

Statement of Community Involvement

Consultation Statement

May 2023



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

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

The following methods were used to consult on these documents:

Website. The draft SCI and the draft Developer Engagement Guidelines were made available on the City Corporation's website, with links to the document provided from the website consultation page as well as from the Planning Policy landing page. A web link to the location of the document and invitation to comment was sent to interested parties.

In advance of the formal public consultation, information on the intention to review and consult on a revised SCI and guidance for developers was included in the Outstanding Issues agenda item on the public agenda for the Planning & Transportation Committee. The first notification appearing in February 2022.

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

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

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

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

Summary of Comments and Responses

Statement of Community Involvement

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

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

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

APPENDIX 1

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

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

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

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

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

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

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

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

Developer Engagement Guidelines

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

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

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

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

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

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

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

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

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

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

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

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