

Committee(s): Planning and Transportation Committee	Dated: 21/01/2025
Subject: Planning for Sustainability Supplementary Planning Document	Public
This proposal a) delivers Corporate Plan 2024-29 outcomes (see list below) b) provides statutory duties c) provides business enabling functions	
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: Katie Stewart, 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).

The purpose of the Planning for Sustainability SPD is to provide guidance on how applicants should approach environmental sustainability in their developments through the planning application process. It provides detail and guidance on how to fulfil policies of the current Local Plan, as well as emerging policies such as the City Plan 2040. Specifically, it:

- Sets out the key approaches the City of London Corporation is targeting on different sustainability themes.
- Identifies a list of key actions.
- Provides guidance on what, how and when relevant sustainability aspects should be considered during the planning application process.
- Provides a collation of relevant recommended standards, certifications and guidelines.

Following approval by this committee in December 2023, a public consultation exercise was conducted from March to May 2024. A number of responses were received, all of which have been considered by officers. Most responses welcomed the Planning for Sustainability SPD and supported its aims. The SPD has been updated in response to comments received and is now presented to this committee for adoption.

Recommendation(s)

Members are asked to:

- Approve the adoption of the Planning for Sustainability SPD attached at Appendix 1.

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 Corporation Local Plan 2015 (the Development Plan) contain policies on sustainable development, circular economy, climate resilience and greening and biodiversity. The emerging City Plan 2040 sets out further, more ambitious policies that drive environmental sustainability.
3. The Planning for Sustainability SPD was drafted with the support of Buro Happold. It seeks to support these policies with further guidance and recommendations. It has been informed by extensive experience with applications in the Square Mile, drawing on industry best practice, and extensive consultation with a wide range of stakeholders. It builds on and complements other City Corporation policies and strategies, such as the CAS, Carbon Options Guidance Planning Advice Note (PAN), Biodiversity Action Plan (BAP), Local Area Energy Plan (LAEP), and the Circular Economy Framework.
4. 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 sustainability issues.
5. The draft Planning for Sustainability SPD was approved by the Planning and Transportation (P&T) Committee for public consultation on the 12 December 2023. Formal public consultation was conducted from Monday 18 March to Friday 17 May 2024.
6. Further informal engagement with expert stakeholders was conducted from August to December 2024 to finalise technical detail in the draft SPD in response to feedback received in the formal consultation period.
7. The SPD has been developed alongside the City Plan 2040, the City Corporation's emerging new Local Plan, which will replace the Local Plan 2015 upon its adoption. The guidance and approaches set out in the Planning for

Sustainability SPD have been carefully shaped to ensure that they support the implementation of both the adopted Local Plan and the emerging City Plan (upon its adoption). The SPD is clear that it applies to the adopted Development Plan.

8. The SPD has been updated to reflect changes to the NPPF made on 12 December 2024

The Planning for Sustainability SPD

9. The draft Planning for Sustainability SPD has been informed by internal and external consultation. It applies to all major and minor applications for new buildings, refurbishments and retrofits. It provides detail and guidance for applicant teams on how to fulfil sustainability policies in the Development Plan.

10. The draft SPD is divided into five thematic chapters that focus on the environmental sustainability of the City's built environment. The five topic chapters are:

- Retrofit and reuse
- Greenhouse gas emissions and energy use
- Circular economy
- Climate resilience
- Urban greening and biodiversity

11. Each topic chapter:

- Sets out the key approaches the City Corporation is targeting on different sustainability themes.
- Identifies a list of required and recommended key actions.
- Provides guidance on what, how and when relevant sustainability aspects should be considered during the planning application process.
- Provides a collation of relevant recommended standards, certifications and guidelines.

12. In addition to guiding applicant teams, this SPD is also for the use of City Corporation officers, decision makers and stakeholders.

Public Consultation

13. Formal public consultation was conducted from Monday 18 March to Friday 17 May 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 Town and Country Planning (Local Planning) (England) Regulations 2012.

14. During the consultation period a range of engagement methods were used, including publication on the website, physical copies were available in City libraries, and consultation was promoted through social media channels, emails to the Local Plan Consultation Database, Climate Action Bulletin, and City

Resident Newsletter.

15. A 'Planning for Sustainability SPD' webpage was set up on the online engagement platform 'Commonplace' to share contents on the SPD and provide an opportunity for the public to submit feedback.
16. Two public consultation events were held in March (online and in person), two in person expert roundtable workshops were held in May, and two in person meetings with the CPA were held in June and August 2024.
17. Approximately 39 responses were received from organisations and individuals. This is in addition to comments collected at consultation events.
18. The responses support the preparation of the SPD and its ambition to support sustainable growth in the City. The draft SPD was considered to align with both NPPF and London Plan policies. Further detail about the consultation methods, consultation events, and consultation responses are included in Appendix 2 – Consultation Statement.
19. All public consultation responses have been reviewed by officers. Consultation responses informed a thorough review of the document to ensure clear and consistent language. Amendments were made to all sections. Further engagement with industry experts was conducted to inform technical detail in key areas of the SPD.
20. Key areas of changes, as raised by public consultation responses, include:
 - Ensuring requirements and recommendations are clearer. The SPD was reviewed to ensure that requirements referenced as 'must' are mandatory as required by the Development Plan (City Plan 2040 upon its adoption/London Plan 2021). Requirements referenced as 'should' are strongly recommended, as applied on case-by-case basis where they constitute a significant opportunity to drive sustainability. These requirements are outlined in Chapter 1. The key actions in each topic chapter were revised to clearly demonstrate what key actions are required to positively address the City Corporation's policy framework, and what key actions are strongly recommended to develop exemplary schemes.
 - A revised retrofit definition. In Chapter 3, the definition of retrofit is updated to 'the upgrading of a building in relation to the installation of new building systems or building fabric to improve efficiency, reduce environmental impacts and/or adapt for climate change. A retrofit should retain and reuse at least 50% of the existing building(s)' superstructure (by mass). The SPD includes revised definitions of 'light retrofit', 'deep retrofit', 'retrofit with new build' and 'new build'.
 - Clarification on the NABERS UK 5* minimum target to major applications. NABERS is a performance-based rating scheme that measures the energy consumption of a building. The challenging NABERS UK 5* target rating requirement will be applied to new major office developments, while retrofitted

office buildings will be required to achieve a 4* rating. The guidance aligns the planning application process with the NABERS UK Design for Performance agreement and the ongoing reporting process.

Further guidance on operational energy reporting for non-office developments is also included in Chapter 4 to capture developments that are not required to achieve NABERS certification.

Further consultation was conducted with industry experts to ensure the technical detail on NABERS is implementable.

- Introduction of embodied carbon benchmarking as recommended by industry experts. Embodied carbon benchmarks, aligning to GLA whole life-cycle carbon benchmarks, are introduced in Chapter 4. It was determined that introducing benchmarks in the SPD would offer a softer approach than targets, which could be considered in the future. Developments are already required to report against these benchmarks in Whole Life-Cycle Carbon Assessments, therefore, the introduction of embodied carbon benchmarks won't require further reporting. A third-party review is recommended to confirm consistency in the application of the benchmarks.

Further consultation was conducted with industry experts to ensure the technical detail on embodied carbon benchmarks is implementable.

- Introduction of wider environmental benefits in Chapter 4. All high carbon impact developments will be expected to provide wider environmental sustainability benefits if they do not achieve the GLA embodied carbon benchmark at planning stage. These benefits should be proportionate to the level of carbon impact and take advantage of any opportunities of the site for contributing to substantial sustainability improvements in the locality. This could include implementing priorities of the LAEP, supporting sustainable transport modes, developing material passports, implementing climate resilience measures and/or urban greening infrastructure in the local area.

Further consultation was conducted with industry experts to confirm the environmental benefits approach is implementable.

- Further guidance on pre-redevelopment audits and pre-deconstruction audits. Consultation feedback requested further guidance and templates for pre-redevelopment and pre-demolition audits to improve consistency. Pre-demolition audits were reframed to pre-deconstruction audits to reflect the focus on retention and reuse. The draft guidance, included in Chapter 5, draws upon GLA Circular Economy Statement guidance and introduces City-specific and best-practice guidance. The guidance encourages developments to embed circular economy principles and reuse opportunities into early design concept to create an improved basis for retention and reuse.

Further consultation was conducted with industry experts to confirm the pre-redevelopment audit guidance and pre-deconstruction audit guidance is implementable.

Strategic Environment Assessment (SEA) and Habitat Regulations Assessment (HRA) Screening Opinions

21. LUC, on behalf of the City Corporation, drafted the SEA and HRA Screening Opinions. The SEA Screening Opinion considered whether a Strategic Environment Assessment (SEA) should be undertaken for the SPD. It concluded that the SPD is unlikely to have significant environmental effects and that a full SEA is therefore not required. The HRA Assessment Screening concluded that the SPD would not adversely affect any 'European Site' in accordance with the Habitat Regulations (HR) 2017.
22. To meet the requirements of the SEA and HR Regulations, the views of three statutory consultees (Natural England, Historic England and the Environment Agency) were sought during a five-week consultation period between 27 February and 2 April 2024. All statutory consultees note the findings of both the SEA and HRA Screening Opinions, and that a full SEA and HRA is not required.
23. Further information about the SEA and HRA Screening consultation is included in Appendix 2 – Consultation Statement. The SEA Screening Opinion is included as Appendix 4 and the HRA Assessment Screening is included as Appendix 5.

Corporate & Strategic Implications

24. Strategic implications – the Planning for Sustainability SPD is in line with the aims and objectives of the Corporate Plan 2024-2029. The SPD supports the delivery of the 'diverse engaged communities' outcome as a meaningful public consultation process was conducted with resident and worker communities to inform the delivery of this SPD. This SPD delivers the 'leading sustainable environment' outcome by encouraging developments to support the delivery of the CAS square mile net zero target, embed circular economy principles, and deliver climate resilience and biodiversity measures.
25. Financial implications – none
26. Resource implications – none
27. Legal implications – the Planning for Sustainability SPD has been developed in accordance with the requirements of Town and Country (Local Planning) (England) Regulations 2012 and other relevant legislation.
28. Risk implications – none
29. Equalities implications – the Planning for Sustainability SPD will contribute to the delivery of the City Corporation's Public Sector Equality Duty 2010. An updated Equality Impact Assessment (EqIA) screening of the final SPD was 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 3.

30. Climate implications – the Planning for Sustainability SPD is an output of the Climate Action Strategy. It supports the delivery of CAS commitments in the Square Mile to achieve net zero by 2040 and improve the City’s climate resilience measures.

31. Security implications - none

Next steps

32. An adoption statement will be prepared in line with the Town and Country Planning Regulations.

33. It is expected that the SPD will be adopted within a few weeks of the decision date of Committee, and the final SPD and adoption statement will be made publicly available.

Conclusion

34. The City Corporation is grateful to all internal and external consultees, individuals and organisations for their responses to the draft SPD. The various comments and feedback were invaluable in the development of the final SPD.

35. This report presents and updates the Committee on the draft Planning for Sustainability SPD including setting out the purpose, themes and structure of the SPD. It details the formal public consultation exercise undertaken between March – May 2024 and how this has informed the latest version of the SPD. The Planning for Sustainability SPD has been broadly welcomed during the public consultation and is recommended for approval.

36. If approved by the Planning and Transportation Committee, the SPD will be adopted, published and will become a material consideration in the determination of planning applications.

Appendices

- Appendix 1 – Planning for Sustainability Supplementary Planning Document
- Appendix 2 – Planning for Sustainability SPD - Consultation Statement
- Appendix 3 – Planning for Sustainability SPD - Equality Impact Assessment
- Appendix 4 – Planning for Sustainability SPD - SEA Screening Opinion
- Appendix 5 – Planning for Sustainability SPD - HRA Screening

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