

Committee(s)	Dated:
Planning and Transportation Committee	12 December 2023
Subject: Planning for Sustainability Supplementary Planning Document	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1, 2, 5, 11, 12
Does this proposal require extra revenue and/or capital spending?	No
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: Bob Roberts, Interim Executive Director Environment	For Decision
Report author: Kerstin Kane, Principal Planning Officer (Sustainability), Environment Department, Policy & Strategy	

Summary

This report presents the Planning for Sustainability Supplementary Planning Document (SPD), which sets out guidance, requirements and processes for the environmental sustainability aspects of proposed development in the Square Mile. The SPD seeks to achieve an ambitious and high quality outcome for the environmental sustainability of development in the City of London, in line with the Local Plan 2015 and the forthcoming City Plan 2040.

The report sets out the planned public consultation exercise for at least six weeks in spring 2024, subject to approval by the Planning & Transportation Committee.

Recommendation(s)

Members are asked to:

- Approve the draft Planning for Sustainability SPD attached at Appendix 1 for public consultation.

Main Report

Background

1. The City of London Climate Action Strategy (CAS), approved by the Court of Common Council in October 2020, includes a Square Mile Built Environment workstream with high level actions of which Action 7.4 refers to the tightening of standards for new buildings through planning guidance.
2. The London Plan 2021 and the City of London Local Plan 2015 contain policies on sustainable development and climate change as well as circular economy principles. The emerging City Plan sets out further, more ambitious policies to push forward the environmental sustainability of new development. The draft Planning for Sustainability SPD seeks to provide further detailed guidance, requirements and recommendations to applicants on these policies, informed by extensive experience of working on applications in the Square Mile and drawing on best practice from a wide range of sources. The SPD builds on and complements the City Corporation's Carbon Options Guidance planning advice note, adopted in 2023, through providing guidance, requirements and processes in relation to retrofit and reuse of existing buildings and building elements, as well as promoting exemplary standards for new buildings.
3. The guidance provided by the draft SPD is designed to be specific to the City of London's built environment on relevant topics and sets out requirements and recommendations to demonstrate exemplary practice. The SPD was informed by work undertaken by consultants Buro Happold and has been developed by City of London officers.
4. Subject to approval from Planning & Transportation Committee, an engagement exercise will be undertaken in accordance with the City of London Statement of Community Involvement (SCI) and The Town and Country Planning (Local Planning) (England) Regulations 2012, to gather responses to the approach presented in the SPD.

The draft Planning for Sustainability SPD

5. The Planning for Sustainability SPD has been informed by internal consultation and a review of an extensive range of sustainability guidance prepared by other authorities and expert organisations. It provides planning guidance for developers on sustainability topics relevant to the City's built environment and will help developers to meet the requirements of the Development Plan policies that relate to sustainability. The SPD covers approaches to the design, delivery and operation of buildings and spaces with high quality sustainability standards.
6. The document sets out:

- Relevant policy, guidance, and strategies
 - Guidance on addressing the relevant sustainability topics - Retrofit and Reuse, Greenhouse Gas Emissions and Energy Use, Circular Economy, Climate Resilience, Urban Greening and Biodiversity – in the planning process. This includes key actions, key measures and detailed measures for developments, relevant background and case studies to support the design development.
 - Key considerations and requirements – these are grouped by application stage and consist of a list of issues to be considered by applicants for a sustainable development of the highest quality, and how these should be presented in an application.
 - Recommended standards, certifications and guidelines as well as the LETI Retrofit process in appendices A and B.
7. The SPD encourages developers to address sustainability at an early stage to inform the design development for the application proposal. Using this guidance, appointing experienced and creative consultants and designers, and establishing a dialogue with officers of the City of London Corporation will contribute to achieve best practice outcomes.

Public consultation and engagement

8. The City Corporation in collaboration with Buro Happold carried out preliminary engagement in May 2023 with key stakeholders, including statutory authorities like Historic England and Greater London Authority, Business Improvement Districts, and environmental industry experts. This engagement was conducted to seek views and ensure that the SPD was focussed on the most important and relevant issues.
9. The City Corporation will consult on the draft SPD for a period of at least six weeks during early spring 2024, in accordance with the City Corporation’s Statement of Community Involvement (this is a longer timeframe than the statutory consultation period for a SPD of four weeks, as required by the The Town and Country Planning (Local Planning) (England) Regulations 2012). A comprehensive engagement plan will be developed for the SPD to include residents, businesses, workers, consultants and other relevant stakeholders. Copies of the SPD and any other relevant documents will be made available on the City Corporation’s website as well as physical copies in the locations specified in the City Corporation’s SCI. The consultation will include:
- Public meetings to introduce and receive feedback on the SPD
 - Publish the SPD on the City Corporation’s website
 - Material for onward distribution by City Corporation Members
 - Use of City Corporation social media channels
 - Use of the City Corporation’s Commonplace platform for online consultation
 - Emails to stakeholders and those signed up to the Corporation’s planning consultation database
 - Workshops with industry professionals.

10. The aims of the public consultation are:

- To obtain feedback from stakeholders on the draft SPD and use that feedback to improve the document and inform the final version
- To ensure stakeholders are aware of the SPD and use it to inform development proposals
- To seek broad consensus, where possible, from stakeholders and experts for the final SPD to support a consistent high standard for new development.

11. A Sustainability Appraisal/Strategic Environmental Assessment screening will be conducted to determine whether a full assessment is required. Since the SPD will provide further guidance to policies in the adopted City Plan, a full assessment is normally only required in exceptional circumstances. The Sustainability Appraisal screening will be published with the SPD during the public consultation.

12. Following the public consultation, the SPD will be revised and brought again to the Planning and Transportation Committee for approval in 2024, along with the Sustainability Appraisal screening/full assessment and a consultation statement setting out who was consulted, the main issues raised, and how those issues have been addressed in the SPD. Once the SPD is adopted it will become a material consideration in the determination of planning applications.

Corporate & Strategic Implications

13. **Strategic implications-** The consultation strategy will help to ensure the Planning for Sustainability SPD supports the delivery of the following outcomes in the Corporate Plan:

- Outcome 1: People are safe and feel safe
- Outcome 2: People enjoy good health and wellbeing
- Outcome 5: Businesses are trusted and socially and environmentally responsible
- 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 consultation on the SPD will be through existing Environment Department staff resources.

16. **Equalities implications-** Section 149 of the Equality Act 2010 requires that the City Corporation, as a public authority must, in the exercise of its functions, have due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The characteristics protected by the Equality Act are age, disability, gender, reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation.

Communications and events will be designed to be accessible. An Equality Impact Assessment (EqIA) screening of the draft SPD has been undertaken to evaluate the implications for people with protected characteristics. The EqIA screening concluded that a full Equality Impact Assessment is not necessary because none of the nine protected characteristics demonstrated a negative or adverse impact resulting from the implementation of the proposed Planning for Sustainability SPD. The EqIA screening is attached as Appendix 2.

17. **Climate implications-** Delivery of the SPD 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 SPD is making the best possible contribution to sustainable development.
18. **Legal implications** -There are no legal implications arising from this report. The SPD is being developed in line with the requirements of The Town and Country Planning (Local Planning) (England) Regulations 2012. The Levelling-up and Regeneration Act 2023 received Royal Assent on the 26th of October 2023. This Act introduces changes to the plan making system but the dates for the initial commencement of the relevant sections is yet to be appointed, meaning these sections don't yet apply. Once the relevant sections are commenced, local planning authorities will no longer be able to produce supplementary planning documents. It is unlikely that the relevant sections will be commenced before this SPD is adopted and whilst the legislation allows the Secretary of State to make transitional arrangements, we don't yet know what these will cover and how they will deal with SPDs which have already been adopted or are in the process of being made. In the event that a date is appointed before the SPD is adopted, it is likely that the SPD could still be treated as a material planning consideration and officers consider it will still provide useful guidance to inform the planning process.
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. This report presents Members with the draft Planning for Sustainability SPD and seeks approval for the public consultation strategy including expert

engagement which will help to ensure that the SPD is a robust, practical document. Subject to public consultation and approval by this Committee, the SPD will be published and will become a material consideration in the determination of planning applications, helping the City to reach its goal of achieving net zero for the Square Mile by 2040.

Appendices

- Appendix 1 – Planning for Sustainability Supplementary Planning Document
- Appendix 2 – Equality Impact Assessment Screening

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