

Committee(s)	Dated:
Planning and Transportation Committee	19 July 2022
Subject: Consultation Strategy for the Planning Advice Note: Whole Lifecycle Carbon Optioneering	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1, 5, 7, 10, 11, 12
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	£0
What is the source of Funding?	n/a
Has this Funding Source been agreed with the Chamberlain's Department?	n/a
Report of: Juliemma McLoughlin, Executive Director, Environment	For Information
Report author: Rob McNicol, Environment Department	

Summary

This report provides information on the consultation strategy for the Whole Lifecycle Carbon Optioneering Planning Advice Note. It sets out the consultation requirements for this type of document as well as summarising the bespoke approach that is being taken for this Planning Advice Note.

Recommendation(s)

Members are asked to:

- Note the report (and Appendix 1 – WLC PAN Consultation Strategy)

Main Report

Background

1. On 7 June 2022, the Planning and Transportation Committee approved the draft Whole Lifecycle Carbon Optioneering Planning Advice Note (WLC PAN) for public consultation.
2. At that meeting, Members suggested that the WLC PAN should be widely consulted on, and feedback should be sought particularly from industry experts and other relevant stakeholders. This report and the accompanying

consultation strategy (see Appendix 1) sets out the planned approach to consultation on the WLC PAN, for Members' information.

Consultation and the Planning System

3. The National Planning Policy Framework makes it clear that the planning system should provide “a platform for local people to shape their surroundings”. Plans should be “shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees” (NPPF, paragraphs 15 and 16).
4. In recent years, there has been increasing public interest in the planning system and widespread recognition that communities, businesses and other stakeholders play an important role in informing policies, strategies and planning guidance. This is reflected in the Government's proposal – set out alongside the Levelling Up and Regeneration Bill in May 2022 – to produce new guidance on community engagement in planning, which is forthcoming.

Consultation Requirements

5. The City Corporation has an adopted Statement of Community Involvement (SCI), from 2016. The SCI sets out how the Corporation will consult as it develops planning policy documents (including the Local Plan and Supplementary Planning Documents, or SPDs) and how it will consult communities regarding planning applications. The SCI is being updated and will be brought to the Planning and Transportation Committee in autumn 2022, prior to public consultation. While the approach to consultation for the WLC PAN is coming ahead of the updated SCI, it is intended to be an early exemplar as well as an opportunity to learn from.
6. The SCI does not set out how Planning Advice Notes should be consulted on – however, the aspects of the SCI relating to SPDs has informed the engagement strategy for the WLC PAN. Planning Advice Notes can vary considerably in their substance, and there are no statutory requirements for how to consult on them – therefore bespoke approaches are warranted. The PAN is intended to inform the forthcoming Sustainability SPD, which will also be subject to public consultation.
7. Following the decision by Committee to agree consultation on the WLC PAN, a news release was issued by the Corporation. The draft WLC PAN was also published as part of the committee papers, and therefore from this point stakeholders could provide consultation responses should they wish – however, the formal start to the consultation is the sending of notifications on 6th July 2022.

WLC PAN Consultation Strategy

8. The Whole Life Cycle Optioneering Planning Advice Note will be used by developers and those designing new development. It is a technical document,

standardising the information and process required for an applicant to demonstrate their proposed development is optimising whole lifecycle carbon.

9. This is also an issue that has widespread public interest, including from City residents and others. These stakeholders will want to understand the approach being proposed and to share their views as to whether this aligns with their priorities. For this reason, the engagement strategy includes reaching out to residents groups and facilitating one or more public meetings (depending on interest). We will also publicise the PAN more widely, to seek consultation responses from wider audiences who may be interested in the document.
10. It is important that a wide variety of stakeholders who are involved in developments both scrutinise and buy into the approach set out in the PAN. The consultation strategy therefore involves a number of expert workshops with representatives from specific groups including applicants, land owners, architects, planning consultants, sustainability experts, and others.
11. We also want to learn from others who are involved in this topic and ensure our approach complements the work of other London government bodies and best practice more broadly. The engagement strategy therefore includes meetings with expert organisations such as the UK Green Building Council and LETI as well as London boroughs and the GLA.
12. The consultation was launched on 6 July 2022, with email notifications sent to a wide variety of recipients, including around 500 groups or individuals that are signed up to the Local Plan consultation database as well as a range of other stakeholders. Full details can be seen in the consultation strategy, set out in Appendix 1. (Documents were loaded to the website prior to the notifications being sent, in order to verify information and validate links.) Given the timing of the consultation, it will run across the summer and through to 30 September 2022, giving stakeholders full opportunity to engage. This twelve week consultation period is substantially longer than the four week period that the regulations require for Supplementary Planning Documents. Engagement events will be held in September, to maximise availability, and notifications about those events will be sent in advance of them, once dates have been set.
13. This bespoke approach is additional to following the steps set out in paragraph 2.80 of the SCI. These requirements include making the document available, consulting interested parties, consulting residents, businesses and landowners, and notifying the corporation's Local Plan consultation database.
14. Feedback will be taken from stakeholders at all of the meetings, as well as from written submissions that are sent in, and a consultation statement will be produced alongside the final PAN, setting out how the engagement informed the final document.
15. Stakeholders will be kept notified throughout the engagement, after it is closed, and as the document is adopted.

Corporate & Strategic Implications

16. **Strategic implications-** By seeking widespread and expert feedback on the WLC PAN, the consultation strategy will help to ensure the WLC PAN supports the delivery of the following outcomes in the Corporate Plan:
 - Outcome 1: People are safe and feel safe
 - Outcome 5: Businesses are trusted and socially and environmentally responsible
 - Outcome 7: We are a global hub for innovation in financial and professional services, commerce and culture
 - Outcome 10: We inspire enterprise, excellence, creativity and collaboration
 - Outcome 11: We have clean air, land and water and a thriving and sustainable natural environment
 - Outcome 12: Our spaces are secure, resilient and well-maintained.
17. **Financial implications-** There are no financial implications arising from this report.
18. **Resource implication-** Delivery of the consultation on the Planning Advice Note will be through existing Environment Department staff resources.
19. **Equalities implications-** Communications and events will be designed to be accessible.
20. **Climate implications-** Delivery of the Planning Advice Note will contribute towards meeting the objectives of the Climate Action Strategy. Ensuring buy-in from a wide range of stakeholders, including sustainability experts, will help to ensure the PAN is making the best possible contribution to sustainable development.
21. **Legal implications** -There are no legal implications arising from this report.
22. **Risk implications** - There are no additional new risks arising from this report.
23. **Security implications** - There are no security implications arising from this report.

Conclusion

24. By facilitating widespread and expert engagement, the consultation strategy for the WLC PAN will help to ensure that the WLC PAN is a robust, practical document that can be used to inform development proposals, helping the City to reach its goal of achieving net zero for the Square Mile by 2040.

Appendices

- Appendix 1 – WLC PAN Consultation Strategy

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