus declaration does not extend to the highway stratum which will remain as highway and vested in the City Corporation as the highway authority (unless it is ever stopped up, which is not proposed in this disposal). Where applicable, the vertical extent of the highway stratum would be approved by the Deputy Director of Transportation and Public Realm to ensure that sufficient stratum remained to enable the use, management and maintenance of the highway.
9. The proposed development will not require stopping-up of any highway.
10. Detailed research by City Surveyors confirms the City Corporation's ownership of the parcels affected comprise of airspace measuring 1274 sq. ft. in total. This is split between City Cash (841 sq. ft.) and City Fund (Highway) (433 sq. ft.). A breakdown of the areas is available in the plans within Appendix A and B.
11. The upper and lower levels of the projection will be governed by Ordnance Datum Newlyn levels. Ordnance Datum Newlyn is the British mainland national geographic height system by reference to which the volume of land or airspace can be defined and identified by its upper and lower levels. The relevant ordnance datum levels to suitably restrict the vertical extent of the leasehold airspace demise will be agreed with River Court Properties Limited in due course and authorised under the City Surveyor's Delegated Authority after being determined by the City Surveyor and Deputy Director of Transportation and Public Realm.

## **Proposals**

12. The airspace in question is not considered necessary for the use of the highway and the exercise of the highway (subject to the Deputy Director of Transportation and Public Realm approval of the vertical extent of the highway stratum) and it is therefore proposed that subject to your agreement to declare the area of City Fund airspace round 120 Fleet Street, London, EC4A 2BE, to be surplus to highway requirements (measuring 433 sq. ft.) so that the City Corporation disposes of a suitable interest in the upon terms to be approved by the Delegated Authority of the City Surveyor.

## **Corporate & Strategic Implications**

13. Strategic implications –

- 7. We are a global hub for innovation in finance and professional services, commerce and culture.
- 10. We inspire enterprise, excellence, creativity and collaboration.

14. Financial implications –

- The terms of the highway disposal transaction are to be reported to The City Surveyor for approval under his delegated authority and to Operational Property and Projects Subcommittee, subject to you declaring the affected City Fund airspace to be surplus to highway requirements.

15. Resource implications – None

16. Legal implications –

- Disposal of any interests in City Fund airspace which is held for highway purposes is authorised by the City of London (Various Powers) Act 1958, Section 9, which allows the City Corporation to dispose of its land or airspace within or outside of the City in such manner and for such consideration and on such terms and conditions as it thinks fit, or (where such interest has been acquired and is held for planning purposes) the Town and Country Planning Act 1990 Section 233 which allows for disposal at best consideration for the better planning of the area/to make best use of land.

17. Risk implications – The developer could choose not to proceed with the transaction or redevelopment; however, this is currently considered unlikely.

18. Equalities implications – No equalities issues identified.

19. Climate implications – None

20. Security implications - None

## **Conclusion**

21. The airspace proposed to be declared surplus to highway purposes are not required for highway functions. If declared surplus it is proposed to dispose of an appropriate legal interest and commercial terms to enable the redevelopment of the property according to the planning permission that has been granted (21/00538/FULEIA).

## **Appendices**

- Appendix A - Eastern Boundary of Site City of London Ownerships oversailing area of City Fund Estate - 120 Fleet Street, London, EC4A 2BE
- Appendix B - Oversailing Areas of City of London Ownerships - 120 Fleet Street, London, EC4A 2BE

## **Isobel Tucker**

Principal Surveyor

City Surveyor's Department

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St Brides Street  
City Fund Estate

Habitable Area

Building Area

Title number NGL729721 (not City of London)

Fleet Street

EASTERN BOUNDARY OF SITE  
 City Fund Estate  
 Habitable and Building Area = 433 sq. ft

Address :  
**Rivercourt House**  
 120 Fleet Street,  
 London EC4

Title :  
 Committee Plan  
 Eastern Boundary of Site  
 City of London Ownerships oversailing  
 area of City Fund Estate

Drawing No :  
**5-C-43347 -01**



**P.G. Wilkinson BSc MSc MRICS**  
 City Surveyor

**CITY SURVEYOR'S DEPARTMENT**  
 Corporate Property Group :  
 Plans & Records Section

Print Scale :  
 1:500 @ A3

Date :  
 Apr 2023

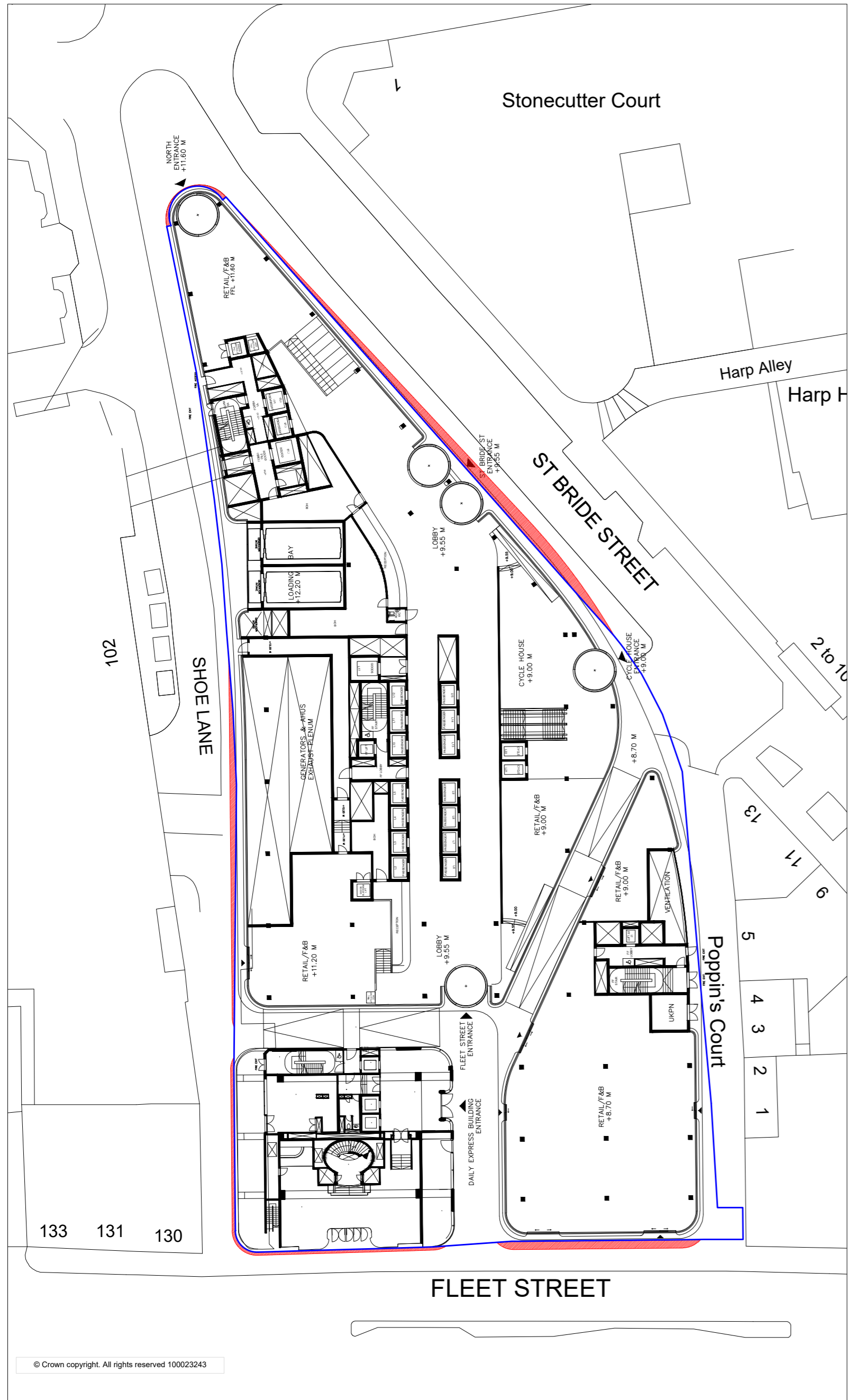
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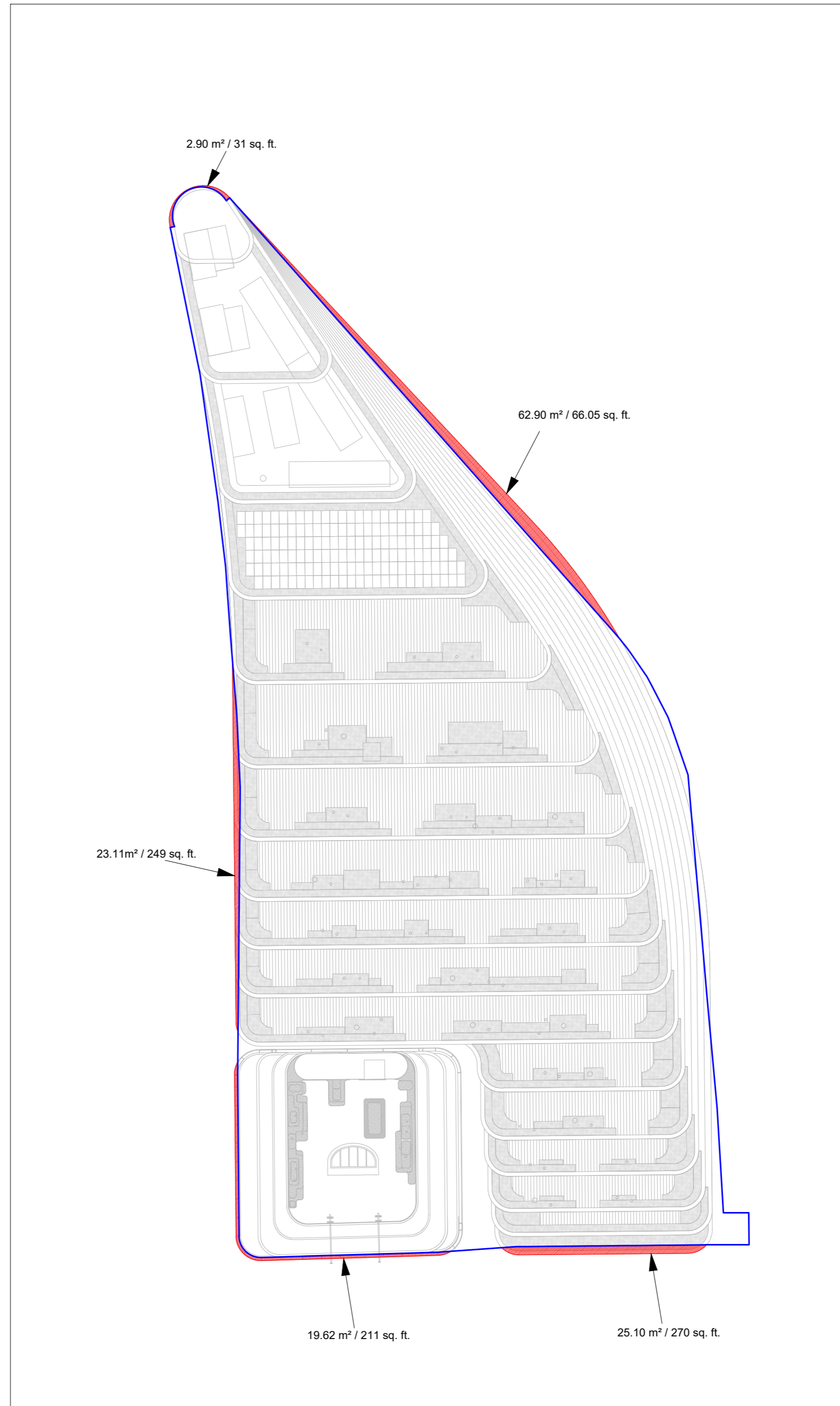
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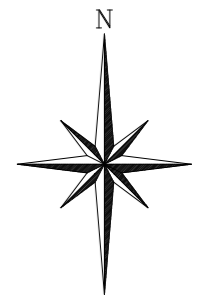
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Ground and Mezzanine Floors



Roof Level



- Areas of proposed development within City of London Freehold Ownership all levels
- Non City of London Freehold Title Number NGL729721

**DRAFT**

Based upon the proposed Architects scheme drawings, topographical survey and registered title plans.

Rev	Drawn	Date



**CITY OF LONDON**  
*P.G. Wilkinson BSc MSc MRICS*  
 City Surveyor

**CITY SURVEYOR'S DEPARTMENT**  
 Corporate Property Group :  
 Plans & Records Section

Address :  
 Rivercourt House  
 120 Fleet Street,  
 London EC4

Title :  
 Oversailing Areas of  
 City of London Ownerships

Print Scale : 1 : 500 @ A2	Drawn by : KT
Date : Oct 2021	Pro code UPRN
Drawing No : 4-C-42910 -01	
Revision	

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

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