

Appendix 2 - Planning for Sustainability SPD - Consultation Statement

Introduction

1. The draft Planning for Sustainability Supplementary Planning Document (SPD) was approved by the Planning and Transportation (P&T) Committee for public consultation on the 12 December 2024.
2. The purpose of the Planning for Sustainability SPD is to provide guidance on how applicants should approach environmental sustainability in their developments through the 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 emerging 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.

Background

3. The City of London 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.
4. The engagement program for the draft Planning for Sustainability SPD was approved by the P&T Committee on the 12 December 2023. It was determined that the City Corporation would 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 Town and Country Planning (Local Planning) (England) Regulations 2012).

Public and Stakeholder Consultation

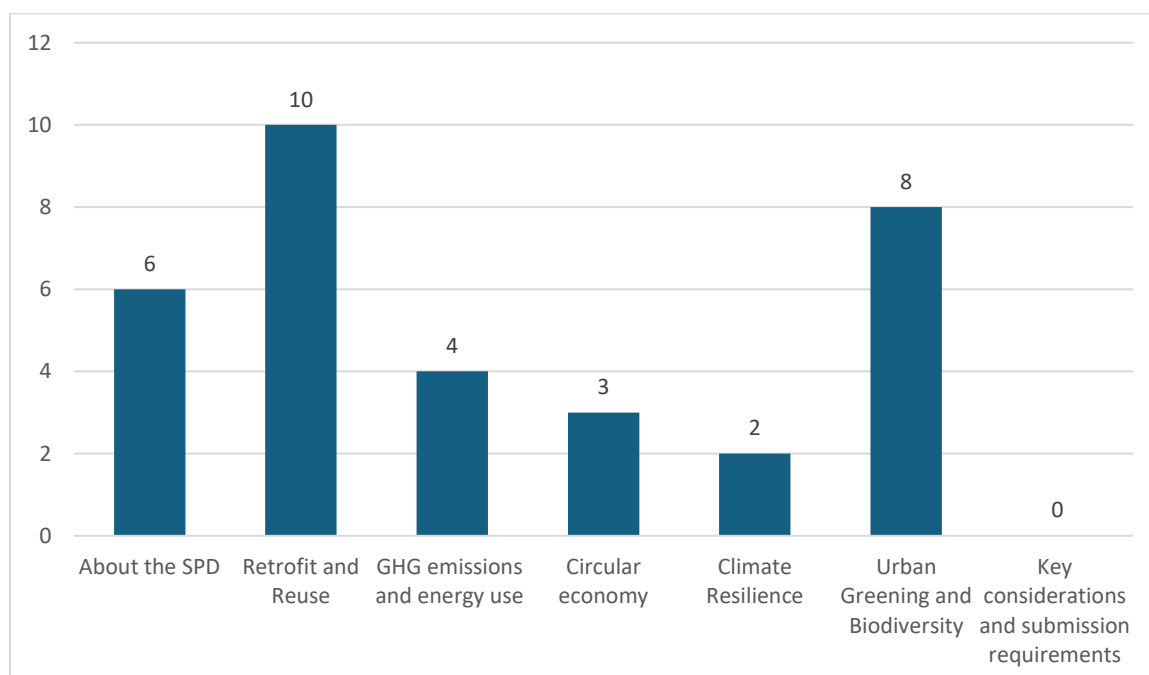
5. Public consultation on the draft Planning for Sustainability SPD was conducted from Monday 18 March to Friday 17 May 2024.

Consultation methods

6. During the consultation period, a range of consultation methods were used:
7. **Website:** digital copies of the draft SPD and relevant documents (HRA screening and SEA screening reports) were published on the City of London Corporation website.
8. **City Libraries:** Physical copies of the draft SPD were available for inspection over the consultation period during opening hours at the following locations:
 - Guildhall North Wing Reception
 - Artizan Library
 - Barbican Library
 - Guildhall Library
 - Shoe Lane Library
 - Small Business Research + Enterprise Centre
9. **Commonplace:** A 'Planning for Sustainability SPD' webpage was set up on the online engagement platform 'Commonplace'. The landing page included general information about consultation of the SPD. Sub-pages were created to share contents about key topic chapters SPD and provided an opportunity for the public to submit feedback.

Key consultation statistics on the Commonplace platform during the consultation period (18 March – 17 May) were:

- 1,436 visitors – total number of unique visitors (measured as one visitor per day)
- 81 subscribers – number of email addresses that are subscribed to the Planning for Sustainability SPD Commonplace page. Subscribers were sent five news updates to draw people back to Commonplace and remind them to submit consultation responses.
- 21 respondents – number of people who added a response to the website.
- 33 responses – total number of responses. Each respondent could respond to more than one page. Responses per topic chapter:



10. **Email:** Approximately 495 emails were sent to consultees on the planning policy consultation database on 18 March 2024. This included all the statutory consultees and individuals who had registered to receive City Plan updates. The email advised recipients of the launch of the consultation on the draft SPD, included links to the digital copies on the website and the Commonplace page, and details of public consultation events.

Emails were also sent to industry contacts to notify them about consultation of the SPD and invite them to expert workshops.

Appendix 2c lists all that were notified about consultation of the SPD.

11. **Social media:** LinkedIn and Facebook were used to promote consultation of the draft SPD. Social media posts were made on the following dates:
- 13 & 18 March – Launch of public consultation and details of public consultation events
 - 8 April – Focused on the theme of retrofit and reuse
 - 24 April – Focused on the theme of circular economy and greenhouse gas emissions
 - 7 May – Focused on the theme of urban greening and biodiversity
 - 15 May – Reminder of the close of consultation
12. **Climate Action Bulletin:** The bulletin provides subscribers an update on the Climate Action Strategy, events, and other related organisational updates. A digital poster was sent in April which promoted consultation on the draft SPD and included links to the document and the Commonplace platform.
13. **City Resident Newsletter:** Aimed at City residents, this monthly digital newsletter provides residents with updates on community and cultural events, health and wellbeing, the environment and public spaces. The April newsletter promoted consultation on the draft SPD and included links to the document and the Commonplace platform.

Events and meetings

14. Two public consultation events were held on:
- Tuesday 19 March 2024 (6 – 7:30pm) – an in-person consultation event at the Guildhall. Six people attended.
 - Wednesday 20 March 2024 (9 – 10:30am) – a virtual consultation event on Microsoft Teams. Fifteen people attended.
15. Two expert roundtable workshops were held on:
- Thursday 2 May 2024 (9 – 11am) – an in-person expert roundtable at the Guildhall which focused on three topic-chapters of the draft SPD: retrofit and reuse, greenhouse gas emissions and energy use, and circular economy.
 - Friday 3 May 2024 (9 – 11am) – an in-person expert roundtable at the Guildhall which focused on two topic-chapters of the draft SPD: climate resilience, urban greening and biodiversity
16. A meeting was held with the City Property Association (CPA) on Wednesday 5 June 2024 (3:30 - 5:30pm) at the Guildhall. The first half of the meeting focused on the emerging City Plan 2040, the second half of the meeting focused on the Planning for Sustainability SPD and discussed the CPA's consultation response.

17. Feedback during the two public consultation events, two expert roundtable events and CPA meeting were captured and are included in Appendix 2a - Consultation response summary.
18. Following consultation, it was determined that further expert advice was required on key topics raised during consultation. Select experts were invited to further workshops on specific topics:
 - Tuesday 6 August 2024 (10am – 12pm) – an in-person workshop at the Guildhall which focused on ‘circular economy’, particularly guidance on pre-redevelopment audits and pre-deconstruction audits.
 - Monday 12 August 2024 (1 – 3pm) an in-person workshop at the Guildhall which focused on ‘carbon’, particularly embodied carbon targets and the application of NABERS UK ratings.
19. The experts reviewed key changes to the SPD to ensure that the technical detail is implementable.
20. Key changes in the SPD were presented back to the CPA on the 20 September 2024.

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

21. LUC, on behalf of the City of London Corporation, drafted the SEA and HRA Screening Reports.
22. The SEA Screening considered whether a Strategic Environment Assessment (SEA) should be undertaken for the SPD. The SEA Screening concluded that the SPD is unlikely to have significant environmental effects and that a full SEA is therefore not required.
23. The HRA Screening concluded that the SPD would not adversely affect any ‘European Site’ in accordance with the Habitat Regulations (HR) 2017.
24. 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.
25. It is Natural England’s opinion that the SEA and HRA Screening Reports show that no adverse effects will be caused by the SPD. It notes that the City Corporation should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be effected. There are no protected species in the City of London and the Biodiversity Action Plan provides detailed consideration of environmental issues, and includes information about City species, habitats, SINCs etc. The SPD supports the implementation of the BAP and therefore does not adversely impact the plan.
26. The Environment Agency notes the findings of both the SEA and HRA Screening Opinions indicate that a full SEA/HRA is not required.

27. Historic England concurs that the SPD is unlikely to result in any significant effects on the historic environment and does not consider it is necessary to undertake a full SEA.
28. All consultee responses, and the City Corporation's responses are captured in Appendix 2b - HRA and SEA Screening Opinions – Consultee Responses.

SPD consultation responses

29. 39 responses were received from organisations and individuals. This is in addition to comments collected at consultation events.
30. 21 consultation responses were received on Commonplace from the following individuals and/or organisations:

Name	Organisation
Tim Webb	
Chris Fellingham	
Matson	
Galton	
Luke Blaney	
Peter	Rose Associates
Anonymous - 01	
Daniela Catalano	
Craig McDonald	
	London Society
Paul Bentley	City Corporation
Anonymous - 02	
Robert Morris	
Anonymous - 03	
Karti Amrania	SWECO
Tom Matchett	
Suttor	
Prabh Gill	
Gareth Fox	
Brendan	
Michael Priaulx	

Note: Respondents were not required to submit their name. The above names reflect their associated email address. If a name could not be discerned, 'anonymous' is listed.

31. 18 consultation responses were received through email from the following individuals / organisations:

Name	Organisation
Fred Rogers	
Kartik Amrania	SWECO UK
Paul Bentley	City Corporation (Air Quality team)
Giles Charlton	Spacehub
Karen Scurlock	Places for London
Chris Colloff	Thames Water
Katie Lewin	Momentum Transport Consultancy
Dustin Lees	Surrey County Council
Josephine Vos	Transport for London
Charles Begley	City Property Association (CPA)

Harry Scott	Environment Agency
Andrew Moore	Hilson Moran
Jennie Colville	Landsec
Lydia Franklin	Save Britian's Heritage
Michael Priaulx	Swifts Local Network
Michelle Statton	Historic England
Joe Loughrey	Prime Light UK
Peter Rogers	Lipton Rogers

32. To summarise, comments generally aligned to the topic chapters of the SPD. Appendix 2a – Consultation response summaries the comments within the following themes:

- General feedback on the structure and contents
- Chapter 1: Introduction
- Chapter 2: Climate change mitigation and adaptation
- Chapter 3: Retrofit and reuse
- Chapter 4: Greenhouse gas emissions and energy use
- Chapter 5: Circular economy
- Chapter 6: Climate resilience
- Chapter 7: Urban greening and biodiversity

33. 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.

34. 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.

Supporting consultation documentation

Consultation responses are captured in the following documents:

Appendix 2a: summaries comments made in response to the consultation

Appendix 2b: a copy of statutory consultee responses on the HRA and SEA Screening opinions.

Appendix 2c: lists all consultees that were notified about consultation of the Planning for Sustainability SPD.

Appendix 2a - Consultation response summary – Planning for Sustainability SPD

Topic	Recommendations	How it has been addressed
<p>General feedback on the structure and contents</p>	<ul style="list-style-type: none"> I. Support of the production of the SPD and its aspirations and approach to sustainability in the City. II. Forward-thinking guidance is welcomed. III. The SPD aligns with the NPPF and London Plan policies. IV. Case studies in the SPD are useful. <p>Consultation responses recommend:</p> <ul style="list-style-type: none"> I. <u>General review.</u> A general review to check for appropriate use of abbreviations and their application, language and wording II. <u>Alignment with GLA guidance.</u> Greater alignment with GLA guidance (e.g. Circular Economy and WLC). Indicate where targets align or exceed the London Plan requirements. III. <u>Requirements and recommendations.</u> Reviewing the document to be more concise and improve clarity on ‘what needs to be completed/ submitted’, clarity on expectations and explanation of how key measures will be evaluated. IV. <u>Transport.</u> Including transport, which is key to enhancing quality and sustainability in both construction and operation, including visitor trips, and delivery and servicing trips. V. <u>Transport standards.</u> A flexible approach to cycle parking standards and blue-badge provision. 	<p>The SPD was reviewed to:</p> <ul style="list-style-type: none"> I. Ensure, the appropriate use of acronyms and abbreviations, appropriate language and consistent terminology of technical terms. Language was reviewed to adhere to the City Corporation style guide. II. Ensure alignment with GLA guidance. GLA was guidance is referenced where appropriate, but repetition was reduced. III. The introduction includes clarification on policy and document requirements. Requirements referenced as ‘must’ are mandatory, as required by the Development Plan (emerging City Plan 2040 upon adoption/ London Plan 2021). Requirements referenced as ‘should’ are recommended, as applied on case-by-case basis where they constitute a significant opportunity to drive sustainability. IV. Transport matters are more clearly embedded within the key actions and measures of other chapters. The updated Transport Strategy is included in Chapter 2. VI. Key actions are split into ‘required’ and ‘recommended’ and explanatory text is included VII. ‘Demolition’ was reframed to ‘deconstruction’ where appropriate.

	<p>Cycle parking design should be in accordance with London Plan Guidance.</p> <p>VI. <u>Key actions.</u> Including explanatory text on the key actions included to clarify the expectations of applicants and their status as requirements or recommendations.</p> <p>VII. <u>Deconstruction.</u> Reframing 'Demolition' to 'deconstruction throughout the document.</p> <p>VIII. <u>Defining best-practice.</u> Draw on more best practice principles from other national, local and industry approaches. Include reference to emerging industry standards.</p> <p>IX. <u>Co-benefits.</u> Including links between topic chapters.</p> <p>X. <u>Visual aids.</u> Flow-charts and diagrams were recommended as visual aids to clearly illustrate the interdependencies between policy documents, and clearly outline what is expected to be submitted when during the planning process.</p>	<p>VIII. Best-practice case studies are included. References to emerging industry standards such as the UK Net Zero Carbon Buildings Standard pilot are included.</p> <p>IX. Include references to topic chapters, when there are links between the topics.</p> <p>X. The 'Key policies and guidance' checklist at the forefront of each topic chapter was reviewed to highlight applicable policies. Chapter 8 was revised to visually outline document requirements according to RIBA stages.</p> <p>Note:</p> <p>V. As detailed cycle parking and blue-badge standards are included in London Plan Guidance, it is not included in the SPD to reduce repetition.</p>
<p>Chapter 1: Introduction</p>	<p>Consultation responses recommend:</p> <p>I. <u>Future flexibility.</u> Including a sentence on future flexibility and the process to update the documents as sustainability policy moves at pace.</p> <p>II. <u>Requirements and recommendations.</u> The requirements are reviewed to improve clarity on what are considered minimum requirements and what are considered recommended requirement.</p> <p>III. <u>Defining major and minor developments.</u></p>	<p>Chapter 1 was reviewed to:</p> <p>I. Include a sentence that the document will be reviewed and updated as and when relevant changes to overarching policy frameworks require this.</p> <p>II. Include clarification on policy and document requirements. Requirements referenced as 'must' are mandatory, as required by the Development Plan (emerging City Plan 2040 upon adoption/ London Plan 2021). Requirements referenced as 'should' are recommended, as applied on case-by-case basis where they constitute a significant opportunity to drive sustainability.</p>

		<p>III. Include a definition of major application, which aligns with the emerging City Plan 2040.</p>
<p>Chapter 2: Climate Change Mitigation and adaptation</p>	<ul style="list-style-type: none"> The SPD supports and aligns with the emerging City Plan 2040. <p>Consultation responses recommend:</p> <ol style="list-style-type: none"> <u>Rename Chapter 2.</u> Chapter 2 is renamed so that it's clearer it's referring to planning policy. <u>Alignment with GLA.</u> Ensuring policy alignment with London Plan policy, including the Mayor's Transport Strategy (MTS) and Healthy Streets approach <u>Air Quality Strategy.</u> Adding a short section on the City Corporation Air Quality Strategy. <u>Flooding strategies.</u> Including references to the Riverside Strategy, ThamesEstuary 2100 Plan and Strategic Flood Risk Assessment (2023) 	<p>Chapter 2 was reviewed to:</p> <ol style="list-style-type: none"> Rename the chapter from 'Climate change mitigation and adaption' to 'Environmental sustainability policy framework'. Ensure the Mayor's Transport Strategy (MTS) and Healthy Streets approach is referenced in Chapter 2 and throughout the SPD. Include the updated City Corporation Transport Strategy. Introduce a section on the Air Quality Strategy 2025-2030 (draft). <p>Note:</p> <ol style="list-style-type: none"> The recommended flooding strategies are referenced within Chapter 6, Climate resilience.
<p>Chapter 3: Retrofit and Reuse</p>	<ul style="list-style-type: none"> Support for the retrofit first approach. Support for the use of case studies in this section, however it'd be useful for case studies to apply the retrofit definitions. <p>Consultation responses recommend:</p> <ol style="list-style-type: none"> <u>Defining retrofit.</u> <u>Including links.</u> Linking Chapter 3 to Chapters 4 and 5. <u>Whole building retrofit plan.</u> Recommending a 'whole building retrofit plan/ longer term retrofit plan' and the 	<p>Chapter 3 was reviewed to:</p> <ol style="list-style-type: none"> Include revised definitions of retrofit, light retrofit, deep retrofit and retrofit with new build. Revise the 'retrofit first approach' and link the steps to Chapters 4 and 5. Include guidance on whole building retrofit plans to enable future retrofits, adaptive reuse and emerging technologies. This guidance encourages projects to consider a retrofit option that achieves the optimum carbon balance between embodied and operational carbon.

	<p>carbon balance between light/deep retrofit and embodied/operational carbon.</p> <p>IV. <u>Retrofit storage strategy</u>. Clarification on the retrofit storage strategy.</p> <p>V. <u>Pre-demolition and pre-redevelopment audits</u>. Including guidance and templates to reduce variation and improve consistency.</p> <p>VI. <u>Retrofit Historic buildings toolkit</u>. Including further guidance on its application</p> <p>VII. <u>Conditions process</u>. Applying flexibility to the conditions process and when documents are required in the planning process.</p> <p>VIII. <u>Historic Significance</u>. Reviewing language to ensure consistent references to historic significance. Highlight the importance of building repair and maintenance</p> <p>IX. <u>Optioneering and third-party review process</u>: include further guidance</p> <p>X. <u>Retrofit first</u>. Ensure the retrofit first policy is carefully worded to ensure that it does not constrain major projects and surrounding land.</p>	<p>IV. Reframe reference to the storage strategy from a requirement, to encourage applicants to consider potential storage options.</p> <p>V. Guidance for pre-demolition audits and pre-redevelopment audits is included in Chapter 5.</p> <p>VI. Provide further detail from the Retrofit Historic Buildings toolkit, including the heritage retrofit roadmap.</p> <p>VII. Include a note that supporting information can be triggered by conditions, when not practical at planning application stage.</p> <p>VIII. Ensure consistent references to historic significance. Highlight the importance of building repair, maintenance and cleaning.</p> <p>Note:</p> <p>IX. The optioneering and third-party review process is not within the scope of this SPD but will be revised in a review of the Carbon Options Guidance PAN.</p> <p>X. The City Corporation has introduced a retrofit first approach, not a retrofit only approach.</p>
<p>Chapter 4: GHG Emissions & Energy Use – Whole Life- Cycle Carbon</p>	<p>Consultation responses recommend:</p> <p>I. <u>Carbon optioneering</u>. Clarifying the trigger for carbon optioneering.</p> <p>II. <u>Transport and WLC Assessments</u>. In-use transport related emissions should be considered within WLC assessments. Reported transport carbon impacts in the WLC assessment (A2 & C2) should be reported in Transport Assessments (TAs) and Construction Logistics Plans (CLPs).</p>	<p>Chapter 4 was revised to:</p> <p>I. Clarify that the trigger for carbon optioneering is all major developments, as well as minor applications that do not retain the majority of substructure and superstructure (by mass).</p> <p>III. Include guidance that B6 reporting should use a predictive energy modelling method, following guidance such as CIBSE TM54 or NABERS UK.</p>

	<p>III. <u>B6 reporting</u>. Including guidance on how carbon is reported for the B6 element of WLC assessments.</p> <p>IV. <u>Conditions process</u>. Flexibility is applied to the submission of RIBA stage 4 and 6 WLC assessments</p> <p>V. <u>Third party review</u>. Further guidance on the third-party review process for carbon optioneering and WLC assessments.</p> <p>VI. <u>Third party review</u> reports should be publicly accessible.</p> <p>VII. <u>Sustainable Life-Cycle Cost (LLC)</u>. Including further guidance on how it links to WLC (p.20).</p> <p>VIII. <u>Embodied carbon benchmarks</u>. Support for embodied carbon targets, as targets drive change and provide an opportunity for the City Corporation to drive best practice.</p> <p>Opposition to embodied carbon targets, as currently there is not a strong enough dataset to report against targets, particularly for tall buildings. Rather, the focus should be improving accuracy in reporting.</p> <p>Banding/benchmarks is a good stepping stone to setting embodied carbon targets. Benchmarks should use industry benchmarks, apply flexibility, and consider using incentives to drive targets.</p>	<p>V. Include a sentence that carbon options assessments and WLC assessments should be independently reviewed to ensure accuracy and quality assurance.</p> <p>VII. The reference to Sustainability Life-Cycle Cost (LLC) analysis was removed as this is not building upon standard practice in planning.</p> <p>VIII. Introduce embodied carbon benchmarks. The approach aligns with the GLA WLC Assessment Guidance, is a softer approach than setting hard targets, and won't require further reporting. High carbon impact developments will be expected to provide sustainability benefits, which included as a beyond the building measure in Chapter 4-WLC.</p> <p>Note</p> <p>II. The City Corporation aligns to the GLA guidance for WLC Assessments, of which in-use transport related emissions is not reported at this stage. The requirements of TAs and CLPs is outside the scope of this SPD.</p> <p>IV. Flexibility on submission requirements is applied on a case-by-case basis and should be negotiated and agreed during pre-application.</p> <p>VI. It is not a statutory obligation for third party reviews to be publicly available. Publicly published documents are to the discretion the City Corporation Officer, who integrate the results into the Officer's report.</p>
<p>Chapter 4: GHG Emissions & Energy Use –</p>	<ul style="list-style-type: none"> • Support for the inclusion of Minimum Energy Efficiency Standards (MEES) regulations and Carbon Risk Real Estate Monitor (CREEM) decarbonisation pathways. 	<p>Chapter 4 was revised to:</p> <p>I. Ensure that operational carbon is calculated and monitored through NABERs (for office buildings) and TM54 (for non-office buildings).</p>

Operational Carbon

Consultation responses recommend:

- I. Operational carbon is important to capture, monitor, measure.
- II. NABERS target. Clarification of the NABERS 5* minimum target including confirmation it applies to offices only. The SPD should recognise the challenge for retrofits projects achieving 5*. The SPD should align with the Design for Performance agreement.
- III. Operational energy reporting method should be applied to other building types and mixed uses of which NABERS does not apply.
- IV. Sustainable delivery and servicing. Including a key action on sustainable delivery and servicing strategies, and provision of facilities to maximise active travel in development proposals.
- V. Backup power generation. Including a hierarchy chart for the backup power generation options.
- VI. Water efficiency measures. Encouraging water efficiency measures which can reduce operational energy requirements.
- VII. Flexibility in the application of measures. Applying flexibility to measures to allow for deliverability and viability. Measures include the 'Bespoke, optimised energy strategy', BREEAM 'outstanding' rating, exchange thermal load.
- VIII. Incentivising mixed-uses and dispersing commercial occupation rates to ensure efficiency in operational energy.
- IX. Carbon balance. The WLC implications of additional equipment to provide resilience of supply should be acknowledged.

- II. Include further guidance on the application of the NABERS UK target. Guidance confirms the certification applies to offices only and introduces a 4* NABERS target for retrofit projects. The guidance aligns the planning application process with the NABERS Design for Performance agreement and ongoing reporting process.
- III. Include further guidance that non-office developments should use a predictive energy modelling method, in accordance with CIBSE TM54,
- IV. Include a recommended key action to 'Develop innovative approaches to low carbon servicing and servicing access of buildings'.
- V. Include a hierarchy of backup power generation options.
- VI. Include a line that water efficiency measures can reduce operational energy demand, and include a link to Chapter 6, Climate Resilience.
- X. Add a new measure to the infographic: 'Encourage innovative photovoltaic panel materials to maximise opportunities for use.'

Note:

- VII. Flexibility on the requirements and recommendations of the SPD are applied on a case by case basis and should be negotiated and agreed during pre-application.
- VIII. Influencing uses in the City is outside the scope of this SPD.
- IX. Chapter 1 recommends applicants work through all topics to achieve the best-balanced approach. This applies to balancing WLC impacts with resilience of supply.

	<p>X. <u>Encouraging PV</u>. Including a key measure in the infographic that encourages innovative uses of PV panels</p>	
<p>Chapter 5 - Circular Economy</p>	<p>Consultation responses recommend:</p> <ol style="list-style-type: none"> I. <u>Including 'Reuse' and 'recycling' definitions.</u> II. <u>Reframing 'pre-demolition' audit.</u> III. <u>Circular economy reports.</u> Including guidance on the contents, information required, and reporting. IV. <u>Pre-redevelopment and pre-demolition audits.</u> Including guidance and templates to reduce variation and improve consistency. The guidance should include core principles, minimum requirements and aspirational standards. The guidance should clarify whether pre-redevelopment reports should be undertaken independently, and at what stage they should be submitted through the planning process (as per RIBA stages). V. <u>Conditions process.</u> Flexibility should be applied to the RIBA stage 4 circular economy update. VI. <u>Targets and quantification.</u> Further numerical targets and quantification in the circular economy chapter. VII. <u>Demolition strategy.</u> Including a measure encouraging a demolition strategy. VIII. <u>Zero-waste targets</u> should be reviewed. IX. <u>Circular economy principle.</u> The principle 'all new construction must be built in layers' should be reviewed. X. <u>Maintenance and deconstruction strategy.</u> Further guidance and how it would be secured through the planning process. XI. <u>Development coordination team.</u> A City Corporation development coordination team is created to help 	<p>Chapter 5 was revised to:</p> <ol style="list-style-type: none"> I. Include 'reuse' and 'recycling' definitions at the beginning of the chapter. II. Reframe 'Pre-demolition' audit to 'pre-deconstruction' audit, to encourage deconstruction and material reuse over demolition and waste. III. Include further guidance on pre-redevelopment and pre-demolition audits, which 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. Templates are considered a future action outside the scope of this SPD. VI. The pre-redevelopment audit and pre-deconstruction audit guidance encourages developments to set their own quantified targets as applicable to the development. VII. The pre-redevelopment audit is a strategic document, that is considered a demolition strategy. VIII. The zero-waste targets are reframed to 'working towards zero waste' to align with the emerging City Plan 2040. IX. The phrase is reframed to 'All new construction must <u>should</u> be designed and built <u>considering</u> layers.' X. Include further guidance on the 'access, maintenance and deconstruction strategy' which should build an access and maintenance strategy usually prepared by the design team.

	<p>facilitate the exchange of materials between projects.</p> <p>XII. <u>Encourage a portfolio-based approach</u> to encourage material exchange between projects and improve WLC.</p> <p>XIII. <u>Materials data/materials passports</u>. Include further guidance about preparing materials data/materials passports. The City Corporation could consider open-source data sharing and a geographic materials database/Square Mile materials dashboard.</p> <p>XIV. <u>Material exchange platforms</u>. Careful promotion of these platforms to ensure all platforms are supported in an open market.</p>	<p>XII. The pre-redevelopment audit guidance encourages applicants to consider collaboration and coordination opportunities within a portfolio.</p> <p>XIII. The pre-demolition audit guidance recommends the data should work towards material passport-type information. A Square Mile materials database is outside the scope of this SPD but may be considered as a future action.</p> <p>XIV. Material exchange platforms are referenced generally, specific reference to Circuland was removed to encourage as many platforms as possible and an open-source approach.</p> <p>Note:</p> <p>III. The SPD notes that all major applications are required to submit a Circular Economy report in line with GLA guidance.</p> <p>V. Flexibility on submission requirements is applied on a case-by-case basis and should be negotiated and agreed during pre-application.</p> <p>XI. City Corporation resourcing is outside the scope of this SPD, including the formation of development coordination team.</p>
<p>Chapter 6 – Climate resilience</p>	<p>Consultation responses recommend:</p> <p>I. <u>Climate Change Resilience Sustainability Statement (CCRSS)</u>. Include further guidance and requirements, e.g. how should applicants approach, report, and provide mitigation solutions against climate risks?</p>	<p>Chapter 6 was revised to:</p> <p>I. Include guidance on the CCRSS and the BREEAM Wst 05 Credit.</p> <p>III. Align the structure to other topic chapters in the SPD with ‘whole building’ and ‘beyond the building measures’.</p>

	<p>II. <u>Carbon balance</u>. The SPD recognises the additional carbon associated with climate resilience initiatives e.g increased cycle storage and showers, water storage in basements.</p> <p>III. <u>General review of the structure</u>.</p> <p>IV. <u>Flood risk</u>. A review of the Flood Risk section to focus on additional guidance, provide clarity on what SuDS should be prioritised, include reference to tidal flooding risk, reference further flooding policies and strategies, and guidance on Flood Risk Assessments.</p> <p>V. <u>Water Resource Management</u>. A review of the Water Resource Management section to include further measures that developments; should calculate 'actual water' consumption, should maximise the capture of rain and grey water, must ensure water supply network capacity, major developments should achieve an 'excellent' BREEAM rating (or equivalent) in the WAT 01 category, and residential developments must achieve water consumption of 105 litres of potable water per person per day (pp/pd).</p> <p>VI. <u>Building and Overheating</u>. A review of the Building and Overheating Section to encourage shading for ground floor uses, reference to the Cool Streets and Greening Programmes, include microclimate requirements, include a connection between the UHIE and the LAEP and transport mobility, and include weather files and future climate scenarios.</p> <p>VII. <u>Pests and Diseases</u>. A review of the Pests and Diseases section to include further guidance and policy references.</p> <p>VIII. <u>Infrastructure Resilience</u>. A review of the Infrastructure Resilience section to encourage the</p>	<p>IV. The flood risk section was reviewed to reference the SuDS hierarchy in London Plan Policy 5.13, include tidal flooding measures, and references to TE 2100 Plan, Strategic Flood Assessment and other flooding policies, and Flood Risk Assessments</p> <p>V. The Water Resource Management section was reviewed to include the recommended measures.</p> <p>VI. The Building and Overheating section was reviewed to ensure reference to the Cool Streets and Greening Programme, weather files, and thermal comfort guidelines. A connection between the UHIE and the LAEP is introduced.</p> <p>VII. The Pests and Diseases section was reviewed to include reference to the UK Plant Health Database, Invasive Non- Native Species (INNS) listed in Schedule 9 of the Wildlife and Countryside Act 1981 (as amended), the Non-Native Species Secretariat of Great Britain and Ireland, and the London Invasive Species Initiative (LISI).</p> <p>VIII. The Infrastructure Resilience section was reviewed to encourage the use of resilience-based measurement frameworks and reporting standards.</p> <p>Note:</p> <p>II. Chapter 1 recommends applicants work through all topics to achieve the best-balanced approach. This applies to the consideration of additional carbon associated with climate resilience measures.</p>
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	<p>use of resilience-based measurement frameworks and reporting standards and guidance.</p>	
<p>Chapter 7 – Urban Greening and Biodiversity</p>	<p>Consultation responses recommend:</p> <ol style="list-style-type: none"> I. <u>Suggested Greening and Biodiversity measures.</u> Encouraging further greening and biodiversity measures such as green bridges, green houses, urban food farms. II. <u>Urban greening section.</u> Include further guidance on connecting onsite and offsite greening, planting and strengthening urban greening in the streetscape, and landscape future proofing. III. <u>Urban Greening Factor (UGF).</u> The UGF section is revised to clearly outline the difference between CoLC and GLA requirements and clarify whether student accommodation classifies as residential. IV. <u>Biodiversity.</u> The biodiversity section is revised to include further guidance on green roof types, soil protection and soil depths, landscape future proofing requirements, soil protection requirements, embodied ecological impacts. The reference of 'species-specific bricks' is changed to 'swift bricks' to comply with BS 42021. V. <u>Biodiversity Net Gain (BNG).</u> The BNG section is revised in accordance with updated regulations and includes further guidance on the underlying criteria, hierarchy of importance for the delivery of BNG. BNG offsets should be permitted offsite on City Corporation controlled lands or on other portfolio sites within the City. VI. <u>Policies and strategies.</u> Including references to further policies and strategies. 	<p>Chapter 7 was revised to:</p> <ol style="list-style-type: none"> I. Align the structure to other topic chapters in the SPD with 'whole building' and 'beyond the building measures'. Further design measures are included in the 'biodiversity' section which align to the BAP and City Plan 2040. II. The Urban Greening section was reviewed to ensure developments are supported to connect onsite greening into public realm strategies and integrate with offsite greening. III. The Urban Greening Factor section was reviewed to outline the difference between CoLC and GLA UGF requirements. Note the LPG confirms that student accommodation classifies as residential, therefore this clarification is not required in the SPD. IV. The biodiversity section was reviewed to include further guidance on green roof types, soil depths, soil protection, embodied ecological impacts. The reference to 'specific-specific bricks' is changed to 'integral nest bricks, complying with BS 4202'. Swift bricks are not specified, as they are more appropriate for residential development and therefore not appropriate for the City context. V. The BNG section was reviewed to reference the updated regulations. The City Corporation is conducting further research on the implementation of BNG which will include further guidance. The SPD states that the delivery of onsite biodiversity should be prioritised.

	<p>VII. <u>Maintenance and management</u>. Including long-term maintenance and management of greening and biodiversity infrastructure as a key consideration.</p> <p>VIII. <u>Clarify the required reports</u>.</p> <p>IX. The SPD acknowledges the conflict priorities competing for roof space – e.g. balancing urban greening, MEP plant, amenity.</p>	<p>VI. Include reference to the Riverside Strategy (CoLC) and Sustainable Development Framework (TFL).</p> <p>VII. Long-term management and maintenance is included under key approaches and is supported by the document requirements outlined in the point below.</p> <p>VIII. Submission requirements were revised to align with the emerging City Plan, including the Biodiversity Gain Plan (BGP), Habitat Management and Monitoring Plan (HMMP), Operation and Maintenance Plan, Ecological Assessment.</p> <p>Note:</p> <p>IX. Chapter 1 recommends applicants work through all topics to achieve the best-balanced approach. This applies to the consideration of competing priorities such as balancing urban greening with carbon initiatives such as MEP plant.</p>
<p>Chapter 8 - Submission requirements and appendices</p>	<ul style="list-style-type: none"> Support the inclusion of Chapter 8 as a summary of all key considerations and document requirements, applicable to each RIBA stage. <p>Consultation responses recommend:</p> <ol style="list-style-type: none"> <u>Simplification</u> of this chapter to clearly distinguish between minimum and recommend requirements. <u>Validation checklist</u>. A review to ensure the submission requirements aligns to the City Corporation validation checklist. <u>RIBA 0</u>. Include recommendations to help set the brief for design teams. <u>RIBA 1</u>. Include guidance on carbon optioneering process. 	<p>Chapter 8 was reviewed to:</p> <ol style="list-style-type: none"> Visually presenting the key considerations, required and recommended information requirements. Ensure alignment to the validation checklist. Include recommended document requirements in RIBA stage 0 which are encouraged to commence early in concept design. Include changes to RIBA 2-3 to clarify that confirmation of a NABERS UK DfP agreement is required at planning application, 'Be seen' operational modelling and BNG requirements are moved to later RIBA stages, air quality assessment and predictive energy modelling are included. RIBA Stages 4-7 are split; RIBA Stage 4 for detailed design conditions and RIBA stages 5-7 for

	<p>V. <u>RIBA 2-3</u>. Clarifications on NABERS UK, 'Be Seen', operational energy modelling, climate risk mitigation, BNG requirements. Recommend including air quality assessments.</p> <p>VI. <u>RIBA 4-7</u>. Recommend splitting deliverables into typical condition stages. Include further guidance on CCRSS, clarify timing of NABERS UK final certificate. Remove reference to Circuland. Submission to BECD and EPDs should be a required information.</p>	<p>completion/in-use conditions. Detail on CCRSS conditions are included in Chapter 6. Reference to Circuland is removed.</p> <p>Note:</p> <p>VII. The carbon optioneering process is detailed within chapter 2.</p>
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Appendix 2b - HRA and SEA Screening Opinions – Consultee Responses - Planning for Sustainability SPD Consultation

Consultee	Consultee Comments	City Corporation Response
<p>Natural England</p>	<p>It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.</p> <p>It is Natural England’s opinion that the SEA and HRA show that no adverse effects will be caused by the Supplementary Planning Document.</p> <p>We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.</p> <p>We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.</p> <p>Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with</p>	<p>There are no protected species within the City of London due to its highly urbanised nature.</p> <p>The Black Redstart is afforded protection as a Schedule 1 Breeding Species under the Wildlife Conservation Act, 1981. It is expected that outcomes from the Planning for Sustainability SPD will support the protection and growth of the species.</p> <p>The City of London Biodiversity Action Plan (BAP) provides detailed consideration of environmental issues, and includes information about CoLC species, habitats, SINCs etc. The Planning for Sustainability SPD supports the implementation of the BAP and therefore does not adversely impact the plan.</p> <p>Therefore, the recommended information has been addressed and considered in the review of the SPD.</p>

	its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.	
Environment Agency	<p>We recommend an objective is included to protect and enhance the environment. Indicators should relate to the environmental constraints in your local area. This may include flood risk, including the risk of flooding from a breach in the Thames tidal flood defenses, water quality, and biodiversity. We also recommend your SEA takes account of relevant policies, plans and strategies including your local Strategic Flood Risk Assessment, flood risk strategies, Riverside Strategy, and the Thames River Basin Management Plan.</p> <p>As there are no European sites within the City of London LPA boundary, we have no comments on the HRA.</p> <p>We note the findings of both documents indicated that a full SEA/HRA is not required, however, if submitted alongside the statutory consultation for the City of London SPD (on 18th March) we will provide any comments we have in more detail as part of our response to that consultation.</p>	<p>The purpose SPD is to address key sustainability issues in the City, to protect and enhance the environment. It includes chapters on Climate resilience (including flood risk management and water resource management) and Urban Greening and Biodiversity.</p> <p>Recommendations from the Environment Agency's consultation response to the Planning for Sustainability have been addressed in the review of the SPD. This includes references to the TE2100. City Corporation's Riverside Strategy and Strategic flood risk assessment. The SPD notes that proposed development on riparian sites should maintain flood defences in line with these flood management policies.</p> <p>Therefore the recommended objective and policies are addressed in the final SPD.</p>
Historic England	Agree with the assessment that the document is unlikely to result in any significant effects on the historic environment. We therefore do not consider it is necessary to undertake a SEA of this particular SPD.	Support noted.

Appendix 2c – Complete list of consultees