

City of London

Planning Obligations
Supplementary Planning
Document

Consultation Statement

May 2021



INTRODUCTION

The City of London Corporation implemented a Planning Obligations Supplementary Planning Document (SPD) on 1 July 2014, alongside implementation of the City of London Community Infrastructure Levy. The City Corporation has resolved to update the Planning Obligations SPD to bring it into line with the national Planning Policy Framework 2020, the London Plan 2021 and the City Plan 2036.

CONSULTATION REQUIREMENTS

Consultation on the draft Planning Obligations SPD has been undertaken in accordance with the requirements of the City Corporation's Statement of Community Involvement 2016. Consultation documentation was sent to:

- adjoining local planning authorities,
- the Mayor of London,
- City residents and City businesses,
- those voluntary bodies or business representative bodies that the City Corporation consider appropriate, and
- other groups and bodies on the City Corporation's City Plan database.

EARLY CONSULTATION ON THE PLANNING OBLIGATIONS SPD

The City Corporation is preparing a new Local Plan, City Plan 2036. This Plan is at an advanced stage of preparation with Regulation 19 pre-submission consultation due to conclude on 10 May 2021.

Draft Local Plan Strategic Policy S27: Planning Contributions, sets out the City Corporation's approach to the use of s106 planning obligations alongside the City of London Community Infrastructure Levy. Policy PC1: Viability Assessments, sets out how viability assessments should be prepared and how the City Corporation will consider assessments submitted with planning applications.

The draft Planning Obligations SPD provides further guidance on the range of planning obligations that the City Corporation will require to mitigate development and supplements the policies in the draft City Plan 2036.

Draft Local Plan Consultation

The City Corporation consulted on a full draft of City Plan 2036 between 12 November 2018 and 28 February 2019. A total of 8 comments were received on Policies S27 and PC1 seeking changes to bring the Plan into line with amendments to the Mayoral CIL and minor textual changes. No comments

were received on the potential content of an updated Planning Obligations SPD.

Regulation 19 pre-Submission consultation on the draft City Plan was underway at the time of writing this consultation statement and comments have not yet been reviewed.

City Corporation Committee Consultation

The need for review of the Planning Obligations SPD and progress in delivering the review was considered in public meetings of the City Corporation's Local Plan Sub-Committee and the Planning & Transportation Committee. At these meetings, elected Members provided guidance on the need for review of the affordable housing provisions in the SPD and the need for effective s106 planning obligation provisions to mitigate the impacts of development in the City:

a) Local Plan Sub-Committee

The City Plan 2036 was drafted through regular meetings of the City Corporation's Local Plan Sub-Committee which meets in public. The need for review of the Local Plan approach to s106 planning obligations and the provisions for affordable housing, in particular, were discussed at meetings from September 2018 until January 2020. Members were given regular verbal updates on progress on planning obligations provisions and underpinning viability evidence. Members expressed strong support for an early review of the Planning Obligations SPD prior to the adoption of City Plan 2036.

b) City Corporation Planning & Transportation Committee

The City Corporation's Planning & Transportation Committee meets approximately every 6 weeks in public. In 2019, Committee members requested that a review of the Planning Obligations SPD be progressed and this was included in the Committee's list of Outstanding Actions from November 2019.

CONSULTATION ON DRAFT S106 PLANNING OBLIGATIONS SUPPLEMENTARY PLANNING DOCUMENT

Consultation on the draft s106 Planning Obligations Supplementary Planning Document took place from 26 October 2020 until 11 December 2020. Consultation measures included:

a) Consultation Notification Emails

Over 500 emails were sent to consultees on the City Plan consultation database, including neighbouring boroughs, the Mayor of London, City businesses, developers and agents, and City residents.

Ten representations were received on the draft SPD. These representations and the City Corporation's response are attached at Annex 1.

b) Website

The draft Planning Obligations SPD was published on the City Corporation's website.

c) City Libraries and Guildhall

Due to national restrictions imposed during the Covid-19 Pandemic and, in accordance with the provisions of the Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020, physical copies of the SPD were not placed in City libraries or made available at the Guildhall for inspection.

d) Internal City Corporation Consultation

Information about the consultation was made available to City Corporation Members, through an email to all Members on the Planning & Transportation Committee and an article in the October 2020 Members Briefing.

e) Consultation meetings

Information on the draft Planning Obligations SPD was provided to the Built Environment Users Panel meeting and through other meetings with developers and agents.

Annex 1:

Summary of Consultation Comments and City Corporation Response

Comment Number	Respondent	Comment	City Corporation Response
1	Natural England	The SPD does not appear to relate Natural England interests to any significant extent. We therefore do not wish to comment.	Noted
2	Highways England	Development proposals and the way in which the City Corporation manage contributions towards future infrastructure improvements within the City of London are not considered likely to have any impact on the SRN.	Noted
3	Environment Agency	<p>Welcome the mention of the use of CIL funding for infrastructure including flood defences but would like to see further detail regarding flood risk. Reference could be made to the ambition of the draft City of London Riverside Strategy and to bring the document in line with the priorities of the London Plan. CIL funding could be used to facilitate the raising of flood defences as required under the draft City of London Riverside Strategy which aims to implement the requirements of TE2100.</p> <p>Recommend that section 106 is mentioned to assist with the raising of flood defences where it is required to make a development acceptable. The London Plan states that "important priority uses for s106 funding that apply generally across London are measures to mitigate and adapt to climate change." Appropriate contributions from developers to improving flood defences would help to secure climate change adaptation.</p> <p>Biodiversity. Welcome the inclusion of biodiversity improvements as part of this SPD. Support reference to Local Plan Policy OS3, which aligns with the National Planning Policy Framework and is essential in ensuring development minimised impact on biodiversity and provide enhancements which lead to biodiversity net gain. Developer contributions should also be sought via</p>	<p>Agree that further detail should be included in the SPD on flood risk matters and the role of s106 and CIL in addressing City of London flood risk issues. A new section on Flood Risk has been added to the SPD providing guidance on the use of CIL and s106 planning obligations for flood risk mitigation.</p> <p>Biodiversity Agree with comments on biodiversity. Additional wording has been added to refer to enhancements of improvements to watercourses in line with the Thames River Basin Management Plan.</p>

		planning obligations wherever reasonable and/or practicable to deliver enhancements or improvements to watercourses in line with the Thames River Basin Management Plan.																													
4	City Property Association	<p>The CPA understand the need to review financial planning obligations to ensure that financial contributions remain in line with inflation and appropriately mitigate the impact of a development and the necessity to introduce new financial obligations in appropriate circumstances in accordance with Government guidance on this topic. The CPA raises no in principle concerns with the introduction of a financial contribution toward security in the city cluster area.</p> <p>The CPA does not raise objections to the proposed increase in financial obligations set out within the SPD but stresses the short to medium term challenges the Square Mile faces in light of the covid-19 pandemic and Brexit. The CPA wishes to highlight the potential adverse impact of increased financial obligations on development generally and on the ability of the City to meet strategic policy objectives.</p> <p>Provides a table comparing current s106 charges with and without indexation and the proposed charging rates within the draft SPD.</p> <table border="1"> <thead> <tr> <th></th> <th>Current (not indexed)</th> <th>Current (Indexed)</th> <th>Proposed (CIL indexed)</th> </tr> </thead> <tbody> <tr> <td>Affordable Housing Contribution</td> <td>£20</td> <td>£27.95</td> <td>£50</td> </tr> <tr> <td>Local Training, Skills and Job Brokerage Contribution</td> <td>£3</td> <td>£3.29</td> <td>£30</td> </tr> <tr> <td>Security Contribution (city cluster only)</td> <td>£0</td> <td>£0</td> <td>£10</td> </tr> <tr> <td>Mayoral CIL (offices)</td> <td>£185</td> <td>£185</td> <td>£185</td> </tr> <tr> <td>City CIL</td> <td>£75</td> <td>£104.81</td> <td>£104.81</td> </tr> <tr> <td>Total</td> <td>£283</td> <td>£321.05</td> <td>£379.81</td> </tr> </tbody> </table>		Current (not indexed)	Current (Indexed)	Proposed (CIL indexed)	Affordable Housing Contribution	£20	£27.95	£50	Local Training, Skills and Job Brokerage Contribution	£3	£3.29	£30	Security Contribution (city cluster only)	£0	£0	£10	Mayoral CIL (offices)	£185	£185	£185	City CIL	£75	£104.81	£104.81	Total	£283	£321.05	£379.81	<p>Note the comments supportive of the principle of financial contributions to address City Cluster security.</p> <p>Comments regarding the timing of the proposed changes in the light of Covid and the potential adverse impacts on developer sentiment are noted. The City Corporation's s106 planning obligations have not been updated since 2014. The viability assessment prepared for the City Plan 2036 identified potential for increased developer contributions, either CIL or s106, without an adverse impact on development, in addition to meeting the requirements in the draft City Plan and the draft London Plan. The proposed changes are within the scope of the increases tested through the viability assessment.</p> <p>An updated viability assessment commentary for the City Plan in February 2021 indicated that the fundamental viability of development in the City had not been changed due to Covid, although flexibility was required in considering the impacts of contributions on individual sites.</p> <p>The City Corporation has introduced developer flexibility in relation to CIL</p>
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		<p>The proposed charges in respect of Affordable Housing and Local Training, Skills and Job Brokerage increase at a margin well above current levels of indexation. The economic impacts of the pandemic and Brexit on the Square Mile have far reaching impacts in the short-medium-term and the CPA wish for this to be recognised with regard to the implementation of the revised contributions. The CPA are of the strong view this is not the appropriate time for the City Corporation to be increasing financial contributions, which will decrease confidence in the City market at a time of great uncertainty. The attractiveness of the City market may well be diminished as a result.</p> <p>It must also be recognised that the Intend to Publish London Plan also increases developer costs, which are not reflected in the table above. The draft City Plan 2036 will also do likewise. The CPA strongly requests that the revised contributions are either (1) delayed in their implementation date by 18-24 months, or (2) raised to a level which is more in line with indexation until the economy has recovered to incentivise development in the pipeline to be delivered.</p> <p>The CPA suggests the indicative rates set out below could be adopted in the short to medium term and suggests the City Corporation explores a tapering mechanism in order to enable smaller development and refurbishment.</p> <table border="1" data-bbox="600 1050 1458 1286"> <thead> <tr> <th></th> <th>Current (indexed)</th> <th>Rates 2021-2022</th> <th>Rates 2023 onwards</th> </tr> </thead> <tbody> <tr> <td>Affordable Housing</td> <td>£27.95</td> <td>£30.00</td> <td>£50.00</td> </tr> <tr> <td>Training, Skills & Job Brokerage</td> <td>£3.29</td> <td>£5.00</td> <td>£30.00</td> </tr> <tr> <td>Security (City Cluster only)</td> <td>£0</td> <td>£10.00</td> <td>£10.00</td> </tr> </tbody> </table> <p>The CPA notes the importance of providing employment and skills initiatives within development which support local people in the</p>		Current (indexed)	Rates 2021-2022	Rates 2023 onwards	Affordable Housing	£27.95	£30.00	£50.00	Training, Skills & Job Brokerage	£3.29	£5.00	£30.00	Security (City Cluster only)	£0	£10.00	£10.00	<p>payments in response to Covid, deferring payments until 60 days after July 2021. In line with this flexibility, it is proposed that any changes to the s106 planning obligations SPD should not be implemented until 1 October 2021, with the potential for review prior to October retained in the event that Covid recovery takes place at a slower rate than envisaged in the national road map.</p> <p>With regard to local skills, training and employment and local procurement, additional wording has been added to reflect the City's priority for investment in green skills to support the implementation of the Climate Action Strategy. The SPD has also been amended to clarify that the formula-based approach to developer contributions will be kept under review to ensure that levels of contributions remain appropriate in a rapidly changing economic and social environment.</p> <p>The comments about the need for greater developer-led training and skills initiatives are noted. The existing SPD and the proposed SPD both set out the circumstances under which developer-led training and skills initiatives will be appropriate. It should be noted that since 2014, only one developer has sought to deliver training, skills and</p>
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		<p>Square Mile and its neighbouring Authorities but would like greater clarity on what the ten-fold increase and resulting additional funding would be used for, along with deeper involvement of contributing partners on how and where such funds are maximised for local benefits.</p> <p>CPA would particularly welcome a discussion of how these funds might be used in partnership with individual development sites. A proportion of the increased contribution could be ringfenced for site-specific initiatives used to support local procurement, apprenticeships and training programmes on construction sites, and believe this would help maximise local benefits.</p> <p>Greater partnership and transparency on the investment of CIL/S106 spending could help maximise local benefits. The City's Annual Monitoring reports detail where such funding is spent, but this is by definition only a historic and passive record, and at risk of long periods passing way beyond the completion of individual schemes. CPA consider that this risks breaking the critical link of locally derived benefit from development. If contributing parties had a voice in the process of allocating funding it would inevitably help promote innovation and efficiency.</p>	<p>employment initiatives directly in place of a financial contribution. There is little evidence of further demand for developer-led initiatives and no change is therefore proposed.</p> <p>In relation to transparency of s106 and CIL contributions and spend, since the draft SPD was published, the City Corporation has published its Annual Infrastructure Funding Statement, which includes details of CIL and s106 receipts, spending on projects and spending priorities for the coming year. Additional clarification on monitoring has been added to the SPD. The City Corporation has also implemented its CIL Neighbourhood Fund which invites funding bids from local groups, organisations and developers for locally supported infrastructure projects from across the City of London.</p>
5	DP9 on behalf of British Land	<p>British Land is a member of the CPA and endorses the Association's comments on the SPD. British Land does not have an in-principle objection to the proposed increase in financial obligations. It is acknowledged that contributions need to be re-visited over time to ensure that they take into account inflation and also continue to adequately mitigate the impacts of new development. Welcome that the SPD recognises that the newly proposed contribution towards security measures is only likely to be relevant to schemes within the city cluster.</p> <p>Support the CPA's proposal in relation to the delayed or phased introduction of increases in the short term. The economic impacts</p>	<p>Note the comments supportive of the principle of financial contributions to address City Cluster security</p> <p>Comments regarding the timing of the proposed changes in the light of Covid and the potential adverse impacts on developer sentiment are noted. The City Corporation's s106 planning obligations have not been updated since 2014. The viability assessment prepared for the City Plan 2036</p>

		<p>of both Brexit and the COVID-19 pandemic on business are well-documented. Although British Land remains steadfast in its confidence in the future of the City and London as a whole, it supports a delayed or phased introduction of the new rates to help ensure that the City can recover quickly from the impacts of Brexit and the pandemic.</p> <p>Also support the CPAs comments in relation to the proposed Local Training, Skills and Job Brokerage contribution which represents a significant increase compared to the existing tariff. Further evidence for the increase is needed. Given the City's aspirations to increase the level of employment and training provision associated with developments, would like to explore the potential for developments to contribute towards local employment, training and skills provision in kind. For example, where identified employment and training targets are met by developers and/or their contractors and secured within a S106 agreement, a reduced financial contribution or off-set could be secured. Alternatively, part of the contribution could be ring fenced for employment, training and skills provision on-site.</p>	<p>identified potential for increased developer contributions, either CIL or s106, without an adverse impact on development, in addition to meeting the requirements in the draft City Plan and the draft London Plan. The proposed changes are within the scope of the increases tested through the viability assessment.</p> <p>An updated viability assessment commentary for the City Plan in February 2021 indicated that the fundamental viability of development in the City had not been changed due to Covid, although flexibility was required in considering the impacts of contributions on individual sites.</p> <p>The City Corporation has introduced developer flexibility in relation to CIL payments in response to Covid, deferring payments until 60 days after July 2021. In line with this flexibility, it is proposed that any changes to the s106 planning obligations SPD should not be implemented until 1 October 2021, with the potential for review prior to October retained in the event that Covid recovery takes place at a slower rate than envisaged in the national road map.</p> <p>With regard to local skills, training and employment and local procurement, additional wording has been to reflect</p>
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			<p>the City's priority for investment in green skills to support the implementation of the Climate Action Strategy. The SPD has been amended to clarify that the formula-based approach to developer contributions will be kept under review to ensure that levels of contributions remain appropriate in a rapidly changing economic and social environment.</p> <p>The comments about the need for greater developer-led initiatives are noted. The existing SPD and the proposed SPD both set out the circumstances under which developer-led training and skills initiatives will be appropriate. It should be noted that since 2014, only one developer has sought to deliver training, skills and employment initiatives directly in place of a financial contribution. There is little evidence of further demand for developer-led initiatives and no change is therefore proposed.</p> <p>The Planning Obligations SPD will be monitored on an annual basis through the Infrastructure Funding Statement. The City Corporation is always willing to discuss the need for flexibility or review of planning policy.</p>
6	DP9 on behalf of Tenacity Group	The Tenacity Group recognises that the existing Planning Obligations SPD is due for renewal and supports this taking place alongside or shortly after the emerging City Plan 2036. It is considered that it would be appropriate to understand the	The draft SPD aligns with the adopted London Plan 2021 and the Regulation 19 Publication version of the draft City Plan 2036. It is considered that these

		<p>findings of the forthcoming Examination of the City Plan 2036 before finalising the SPD, which should also be debated at Examination.</p> <p>The existing SPD includes two flat rate financial contributions relevant to office buildings, for local skills, employment and training (£3/sqm) and a contribution towards affordable housing (£20/sqm). With current indexation these rates are now £3.29 and £27.95. The emerging SPD seeks to increase these rates to £30/sqm (skills, employment and training) and £50/sqm (affordable housing). Additionally, the emerging SPD introduces a flat rate of £10/sqm towards security for City Cluster and related schemes. These must be considered alongside non-financial contributions in the draft SPD which carry a cost such as enhanced on-site skills, employment and training requirements and requirements for cultural plans. Recent significant Mayoral CIL rate increases and the increase in carbon offsetting charges – from £60 to £95 per tonne of carbon over a 30-year period – are also important to setting the context, even if not driven by the emerging SPD.</p> <p>The cost to City Cluster developers would increase from the current £31.24/sqm rate to £90/sqm. This will contribute to a massive increase in infrastructure costs to developers in the City, especially when considering Mayoral CIL increases, potential future City CIL review and carbon offset cost increases. The SPD suggests that the increase has been viability tested but does not make this information available for consideration.</p> <p>In a time where the City needs to plan to ‘bounce-back’ from the substantial short-term impact of the COVID-19 pandemic and plan to stay competitive with other global financial centres following the end of the Brexit transition period, the City should be aiming to increase confidence in the development industry to invest in it and should consider whether implementing increased costs to developers is a sensible course of action. The City has</p>	<p>plans provide a robust policy basis for the SPD and that delay until after the Local Plan Examination is unnecessary.</p> <p>The proposed planning obligations contributions in the SPD have been informed by the viability assessment undertaken for the City Plan 2036. The viability assessment identified potential for increased developer contributions, either CIL or s106, without an adverse impact on development, in addition to meeting the requirements in the draft City Plan and the draft London Plan. The proposed changes are within the scope of the increases tested through the viability assessment.</p> <p>An updated viability assessment commentary for the City Plan in February 2021 indicated that the fundamental viability of development in the City had not been changed due to Covid, although flexibility was required in considering the impacts of contributions on individual sites.</p> <p>The City Plan 2036 viability assessment and updated commentary are available on the City Corporation’s website.</p> <p>The City Corporation has introduced developer flexibility in relation to CIL payments in response to Covid, deferring payments until 60 days after</p>
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		<p>already determined to support deferral CIL payments in light of COVID-19, so is clearly cognisant of the effect it might have on development in the City.</p> <p>With reference to off-site affordable housing levies, the City needs to determine if the recent Inspector's ruling against this approach during the Westminster City Plan Examination impacts its intention to both retain and seek to increase the levy in its Planning Obligations SPD.</p> <p>With reference to the City Cluster Area-Wide Security Contribution, the City should be considering whether the potential forthcoming creation of an Eastern Cluster Business Improvement District (BID) might be an alternative mechanism through which to raise funds for infrastructure in the City Cluster. A BID would be entitled to funds, which might be used to improve security in the City Cluster.</p>	<p>July 2021. In line with this flexibility, it is proposed that any changes to the s106 planning obligations SPD should not be implemented until 1 October 2021, with the potential for review prior to October retained in the event that Covid recovery takes place at a slower rate than envisaged in the national road map.</p> <p>In relation to affordable housing, the comments of the Inspector at the Westminster City Plan have been considered in taking this SPD forward. The SPD continues the City Corporation's long standing approach of seeking contributions towards affordable housing from commercial development. The City's policy approach has been in place since 2004 and approved through Public Examination into the City of London Core Strategy and City of London Local Plan.</p> <p>The comment regarding the potential Eastern Cluster BID as a mechanism for seeking security contributions is noted. The BID is subject to further formal consideration and approval through the statutory process and cannot be constrained by the City Corporation. The approach set out in the draft SPD will ensure that additional activity associated with new development in the Cluster will contribute towards the</p>
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			<p>mitigation of the additional security risk created by these developments in a coordinated way and is considered to be in alignment with the requirements of CIL Regulation 122.</p>																				
7	<p>DP9 on behalf of Aviva Investors</p>	<p>Provides a table comparing current and proposed SPD charge rates as follows:</p> <table border="1" data-bbox="600 459 1447 794"> <thead> <tr> <th>Contribution</th> <th>Current (non-indexed)</th> <th>Current (Indexed)</th> <th>Proposed</th> </tr> </thead> <tbody> <tr> <td>Affordable Housing</td> <td>£20.00</td> <td>£27.95</td> <td>£50.00</td> </tr> <tr> <td>Training, Skills & Job Brokerage</td> <td>£3.00</td> <td>£3.29</td> <td>£30.00</td> </tr> <tr> <td>Security (City Cluster only)</td> <td>£0</td> <td>£0</td> <td>£10.00</td> </tr> <tr> <td>Total</td> <td>£23.00</td> <td>£31.24</td> <td>£90.00</td> </tr> </tbody> </table> <p>The proposed tariff increases amount to a total of £90.00 per sqm of new development. This is an increase from the current overall indexed linked tariff charge of £31.24. It equates to a difference of £58.76 per sqm of development.</p> <p>As a worked example, a development proposal that has c.50,000 sqm of additional GIA (say where a typical City office building is proposed for redevelopment) this means the difference is c. £3 million between what is paid under the current SPD and the revised SPD. The revised SPD consultation suggests that the increase has been viability tested but does not make this information available for consideration.</p> <p>Whilst not driven by the City Corporation's draft SPD, there have been significant Mayoral CIL rate increases that came into effect within the last couple of years which also place an additional financial constraint upon development. This constraint would be</p>	Contribution	Current (non-indexed)	Current (Indexed)	Proposed	Affordable Housing	£20.00	£27.95	£50.00	Training, Skills & Job Brokerage	£3.00	£3.29	£30.00	Security (City Cluster only)	£0	£0	£10.00	Total	£23.00	£31.24	£90.00	<p>The proposed planning obligations contributions in the SPD have been informed by the viability assessment undertaken for the City Plan 2036. The viability assessment identified potential for increased developer contributions, either CIL or s106, without an adverse impact on development, in addition to meeting the requirements in the draft City Plan and the draft London Plan. The proposed changes are within the scope of the increases tested through the viability assessment.</p> <p>An updated viability assessment commentary for the City Plan in February 2021 indicated that the fundamental viability of development in the City had not been changed due to Covid, although flexibility was required in considering the impacts of contributions on individual sites.</p> <p>The City Plan 2036 viability assessment and updated commentary are available on the City Corporation's website.</p> <p>The City Corporation has introduced developer flexibility in relation to CIL payments in response to Covid,</p>
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		<p>exacerbated by any future borough CIL review initiated by the City Corporation.</p> <p>In addition, development projects are also being subject to increased tariffs in relation to carbon offsetting from £60 per tonne of carbon to £95 per tonne of carbon over a 30 year period. This again is not driven by the City Corporation's revised SPD because it is a London-wide change proposed through the Intend to Publish London Plan. However, the City Corporation's revised SPD does seek to formalise the Intend to Publish London Plan carbon offset recommendation. The effect of this tariff increase is not quantified above as this will be specific to each development project. It is nevertheless an important consideration in the context of the City Corporation's current consultation.</p> <p>There are also other non-financial contributions set out in the SPD consultation which carry a cost to developers in an indirect way such as enhanced on-site skills, employment and training requirements.</p> <p>The Coronavirus outbreak is the largest public health crisis in living memory that has had significant implications for the UK economy. In London, the context for recovery is extremely challenging due to the pronounced impact of the crisis on London's businesses.</p> <p>The Mayor of London has developed a recovery plan which is being put into action by the London Recovery Board and its associated initiatives. Specifically in the City, the City Corporation has commissioned a report called 'London Recharged: Our Vision for London in 2025' which highlights the importance of enabling businesses of all types to respond and adapt to the crisis. The delivery of fit-for-purpose workspaces in the City is needed to achieve this.</p> <p>In a time where the City needs to quickly recover from the impacts of the pandemic and stay competitive following the end</p>	<p>deferring payments until 60 days after July 2021. In line with this flexibility, it is proposed that any changes to the s106 planning obligations SPD should not be implemented until 1 October 2021, with the potential for review prior to October retained in the event that Covid recovery takes place at a slower rate than envisaged in the national road map.</p>
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		<p>of the Brexit transition period, the City Corporation should be aiming to increase confidence in the development industry to invest in the City. It is therefore questionable whether implementing increased tariff charges on development projects is a sensible course of action. The City Corporation has already agreed to defer CIL payments in light of the pandemic, so is clearly cognisant of the effect that charges of this nature might have on development in the City.</p> <p>In the current economic climate the proposed changes, when considered alongside the other financial obligations placed on development set out in these representations, pose an additional cost constraint that may harm the City's ability to deliver its strategic objectives of providing for new development that is fit for the post coronavirus recovery of the City.</p> <p>Aviva would therefore encourage the City Corporation to reconsider the proposed changes, and instead consider a periodic review of the tariff in the short-medium term.</p>	
8	DP9 on behalf of Knighton Estates	<p>Knighton Estates Limited do not object to the increase in financial obligations where they are designed to align with inflation or where there has been a policy directive on a particular issue, such as security. Therefore, no objection is raised in relation to security.</p> <p>Knighton Estates does not object to an increase in financial obligations in the long term but is concerned about bringing forward such increases in the short to medium term, following the impact of the covid-19 pandemic. Such increases will have a significant impact of the viability of proposals coming forward which in turn could affect the CoL's and London's policy objectives.</p> <p>At present the proposed contributions for Local Training, Skills and Job Brokerage and Affordable Housing without indexation applied, exceed the current levels of contribution under the adopted SPD with indexation applied. It is requested that in light</p>	<p>Note the comments supportive of the principle of financial contributions to address City Cluster security</p> <p>The City Corporation has introduced developer flexibility in relation to CIL payments in response to Covid, deferring payments until 60 days after July 2021. In line with this flexibility, it is proposed that any changes to the s106 planning obligations SPD should not be implemented until 1 October 2021, with the potential for review prior to October retained in the event that Covid recovery takes place at a slower rate than envisaged in the national road map.</p>

		<p>of the economic impacts of the covid-19 pandemic, that the proposed increases in financial contributions are reflective of current levels of indexation or alternatively delayed in their implementation until the current economic uncertainty has passed.</p> <p>In relation to the increase in the Local Training, Skills and Job Brokerage contribution, this appears to be substantial when compared against the existing tariff in relation to the same aspect. It is requested that clarification is provided as to why a 10-fold increase in the tariff is proposed. It is also requested in addition that the CoL consider the potential for any contributions to be ring fenced or delivered in kind where programmes can be delivered on site during the construction or operation and secured through an associated S106 agreement.</p>	<p>In relation to training and skills provision, the methodology underpinning the proposed contribution is set out in Appendix 1 of the SPD. Additional wording has been added to clarify that the criteria underpinning the calculation will be kept under review to ensure that levels of contribution remain appropriate.</p> <p>The comment about the need for greater developer-led initiatives is noted. The existing and proposed SPDs both set out the circumstances under which developer-led training and skills initiatives will be appropriate. It should be noted that since 2014, only one developer has sought to deliver training, skills and employment initiatives directly in place of a financial contribution. There is little evidence of further demand for developer-led initiatives and no change is therefore proposed.</p>
9	Transport for London	<p>The comments are made from TfL's role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the GLA.</p> <p>Welcome the revisions to this SPD with updated details to national and London policy, reference to Mayoral CIL requirements and the Intend to Publish London Plan.</p> <p>Consider that the SPD can be improved from a transport perspective. The SPD lacks an overarching vision or aim for the type of transport the Corporation would like to promote through</p>	<p>Note the comments regarding transportation and suggested closer alignment with the City of London Transport Strategy.</p> <p>As the draft SPD points out in para 12, it is anticipated that funding for additional infrastructure, including transport infrastructure, will come principally through CIL contributions.</p>

		<p>planning obligations, and which types will be prioritised. Reiterating some of the aims of the Transport Strategy within the SPD would strengthen the document for use as a tool when securing developer contributions.</p> <p>It would be helpful to have the City of London's vision for transport reiterated in the SPD within the 'Transportation' section. This section is brief and does not reference any specific types of transport which the Corporation wish to fund through planning obligations. It seems to focus on the vehicular impacts of development.</p> <p>This section should state the importance of a safe, active, accessible transport system which encourages people to walk and cycle, in line with the Transport Strategy. Over-arching visions for other types of infrastructure have been stated within the SPD, such as for Cultural Strategies and Public Art. A similar visionary paragraph for the Transportation section is necessary to ensure the vision for the City is achieved.</p> <p>As of March 2019, s106 planning obligations received in the City of London for transport totalled £19.2m, with a further £70.9m received for Crossrail 1. The importance of this mechanism for delivering valuable, sustainable transport infrastructure is not strongly reflected in the SPD, thus more emphasis should be given to the importance and value of transport contributions.</p> <p>Recommend that the SPD mentions the possibility of pooling s106 funds for off-site transport mitigation. This is a crucial way to fund larger off -site improvements to mitigate the cumulative impacts of multiple developments within the same vicinity. This strategy can be used to fund active travel infrastructure such as new cycleways.</p> <p>There are no references in the SPD to specific public transport modes. The Mayor's Transport Strategy sets a target of 95% of all</p>	<p>A new paragraph has been added which refers to the Transport Strategy Vision, Aims and Proposals, indicating that City CIL and s106 funds will be used, where appropriate to help fund the improvements set out in the Strategy.</p> <p>Agree that additional wording should be added to the Transportation section highlighting the potential to pool s106 planning obligations where appropriate to deliver area-wide mitigation measures. Additional wording will also be added highlighting the potential to use s106 obligations to help deliver public transport, where appropriate.</p> <p>Transport Plans – comments are noted, Para 64 indicates that Travel Plans should incorporate Cycle Promotion Plans. Other comments about the format of Travel Plans and the need to promote active travel are more relevant to the Transport Strategy and the emerging City Plan 2036.</p> <p>Agree that reference to the Healthy Streets Approach should be added in relation to Transport Assessments in para 64.</p> <p>Additional paragraph added to section on Open Spaces and Green Infrastructure addressing the potential</p>
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	<p>trips in central London to be made on foot, by cycle or using public transport by 2041. A key public transport mode for achieving this target is buses, which TfL believes will continue to play an important role in the City, especially for trips where cost is an influence in mode choice or travel times are antisocial. Although financial contributions for buses are generally only requested for very large developments, would like to see reference to buses and s106 mitigation included within the SPD. Would also encourage the Corporation to consider specifying other forms of public transport (for example London Underground, Docklands Light Railway, Cycle hire) which can be funded through planning obligations.</p> <p>The SPD helpfully states the requirements for Transport Assessments, Construction Logistics Plans, Travel Plans and Delivery and Servicing Plans, which are all required for certain developments as stated in Policy T4 B of the ItP London Plan.</p> <p>The SPD also states a requirement for Cycling Promotion Plans, incorporated within Travel Plans. Pleased to see an emphasis placed on the importance of encouraging people to cycle; however, there is no need to require both plans, which could increase the bureaucracy of development proposals. Additionally, Travel Plans would have limited use if only dealing with the vehicular impacts of development, especially in the context of the City of London. Due to the level of PTAL throughout the City of London, public transport use is already very high, and few need dissuading from private car journeys into the City of London (although taxi and private hire vehicle use may need addressing).</p> <p>TfL suggest that cycling promotion strategies are included within Travel Plans rather than in a separate document attached to Travel Plans. Developers in the City of London should be encouraged to give an active travel focus to their Travel Plans. Cycling Promotion Plans are disadvantaged in their inability to</p>	<p>use of s106 obligations to deliver public realm enhancement.</p> <p>Transport assessment threshold – where new transport infrastructure generates an additional 500+ trips per peak hour, there will be a requirement to submit a transport assessment.</p>
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		<p>consider other types of active travel aside from cycling. Developers across London should consider the needs for users of all types of active travel, including walking, running and wheelchair use. Depending on the outcome of the forthcoming trial, scooting might also play a role in the future transport mix of the City.</p> <p>TfL is committed to delivering safe, inclusive and well-connected public transport, and part of this is the provision of high-quality public realm. The Healthy Streets Approach gives guidance as to how such places can be achieved, and should be a key consideration within Transport Assessments, as stated in Policy T4 B of the ItP London Plan. Recommend the SPD states the importance of a Healthy Streets focus within Transport Assessments. Reference should be given to ItP London Plan Policy D8 Public Realm which covers Healthy Streets principles and the requirements for development plans in relation to public realm.</p> <p>The SPD does not currently mention the possibility for public realm contributions—this should be included and give consideration to inclusive design, as well as pedestrian movement planning and the use of Pedestrian Comfort Guidance as part of Transport Assessments.</p> <p>Welcome the requirement for Delivery and Servicing Plans (DSPs) on large developments and the encouragement of DSPs on smaller/constrained sites (paragraph 65). The reference to the City Corporation’s Freight and Servicing supplementary guidance is helpful in pointing to further information on this.</p> <p>The table on page 17 is unclear in relation to the threshold for ‘transport infrastructure’. All the other items in this table relate to clear land uses, but this appears to be saying that transport infrastructure itself (for example a new station) must provide a Transport Assessment. Is this understanding correct?</p>	
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10	Daniel Watney LLP	Whilst understand the intent and need behind the review of the document, urges caution in the timing of the implementation of the revised charges given the current COVID crisis, on-going economic uncertainty and so as not to stifle recovery over the course of the next 12 months in particular.	The City Corporation has introduced developer flexibility in relation to CIL payments in response to Covid, deferring payments until 60 days after July 2021. In line with this flexibility, it is proposed that any changes to the s106 planning obligations SPD should not be implemented until 1 October 2021, with the potential for review prior to October retained in the event that Covid recovery takes place at a slower rate than envisaged in the national road map.
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