



## Planning and Transportation Committee

**Date:** TUESDAY, 11 OCTOBER 2022

**Time:** 11.00 am

**Venue:** LIVERY HALL - GUILDHALL

**Members:**

Deputy Shравan Joshi (Chairman)	Natasha Maria Cabrera Lloyd-Owen
Deputy Alastair Moss (Deputy Chairman)	Alderman Ian David Luder
Deputy Randall Anderson	Antony Manchester
Alderman Alexander Barr	Alderman Bronek Masojada
Brendan Barns	Andrew Mayer
Emily Benn	Deputy Brian Mooney
Ian Bishop-Laggett	Deborah Oliver
Deputy Keith Bottomley	Deputy Graham Packham
Deputy Michael Cassidy	Deputy Susan Pearson
John Edwards	Judith Pleasance
Anthony David Fitzpatrick	Deputy Henry Pollard
Deputy John Fletcher	Ian Seaton
Deputy Marianne Fredericks	Alethea Silk
Martha Grekos	Luis Felipe Tilleria
Jaspreet Hodgson	Shailendra Kumar Kantilal Umradia
Alderman and Sheriff Alastair King DL	William Upton KC
Deputy Edward Lord	Alderman Sir David Wootton

**Enquiries:** Gemma Stokley  
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### Accessing the virtual public meeting

Members of the public can observe this virtual public meeting at the below link:

[https://youtu.be/Pj\\_jhUA3ba4](https://youtu.be/Pj_jhUA3ba4)

A recording of the public meeting will be available via the above link following the end of the public meeting for up to one civic year. Please note: Online meeting recordings do not constitute the formal minutes of the meeting; minutes are written and are available on the City of London Corporation's website. Recordings may be edited, at the discretion of the proper officer, to remove any inappropriate material.

**Lunch will be served in Guildhall Club at 1pm**

**John Barradell**  
Town Clerk and Chief Executive



# AGENDA

NB: Certain matters for information have been marked \* and will be taken without discussion, unless the Committee Clerk has been informed that a Member has questions or comments prior to the start of the meeting. These information items have been collated in a supplementary agenda pack and circulated separately.

## Part 1 - Public Agenda

1. **APOLOGIES**
2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
3. **MINUTES**  
To agree the public minutes and summary of the meeting held on 20<sup>th</sup> September 2022.  
  

**For Decision**  
(Pages 5 - 16)
4. **APPROVAL OF DRAFT REVISED STATEMENT OF COMMUNITY INVOLVEMENT AND DEVELOPER ENGAGEMENT GUIDANCE FOR PUBLIC CONSULTATION**  
Report of the Planning and Development Director.  
  

**For Decision**  
(Pages 17 - 78)
5. **BUSINESS PLANS 2022/23: PROGRESS REPORT (PERIOD 1, APRIL-JULY)\***  
Report of the Executive Director, Environment.  
  

**For Information**
6. **RISK MANAGEMENT UPDATE REPORT\***  
Report of the Executive Director, Environment.  
  

**For Information**
7. **PUBLIC LIFT REPORT\***  
Report of the City Surveyor.  
  

**For Information**
8. **VALID PLANNING APPLICATIONS RECEIVED BY DEPARTMENT OF THE BUILT ENVIRONMENT\***  
Report of the Chief Planning Officer and Development Director.  
  

**For Information**

9. **DELEGATED DECISIONS OF THE CHIEF PLANNING OFFICER AND DEVELOPMENT DIRECTOR\***

Report of the Chief Planning Officer and Development Director.

**For Information**

10. **OUTSTANDING ITEMS\***

Report of the Town Clerk.

**For Information**

(Pages 79 - 82)

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

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

## PLANNING AND TRANSPORTATION COMMITTEE

Tuesday, 20 September 2022

**Minutes of the meeting of the Planning and Transportation Committee held at the Guildhall EC2 at 11.00 am**

### **Present**

#### **Members:**

Deputy Shравan Joshi (Chairman)	Alderman Ian David Luder
Deputy Alastair Moss (Deputy Chairman)	Alderman Bronek Masojada
Deputy Randall Anderson	Deborah Oliver
Brendan Barns	Deputy Graham Packham
Deputy Michael Cassidy	Deputy Susan Pearson
John Edwards	Ian Seaton
Deputy John Fletcher	Luis Felipe Tilleria
Deputy Marianne Fredericks	Shailendra Kumar Kantilal Umradia
Jaspreet Hodgson	William Upton KC
Deputy Edward Lord	Alderman Sir David Wootton
Natasha Maria Cabrera Lloyd-Owen	

#### **Officers:**

Gemma Stokley	- Town Clerk's Department
Fleur Francis	- Comptroller and City Solicitor's Department
Andrew Coke	- City Surveyor's Department
David Horkan	- Environment Department
Ian Hughes	- Environment Department
Gwyn Richards	- Environment Department
Bruce McVean	- Environment Department
Rob McNicol	- Environment Department
Clive Whittle	- Environment Department

This being the first meeting of the Planning and Transportation Committee since the death of Her Majesty, Queen Elizabeth II, the Chairman asked that all stand for a moment's silence. He concluded this by recording his thanks to Officers who had worked diligently around the clock to ensure that all had been in place for arrangements in the City and beyond over the past fortnight.

#### **1. APOLOGIES**

Apologies for absence were received from Alderman Alexander Barr, Ian Bishop-Laggett, Antony Fitzpatrick, Martha Grekos, Alderman Alastair King DL, Deputy Brian Mooney, Judith Pleasance and Deputy Henry Pollard.

#### **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 19 July 2022 and approved them as a correct record.

**MATTERS ARISING**

**347 Crescent House, Golden Lane Estate, EC1Y 0SN** (page 11) – A Member questioned whether if, for future reference, where various amendments were proposed, the Chairman or Clerk might summarise what had been voted on and agreed at the end of an item. The Chairman undertook to action this going forward.

4. **THAVIES INN HOUSE, 3 - 4 HOLBORN CIRCUS, LONDON EC1N 2HA - TO CONFIRM A GROUP TREE PRESERVATION ORDER (TPO) ON THE LONDON PLANE TREES (PLATANUS X CERIFOLIA) SITUATED ON THE PUBLIC HIGHWAY ON ST ANDREW STREET, TO THE FRONT OF THAVIES INN HOUSE**

The Committee considered a report of the Chief Planning Officer and Development Director to confirm a group Tree Preservation Order (TPOs) on the London Plane Trees (*Platanus x acerifolia*) situated on the public highway on St Andrew Street, to the front of Thavies Inn House.

The Chief Planning Officer reminded the Committee that, on 20 April 2022, they had agreed to issue a Tree Preservation Order (TPO) for two London Plane trees on this site because of their contribution to the amenity of the area and reported that the TPOs needed to be confirmed within six months. He added that, in Summer of this year, the Committee had also agreed to grant permission for the redevelopment of the Thavies Inn site. By virtue of the public benefit and the tree planting proposed, it was agreed that the loss of these trees would be acceptable. The confirmation of the TPO was to address the fact that there was no guarantee that this scheme would come forward (although there was equally no suggestion that it would not) and to protect the City Corporation's position on this.

A Member commented that the report suggested that this needed to be confirmed every 6 months. She went on to question whether these were the only TPOs to bring to the Committee's attention. The Chief Planning Officer reiterated that this would be confirming the TPO in perpetuity. He added that it was extremely rare for these matters to be brought to Committee as there were very few of these.

**RESOLVED** - That the Thavies Inn Tree Preservation Order (2022) be confirmed without modification.

5. **TRAFFIC ORDER REVIEW**

The Committee considered a report of the Executive Director Environment relative to the Traffic Order Review.

Officers reminded the Committee that they had agreed a three-stage approach to this review in May 2022. This report provided an update on the outcome of the first stage which had involved the compilation of a comprehensive index of

all the traffic orders currently in place on the City's streets. The report also sought approval for the methodology of the second stage of the review and contained some suggestions as to some orders to be excluded from further review.

A Member questioned the different documents that were to be used to define the scoring system such as the Transport Strategy, the Climate Action Strategy and the Road Danger Plan. He stated that the Committee and indeed the wider Court were very familiar with these documents, however, amongst the documents was one which was not so well defined to date – Destination City. He therefore expressed his concerns as to using this to help define the scoring system for the traffic order reviews when it was still largely unknown as a Policy document. Officers responded by stating that the ranking system was something which had not yet been finalised with the consultants working on the review. Further discussions on this would take place should Members agree the methodology set out within this report and would include how best to represent Destination City within this work.

Another Member spoke on site visits stating that she was very conscious that there were currently a number of pedestrian areas with markings on the road showing a white man and that these were confusing for cyclists and other road users as they were situated in what would ordinarily be the cycle lane. She added that she had personally witnessed a number of incidents here and questioned whether there was an awareness of these kinds of issues amongst Officers. She went on to ask whether the sites concerned would be visited and, if not, how this would be understood as part of a desktop exercise. Secondly, the Member questioned whether it was possible to have more information as to costs associated with this review and the suggestion that more may be needed. Finally, the Member questioned stakeholder engagement and noted that the report referred to focus groups of business leaders, disabled people and other people with protected characteristics. She sought clarification as to why business leaders were included here and not residents and workers who would only be contributing to a sentiment survey. She also questioned what 'business leaders' meant and how many would be involved. Officers responded to state that schemes where temporary arrangements were still in place since the COVID-19 measures had been introduced were not intended to form part of this review as they were experimental traffic orders with their own review processes currently underway. It was highlighted that a report had been submitted to the last meeting of the Streets and Walkways Sub-Committee highlighting these schemes. The original intention had been to remove these pedestrian areas demarcated with lines and to build these out by way of temporary pavement widening although this had proven to be more expensive than originally anticipated. Officers were now therefore seeking to move as quickly as possible to seek approval for permanent schemes in these locations. Public consultation would be undertaken on these in the coming months and, if recommendations were approved, would result in the permanent build out of pavements in these areas to address the various safety concerns raised. It was reported that the use of different colour paint had been looked at as a temporary measure in these areas but that this had not been taken forward for a variety of reasons. Officers reported that they had learned a lot through this process and would not

seek to replicate these arrangements (which had been introduced in response to a very particular and fast moving situation) going forward.

With regard to funding, Officers stated that most of this to date had been attributed to data collection with some funding also committed to the next stage of the review. There was a reasonably healthy balance left should the next stage require more detailed consultancy support. The third stage of the review was not yet funded. The current budget accounted for the review process only. If the review were to identify changes required on-street outside of existing projects or programmes then further funding may need to be sought for this. In terms of the focus groups, Officers reported that the number of focus groups that could be arranged and recruited to within the time and the budget available had been limited. Debate around traffic movements often revealed that business leaders and disabled persons often had views on these and it was felt helpful to better understand their needs. It was reported that the focus groups involved between 12-20 people. With regard to business leaders, these would include senior representatives of various businesses in terms of size and the areas covered. Officers went on to state that it was felt that the sentiment survey would provide a good and far-reaching view from residents and workers and would replicate previous surveys undertaken. It was reported that the intention was to work closely with Ward Members in the next stage of this work to seek to better understand local issues.

A Member commented that the review was currently silent in terms of member involvement. He suggested that Members should be involved in terms of approving the final list of key objectives against which the measures would be judged. He added that there may also be a need to rank these objectives. It was suggested that the Streets and Walkways Sub-Committee might be best placed to undertake this work. Officers underlined that this may prove difficult in terms of the time frames set by the Court for this work. It was suggested that additional meetings of the Sub-Committee could be called to accommodate this.

A Member commented on the sheer volume of work involved here and questioned whether it was worthwhile drawing this to the attention of the Court and suggesting that either the review be broken down into different areas of the City or requesting additional time to undertake this. Officers stated that additional time to undertake the review would be extremely helpful and suggested that they might work alongside the Chairman and Deputy Chairman to request this within the forthcoming Court report. In terms of how the review might usefully be broken down, Officers suggested that the most logical way to do this might be to go through the first elements of the second stage and to finalise the methodology and scoring system around this before then undertaking a first sift of the orders which would then rationalise the list.

In response to further questions, Officers reiterated that in terms of experimental traffic orders, the only ones currently in place were those that had been introduced in relation to COVID measures and that recommendations on these would be taken to the Streets and Walkways Sub-Committee early in the new year with review mechanisms built into this. For this reason, it was



suggested that these were not included within this review. It was reported that Bank Junction also had a separate review process which was being undertaken by the Streets and Walkways Sub-Committee.

A Member spoke out against the suggestion of excluding TMOs which enable the creation of traffic free public spaces, such as Aldgate Square, Walbrook and Southampton Buildings from the review. Officers stated that this was a matter for Members to determine as they saw fit.

A Member congratulated Officers on the work undertaken to date. They went on to discuss the matter of process. He referred to the Publica report on Bank Junction and questioned whether it might be sensible to go back to Publica post-pandemic and ascertain whether there were any aspects of their recommendations that they might like to rethink. He also questioned whether there might be any tensions between a technical review of traffic movements at Bank and the sort of vision that many Members, particularly the Policy Chair, clearly now had around a post-pandemic City and reintroducing vitality. The Chairman stated that it was important to differentiate this piece of work and the Bank Junction work. Officers clarified that the Bank Junction review was about the nature and timing of the traffic restrictions in place here on the arms that would remain open after All Change at Bank had been delivered. The All Change at Bank project would include the creation of significant amounts of new public realm outside of the Royal Exchange and Mansion House and was still proceeding as agreed.

Another Member recalled that this had originally come to Court as a Motion around traffic flow, particularly taxis, at Bank Junction and that the traffic order review had been offered as a peace offering. They noted that they had cautioned at the time that this would be a mammoth task in terms of timing and resources, they had also underlined that it was important to determine from the outset what this review was setting out to achieve and to also look at this in terms of 'future City'. The Chairman went on to acknowledge the stresses that the two Court motions had placed upon existing resources within the Environment Department in terms of both manpower and budget. He therefore underlined his support for returning to the Court and looking at how this might be better handled. He cautioned that he was, however, sceptical about widening the scope of this review even further until the current piece of work and existing traffic orders were better understood. Officers stated that they were always keen to look to the future and that this was underpinned in both the Transport and Climate Action Strategies as well as the City Plan which were both key in terms of what these orders would be reviewed against.

A Member questioned whether, if the Motion put to Court had come through proper/alternative channels such as the Streets and Walkways Sub-Committee and this Committee, it might have come with a better idea of budget and greater detail attached to it. The Member underlined that her concerns were that a project costing this much should be done thoroughly but that this was clearly not possible within the timeframes stipulated by the Court. They asked Officers to comment on what they felt was the best way to spend this amount in order to make a safe, climate conscious, future looking City. Officers

commented to state that the process undertaken had been relatively efficient in terms of how the budget had been allocated. The desktop exercise to be undertaken next to narrow down the reviews to those that would benefit from a more detailed study should also be relatively quick and cost efficient once the scoring matrix had been defined and agreed. They also highlighted that, whilst this budget had been made available because of this review requested by the Court, the data and evidence being collected through the traffic surveys and other engagement exercises would be extremely useful going forwards in terms of understanding the post-pandemic City and would also help inform the Transport Strategy review. The work undertaken to date in terms of gathering together the information on all of the existing traffic orders into one document had also proven to be a very worthwhile exercise. Finally, Officers stated that they would not necessarily require all of the budget that had been allocated to this but that, at present, it was not clear as to what additional funds would be needed for the more detailed reviews.

A Member surmised that the general feeling here appeared to be that if this exercise was to be done it ought to be done properly and that Officers should therefore be supported in terms of requesting more time to undertake this work. This would allow for more effective management of resources and also for more Member involvement in and scrutiny of the process.

A Member moved that it be delegated to Officers in consultation with the Chairman and Deputy Chairman to put a motion to the October Court of Common Council meeting seeking an extension to the timeframe set for this piece of work to be completed and explaining the reasons for this. The Chairman clarified that whilst he was supportive of this, he felt it important that the work already underway continued and was not paused whilst the outcome of this ask of the Court was determined. Members discussed the motion and, alternatively, it was decided that this Committee should present an update report to the October meeting of the Court of Common Council setting out what it had done in response to the Motion and, within the recommendations attached to this, request that there be an extension of time to enable Officers to comply with their initial instruction and explain the reasons for this.

**RESOLVED** – That Members:

- Note the outcome of the Stage 1 TMO review.
- Agree the Stage 2 TMO review methodology, detailed in paragraphs 11 to 15 and in Appendix 2.
- Agree the categories of TMOs to be excluded from the review process, detailed in paragraph 14 and in Appendix 2.
- Note the high number of traffic orders and associated measures that need to be reviewed and agree to extend the deadline for completing the traffic order review to March 2023.

6. **TRANSPORT STRATEGY DELIVERY PLAN UPDATE: QUARTER 1 2022/23\***

The Committee received a report of the Executive Director Environment providing an update on the Transport Strategy Delivery Plan for Quarter 1 2022/23.

A Member noted that the report referenced public realm improvements at Creed Court and a six week delay to these. However, the Member clarified that this was not strictly true as the project had taken six week's longer than anticipated during the construction phase which had caused many of the shops located here to lose out in terms of passing trade. The Member reported that he had requested signage be placed here to indicate that pedestrians could still pass through and was pleased to note that this had been quickly provided but he still expressed his frustration as to how the delay had been presented within this report. He questioned whether the business rates for these premises might be adjusted downwards to account for this period of time.

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

7. **PUBLIC LIFT REPORT\***

The Committee received a report of the City Surveyor concerning public lifts.

A Member referred to the London Wall up and down escalators and London Wall West. She commented that even the 27.42% of service reported did not tally with her own experience of these escalators consistently not working. She questioned how, moving forwards, the reporting of this was intended to work. The City Surveyor reported that the Wood Street escalators were not within the City's remit and that, as such, Officers did not see any service data related to them. It was reported that the City were in ongoing discussions with the managing agent for 125 London Wall about this. It was understood that these escalators had been brought back into service but had since failed again.

The Member responded to propose that there were clearly a number of escalators here that members of the public would assume the City had some remit for. She therefore requested a short paper as to which other escalators aside from Wood Street had similar issues and were not the City's responsibility but were being used by those in the City and what the proposed solution to this might be.

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

8. **VALID PLANNING APPLICATIONS RECEIVED BY DEPARTMENT OF THE BUILT ENVIRONMENT\***

The Committee received a report of the Chief Planning Officer and Development Director detailing development and advertisement applications determined by the Chief Planning Officer and Development Director or those so authorised under their delegated powers since the report to the last meeting.

**RESOLVED –** That the report be noted.

9. **DELEGATED DECISIONS OF THE CHIEF PLANNING OFFICER AND DEVELOPMENT DIRECTOR\***

The Committee received a report of the Chief Planning Officer and Development Director detailing development applications received by the Department of the Built Environment since the report to the last meeting.

**RESOLVED** – That the report be noted.

10. **OUTSTANDING ACTIONS\***

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

A Member requested an update as to progress on the Sustainability SPD that she had requested be added to the list some time ago now. She also questioned whether this item, although for information only, could once again feature within the main agenda pack given its importance.

The Chief Planning Officer and Development Director stated that Officers were conscious that the list required an update and undertook to action this ahead of the next meeting of this Committee. In terms of the Sustainability SPD, it was reported that consultants had now been appointed to assist with the compilation of this document and that initial meetings had been held with them on this. A comprehensive programme for developing this had now been drawn up. This piece of work would feed into both the City Plan and the work undertaken on the Whole-Life Carbon Planning Advice Note. It was expected that a final version of the document would be available for presentation to Committee in early 2023.

**RECEIVED.**

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

**Capital Projects**

A Member noted that, as a result of the financial pressures on the City's ability to fund capital projects, two responses had been initiated – the first being the formation of the Operational Property and Projects Sub-Committee (OPPSC) and the second being the Capital Review process. He stated that he did not believe that the terms of reference of each of these had been circulated to Members which had led to a lot of confusion and unnecessary questions/debate. This had certainly been the case in the most recent meeting of the Streets and Walkways Sub-Committee. The Member therefore questioned whether Officers might provide an overview of both areas and how these were coordinated. He also sought assurances that when Planning and Transportation projects were being reviewed, that Members of this Committee would be able to provide informed input. Finally, he sought assurances that there had been no avoidable increase in Planning and Transportation related project costs because of delays incurred by these processes. He added that he was particularly referring to the latest Bank project where it was hoped that a decision could be secured under urgency in order to place orders for materials.

Officers responded to highlight that there had been a resolution passed by the Resource Allocation Sub Committee (RASC) about the need to review all projects that the City Corporation was delivering across its entire portfolio in relation to the medium-term financial pressures that the organisation is facing. They highlighted a particular need to focus on strengthening financial discipline and to consider whether there was sufficient financial allocation to meet the needs of the projects that were being proposed and to ensure that the projects that are moving forward are aligned with the Corporation's strategic priorities. Officers went on to report that there was particular concern around inflation costs impacting projects across the board in terms of construction. For this Committee, it was clarified that those projects relating to S278 contributions from developers were excluded from this process. However, if the process did include all projects funded from central Corporation funded sources such as Community Infrastructure Levy. In terms of meeting this resolution from RASC, the Environment Department had looked at approximately 75 projects, many of which sat under the purview of this Committee. It was reported that this initial assessment of projects was moving at pace as there was a desire not to hold up the existing ability to deliver projects. With regard to Bank works, it was reported that Officers were looking to commence these very soon and that they had had reassurances from colleagues in Chamberlains Project Management office that this could be progressed through the urgency process. The expectation was that this short delay should not result in an increase in costs and it was reported that Officers had built in capacity through the Capital Bid process for an increase in costs in relation to the change in contractors. The Member responded by asking for an update on this particular matter as soon as possible. Officers stated that it was hoped that the outcome of this would be known by the end of the week.

It was reported that discussions around the need for broader engagement in terms of any decisions affecting spending committees had been widespread and that the initial assessment of and affordability/prioritisation of projects had now been completed by the Chamberlain and the Project Management Office and had been reviewed by Chief Officers at last week. Recommendations were to be presented to the Finance Committee later today and would then be considered by RASC. How spending committees might be better engaged in terms of priorities and impact would form part of the discussions here.

The Chairman thanked Officers for all of their work on this to date, noting that it was yet another demand upon existing resources within the Department. Officers stated that they appreciated the need to progress this at pace and to bring together a considerable amount of information to help inform how this process would work.

In terms of the broader remit of the OPPSC, Officers reported that this Committee were also leading a review of the governance process of Gateway Projects which would also be a key aspect of this piece of work.

### **Consultation Notices**

A Member remarked that she had passed Stanley Cohen House earlier this week and seen public consultation notices posted in relation to the Crescent

House application, stating that the consultation period ended on 17 May and others advertising a July deadline for this. She questioned who was responsible for removing these notices and why this had not happened in relation to this particular application. The Chief Planning Officer reported that this was the responsibility of his team and undertook to action the removal of these particular notices without further delay. He added that these were ordinarily removed around a month after the consultation period had ended.

**Pavement Licences**

A Member stated that several of her constituents had reported disturbances from a premises operating a pavement licence over the past weekend. This had been reported and Officers had responded to state that pavement licences were up for renewal on 1 October and that residents had the opportunity to feed into this process with comments by no later than 27 September. The Member questioned whether this was being widely advertised amongst residents so that any issues could be addressed quickly and efficiently and taken into account ahead of these renewals. It was reported that this process was managed by the Public Protection Team who took any complaints of this type very seriously and addressed them as they arose as opposed to awaiting a licence review period. Officers undertook to report back to colleagues in the Public Protection Team and ask that they respond to the Member in full with regard to the public consultation process.

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

There were no additional, urgent items of business for consideration.

**13. 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.

<u>Item No(s).</u>	<u>Paragraph No(s).</u>
14	3
15-16	-

**14. NON-PUBLIC MINUTES**

The Committee considered the non-public minutes of the meeting held on 19 July 2022 and approved them as a correct record.

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

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

**16. 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 12.35 pm**

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Chairman

**Contact Officer: Gemma Stokley**  
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<b>Committee(s):</b> Planning & Transportation Committee	<b>Dated:</b> 11/10/2022
<b>Subject:</b> Approval of draft revised Statement of Community Involvement and Developer Engagement Guidance for public consultation	<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>£</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: Gwyn Richards, Planning &amp; Development Director</b>	<b>For Decision</b>
<b>Report author: Peter Shadbolt, Environment Department</b>	

## Summary

The City Corporation has a statutory duty to prepare and keep up to date a Statement of Community Involvement, which sets out how the City Corporation will engage and consult with the City's communities on both planning policy matters and planning applications. The most recent adopted SCI dates from 2016 and an updated document has been prepared for consultation.

For many years, the City Corporation has encouraged developers to consult with the City Corporation and local communities on their development proposals prior to the submission of a formal planning application. Engagement by developers is not required by legislation but is increasingly being carried out. To make sure this is done well, draft guidance to developers on the City Corporation's expectations has also been prepared for consultation.

Both the SCI and the developer engagement guidance will be issued for public consultation for a period of 6 weeks, following which both will be brought back to the Planning & Transportation Committee for further consideration and formal approval.

## Recommendation(s)

Members are asked to:

- Approve the Statement of Community Involvement and the Developer Engagement Guidance for public consultation.

## **Main Report**

### **Background**

1. The Planning & Compulsory Purchase Act 2004 introduced a legal requirement for each Local Planning Authority, including the City Corporation, to prepare a Statement of Community Involvement (SCI). This is a legal planning document that sets out how the City Corporation will consult with members of the public and other stakeholders when preparing planning policy documents and when considering applications for planning permission and related consents. Legislation requires that SCIs are updated on a 5 yearly basis.
2. The City's current SCI was adopted by the Planning & Transportation Committee at its meeting on 5 July 2016.
3. 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.

### **Current Position**

4. Since the current SCI was adopted in 2016, there have been no permanent changes to primary legislation setting out how Local Planning Authorities should consult on planning matters. During the Covid Pandemic, a number of temporary measures were introduced to enable consultation to continue during movement restrictions. Whilst these temporary measures have now been removed, they have shown that new and innovative ways of consulting and engaging can increase participation in planning, alongside more traditional methods. The consultation and engagement lessons learned during the Pandemic now need to be incorporated into the City Corporation's consultation processes on a permanent basis.
5. The City Corporation is also preparing a revised City Plan, to provide a planning framework for the City up to 2040 and ensure a more environmentally, socially and economically inclusive City post Covid. The City Corporation is looking to enhance its consultation methods for the new Plan, including through the use of an online consultation portal which will provide a more user-friendly and efficient way for communities to get involved in planning matters. Amending the SCI will provide a framework for this enhanced approach to consultation and provide certainty to the City's communities on how the City Corporation will involve them in the consideration of planning matters. The engagement strategy for the City Plan will be published shortly and shared with stakeholders.
6. The City Corporation has for many years encouraged developers to work with planning officers at an early pre-planning application stage to help shape development proposals and ensure that they comply with the City's Local Plan. Although not a legal requirement, the City Corporation also encourages developers to engage with local communities and other stakeholders at an early stage in the design process to explain their proposals and enable local stakeholders to influence the design and layout of schemes. This has been progressed in an informal way, with developers encouraged to learn lessons from

previous consultations and to continually improve the way they communicate and engage with the local community.

### **Proposals**

7. A revised and updated City Corporation Statement of Community Involvement is attached as Appendix 1 to this report. The revised SCI provides updated information on when the City Corporation will consult on statutory planning matters, how this consultation will take place, and how long documents and planning applications will be available for consultation. The revised SCI factors in the lessons learned during Covid, making provision for online and hybrid meetings and consultation events, the use of new presentational techniques such as 3D modelling and the use of QR codes to provide a shortcut to further information. The SCI outlines that consultation periods will meet, but normally exceed, statutory requirements for public consultation, particularly in relation to planning policy requirements.
8. Attached at Appendix 2 is the draft developer engagement guidance. This is a new Planning Advice Note that 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. This is intended to provide good practice guidance as to what is expected from the development industry and how early and continuous engagement can help to improve trust in the planning system and seek to deliver better schemes, informed and improved by stakeholder feedback and involvement. The guidance will also provide greater certainty to stakeholders on how they will be engaged by developers. Developers will be expected to provide information on engagement when submitting a planning application.
9. Members are asked to agree to issue the statutory SCI and the developer engagement guidance for public consultation. This consultation will be carried out in line with the requirements in the new SCI, with the consultation running for at least 6 weeks. The consultation will involve direct engagement with a wide variety of stakeholders, including residents of the City of London, community and amenity groups, developers and businesses, Business Improvement Districts, and people who work in the Square Mile. The response to this consultation will be brought back to a future meeting of this Committee for consideration and approval of both documents.

### **Corporate & Strategic Implications**

10. Strategic implications – The SCI and the developer engagement guidance 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.

11. Financial implications – There are no financial implications arising from this report. Consultation costs will be met from within the Planning & Development Local Risk Budget.
12. Resource implications – There are no resource implications arising from this report. Consultation will be undertaken within existing Planning & Development Service resources.
13. 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.
14. Risk implications – None
15. Equalities implications – The draft SCI and the Developer Engagement Guidance have been considered through an Equalities Impact Assessment Screening, which has identified no equalities implications
16. Climate implications – None.
17. Security implications – None.

### **Conclusion**

18. The City Corporation as the Local Planning Authority for the City of London has a statutory duty to prepare and keep up to date a Statement of Community Involvement. 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 most recent adopted SCI dates from 2016 and an updated document has been prepared for consultation setting out a revised approach to consultation, building upon lessons learned over the past 7 years, in particular the move to greater use of online resources and hybrid ways of working.
19. For many years, the City Corporation has encouraged developers to consult with the City Corporation and local communities on their development proposals prior to the submission of a formal planning application. Pre-application engagement remains a non-statutory part of the planning system. To provide further guidance to developers on the City Corporation's expectations as to the content and conduct of pre-application engagement, draft planning guidance has also been drafted for consultation.
20. Both the SCI and the developer consultation guidance will be issued for public consultation for a period of 6 weeks, following which both will be brought back to the Planning & Transportation Committee for further consideration and formal approval.

### **Appendices**

- Appendix 1 – Draft Statement of Community Involvement
- Appendix 2 – Draft Developer Engagement Guidance Planning Advice Note

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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 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 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 the City Corporation's 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 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 Corporation aims to achieve in performing its statutory planning function. 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.

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.
- 1.5. 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 and expects developers and agents to follow the same principles in undertaking consultation on development schemes.
- 2.2. **Accessibility:** 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. the City Corporation will proactively engage with all groups in a way that suits their needs. Participants 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. The City Corporation will always be open to new ways and methods for participation.
- 2.5. **Clear and informative:** participants 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:** the scale of the consultation will be proportionate to the scale and impact of the decision following the consultation. Where the City Corporation is consulting on several documents, consultation periods and closing dates will be co-ordinated as far as practical.
- 2.7. **Early engagement:** stages of consultation will be planned and timetabled before consultation begins. The City Corporation will publish, and keep up to date, a Local Development Scheme outlining the timetable and process for the preparation of planning policy documents. The City Corporation 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 development.
- 2.8. **Continuous engagement:** the City Corporation 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:** The City Corporation will acknowledge the receipt of all comments on planning policy consultations. Following consultation on policy documents, the City Corporation 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 & Transportation 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. The City Corporation is 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 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. The City Corporation will look to enhance this technology, including its wider availability, to make it easier for local communities to understand the impacts of planning policy and planned development.
- 2.13. The Environment Department provide 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 are aware of the opportunities to participate. The City Corporation will also publish on its website a City Plan Bulletin from time to time, providing updated information on planning policy preparation.
- 3.4. The City Corporation will consult and engage the City's communities throughout the preparation of all planning policy documents. Planning legislation sets out minimum requirements for consultation and the City Corporation 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 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 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.

### Consultation Techniques

- 3.9. The tables below provide further information on how the City Corporation will consult during formal public consultation on the City Plan, other local planning documents and the Community Infrastructure Levy. 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 individuals or groups. The methods used for consultation will be selected as appropriate according to the consultation subject and audience.
- 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 the City Corporation will adopt other methods and channels as appropriate, as well as responding to individual requests to provide information or attend meetings.

<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="http://www.cityoflondon.gov.uk">www.cityoflondon.gov.uk</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 may 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 posters may be used to publicise consultation at the Guildhall, public lending libraries in the City, community centres or other appropriate places.
Focus groups and workshops	<p>These may be held 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.</p> <p>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.</p>
Meetings and Events	Public meetings and events will be arranged when appropriate and according to the issues on which views are being sought. These meetings and events will be held in locations that are accessible to the community being consulted. The number of meetings will vary and meetings may be held on a number of different days and at different times to ensure that all of the local community have an opportunity to attend and express their views.

<b>Consultation and engagement technique</b>	<b>Detail</b>
	<p>Requests from local community groups and others 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.</p>
Direct email and Mailshots	<p>The 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="#">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 may be conducted through an online consultation platform, or via the City Corporation's website.</p>
Members	<p>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 &amp; 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.</p>

<b>Consultation and engagement technique</b>	<b>Detail</b>
Resident Associations/Groups	<p>Information will be made available to residents through regular liaison meetings with resident associations, 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 may contact, by letter, all occupiers of residential addresses to notify them of policy consultation.</p>
Business Associations/Groups	<p>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.</p>
Media	<p>The City Corporation will issue press releases providing information on public consultation through national, London-wide 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.</p>

*Table 1 consultation and engagement techniques*

### **City Plan Preparation**

- 3.12. Any City Plan review 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/or consultation portal, detailing where and when they can be inspected</li> <li>• Publish a statement setting out who was consulted, 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 Corporations 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 consultation portal 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 and consultation portal and for inspection for 6 weeks following the adoption statement</li> </ul>

*Table 2 City Plan making stages*

3.13. At each public consultation stage, the City Corporation will acknowledge responses within five working days of receipt and will consider further engagement where requested.

### **Supporting Documents**

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**

- 3.15. 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**

- 3.16. 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). An 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 conservation management of a site.
- 3.17. Consultation with statutory consultees (The 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**

- 3.18. The purpose of an Equalities Impact Assessment (EqIA) is to ensure that policies promote equality in line with the 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**

- 3.19. 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**

- 3.20. 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.
- 3.21. 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.
- 3.22. Following consultation on an SPD, the City Corporation will consider the comments received before amending the guidance (if necessary) and adopting the SPD.

<b>Preparation stage</b>	<b>Minimum Consultation Requirement</b>
<b>Draft SPD</b>	<ul style="list-style-type: none"> <li>• Consultation for a minimum of 4 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> <li>• Seek views from the Conservation Area Advisory Committee and Access Group 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 and consultation portal</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 and/or consultation portal for inspection for 3 months following formal adoption</li> </ul>

*Table 3 Supplementary Planning Document preparation stages*

## **Planning Advice Notes**

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**

3.24. Neighbourhood Plans 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 rests with local Neighbourhood Forums not the City Corporation.

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

<b>Preparation stage</b>	<b>Minimum Consultation Requirement</b>
<b>Application to designate a neighbourhood planning forum</b>	<p>Upon receipt of a valid application to nominate a neighbourhood forum:</p> <ul style="list-style-type: none"> <li>• Consult for a minimum of 6 weeks</li> <li>• Publish on the City Corporation website and/or 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 neighbourhood forum</b>	<p>Publish notification of designation of forum:</p> <ul style="list-style-type: none"> <li>• on City Corporation website and/or consultation portal</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 neighbourhood planning area</b>	<p>Upon receipt of a valid application to designate a neighbourhood planning area:</p> <ul style="list-style-type: none"> <li>• Consult for a minimum of 6 weeks</li> <li>• Publish on the City Corporation website and/or 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>Preparation stage</b>	<b>Minimum Consultation Requirement</b>
<b>Designation of neighbourhood planning area</b>	<p>Publish notification of designation of forum:</p> <ul style="list-style-type: none"> <li>• on City Corporation website and/or consultation portal</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 proposal</b>	<p>As soon as possible after receiving a neighbourhood plan proposal:</p> <ul style="list-style-type: none"> <li>• Consult for a minimum of 6 weeks</li> <li>• Publish on the City Corporation website and/or 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>• Consult any organisations or individuals identified in the Neighbourhood Plan Consultation Statement</li> </ul>



<b>Preparation stage</b>	<b>Minimum Consultation Requirement</b>
<b>Examination of neighbourhood plan</b>	<ul style="list-style-type: none"> <li>• The Plan and any consultation comments are sent to an independent inspector for public examination.</li> <li>• Following receipt of the Inspector's report, the City Corporation will determine what action is required to either approve the Plan, approve it with modifications or decline the plan. This decision will be: <ul style="list-style-type: none"> <li>• published on City Corporation website and/or consultation portal</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>
<b>Publicising a Neighbourhood Plan</b>	<ul style="list-style-type: none"> <li>• Publish the Neighbourhood Plan on the City Corporation's website, including details of where the Plan can be inspected.</li> <li>• Make the Plan available at: <ul style="list-style-type: none"> <li>• the Guildhall and public lending libraries in the City during normal opening hours</li> <li>• email 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 asked to be notified of the making of the Plan</li> </ul> </li> </ul>

*Table 4 Neighbourhood Planning Preparation Stages*

## **Planning Contributions**

- 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 section 106 agreements. The City Corporation publishes on its website an Annual Infrastructure Funding Statement which sets out financial contributions received, what CIL or s106 has been used to fund and future spending priorities.

## **Planning Obligations (Section 106 Agreements)**

- 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. S106 agreements are also used to deliver affordable housing and training, education and skills provision. Details are set out in the Planning Obligations 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>.
- 3.28. The Planning Obligations SPD is subject to formal consultation as set out in Table 3 above.

## **Community Infrastructure Levy**

- 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**

- 3.30. 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 Fund. The Fund 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 CIL Neighbourhood Fund structure and funding regime. This consultation will take place over a minimum 4-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/or 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 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 to enable the local community to comment on and help shape development proposals before a planning application is formally submitted to the City Corporation.
- 4.4. Development Management can also 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 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 and legislation, supplementary guidance (set out in adopted City of London 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 (the development management process) takes place at a number of stages:

- **Pre-Application Stage** – developers and 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 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 is preparing separate guidance for developers 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 the 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, 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 & Transportation 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 & Transportation Committee. At the time of adopting this SCI, the threshold is 10 or more objections. 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, 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.
- 4.10. The City Corporation offers a pre-application advice service for developers and 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, 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. As part of the pre-application advice service, the City Corporation can advise developers on good practice for wider community engagement, including the timing, length and extent of any consultation, and appropriate engagement methods. The City Corporation is preparing Early Community Engagement Guidance, setting out the principles, processes and methods that developers / applicants should use to engage with local communities from an early stage of the design of a development.
- 4.12. The applicant / developer must have regard to any responses received as part of their pre-application consultation process. The City Corporation will expect 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. There are many different types of planning application, 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. In most cases, the City Corporation 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.
- **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 preservation orders and removal of trees in conservation areas. This notice provides summary details of the application received and where further detail can be seen.
- **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: [www.cityoflondon.gov.uk/plans](http://www.cityoflondon.gov.uk/plans)

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

- **Local newspaper:** When required by 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. Where appropriate, Members of the City Corporation's Planning & Transportation 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 and the City of London Access Group, 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. 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. **Availability of 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. 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). Figure 5 sets out the minimum requirements that the City Corporation will meet in publicising planning applications in accordance with the statutory requirements.



<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>
<b>Any application affecting a public right of way or footpath/way</b> Excluding pavement crossovers, new / revised vehicular or pedestrian accesses	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>
<b>Applications for Listed Building Consent</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>

<b>Type of development</b>	<b>Website</b>	<b>Site Notice</b>	<b>Press Notice</b>
<b>Advertisement Consent</b> a) Signage on shop fronts or business b) Free-standing advertisements c) Large scale advertisement hoardings	<b>Yes</b>	<b>No</b>	<b>No</b>
<b>Prior Approval - Telecommunications</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>
<b>Applications to vary or discharge conditions attached to a listed building consent.</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>

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.

<b>Type of Development</b>	<b>Consultation Requirement</b>
<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 7a Consultation requirements for planning applications

## Planning Application Consultation Period(s)

- 4.19. 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. 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. 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 the City Corporation 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 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. The City Corporation welcomes 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. The City Corporation 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. The quickest way to comment on planning applications is to submit comments online via [Public Access](#)
- 4.25. If you are unable to provide comments online, you can email the Planning Team at [Planning Comments](#).

- 4.26. The City Corporation prefers 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 available to you, you can write to us at:

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

- 4.27. Copies of planning applications, the plans and any other documents submitted with it, can be viewed online at [Public Access](#)
- 4.28. This information is also available for inspection by appointment at the Guildhall by contacting: [Planning Team](#) or telephone 020 7332 1710.
- 4.29. When making comments, it is important that the application reference 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. 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. The City Corporation 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. 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 and Transportation Committee but comments will be anonymous and that may affect the weight the Members give them.
- 4.33. When considering a planning application, the City Corporation 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 City Plan and Supplementary Planning Documents (SPDs). This 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;
- Impacts on air quality and other microclimate considerations;
- Impacts on listed buildings and conservation areas;
- Contaminated land;
- Impact on the provision of social infrastructure;
- Capacity of physical infrastructure, such as public drainage and water.

4.34. 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. 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 significant revisions are made, the City Corporation will notify those it considers would be affected by the revisions and who have commented on the proposal, in writing or by email, as appropriate.

- **Committee and Delegated Reports.** When an application is referred to the Planning & Transportation 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 & Transportation 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 <https://www.cityoflondon.gov.uk/assets/About-us/planning-protocol-2020.pdf> , or 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. 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 & Transportation Committee. Over 90% of planning applications in the City of London are normally decided under delegated powers.
- 4.37. Larger development schemes or planning applications with outstanding policy conflicts are considered by the Planning & Transportation Committee. Planning applications must also be decided by 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 & Transportation 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 may also be viewed on the City Corporation's website.
- 4.38. Planning officers will make recommendations on planning applications based on planning policy documents, material considerations, responses from the consultation on the application, including from 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. If a planning application is required to be considered by the Planning & Transportation 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 & Transportation 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. It is important that planning decisions are open and transparent. Decisions on planning applications are usually made by the Planning & Transportation Committee, the Planning & Development Director or other officers with delegated powers.
- 4.41. **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. **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. **Weekly list of applications determined** – This is available on the City Corporation's website.

## **Planning Appeals**

- 4.44. 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. 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 people play an essential role in this aspect of the planning system.
- 4.46. 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. The City Corporation's published Planning Enforcement Supplementary Planning Document sets out how investigations are prioritised and responded to, based on the level of harm caused. The City Corporation will continue to direct

resources to ensure this principle is applied consistently throughout the Square Mile. Residents and local businesses are encouraged to contact the City Corporation with any information related to unauthorised development and its impacts.



## Glossary

**Community Infrastructure Levy:** A statutory charge payable on new development 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.

**Local Plan:** The strategic framework for development in an area or borough produced by the Local Authority.

**London Plan:** The Mayor of London is responsible for the planning strategy for the whole of Greater London, known as the London Plan.

**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 of London's City Plan

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

**Neighbourhood Forum:** Community groups that are designated to produce a neighbourhood plan.

**Neighbourhood Plan:** A plan prepared by a Neighbourhood Forum for a particular neighbourhood area

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

**Planning Obligation:** 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:** These provide more detailed advice on the interpretation of planning policy set out in the City Plan.

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# Developer Engagement Guidance

City of London Corporation Planning Advice Note

Page 59

Draft document

October 2022

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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.
- 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, 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 local community as possible, including members of the community who have been less engaged or disengaged.
- 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, 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. 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)
- Visitors, tourists, and workers (particularly for development within the City's Principal Shopping Centres, the Culture Mile and other relevant areas).

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>

### **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.

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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>

- 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 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 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. 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>



### 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 happen when. Each development will be different, and timing and information may vary depending on what is relevant and proportionate to the scheme.

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 officers
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> (Project brief approved by the client and confirmed that it can be accommodated on the site)	Pre-application advice	Events, workshops, talks, meetings with various 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.  Opportunity for planning officers to attend and visit events, talks, workshops, and meetings

No	RIBA Stage	Core planning tasks (as set out in the RIBA plan of work 2020)	Engagement Expectations
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 various 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.  Inform stakeholders of changes to their environment as a result of construction, for example noise and

No	RIBA Stage	Core planning tasks (as set out in the RIBA plan of work 2020)	Engagement Expectations
			dust disturbance, road changes that may affect their journeys.
6	<b>Handover</b> (Building handed over, aftercare initiated and building contract concluded)	Comply with planning conditions as required	
7	<b>Use</b> (Building used, operated and maintained efficiently)	Comply with planning conditions as required	Publish 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 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.

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## 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. Developers should notify key stakeholders about the community engagement strategy. This point 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.
- 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 and interested in the proposed development 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.
- 4.7. At an early stage, 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 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. Developers should explore 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 positive and any potential adverse impacts of the proposed development, including the impact on the amenity of neighbouring occupiers, the impact on the local highway network and the public realm, and its contribution to climate resilience, tackling 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. 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. Developers 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 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, are more balanced and impartial, which can help to facilitate co-operative engagement. 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.

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## 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.

<b>Method of engagement</b>	<b>Form of communication</b>	<b>Examples and uses</b>
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 or resident groups	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 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. 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 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). City Corporation officers should be given the opportunity to attend events that are organised and to meet applicants to discuss consultation responses and data.

### 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>
Engage with Ward Councillors			✓	✓	(✓)

<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>
					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

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 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. 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 and Transportation 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 the proposed development. The submitted SCI will be the basis for this information.

## Post Application Submission Engagement

- 6.4. The applicant 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.
- 6.6. Further guidance of engagement during construction works is provided in 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>

**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	<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 (20 July 2021) – see action 1a)</b></p> <p><b>The new BRE guidance for daylight/sunlight was published in June 2022 which Officers are reviewing and have arranged for training from industry experts. A report will be brought back to Committee by December to set out options for producing a new advice note/guidance for the City.</b></p>

1a)	<p>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</p>	<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 (21 September 2021)</b> - The Chief Planning Officer and Development Director underlined that, ultimately, Officers would be producing a planning advice note in order to create more clarity on the methodology and that they were still working through this with the BRE and other stakeholders to deliver this. He added that, to date, Officers had not had any pushback from the industry when requiring the provision of radiance studies for relevant planning applications.</p> <p><b>To be completed: Further report to Committee setting out/providing updates on these points by Winter 2021.</b></p> <p>Radiance assessments continue to be requested and submitted with planning applications. An update on the use of this methodology will be incorporated into the abovementioned report to Committee setting out options for a new advice note/guidance.</p>
2	<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 8 June 2021 29 June 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 authorities offered more extensive training and induction for Planning Committee members and also requested that those sitting on the Planning</p>	<p>UPDATE: (17 November 2020): Members were of the view that more formal training should be offered by the Department to any newly appointed members of the Committee in line with the principles of the Planning Protocol.</p> <p><b>To be completed: Training offering for new Members to be considered in 2021 with a view to implementing this for the new municipal year.</b></p>



	<p>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</p>	<p>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>	<p>All new Members of the Committee undertook training ahead of attending their first meeting of the Planning Committee and considering any applications.</p>
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</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>Work on the Sustainability SPD is underway, with a consultancy commissioned to assist in the production of the document. A draft of the document for public consultation will be brought to the Planning &amp; Transportation Committee between January and March 2023.</p>
4.	<p>22 Feb 2022 26 April 2022 17 May 2022</p>	<p style="text-align: center;"><b><u>Update to Statement of Community Involvement</u></b></p>	<p>Draft versions of the Statement of Community Involvement and the accompanying Developer Engagement Guidance Planning Advice Note have</p>

	<p>7 June 2022          1 July 2022          19 July 2022          20 Sept 2022</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>been brought to the Planning and Transportation Committee on Tuesday 11 October 2022. If agreed by Committee, feedback from stakeholders will be sought through public engagement, with final versions of the documents scheduled to be brought to Committee in March 2023.</p>
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