# Developer Engagement Guidance

City of London Corporation Planning Advice Note

~~Draft document~~

~~October 2022~~May 2023

# Contents

# 1. Introduction

**Purpose of this Guidance**

1.1. This guidance aims to ensure applicants and developers communicate and engage positively and meaningfully with the City's communities and stakeholders. It sets out the City of London Corporation's (the City Corporation) expectations from early planning stages through to completion of development, including the information Applicants are expected ~~to provide~~ to demonstrate how the engagement they have undertaken has positively influenced and contributed to the evolution of their development proposals. <u>References to 'developers' in this document includes applicants, their agents and developers.</u>

1.2. The City Corporation strongly endorses the view expressed in the National Planning Policy Framework (July 2021, paragraph 39) that early engagement in the planning and development process has significant potential to improve the efficiency and effectiveness of the planning application system for all parties.

1.3. We believe that targeted and meaningful pre-application engagement with local communities and other stakeholders will help to deliver high quality, sustainable development, that contributes to creating and maintaining a vibrant and thriving City of London.

1.4. Well timed and well executed engagement can reduce conflict and build trust by allowing communities to have their say at early and important stages of the development process, as well as provide developers with insight, local knowledge and experiences of the local area and site. It gives an opportunity to develop mutual respect and understanding of developers' objectives and the needs and aspirations of local communities.

1.5. Successful engagement can clarify understanding of planning considerations and ultimately reduce the likelihood of objections, an application being delayed, refused or subsequently legally challenged. This can assist the City Corporation as Local Planning Authority to make more timely and positive decisions and could speed up the planning application process.

## 2.  Who to Engage

2.1.  Applicants and developers are encouraged to engage with a broad range of stakeholders and anyone who would be affected by the proposed development; statutory bodies, interest groups and the local community. Engagement should be inclusive and with as diverse a cross section of the community as possible, upholding the values of equality, diversity and inclusion. Inclusive engagement is proactive engagement – actively seeking to understand the different communities and groups that would be interested in or affected by the development and facilitating their involvement in the engagement process.

2.2.  The City of London has many active community and residents' groups, amenity societies and other interest groups who are regularly involved in consultation or community engagement and have made a significant contribution to planning and development in the Square Mile. However, applicants and developers should ensure that engagement is not limited to established groups and reaches as many of the people who would be affected by the proposed development as possible, including members of the local community who have been less engaged or disengaged. The City Corporation can provide advice to applicants and developers on potential groups to be involved in early engagement.

2.3.  In areas of the City of London that are characterised by a mixture of uses, engagement should be focused to include both residential and non-residential occupiers and groups that represent both local residential, commercial or other non-residential interests. For example, residents' associations, Business Improvement Districts (BIDs), schools, further and higher educational establishments, community, faith and cultural groups. In all cases applicants and developers should ensure that their community engagement is inclusive and does not put in place barriers to participation.

2.4.  The list of groups included in community engagement will vary according to the nature of the proposed development but normally As a minimum, the groups identified in the list below should be included when undertaking community engagement. Applicants and developers should also seek advice from local community groups and the City Corporation's planning team, who may be able to assist in identifying additional community stakeholders, their particular interests and needs, and how best to engage with them.

2.5.    Recommended groups for inclusion in community engagement include:

- Local communities including residents, workers, businesses and landowners in the local area[1] of the development site, having particular regard to how those groups who do not normally get involved in consultation can be engaged

- All immediate neighbours to the development proposal

- Amenity societies

- Community, residents' and tenants' groups and associations

- Ward Councillors

- Business Improvement Districts (BIDs)

- Youth forums and groups

- Local faith and cultural groups

- Special interest groups (for example 'friends of' groups, conservation groups)

- Local Landmarks, Visitors, tourists, and workers (particularly for development within the City's Principal Shopping Centres, the Culture Mile and other relevant areas).

  Developers are advised to have regard to the list of specific and general consultees published on the City Corporation's website in support of the Statement of Community Involvement when identifying potential groups for community engagement.

2.6.    In addition to community engagement, applicants and developers are encouraged to engage with the City Corporation's planning officers through its pre-application advice service, and to consult other relevant statutory and non-statutory consultees.[2]

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[1] The 'local area' should be determined having regard to the scale and potential impact of the proposed development and not defined by a set distance from the development site. Applicants / developers are encouraged to seek advice from officers when unsure whether the scope of consultation is appropriate to the scale and form of the development proposed.

[2] NPPG table of statutory consultees at planning application stage: https://www.gov.uk/guidance/consultation-and-pre-decision-matters#Statutory-consultees-on-applications

## Engaging with Members of the City of London Corporation

2.7.  Developers are encouraged to let ward members know about the scheme and to engage with them appropriately and at an early stage. Ward members should be offered options as to how developers should engage with them. Some may welcome a meeting to understand a scheme, others will prefer to come to public meetings, and others may prefer to receive information in writing or electronically.

2.8.  The roles of ward members, including any positions on City of London Corporation committees, should be respected.

2.9.  Where a meeting is held between a ward member and developer, developers ~~should~~ must prepare a note of the meeting and provide a copy of this to the ward member and the Planning & Development Director. Any such notes will be made available on the public planning register on submission of a planning application.

2.10.  Members who sit on the Planning and Transportation Committee are involved in determining planning applications. It is important that all parties take care when engagement between developers and Members of the Committee take place. ~~They~~ Members are bound by a code of conduct and are obliged to consider all planning applications objectively on the basis of evidence of relevant planning issues presented to them at Committee. Members of Committee must take care not to indicate they have made up their mind on an issue before they have heard and/or read all the evidence, and should make clear that any views expressed are personal and provisional. Further guidance on their role is set out in the City Corporation's Planning Protocol.[3]

2.11.  Where a meeting is arranged between a member and an applicant, the member should ask for an officer to attend and make a record of the meeting.

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[3] ~~https://www.cityoflondon.gov.uk/assets/About-us/planning-protocol-2020.pdf~~ https://www.cityoflondon.gov.uk/assets/about-us/plans-and-policies/planning-protocol-october-2022.pdf

# 3.   When to Engage

3.1.   Developers and applicants should engage with the local community at the earliest possible stage in the design and formulation of their development schemes, and throughout the process of seeking planning permission and undertaking construction. Table 1 sets out a framework to aid developers and applicants to plan what information and activity ~~should~~ could happen when. This is intended to be an iterative process and ~~E~~each development will be different, and timing and information may vary depending on what is relevant and proportionate to the scheme. Where possible developers should liaise with stakeholders on the timing of consultation and engagement events.

| No | RIBA Stage | Core planning tasks (as set out in the RIBA plan of work 2020) | Engagement Expectations |
|---|---|---|---|
| 0 | **Strategic definition**<br><br>(The best means of achieving the client requirements confirmed) | Strategic appraisal of planning considerations | Produce and agree scope of community engagement strategy with City Corporation Planning officers, having regard to the list of potential consultees identified in paragraph 2.5 |
| 1 | **Preparing and briefing**<br>(Project brief approved by the client and confirmed that it can be accommodated on the site | Pre-application advice | Notify identified stakeholders of community engagement strategy and share with City Corporation planning officers |
| 2 | **Concept design**<br>~~(Project brief approved by the client and confirmed that it can be accommodated on the site)~~<br>(Architectural Concept approved by the client and aligned to the Project Brief) | Pre-application advice | Events, workshops, talks, meetings with ~~various~~ identified stakeholders<br><br>Pre-application meeting with officers to explain what form of engagement has been undertaken so far, what the results and how this is influencing the development of the scheme. |

| No | RIBA Stage | Core planning tasks (as set out in the RIBA plan of work 2020) | Engagement Expectations |
|---|---|---|---|
| | | | Opportunity for planning officers to attend and visit events, talks, workshops, and meetings |
| 3 | **Spatial co-ordination** (Architectural and engineering information spatially coordinated) | Pre-application meetings and submit planning application at end of stage 3 | Follow up events, workshops, talks, meetings with ~~various~~ identified stakeholders to feed back the impact of engagement process on the development of the scheme<br><br>Submit developer statement of community involvement<br><br>Inform stakeholders of next key milestones (submission, committee dates, decision) |
| 4 | **Technical design** (All design information required to manufacture and construct the project completed) | Discharge pre-commencement planning conditions | Material changes resulting from design development to parts of the scheme that were influenced by stakeholders should be reconsulted with those stakeholders. Planning officers should also be notified. |
| 5 | **Manufacture and construction** (Manufacturing, construction and commissioning completed) | Comply with planning conditions related to construction | Material changes resulting from the construction stage to parts of the scheme which were influenced by stakeholders should be reconsulted with those stakeholders. Planning officers should also be notified. |

| No | RIBA Stage | Core planning tasks (as set out in the RIBA plan of work 2020) | Engagement Expectations |
|---|---|---|---|
| | | | Inform stakeholders of changes to their environment as a result of construction, for example noise and dust disturbance, road changes that may affect their journeys. Consultation with stakeholders should continue through demolition construction and fit out. Developers should cComply with guidance set out in in Section 2 of the City of London's Code of Practice for Deconstruction and Construction Sites. |
| 6 | **Handover** (Building handed over, aftercare initiated and building contract concluded) | Comply with planning conditions as required | In large developments facilitate ongoing communication between local stakeholders and building management |
| 7 | **Use** (Building used, operated and maintained efficiently | Comply with planning conditions as required | Publish and provide to the City Corporation and key stakeholders post engagement report documenting any further consultation, feedback, and lessons learned. |

*Table 1*

## Timing of Engagement

3.2.    Developers should programme events, presentations, and consultations to ensure that these are as convenient as possible to the intended audience. Where possible, account should be taken of audience availability during key holiday periods, including Summer, school holidays, religious holidays and festivals. Where it is necessary to carry

out engagement over holiday periods, developers should extend consultation periods to ensure the maximum possible engagement from the local community and other stakeholders.

3.3.    Events, presentations, and consultations should be programmed to run at different times during the week, recognising that not everyone will work a traditional 5-day week, or have regular week to week working patterns, to allow the maximum possible engagement. Events should also be programmed at different times of the day to allow the maximum possible attendance, including evening/after work hours meetings.

3.4.    Developers should outline a timeline which highlights key dates for consultation events, key stages in the development process and share when stakeholders can get involved. Advance notice of consultative events and dates should be given several weeks prior to the date to enable stakeholders to plan accordingly to attend or take part. Where key groups or stakeholders are unable to attend a specific meeting, then an alternative date should be proposed, or arrangements made for those groups to be consulted in a different way, for example through online consultation.

# 4.   Engagement Approach

## Community Engagement Strategy

4.1.   Developers should prepare a community engagement strategy, that sets out:

- How the developer will engage with stakeholders

- A list of potential stakeholders

- A timeline for engagement and the likely submission of a planning application and construction of a scheme

- The methods of engagement that will be used, and how these can be tailored for specific groups

- How engagement will be facilitated and feedback captured

- What steps will be taken to ensure engagement will be inclusive and accessible

4.2.   This strategy should be drawn up at the beginning of the pre-application process and should be published and made available to stakeholders. A copy should be provided to the City Corporation's Planning Team.

4.3.   ~~Applicants~~ Developers should notify key stakeholders about the community engagement strategy. This should be used as an opportunity to seek feedback from stakeholders at an early stage about the site and the wider area, to identify how the scheme may be able to support those aspects that stakeholders particularly value, whilst understanding stakeholders' concerns to how those aspects may be lost or harmed.

4.4.   Community engagement strategies should be proportionate. The extent of engagement, the method of communication, who is involved and what is communicated should correlate with the scale of impact of the proposed development.

4.5.   All stakeholder engagement must uphold the values of equality, diversity and inclusion. The community engagement strategy should seek to identify the demographics and characteristics of those who would be affected by or have an interest in the proposed development, how they are affected and assess whether, as a

consequence, this disproportionately impacts particular demographics of some people more than others and should use this to inform the approach to engagement.

## Approach to engagement

4.6.    The content of material used for community engagement should be proportionate to the scale of development and appropriate for the phase of engagement. It is accepted that Engagement Strategies with local stakeholders will vary and be developed on a case-by-case basis but **all** will need to be developed alongside engagement with the Local Planning Authority and statutory consultees. Material presented should provide sufficient information to enable stakeholders to provide meaningful feedback and developers should be willing to provide additional information, where feasible.

4.7.    At an early stage, applicants developers should work with stakeholders to identify any existing uses, features or characteristics of the site and the wider area that stakeholders value, or any deficits in the area such as a lack of open space, and how the proposed development might be able to supportaffect these.

4.8.    At this early stage, developers should also share their high-level vision for the proposed development, informed by the policy requirements in the City Plan, and identify any existing uses on the site that could be affected by the development, and identify with stakeholder input any sensitive uses or characteristics in the wider area that might be impacted by the development.

4.9.    Applicants Developers should explore any alternative development options for the site with stakeholders and show how they have considered re-use and refurbishment of existing buildings.

4.10.   As the scheme progresses, developers should set out the proposed site layout, uses, form and function of the development. They should identify the any positive and any potential adverse impacts of the proposed development, including the impact on the amenity of neighbouring occupiers and communities in the local area, the impact on the local highway network and the public realm, and its contribution to climate resilience, tackling how it will impact on climate change and improveing the sustainability of the City's building stock.

4.11. Where a development proposal would deliver community uses, social infrastructure, or other uses that are likely to be used particularly by local residents and workers, the engagement should explore the design of these spaces in detail in order to ensure it would meet local needs.

4.12. Stakeholders will expect to see how a development will look within its context. At an early stage this may take the form of illustrative sketches. As the scheme progresses, developers should provide visualisations, digital 3D models, images of the development from different views, and – for tall buildings – a physical scale model showing the building in its context.

4.13. ~~Applicants~~ Developers should share information about the s106 and Community Infrastructure Levy contributions (where applicable) and the public benefits that would come about as a result of the development.

4.14. ~~Applicants~~ Developepers should look ahead to how construction might affect the area and seek feedback from stakeholders on how this can be optimised.

4.15. Throughout the engagement, a summary of feedback from earlier engagement should be provided, including revisions to the proposal and how engagement has informed the scheme so far. Details of how feedback can be given during and following engagement events should be provided throughout the process.

4.16. Engagement documents and presentations should be written in plain English and the use of technical jargon should be minimised. Where technical language is required, it should be explained using plain English. Material should be made available in a range of different formats to ensure that it is as accessible as possible, including large print and audio formats. All information should be shared with City Corporation Planning Officers prior to initial engagement.

4.17. When seeking feedback from engagement, overly prescriptive questionnaires or surveys with closed questions should be avoided.

## Professional facilitators

4.18. Professional facilitators or communications experts may be appointed to assist with the programme of community engagement. The use of professional facilitators, who are outside of the applicant's development team, can help to ensure that the engagement material, its format, and questions to ~~participants~~stakeholders, are more balanced and impartial, which can encourage a co-operative process. Professional facilitators are likely to be of the greatest value when engaging with communities at the earliest stage of a scheme's development.

## Engagement charters

4.19. In addition to following this guidance, developers who frequently undertake development in the City of London are encouraged to develop and publish their own charter or set of principles for community engagement that sets out their pledges for achieving meaningful, practical, and popular influence over significant development proposals that they may bring forward in the future. Where these charters exist, the developer should set out in their community engagement strategy how these principles have been implemented.

# 5. Methods of Engagement

5.1. Methods of communication can take many forms and play different roles in the way that stakeholders receive information on development schemes and set the expectations for their input.

5.2. Depending on the scale of development, it is important to include a mix of methods to ensure that communication is inclusive and meets the needs of different audiences, enabling them to participate fully.

5.3. Each scheme should have a tailored approach to the form the communication takes. Consideration should be given to the use of professional facilitators to prepare materials, agenda topics/questions and/or to lead on events.

| Method of engagement | Form of communication | Examples and uses |
|---|---|---|
| Informative | Leaflets, newsletters, notices and notifications on local notice boards and digitally on websites and social media. | Setting out key aspects of a proposed development<br><br>Advising where further information can be obtained<br><br>Information about where stakeholder opinions and comments can be made and fed back |
| Consultative | Interactive digital platforms for example social media, online questionnaires,<br><br>Public exhibitions, digital tours, 3D models<br><br>Meetings with individual representatives of statutory and non-statutory bodies, for example Transport for London or and resident groups. Developers should make use of pre-application services provided by statutory consultees, where relevant | Useful for where targeted online consultation is necessary, for example the geographic or demographic profile of a specific group of stakeholders.<br><br>Useful for responding to specific concern relayed by a specific group, for example local residents. |

| Method of engagement | Form of communication | Examples and uses |
|---|---|---|
| Collaborative | Forums, workshops and/or exhibitions<br><br>(Consider live streaming events or recording them, making them available online for those unable to attend, and providing an alternative method of submitting feedback to broaden the reach of these events) | Useful for generating ideas, informal discussions, debates and to explore options and design solutions |
| Feedback | Use of the above methods, as appropriate | To feedback information on the engagement, including specific comments from stakeholders and changes arising from the engagement |

*Table 2*

## Barriers to Information

5.4.    When designing engagement approaches, care should be taken to avoid putting in place potential barriers to receiving information and participating. Engagement should make all necessary arrangements so that all stakeholders and members of the community are able to fully participate in the process. There may be a need to provide information in languages other than English, and content should be provided using images and diagrams as well as written text and presented in a way that allows for meaningful feedback. Means of engagement that don't rely solely on access to technology should be used, while also recognising the power for technology to reach larger audiences. Engagement events held at a venue should be fully accessible and inclusive. Using non-traditional venues may help to reach disengaged groups. Venues should be able to support appropriate audio and visual aids.

## Application of Engagement Methods to Different Scales of Development

5.5. The tables below set the City Corporation's general expectations of proportionate means of communication and engagement for different scales of development. For non-major development and change of use, City Corporation Planning Officers can advise on whether impacts are likely to be significant and the degree of engagement that would be expected (as these can vary significantly depending on the specific nature of the proposed development).

**Communication with stakeholders**

| Method of Communication | Non-major development (less than 1000sqm GIA additional/ new floor space or 10 new residential units) | Change of use (all proposals where no additional/ new floor space proposed) | Major development (1000-9990sqm + GIA additional / new floor space or 10-49 new residential units) | Large major development (10,000sqm + GIA additional / new floor space or 50+ residential units) | Minor material amendments |
|---|---|---|---|---|---|
| Leaflets / online communication | (✓) (Where the impact of the proposal or impact of construction would have a significant impact on stakeholders) | (✓) (Where the impact of the proposal or impact of construction would have a significant impact on stakeholders) | ✓ | ✓ | (✓) Where changes to the scheme would have a significant impact on stakeholders |
| Interactive Digital Engagement platform | (✓) (Where the proposal or impact of construction would have a significant impact on stakeholders) | (✓) (Where the impact of the proposal or impact of construction would have a significant impact on stakeholders) | ✓ | ✓ | (✓) Where changes to the scheme would have a significant impact on stakeholders |

| Method of Communication | Non-major development (less than 1000sqm GIA additional/ new floor space or 10 new residential units) | Change of use (all proposals where no additional/ new floor space proposed) | Major development (1000-9990sqm + GIA additional / new floor space or 10-49 new residential units) | Large major development (10,000sqm + GIA additional / new floor space or 50+ residential units) | Minor material amendments |
|---|---|---|---|---|---|
| Engage with Ward Councillors | | | ✓ | ✓ | (✓) Where changes to the scheme would have a significant impact on stakeholders |
| Public events (Exhibitions / Presentations / Workshops) | | | ✓ | ✓ | (✓) Where changes to the scheme would have a significant impact on stakeholders |

*Table 3*

**Communication with officers**

| Method of Communication | Non-Major Development (less than 1000sqm GIA additional/ new floor space or 10 new residential units) | Change of Use (all proposals where no additional/ new floor space proposed) | Major Development (1000-9990sqm + GIA additional / new floor space or 10-49 new residential units) | Large Major Development (10,000sqm + GIA additional / new floor space or 50+ residential units) | Minor Material Amendments |
|---|---|---|---|---|---|
| Agree community engagement strategy with pre-application | | | ✓ | ✓ | (✓) Where changes to the scheme would have a significant impact on stakeholders |

| Method of Communication | Non-Major Development (less than 1000sqm GIA additional/ new floor space or 10 new residential units) | Change of Use (all proposals where no additional/ new floor space proposed) | Major Development (1000-9990sqm + GIA additional / new floor space or 10-49 new residential units) | Large Major Development (10,000sqm + GIA additional / new floor space or 50+ residential units) | Minor Material Amendments |
|---|---|---|---|---|---|
| Give Planning Officers the opportunity to attend any events | ✓ | ✓ | ✓ | ✓ | ✓ |
| Share and discuss consultation response and data | ✓ | ✓ | ✓ | ✓ | ✓ |

*Table 4*

# 6. Planning Applications

## Statement of Community Involvement

6.1. Applicants should submit a statement of community involvement (SCI) that sets out details of the pre-application engagement that has been undertaken, the success of the engagement methods used, details of the views expressed and how and to what extent they have shaped the evolution of the scheme. In the cases where views expressed have not influenced or led to changes to the submitted scheme, this should be explained and justified within the SCI.

6.2. The SCI should set out:

- How the community engagement strategy was put into practice during the pre-application stage.

- Details of the engagement methods used and demonstrate the reach and inclusivity achieved using the chosen engagement methods.

- A timeline of when, where and how the community engagement was undertaken, relative to and in parallel with engagement with City Corporation planning officers.

- A comprehensive schedule of the feedback provided by the members of the community that the ~~applicant~~ developer has engaged with during the pre-application engagement process.

- How the scheme has been amended to address this feedback, having regard to the need to accord with development plan policies. E.g. You said ..., We did.... Where no amendments have been made, this should be explained and justified.

6.3. Where a planning application is presented to the City Corporation's Planning ~~& Transportation Committee~~ Application Sub-Committee for determination, the officer report will set out the engagement that the applicant has undertaken with the local community and how it has ~~contributed to~~influenced the proposed development. The submitted SCI will be the basis for this information.

## Post Application Submission Engagement

6.4. The ~~applicant~~ developer should continue to keep stakeholders informed during the consideration of a planning application and should provide updates on any amendments made to the scheme following submission. This sits alongside the City Corporation's own formal planning application consultation processes.

6.5. Community engagement should continue after planning permission has been granted, to provide an update on progress of conditions or other agreements, demolition works, construction works and timescales, and completion and opening, aligning with the City Corporation's. Code of Practice for Deconstruction and Construction Sites.

6.6.    The City Corporation Environmental Health officers can offer more information and Guidance on Engagement during construction works is provided in Section 2 of the City of London's Code of Practice for Deconstruction and Construction Sites.[4]

6.7.    Applicants and developers should ensure that the engagement principles set out in this guidance are applied to any community engagement undertaken during the planning application process and after planning permission has been granted.

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[4] https://www.cityoflondon.gov.uk/services/environmental-health/construction-demolition-and-street-works