

<b>Committee(s)</b>	<b>Dated:</b>
Planning and Transportation Committee	7 <sup>th</sup> March 2023
<b>Subject:</b> Consultation Responses and Finalisation of the Planning Advice Note: Whole Life-Cycle Carbon Optioneering	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	<b>1, 5, 7, 10, 11, 12</b>
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>N</b>
<b>If so, how much?</b>	<b>£0</b>
<b>What is the source of Funding?</b>	<b>n/a</b>
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	<b>n/a</b>
<b>Report of:</b> Juliemma McLoughlin, Executive Director, Environment	<b>For Information</b>
<b>Report author:</b> Kerstin Kane, Environment Department	

### Summary

This report provides information on the consultation responses received for the Whole Life-Cycle Carbon Optioneering Planning Advice Note. It sets out the consultation engagement undertaken, the type of responses received and the subsequent changes that were made to this Planning Advice Note in response to the received comments and feedback.

### Recommendation(s)

Members are asked to:

- Note the report (and Appendix 1 – WLC PAN Consultation Responses, and Appendix 2 – WLC PAN Pre-Design Version)

### Main Report

#### Background

1. On 7 June 2022, the Planning and Transportation Committee approved the draft Whole Life-Cycle Carbon Optioneering Planning Advice Note (WLC PAN) for public consultation. 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.

2. This report and the accompanying consultation statement (see Appendix 1) describe the consultation responses received and the subsequent changes made to the WLC PAN, for Members' information.

### **WLC PAN Consultation Process**

3. 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 life-cycle carbon impacts.
4. 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. (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 was run across the summer and through to 30 September 2022, giving stakeholders full opportunity to engage. This twelve week consultation period was substantially longer than the four week period that the regulations require for Supplementary Planning Documents. Engagement events were held in September 2022, to maximise availability, and notifications about those events were sent in advance.
5. A wide variety of stakeholders were invited to attend engagement sessions, including professionals involved in developments, other London government bodies, organisations such as LETI, and local residents. The engagement sessions comprised:
  - a. Two public sessions to ensure the public interest and their priorities are reflected in the PAN.
  - b. Two sector experts sessions, to allow stakeholders involved in developments to scrutinise and buy into the approach. These sessions were attended by professionals - including architects, planning consultants and sustainability experts-, London boroughs, and other organisations.
  - c. A separate meeting was held with the GLA to clarify the approach and alignment with the GLA Whole Life-Cycle Carbon Assessments Guidance.
6. Feedback from stakeholders was captured at all of the engagement sessions, and additional written submissions were received via email. All feedback was collated and a consultation statement was produced alongside the final PAN, setting out how the engagement informed the final document (Appendix 1).
7. Stakeholders have been kept notified throughout the process, including the engagement period, after it closed, and as the document is adopted.

## **WLC PAN Consultation Responses**

8. Comments and questions raised during the engagement sessions were noted and reviewed. Written consultation responses were received via email. All comments have been collated in a spreadsheet, and responses have been set out for each comment. Due to some duplication and similarity between questions, comments and responses were grouped together where appropriate and presented in the consultation statement (Appendix 1).
9. While a lot of comments were received, on the whole most responses were supportive of the broad approach being taken by the PAN and welcomed it as a way to help guide development and inform decision-making. Most comments were asking for clarification on the role of optioneering in the wider planning process as well as technical clarifications on the methodology and presentation of results. Some feedback raised specific issues, such as the risk of making some options appear better than others by using different carbon factors and assumptions. Amendments were made to the PAN to address these types of comments (see point 10 and 11 for more detail). The three most significant shifts in the updated PAN are:
  - a. A request for independent third-party verification for all schemes that undertake optioneering to ensure the accuracy of the optioneering results.
  - b. A firmer steer on the types of schemes that would be required to undertake the optioneering process. This has now been changed to all major and referable schemes as well as non-major applications that do not retain the majority of the sub- and superstructure.
  - c. The option to be used as the baseline scenario. This was previously the existing building with no intervention, which has now been changed to a minor refurbishment option. This is a more realistic baseline, as in most cases some works will be required to the existing building to keep the building in use.
10. **Planning process** – Part of the specific feedback relates to the planning process. Questions included how the PAN relates to other planning policy and guidance, how planning officers consider the optioneering results in the planning process, and when optioneering is required. Adjustments were made to the PAN to clarify that optioneering takes place at pre-application stage to guide the discussion with planning officers around retention options and the associated constraints and opportunities. The links between the PAN and other guidance documents on whole life-cycle carbon were described in more detail, highlighting that the PAN methodology forms a pre-cursor to the GLA Whole Life-Cycle Carbon Assessments Guidance and is our preferred way to demonstrate that different options were considered early in the process. It was explained that optioneering is done at an early-stage and is based on many assumptions, and therefore the results will only be used to compare options for a specific site and not to make comparisons across different schemes. It was clarified that the lowest carbon option is not automatically the preferred option, and that other sustainability and planning considerations will

be taken into account when evaluating the optioneering results. It was emphasised that only the preferred option needs to be developed further at planning stage.

**11. Technical Clarifications** – Other feedback relates to the technical side of the PAN to better understand how to apply the methodology correctly and how to avoid bias towards the applicants preferred option. The dashboards and figures were revised to capture all necessary information and avoid misinterpretation. Recommendations were made for the use of operational carbon factors and justification is requested if different factors are used. It was emphasised that assumptions need to be the same across all options and clearly stated to prevent bias towards the applicant's preferred option. Clarification on some of the terminology and abbreviations were requested. To address this, the wording of technical information was revised where needed and specific terms were added to the glossary. The desire for a template or digital tool was expressed to allow for standardised visualisation of the optioneering results. Therefore, an Excel template has been prepared to be used by the applicants to input data for the generation of standardised figures. The PAN methodology will be reviewed frequently and updated when needed to reflect the latest industry and technological advances.

### **WLC PAN Design and Formatting**

12. Some changes were made to the structure and layout of the document to improve the flow and allow for easier navigation. This included shifting some background text to the appendices to keep the main body concise and the focus on the methodology. A section on the scope of the document was added at the start. The design has been improved to ensure the document is fully accessible for visually impaired readers.

### **Corporate & Strategic Implications**

**13. Strategic implications-** 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.

**14. Financial implications-** There are no financial implications arising from this report.

15. **Resource implication-** Delivery of the Planning Advice Note will be through existing Environment Department staff resources.
16. **Equalities implications-** The WLC PAN will be published in an accessible format, in line with the requirements for publication of Corporation documents.
17. **Climate implications-** Delivery of the Planning Advice Note will contribute towards meeting the objectives of the Climate Action Strategy and ensure that as relevant applications come forward, the whole life-cycle carbon implications of the development they propose is considered as part of the application process.
18. **Legal implications** -There are no legal implications arising from this report.
19. **Risk implications** - There are no additional new risks arising from this report.
20. **Security implications** - There are no security implications arising from this report.

## **Conclusion**

21. A large number of responses were received from a broad range of stakeholders throughout the engagement process, which were predominantly positive and in support of the optioneering approach. As a result, the PAN remains largely unchanged. Some specific feedback was received in relation to clarifications on the role of optioneering in the wider planning process as well as some technical clarifications, which have been addressed in the updated version of the PAN. The public consultation helped to raise awareness of the optioneering methodology, to achieve buy-in from a range of stakeholders and to fine-tune the PAN to create a robust, clear and practical document. Adopting this document will help the City to reach its goal of achieving net zero for the Square Mile by 2040.

## **Appendices**

- Appendix 1 – WLC PAN Consultation Responses
- Appendix 2 – WLC PAN Pre-Design Version

## **Report author**

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