

Development Plans Team
Environment Department
City of London Corporation
Guildhall
London EC2P 2EJ

By email: PlanningPolicyConsultations@cityoflondon.gov.uk

3 February 2023

Dear Sir/Madam,

Re: Draft Statement of Community Involvement & Developer Engagement Guidance

I am writing on behalf of the City Property Association (CPA), the membership body for the owners, investors, professional advisors and developers of real estate in the City of London. Our full membership list of 150 companies can be found [here](#).

The CPA welcomes the opportunity to comment on the City's draft Statement of Community Involvement (Draft Report 2022) and the Developer Engagement Guidance (Draft Report 2022). We set out our comments on each document below.

Statement of Community Involvement ('SCI')

The CPA considers that early and effective engagement with relevant stakeholders prior to the submission of any planning application is key to positive, sustainable development. The CPA therefore very much supports the City's work on revising the SCI to encourage meaningful community engagement, with a stronger focus on the use of digital technology in this area.

Developer Engagement Guidance ('DEG')

In a similar vein to the SCI, the CPA also supports the development of the detailed DEG, which we consider will provide a valuable resource for developers, the local authority and the community in guiding engagement.

Notwithstanding this, the CPA suggests some minor amendments, as follows:

At paragraph 2.4, the list of groups at paragraph 2.5 is referenced "as a minimum" to engage with when undertaking community engagement. The reference to "as a minimum" is not considered appropriate, because the level of community engagement is linked to the nature and scale of the development proposed. It will not always be appropriate or necessary to engage with all of the groups set out in paragraph 2.5. We suggest that "**As a minimum.....**" is omitted from paragraph 2.4. Such a deletion would be appropriate given the reference to "for example" in paragraph 2.3 and "recommended" in paragraph 2.5.

At paragraph 3.1 of the document, reference is made to planning applications being submitted at the end of RIBA Stage 3. Notwithstanding the RIBA guidance, often in reality planning applications are submitted earlier, even around the end of RIBA Stage 2. The DEG should look to set guiding principles, rather than requirements, as the specifics for each project will vary on a case-by-case basis. Providing the relevant detail at application stage should be about considering the relevant site issues and responding to those, as opposed to meeting a requirement for a specific level of detail (noting that the RIBA Stages themselves are guidance for best practice).

The following amendments to paragraph 3.1 are therefore suggested:

“Table 1 sets out a framework to aid developers and applicants to plan what information and activity should could happen when. Reference to the relevant RIBA stages is provided as guidance only and is not an absolute requirement. Each development will be different, and timing and information may vary depending on what is relevant and proportionate to the scheme.”

The “Approach to engagement” section at paragraphs 4.6 to 4.17, sets out guidance in respect of the level of expected of material to be shared and set out to stakeholders. The CPA broadly supports the approach set out, but the Guidance must acknowledge that there must be flexibility in the approach and there is no one size fits all approach. Early engagement with local stakeholders must for example be balanced against any early engagement with the local planning authority and other statutory consultees. This is particularly the case where early discussions are often influenced by technical and complex assessments, and confidential contractual or financial matters. These considerations of early pre-application engagement must be acknowledged in the Guidance, such that the appropriate strategy can be formulated.

We look forward to the adoption of these documents which we consider will assist in encouraging meaningful engagement in development in the City of London, a topic which we are actively supportive of.

Yours faithfully,



Charles Begley
Chief Executive
Charles.begley@cwpa.org.uk