

Planning Obligations SPD Consultation Statement

Introduction

This document, alongside the engagement summary included at Appendix 1, forms the 'Consultation Statement' under Section 12 (a) of the Town and Country Planning (Local Planning) Regulations, 2012. It sets out the dates and detail of the formal public consultation and informal engagement carried out with regard to the Planning Obligations SPD.

Appendix 2- 'What We Heard' document sets out the detail of the informal engagement which took place in Autumn 2025.

Scope of Regulation 12/13 consultation

The draft SPD and supporting material was 'made available' from 16 March to 15 April 2026. The documents were made available at the City Corporation's principal offices, the libraries within the Square Mile and on the Corporation website: [Planning guidance - City of London](#). The website also contained links to the 'Konveio' consultation portal.

All persons registered on the Corporation's local plan database were informed of the consultation by email, including information on where to find the SPDs and supporting documents.

A series of consultation events also took place as per the below. These events were also promoted and publicised via social media, City Resident newsletters, posters and leaflets and via other networks.

- 24 March 9-10:30am [SPD information session\(external link\)](#) at Aldgate Centre EC3N 1AB
- 31 March 6:30-8pm [Residents session\(external link\)](#) at Artizan Street Library E1 7AF
- 1 April 10-11am Online session for major planning applicants and developers
- 8 April 9-10:30am [Heritage session\(external link\)](#) at St Ethelburga's Centre for Reconciliation and Peace Venue EC2N 4AG

Summary of main issues raised

A total of 15 representations and 138 comments were made in relation to the Planning Obligations SPD. These are all contained in the table at Appendix 1 as well as a City Corporation response. The main issues raised were:

Statutory Tests

- Several representations raised concerns that planning obligations should not be applied as a rigid framework, and that due regard must be given to the statutory tests set out in Regulation 122 of the CIL Regulations.

Culture

- Widespread unease at the complexity of the formula for calculating cultural contributions and the impact on viability that the higher ratios would have. Several respondents made similar comments, and these were best compiled in the City Property Association representation (R13_29). There was also anxiety with the concept that cultural contributions could be increased based on the wider planning balance.
- The evidence for the formula was questioned as it is based on three schemes from a range of twenty.
- Noted that there is not a single formula that would work optimally for all sites and that often the best interventions are rooted in site specific features.
- Suggestions that a simple pound per square metre rate would be more workable.

Transport

- Concern about the cumulative impact of monitoring costs for several obligations (Travel Plans, Delivery and Servicing Plans, Construction and Logistics Plans). It was suggested that digital tools may be able to reduce the officer time in monitoring these obligations.
- Concern that financial contributions for cycle parking may be sought where it is shown that there is no demand
- Support for pooling contributions to deliver area wide improvements such as the A10 corridor

Local Skills, Training and Employment

- Opposition to the fixed target of 15% of goods and services to be procured from Central London Forward based SMEs. It was claimed that this may be difficult to apply in practice and would amount to undue influence in the commercial market.

Heritage

- It was noted that there could be more signposting in the SPD to heritage guidance in the Local Plan or the Celebrating Heritage SPD, as well as some more details on the types of historic environment obligations that may be sought.

Viability Evidence

- It was suggested that the inputs into the viability assessment are too generic and not specific to construction in the City. This then may cause the assessment to overstate the viability position for larger and more complex sites.

Community Infrastructure Levy

- Support for a review of CIL phasing with the aim to secure a more flexible instalment policy

How those issues have been addressed in the SPD

The City Corporation has considered the representations made as at Appendix 1 and has made some changes to the final adoption version of the Planning Obligations SPD to cover the matters raised. These matters include:

Culture (chapter 11)

- The culture formula at page 21 has been removed and replaced with a flat payment in lieu rate of £23/sqm (GEA), levied on the uplift in floorspace. This has been balanced with a reduction in the Employment and Skills contribution from £35 to £23, so that the overall impact on viability is neutral. In fact, there is a technical betterment to the viability position.
- The text in paragraphs 11.2 to 11.7 has been updated to reflect the change from a formula to a flat rate for payment in lieu contributions
- The standard requirements for on site provision at paragraph 11.9 (now paragraph 11.6) has been updated with additional details that should aid delivery and are specific to different cultural typologies.

Transport

- Additional wording has been included to clarify that contributions towards short-stay cycle parking will only be sought where an identified shortfall results in impacts that require mitigation in order to render the development acceptable in planning terms.

Statutory Tests

- Additional wording is included to clarify that the statutory tests will be applied to all planning obligations sought in relation to an individual application, including those set out in the SPD. Planning obligations will be assessed on a bespoke and proportionate basis, having regard to the specific circumstances of each application.

Appendix 2- What We Heard document, Autumn 2025

<https://www.cityoflondon.gov.uk/assets/Services-Environment/SPD-Autumn-Engagement-What-We-Heard.pdf>

Appendix 3 - Strategic Environmental Assessment Screening Report - Consultation Responses

From:

To:

Date: 11/25/2025 10:17:17 AM

Subject: [REDACTED] REF: Celebrating Heritage Supplementary Planning Document -
SEA Screening

THIS IS AN EXTERNAL EMAIL

Your Ref: Celebrating Heritage SPD - SEA Screening

Our Ref: 531963

Dear [REDACTED]

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has no comments to make on the SEA Screening report for the Celebrating Heritage SPD for the City of London Council.

The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.

If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

Yours sincerely

[REDACTED]
Consultations Team
Natural England
Worcester Team

Enquiries line: 0300 060 3900

Email: consultations@naturalengland.org.uk

www.gov.uk/natural-england



Please be aware there is a [PLANNING DELIVERY NEWS](#) page that highlights planning casework news. Please check this regularly.

This page also includes a link to the HR/HO pipeline, Area Team MI data as well as regular Hub statistics. This is your weekly source of planning updates and performance data, which is located within the Planning

Performance updates section.

Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see [here](#)

For further information on the Pre-submission Screening Service see [here](#)

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From:



Date: 11/25/2025 10:08:31 AM

Subject:

REF: Office Use Supplementary Planning Document - SEA
Screening

Attachments: [Natural England Local Plan Advice Note.docx](#)

THIS IS AN EXTERNAL EMAIL

Your Ref: Office Use SPD - SEA Screening

Our Ref: 531961

Dear

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has no comments to make on the SEA Screening report for the Office Use SPD for the City of London Council.

However, please find attached Natural England's Local Plan Advice Note.

The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.

If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

Yours sincerely

Operations Delivery

Consultations Team

Natural England

Worcester Team

Enquiries line: 0300 060 3900

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From:

Date: 11/25/2025 10:01:00 AM

Subject: REF: Culture Supplementary Planning Document - SEA
Screening

Attachments: [Natural England Local Plan Advice Note.docx](#)

THIS IS AN EXTERNAL EMAIL

Your Ref: Culture SPD - SEA Screening

Our Ref: 531960

Dear

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has no comments to make on the SEA Screening report for the Culture SPD for the City of London Council.

However, please find attached Natural England's Local Plan Advice Note.

The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.

If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

Yours sincerely

Operations Delivery

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Natural England Advice Note – Local Plans

February 2024

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. This advice note sets out the natural environment issues that Natural England consider should be incorporated in Local Plans to take forward relevant policies of the National Planning Policy Framework.

Information on consulting Natural England on plans and development proposals is set out in [Planning and transport authorities: get environmental advice on planning - GOV.UK \(www.gov.uk\)](#)

		NPPE paragraph
The Spatial Development Strategy		
Vision and Objectives	The Plan should include the natural environment in its long-term vision and objectives for the plan area. These should be based on local characteristics and circumstances and include locally specific goals for nature recovery and enhancement, supported by policies and proposals in the plan.	8(c), 20(d), 123, 181
The spatial strategy and allocating land for development	In setting an overall strategy to guide development and allocate land the Plan should: conserve and enhance the natural environment, including landscapes and green infrastructure (GI) make as much use as possible of previously developed or 'brownfield' land allocate land with the least environmental or amenity value. It should be recognised that some previously developed land is important for biodiversity as it can contain the open mosaic habitats (dataset), a priority habitat.	11, 32, 89, 123, 124(b) (c), 181, 181, 172, 186(a), 187, 188, 191
Biodiversity and Geodiversity		
Designated sites	The Plan should include policies and proposals to protect and enhance biodiversity, including designated nature conservation sites (internationally, nationally and locally designated sites of importance for biodiversity). The direct and indirect impacts of proposed development on designated should be considered, including impacts on water quality and the impacts on air quality from increased traffic, intensive agriculture or industrial developments. The Plan should identify and map local wildlife sites and include appropriate policy for their protection and enhancement, reflecting their role in the wider ecological network and for nature recovery. Criteria-based policies to guide development should include application of the mitigation hierarchy and how the direct, indirect and cumulative impacts of development on designated sites will be addressed. Further information on designated sites is at Designated Sites View (https://designatedsites.naturalengland.org.uk/) . Natural England's Impact Risk Zones (IRZ) on MAGIC maps (www.magic.defra.gov.uk) identify potential development impacts. In some Plan areas strategic mitigation solutions may exist or be desirable to address the cumulative impacts of development on designated sites e.g. recreational pressures or nutrient impacts. Where this is the case further advice should be sought from Natural England and robust evidence will be needed to support any strategic approach.	181, 186(a)(b) (c), 187, 188 and Glossary
Irreplaceable Habitats including ancient	The Plan should protect irreplaceable habitats (including ancient woodland and ancient and veteran trees) from loss or deterioration and seek their enhancement wherever possible. Further advice can be found in Natural England's standing advice- Ancient woodland and veteran	186(c), Glossary

woodland and ancient and veteran trees	trees: protecting them from development.	
Biodiversity Net Gain (BNG)	The Plan should identify and pursue opportunities for securing measurable net gains for biodiversity. This should include setting a percentage target level of provision of at least 10% net gain, higher targets should be supported by evidence. The Plan should also set out the BNG strategy including: requirements for on-site and off-site provision identifying priority opportunities of strategic significance (habitats and areas) for BNG, for instance through mapping ecological networks advising on the metric to use to calculate gains, for example the most up to date version of Defra's Biodiversity Metric. The Plan should also aim to achieve wider environmental gains, going beyond BNG, to include wider natural capital benefits such as improved water and air quality and recreation. Natural England's Environment Benefits from Nature tool can help identify opportunities.	180(d), 185(b), 186(d)
Nature recovery	The Plan should include policies and proposals for nature recovery. It should recognise the potential of a connected network of wildlife-rich habitats to improve biodiversity. For instance the protection and recovery of priority species and habitats and supporting habitats outside designated sites for protected species. Consideration should be given to wider benefits such as carbon capture, flood risk management and enhanced access to nature. The Plan should map local ecological networks, including buffers and wildlife corridors and set out policies and proposals to safeguard and enhance the network, including contributions through development where appropriate. These could draw on Local Nature Recovery Strategies where available.	8(c), 185(a)(b), Glossary
Priority species and habitats	The Plan should protect and enhance priority habitats and species. This should include appropriate protection and restoration of deep and shallow peatlands, found in fen and bog priority habitats that are valuable for biodiversity and as a carbon store. Other priority habitats include upland and lowland heathland, traditional orchards, meadows, woodlands and coastal habitats. Details can be found on the Joint Nature Conservation Committee website and on MAGIC maps (www.magic.defra.gov.uk)	185(b), Glossary
Geodiversity	The Plan should make explicit reference to geological conservation (including protection for geological SSSIs and local geological sites) and the need to conserve, interpret and manage geological sites and features in the wider environment.	180, 175
Landscape		
Designated landscapes	The Plan, including site allocations, should give great weight to conserving and enhancing designated landscapes (National Parks, The Broads and National Landscapes (Areas of Outstanding Natural Beauty)). This should reflect their natural beauty and special qualities (as identified in their Management Plans). Policies should help in furthering the statutory purposes of designated landscapes. Policies can be informed by landscape character and sensitivity assessments. The scale and extent of development should be limited in these areas. The Plan should consider both the direct and indirect impacts of development on the designated landscape and its setting. Policy should guide any development in these areas to meet the highest standards of design and environmental quality and seek opportunities to enhance the landscape and improve access to nature. The Plan should set out a definition of major development to guide the determination of planning applications against the 'major developments test.' Policy should also consider how development will be managed in the setting of a designated landscape, with development being sensitively located and designed to avoid or minimise adverse impacts.	20(d), 180, 182, 183
Wider landscapes	The Plan should include policies and proposals for conserving and enhancing the landscape. The Plan should identify, protect and enhance locally valued landscapes, informed by landscape character assessments.,	129, 135(c), 180(a)(b)

	Policies for development in or adjacent to rural areas and urban fringe should ensure they reflect the character of the countryside, as well as seeking opportunities for enhancement and improved access to nature. Local design codes and guides can set out how development can respond to and enhance landscape character.	
Heritage Coasts	Where relevant, the Plan should identify and include policy protection for defined Heritage Coasts, to retain and enhance their special character	184
Light Pollution and Tranquillity	The Plan should include a policy to reduce light pollution. Lighting can be harmful to wildlife and undermine enjoyment of the countryside or night sky, especially in intrinsically dark landscapes, such as protected landscapes and nature reserves. Where appropriate the Plan should identify areas of tranquillity and include policies to protect them.	191 (b)(c)
Green infrastructure, open space, access and design		
Green Infrastructure (GI)	GI is a network of multi-functional green and blue spaces and other natural features that can deliver a wide range of benefits for people, places and nature. Plans should consider the role of GI strategically throughout the plan area as well as links to adjoining areas. The Plan should address unequal access to natural green space and the needs of different user, age, and socio-economic groups. The Plan should set out a clear vision for delivering GI, including identification of deficiencies in provision and opportunities for new and enhanced GI. Plans can be supported by a GI strategy. GI policy should support and align with other natural environment policies, such as those on sustainable drainage systems, biodiversity, access, active travel and open space protection and enhancement. Plans can make use of the Natural England's Green Infrastructure Framework (GIF) to help prepare a GI evidence base that can support policies, site allocations and local design codes. Specific guidance for plan-makers is provided in the GI Process Journeys . The Green Infrastructure Map can be used to identify inequalities in access to greenspace and plan for new GI. The GI standards can be applied locally in policies and design codes.	20(d), 96,167(c)
Open Space and Local Green Space	The Plan evidence base should include a robust and up-to-date assessment of open space requirements and opportunities, with policies and proposals to remedy deficiencies in greenspace provision, including through land allocation. In assessing greenspace provision, consideration should be given to the quality and accessibility of space, as well as the various uses that may need separate provision such as children's play space, opportunities for connecting with nature, formal sports areas and facilities for groups with a variety of needs. Open space provision can use Natural England's Accessible Greenspace Standards to determine needs based on size, proximity capacity and quality. The Plan should identify, designate and have policies to protect and enhance areas of Local Green Space that are of particular importance to local communities.	88(d), 97(a), 102, 103, 105-107
Public Rights of Way and access	The Plan should have policies to maintain and improve access to nature and enjoyment of the countryside. Policies should be in place to protect and enhance public rights of way, access land and national trails, including the England Coast Path. Policies should provide for better connections and address unequal access to nature to support health and well-being outcomes. The design of new or improved routes should consider a range of modes of access including walking, cycling and horse riding, as well as a range of users including children and older people, different socio-economic groups and people with disabilities.	104
Design	L Natural England's GI Design Guide provides details of what good GI design looks like. The guide is linked to the ten characteristics of well-designed places set out in the National Model Design Code and the National design guide . Landscape and townscape character assessments can also inform good design.	132, 133
Green Belt	Plan policies and proposals should positively enhance land within the	147, 150, 151

	Green Belt. This should include compensatory improvements to environmental quality and accessibility of remaining Green Belt where land is removed from the Green Belt. Green Belt land can often be degraded 'urban fringe' landscapes. Therefore, there will be opportunities to 'green' the Green Belt and deliver environmental benefits such as landscape enhancement, habitat creation and enhancement and improved access to nature.	
Agricultural Land and Soils		
Best and Most Versatile agricultural land	The Plan should contain policies to protect Best and Most Versatile (BMV) agricultural land (Grades 1, 2, 3a). Policies should avoid the loss of BMV land. The Plan should recognise that development has an irreversible adverse impact on the finite national stock of BMV land. Any development proposed on BMV land should be informed by a detailed soil survey. .	180(b)
Sustainable management of soils	The Plan should have a policy for the protection of and sustainable management of soils on development sites. This should set out mitigation measures to minimise soil disturbance and retain as many ecosystem services as possible through careful soil management during the construction process and appropriate soil re-use. The Plan should recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils. The impact of all types of development on soils should be considered. Healthy soils are not only important for agriculture, but soils with high environmental value (e.g. wetland carbon stores such as peatland and low nutrient soils) are also important to ecological connectivity. Development should be supported by soils surveys and management plans - see Defra's Code of Practice for the sustainable use of soils on construction sites.	180(a)
Coast		
Coastal Change	Where relevant, the Plan should consider the implications of coastal change and opportunities for nature and improved access. The Shoreline Management Plan should be used to inform the evidence base for the Plan. Coastal Change Management Areas should be identified with appropriate policies set out for development and to manage the change. Policies should reflect and enhance the character of the coast and maintain the route of the England Coast Path. Opportunities for enhancing biodiversity, landscapes and access to nature should also be secured.	14, 20(b), 176, 177, 178, Glossary
Marine environment	Where relevant, the Plan should have policies in place to ensure effective alignment of the terrestrial and marine planning regimes, for instance in plan areas on estuaries or areas with tidal rivers. This should include reference to the relevant marine plan.	176
Climate Change		
Climate Change	The Plan should contain policies to mitigate and adapt to climate change impacts on the natural environment. The Plan should recognise that climate change mitigation and adaptation and biodiversity loss are interlinked. Many habitats provide essential ecosystem services to allow adaptation to climate change e.g. natural flood management, as well as mitigation e.g. through tree planting and retaining peat as a carbon store. Policies should set out appropriate nature-based solutions for climate mitigation and adaptation such as woodland or wetland creation or peatland restoration. Policies should address water use, promoting the use of sustainable drainage systems (SuDS) and water sensitive design as part of a wider green infrastructure approach. In areas of known water constraint, plans should include policies to manage available resources, such as water efficiency or water reuse measures. Consideration also needs to be given to the likely impacts of climate change on protected sites, habitats and species. See the Climate Change Adaptation Manual, Carbon Storage and Sequestration by Habitat and National biodiversity climate change vulnerability model.	11(a), 20(d), 158 and Glossary

Site Allocations

The strategy for allocating land for development should:

avoid protected sites and apply the biodiversity mitigation hierarchy (NPPF 180a)

give great weight to conserving and enhancing designated landscapes

avoid the loss of best and most versatile agricultural land.

Selecting sites and setting design principles for their delivery should conserve and enhance the natural environment. This includes considering potential impacts and opportunities set out in the table above, as well as the issues set out in the table below secured through planning policy.

Evidence	An appropriate evidence base should be used to support the selection of sites and inform the policies for their delivery. This should include: Landscape and Visual Impact Assessments, Landscape Sensitivity Assessments and Landscape Character Assessments. Soil surveys and mapping (Agricultural Land Classification available on Magic maps) ecological surveys, green infrastructure and biodiversity opportunity mapping.
Assessments	Site selection must also be informed by the relevant environmental assessments. These are: Sustainability Appraisal incorporating Strategic Environmental Assessment: it should be clear how this has informed and provided justification for the sites selected for allocation assessed against reasonable alternatives. Recommendations and findings from the assessments should also be used to inform mitigation measures and design principles for the allocated sites. Habitats Regulations Assessment: mitigation and avoidance measures identified through the HRA should be secured through policies in the Plan. Where mitigation or avoidance is not possible the site should not be allocated.
Environmental requirements	Plans should set requirements, opportunities and detailed design guidance for site allocations to conserve and enhance the natural environment. This should include measures secured through policy covering: BNG: This could include specifying whether and what BNG should be delivered on-site given the scale of development anticipated, or if off-site provision will be required. Site allocations should be supported by a baseline assessment of biodiversity value for example using the latest version of Defra's Biodiversity Metric. GI strategy: Allocations should set out measures to protect, enhance and improved connectivity of GI within and beyond allocation sites. Consideration should also be given to setting appropriate GI standards for allocation sites. Landscape features: Allocation policy should incorporate and enhance existing landscape features within the development This could include hedgerows, walls, ancient and veteran trees, woodland and wildlife corridors. Agricultural land and soils: Allocations should be based on a detailed soils survey and have policies should secure a soil management plan. Access: Policies for allocations should incorporate and enhance public access to the natural environment. This includes Public Rights of Way that run through or adjacent to allocated sites, as well as linking from the site to the wider route network.

From: [REDACTED]

Date: 11/11/2025 9:00:31 AM

Subject: RE: SEA Screening

THIS IS AN EXTERNAL EMAIL

Dear City of London Planning Policy Team,

Thank you for consulting us on the SEA Screening Opinion for:

- Culture SPD
- Celebrating Heritage SPD
- Air Quality SPD
- Offices SPD
- An Inclusive City SPD
- Planning Obligations SPD

The Environment Agency, together with other bodies in England and Wales, is a statutory consultee in the SEA process. We must be consulted by plan-makers (or "responsible authorities") at certain key stages. We appreciate that the said plan may require a strategic environmental assessment (SEA) under the Directive and early SEA screening is advised. The Environment Agency may be able to assist the Local Planning Authority at this stage by advising on whether your plan will result in significant environmental impacts within our remit. However, please note that we do not advise on whether the plan falls under the requirements of the SEA Directive.

Considering our current resources and remit, we are unable to provide bespoke comments on SEA Screening Opinions. However, should the Local Planning Authority determine that an SEA is required, please consult us on the scope to ensure our key environmental issues are addressed. We can also provide baseline information and data, as required.

We hope the above information makes sense. Should you have any questions, please let me know.

Best wishes,

[REDACTED]

[REDACTED] (MSc., BSc.)

Planning Specialist (Hertfordshire), Hertfordshire and North London Sustainable Places
Environment Agency | | Alchemy, Bessemer Road, Welwyn Garden City, AL7 1HE

[HNL SustainablePlaces@environment-agency.](mailto:HNL SustainablePlaces@environment-agency) [REDACTED]

Tel: 020 3025 5835

Pronouns: she/her ([why is this here?](#))

Creating a better place
for people and wildlife

