



City of London Corporation
Planning for Sustainability
Supplementary Planning Document (SPD)
Statement of Adoption
19 February 2025

The Town and Country Planning (Local Planning) (England)
Regulations 2012

1. This adoption statement is published to meet the requirements of Regulation 14 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
2. The City of London Planning for Sustainability Supplementary Planning Document (SPD) was adopted on 19 February 2025 and the SPD will be implemented immediately. 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.
3. In accordance with Regulations 14 and 35(1) of the Town and Country Planning (Local Planning) (England) Regulations 2012, this adoption statement and the Planning for Sustainability SPD is published on the [City Corporation website](#) and will be made available for inspection at the following locations for 3 months:
 - Guildhall North Wing Reception
 - Artizan Library
 - Barbican Library
 - Guildhall Library
 - Shoe Lane Library
 - Small Business Research + Enterprise Centre
4. Public consultation on the draft SPD was conducted from Monday 18 March to Friday 17 May 2024 in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Pursuant to section 23(1) of the Planning and Compulsory Purchase Act 2004, the City Corporation made modifications to the SPD following consultation. The modifications were made to take account of representations made during consultation, and to address other matters the City Corporation considered relevant, including factual and clarification corrections, and an update of technical detail. The appendix to this statement sets out the modifications made to the SPD.
5. Pursuant to Section 11(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012 any person with sufficient interest in the decision to adopt the SPD may apply to the High Court for permission to apply for judicial review of that decision. Any such application must be made promptly and, in any event, not later than 3 months after the date on which the SPD was adopted (by 19 May 2025).
6. An Equalities Assessment Screening was completed and a full screening is not considered necessary for the implementation of the SPD. A Strategic Environmental Assessment (SEA) screening was completed and concluded that a full SEA is not required. A Habitat Regulations Assessment (HRA) was completed and concluded that the SPD would not adversely affect any 'European Site' in accordance with the Habitat Regulations 2017.

7. A copy of this Adoption Statement will be sent to all contacts registered on the City Corporation's Local Plan Consultation Database and to those that made representations during the consultation period.
8. If you have any questions or require further information, please email PlanningPolicyConsultations@cityoflondon.gov.uk.

Schedule of changes to the Planning for Sustainability Supplementary Planning Document (SPD) from December 2023 version

Section	Changes	Reason for change
Various	Replaced references to 'CoLC' and 'City of London' with 'City Corporation'.	References updated adhere to the City Corporation style guide.
Various	Updated references to 'emerging City Plan 2040'	To improve detail following a review by officers.
Various	Updated key actions to distinguish between 'required' and 'recommended'. Explanatory text was included to clarify the expectations of applicants.	In response to consultation comments received.
Various	Reframed 'Demolition' to 'deconstruction' throughout the document where appropriate.	In response to consultation comments received.
Various	'Pre-demolition audit' was reframed to 'Pre-deconstruction audit' throughout the document.	In response to consultation comments received.
Various	Case studies were updated with more current detail.	To improve detail following a review by officers.
Various	The 'Key policies and guidance' checklist at the forefront of each topic chapter was reviewed to highlight applicable policies. The 'Mayor's Transport Strategy (MTS)' and 'Healthy Streets approach' is referenced where appropriate.	In response to consultation comments received.
Various	A general review to ensure the appropriate use of acronyms and abbreviations. The abbreviations definitions table on page 3 was updated.	In response to consultation comments received.

Various	A general review to ensure alignment with GLA guidance. GLA was guidance is referenced where appropriate, but repetition was reduced.	In response to consultation comments received.
Various	Updated references to BREEAM requirements / BREEAM credits.	To ensure the BREEAM references will be applicable when version 7 is released.
Various	Added a link to the 'Contents' page to assist ease of navigation.	To help reader navigation, following review by Officers.
Chapter 1: Introduction	Included sentence: 'This Supplementary Planning Document (SPD) focusses on the environmental sustainability of the City.'	To provide clarity following a review by Officers.
Chapter 1: Introduction	Edited sentence to: 'Applicant teams should work through all topics to maximise co-benefits and reach the best-balanced design package for their site.'	In response to consultation comments received.
Chapter 1: Introduction	<p>Included a clarification on policy and document requirements:</p> <p>'The SPD references policy and document requirements applied through the planning process. Requirements referenced as:</p> <ul style="list-style-type: none"> • 'must' are mandatory, as required by the Development Plan (Local Plan 2015 until the adoption of City Plan 2040 and the London Plan) • 'should' are strongly recommended, as applied on case-by case basis where they constitute a significant opportunity to drive sustainability. Application will be determined by City Corporation planning officers during the pre-application process. 	To improve clarity, in response to consultation comments received.
Chapter 1: Introduction	Included guidance on the application of the SPD and clarify major application definition: 'The content of this document applies to all major and minor applications for new buildings, refurbishment and retrofitting of existing buildings, extension and alterations, works to open spaces and landscaped areas on sites, and relate to all types of land uses. Specific requirements apply to major developments only, where the floorspace to be created by the development is 1,000sqm+, the site is 1 hectare or	In response to consultation comments received and a review by Officers.

	more, a residential development of 10+ dwellings, or a residential development on a site of 0.5 hectares or more. For minor developments that include substantial works (e.g. major retrofit, extension etc), detailed sustainability information may be requested in the planning application to demonstrate policy alignment.'	
Chapter 1: Introduction	Included sentence: 'Requirements of this SPD will be applied to applications submitted after its adoption.'	To provide clarity following a review by Officers.
Chapter 1: Introduction	Included sentence: 'It is recognised that sustainability is an evolving field and that flexibility to allow for future learning and innovations must be applied. The document is expected to be reviewed and updated as and when relevant changes to overarching policy frameworks, strategies and technologies and processes require this.'	In response to consultation comments received.
Chapter 1: Introduction	Updated and general review of the Chapters overview. Included a summary on Biodiversity Net Gain: 'Biodiversity Net Gain - advice on the application of emerging BNG policy in the City context including how to meet and exceed statutory and policy targets.'	To provide clarity following a review by Officers.
Chapter 2: Climate Change Mitigation and adaptation	Chapter 2 was renamed from 'Climate change mitigation and adaption' to 'Environmental sustainability policy framework'.	In response to consultation comments received.
Chapter 2: Climate Change Mitigation and adaptation	Updated paragraphs on the NPPF to: 'The National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) set out the government's planning policies for England and how these should be applied. The NPPF reiterates that the purpose of the planning system is to 'contribute to the achievement of sustainable development', acknowledging the role planning can play in securing radical reductions in greenhouse gas emissions and adapting to climate change. The NPPF states that 'The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks, and coastal change. It	Updated to align with the 2024 NPPF updates.

	<p>should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.</p> <p>The NPPF indicates that local authorities should plan for new development in ways which reduce greenhouse gas emissions consistently with the targets set out in the Climate Change Act 2008 policy and reflect nationally described standards.'</p>	
Chapter 2: Climate Change Mitigation and adaptation	Updated paragraph on BNG legislation to: 'Under the Environment Act 2021, all planning permissions granted in England (with a few exemptions) have to deliver a Biodiversity Net Gain (BNG). The City Corporation's BNG approach is set out in Chapter 7 with further detail confirmed in the City Plan 2040 upon its adoption.'	Updated to align with the BNG legislation and the City Corporation's emerging BNG policy.
Chapter 2: Climate Change Mitigation and adaptation	Updated the ' <u>Connectivity and the City of London Transport Strategy</u> ' section to align with the City Corporation Transport Strategy 2024.	Updated detail to align with updated Transport Strategy 2024.
Chapter 2: Climate Change Mitigation and adaptation	Included a section on the <u>Embodied Carbon Action Plan</u> .	Updated detail to align with an emerging policy.
Chapter 2: Climate Change Mitigation and adaptation	Included a section on the <u>Air Quality Strategy 2025-2030 (draft)</u> .	In response to internal consultation.
Chapter 3: Retrofit and Reuse	<p>'Key policies and guidance':</p> <ul style="list-style-type: none"> • Edited Emerging City Plan 2040 to include 'S4: Offices', 'OF1: Office Development', and 'OF2: Protection of Existing Office Floorspace' • Edited Additional Guidance to: <ul style="list-style-type: none"> ○ 'Carbon Options Guidance Planning Advice Note' 	To provide clarity following a review by Officers.

	<ul style="list-style-type: none"> ○ 'Heritage Building retrofit toolkit (CoLC)' ○ 'Embodied Carbon Action Plan (CoLC)' ○ 'Adapting Historic Buildings for Energy and Carbon Efficiency: Historic England Advice Note 18' 	
Chapter 3: Retrofit and Reuse	<p>Edited specific 'Key Actions' to:</p> <ul style="list-style-type: none"> ● 'Adopt a retrofit first approach that is informed by a carbon optioneering assessment in accordance with the Carbon Options Guidance Planning Advice Note' ● 'Consider whether a staged approach starting with light retrofit before advancing to deep retrofit (and new build if applicable) would be feasible to push back high carbon impacts in the short term.' ● 'Define the sustainability aspirations for the site and its context to develop the best practice circular economy and low carbon solutions.' 	To provide clarity following a review by Officers.
Chapter 3: Retrofit and Reuse	<p>The 'Retrofit first approach' was revised to improve clarity, including:</p> <ul style="list-style-type: none"> ● Linking the requirements for pre-redevelopment audits and pre-deconstruction audits to Chapters 4 and 5. ● The 'storage strategy' was reframed from a requirement, to encourage applicants to consider potential 'storage options.' ● A note that supporting information can be triggered by conditions, when not practical at planning application stage. 	In response to consultation comments received and a review by Corporation officers.
Chapter 3: Retrofit and Reuse	Revised definitions of retrofit, light retrofit, deep retrofit and retrofit with new build.	In response to consultation comments received and a review by Corporation officers.
Chapter 3: Retrofit and Reuse	<p>Included guidance on a 'Retrofit plan':</p> <p>'A whole building retrofit plan is encouraged to ensure developments can facilitate future retrofit, adaptive reuse and emerging technologies. The plan should determine the most appropriate retrofit option, or series of retrofit options that could be stages</p>	In response to consultation comments received.

	<p>over several years. It should consider what retrofit option achieves the optimum carbon balance in reducing embodied and operational carbon, and what option immediately minimises upfront embodied carbon. Deep retrofit options could be delayed until building technologies can offer lower carbon solutions. However, a whole building approach is recommended to ensure each phase is considered as part of the wider objectives, potential risks are managed, and ensuring one retrofit option doesn't affect the outcomes or performance a future option. It is recommended this plan is based on 'medium-term improvement plans' in the retrofit standard PAS 2038.'</p>	
Chapter 3: Retrofit and Reuse	<p>Included reference to 'Retrofit Standards' PAS 2038:</p> <p>'Introduced in September 2021, PAS 2038 serves as the UK Standard for energy efficiency and retrofit of non-domestic buildings. It provides a structured framework designed to ensure a comprehensive and systematic approach to retrofitting, covering all stages from initial assessment to final evaluation. It is expected that government schemes will require professionals to follow PAS 2038 to access funding.'</p>	In response to consultation comments received.
Chapter 3: Retrofit and Reuse	<p>The 'Retrofit in Historic Building' section was revised to:</p> <ul style="list-style-type: none"> • Include further detail from the Retrofit Historic Buildings Toolkit, including the heritage retrofit roadmap. • Include reference to the importance of climate adaption and greening interventions to historic parks, gardens and open spaces. • Ensure consistent references to historic significance. • Highlight the importance of building repair, maintenance and cleaning. 	In response to consultation comments received.
Chapter 3: Retrofit and Reuse	<p>Updated the infographic to:</p> <ul style="list-style-type: none"> • Re-order and re-format. • Add: '<u>Develop a whole building retrofit plan to ensure developments can facilitate future retrofits, adaptive reuse and emerging technologies.</u>' 	In response to consultation comments received.

<p>Chapter 4: GHG Emissions & Energy Use</p>	<p>Updated all key actions to:</p> <p>Required:</p> <ul style="list-style-type: none"> • ‘Develop the lowest whole life-cycle carbon solution that optimises the social, economic and environmental sustainability of a scheme through undertaking a carbon options appraisal.’ • ‘Prioritise retrofit over redevelopment solutions upon adoption of the City Plan 2040. Where the GLA WLC (standard) benchmark is not achieved, mitigate high upfront carbon emissions by incorporating substantial wider environmental sustainability benefits into the proposal’s design.’ • ‘Enable attractive, comfortable and inclusive access to, and connectivity between public realm, private open spaces and buildings to encourage active and sustainable transport patterns.’ • ‘Ensure that all public and open spaces are designed with low carbon, preferably reused, repurposed and robust materials.’ • ‘Develop a bespoke and optimised energy strategy for a development, including considering links to energy networks, focussing on adaptability, robust and low embodied carbon building services, floorspaces and building envelopes.’ <p>Recommended</p> <ul style="list-style-type: none"> • ‘Pursue best practice and transformative solutions in low carbon design and construction principles.’ • ‘Develop innovative approaches to low carbon servicing and servicing access of buildings.’ • ‘Seek wider environmental sustainability benefits incorporated into the design of proposals or beyond the site to contribute to the wider sustainability of the Square Mile where opportunities can be identified.’ 	<p>In response to consultation comments received and following a review by Officers.</p>
<p>Chapter 4: GHG Emissions & Energy Use –</p>	<p>Clarified the Carbon Optioneering process to:</p>	<p>In response to consultation comments received.</p>

<p>Whole Life-Cycle Carbon</p>	<p>‘In accordance with the City Corporation’s Carbon Options Guidance PAN, optioneering should be conducted early in the pre-application stage in collaboration with City Corporation officers. It’s recommended that the guidance is used to establish the most sustainable and suitable approach for the site. The options should include retention and retrofit, as relevant to the site, to ensure that the retrofit first approach has been thoroughly applied and evaluated. The optioneering process and outcome should be presented in planning application documents, such as in the Design and Access Statement, to clearly demonstrate the rationale for the proposed development.’</p>	
<p>Chapter 4: GHG Emissions & Energy Use – Whole Life-Cycle Carbon</p>	<p>Clarified the Whole Life-Cycle Carbon Assessment process to:</p> <p>‘When required by development plan policy, all major developments must submit a Whole Life-Cycle Carbon (WLC) Assessment that complies with GLA WLC Assessment Guidance (as current at the time at the time of application submission) including using assessment tools.’</p>	<p>To improve detail following a review by officers.</p>
<p>Chapter 4: GHG Emissions & Energy Use – Whole Life-Cycle Carbon</p>	<p>Introduced embodied carbon benchmarks:</p> <p>‘Proposals should achieve the GLA ‘WLC benchmark’ (‘standard’ benchmark) as a minimum for upfront carbon emissions (life-cycle modules A1 – A5). Proposals should target the GLA ‘aspirational WLC benchmark’ for all embodied carbon emissions (life-cycle modules A – C). Any deviation from the aspirational benchmark should be justified in the WLC Assessment. Until relevant benchmarks are available, hotels and student accommodation should agree an appropriate benchmark with City Corporation Officers (residential or office) to apply on a case by case basis.</p> <p>....</p> <p>All major applications submitted after 2030 should achieve the GLA ‘aspirational WLC benchmark’ as a minimum for all embodied carbon emissions (life-cycle modules A– C), to align with the World Green Building Council’s (WGBC) target of 40% reduction in greenhouse gas emissions by 2030.’</p>	<p>In response to consultation comments received and further consultation with technical experts.</p>

<p>Chapter 4: GHG Emissions & Energy Use – Whole Life-Cycle Carbon</p>	<p>Included guidance on B6 reporting:</p> <p>‘All WLC Assessments should include operational energy use (life-cycle module B6) using a predictive energy modelling method, following guidance such as CIBSE TM54 or NABERS UK Design for Performance (as detailed in the operational emissions section). The in-use embodied carbon emissions (lifecycle modules B-C) should be reported using the assumptions for replacement of building elements in accordance with RICS WLC Assessment Professional Standard. should use a predictive energy modelling method, following guidance such as CIBSE TM54 or NABERS UK.’</p>	<p>In response to consultation comments received.</p>
<p>Chapter 4: GHG Emissions & Energy Use – Whole Life-Cycle Carbon</p>	<p>Included a sentence: ‘The City Corporation encourages applicants to target and meet more ambitious industry standards (e.g. UK Net Zero Carbon Buildings Standard) wherever possible.’</p>	<p>In response to consultation comments received and a review by Corporation officers.</p>
<p>Chapter 4: GHG Emissions & Energy Use – Whole Life-Cycle Carbon</p>	<p>Clarified the requirement for a third-party review to:</p> <p>‘The carbon options assessment and WLC Assessments should be independently reviewed to ensure consistency, accuracy and quality assurance in reporting. The reviews will be arranged by City Corporation planning officers.’</p>	<p>In response to consultation comments received.</p>
<p>Chapter 4: GHG Emissions & Energy Use – Whole Life-Cycle Carbon</p>	<p>The reference to Sustainability Life-Cycle Cost (LLC) analysis was removed as this is not building upon standard practice in planning.</p>	<p>In response to consultation comments received and a review by Corporation officers.</p>
<p>Chapter 4: GHG Emissions & Energy Use – Whole Life-Cycle Carbon</p>	<p>Introduced environmental sustainability benefits:</p> <p>‘Where the standard benchmark for upfront emissions (life-cycle modules A1-A5) is not achieved at planning stage, especially if this is due to competing planning policy priorities, applicants should seek to provide significant environmental sustainability benefits onsite beyond policy requirements, or beyond their site’s boundary when</p>	<p>An update by Officers in consultation with industry experts.</p>

required by the Development Plan. The nature and extent of environmental sustainability benefits should be proportionate to the carbon impact caused by the proposed development and could include, but are not limited to:

- implementing priorities of the City of London Local Area Energy Plan (LAEP), including the creation or extension of local energy networks and the use of waste heat source (example: London Wall West).
- facilitating heating and cooling exchange with nearby developments (example: 115-123 Houndsditch).
- supporting sustainable transport modes, with a climate resilient, green and low carbon design of the public realm around the site (example: 65 Gresham Street).
- testing innovative measures (e.g. low carbon/reused materials, energy generation, storage technologies etc) to drive best practice in sustainable development for example sharing space by integrating a service lift into the public realm.
- creating climate resilience, urban greening infrastructure and cool routes in the local area (see Climate resilience chapter) (example: New Change Garden).
- providing detailed deconstruction material information or passports to facilitate efficiency of reuse (example: 100 Fetter Lane material passport).
- including a sustainable construction skills centre for City of London building types or a facility to showcase sustainable practices.
- providing opportunities for meanwhile uses that provide environmental or social benefits.

Suitable measures are subject to pre-application discussions, based on the nature of the site and the proposal, and opportunities identified in the context of the development. If a development is expected to exceed the standard benchmark for upfront emissions, it should integrate environmental sustainability benefits in the early design phase. However, all development proposals are encouraged to assess the

	opportunities for environmental improvements in the context of the site and respond to these in the design of the proposals.’	
Chapter 4: GHG Emissions & Energy Use – Whole Life-Cycle Carbon	<p>Updated the infographic to:</p> <ul style="list-style-type: none"> • Re-order and re-format • Add ‘Avoid over-specification of structures and services e.g. lifts. Design for typical (rather than extreme) use, with a strategy to upgrade if required.’ • Edit: ‘Demonstrate approaches to massing and loading that prioritise the retention of existing structures, minimal use of new material, modularity, and offsite construction, disassembly, reuse and refurbishment.’ 	In response to consultation comments received and a review by Officers.
Chapter 4: GHG Emissions & Energy Use – Operational Carbon	<p>Included a line on how water efficiency measures can reduce operational energy demand:</p> <p>‘Water efficiency measures can also reduce operational energy demand, due to reduced Domestic Hot Water demand. The Climate Resilience chapter includes a topic on water resource management with details on water efficiency in development proposals.’</p>	In response to consultation comments received.
Chapter 4: GHG Emissions & Energy Use – Operational Carbon	<p>Included a paragraph on ‘Back-up energy supply’:</p> <p>‘Although only used and tested periodically, diesel power emergency generators are an additional source of carbon emissions and air pollution in the Square Mile. Alternatives to the use of fossil fuel for emergency supply therefore should be explored, such as dual diversified electrical supply from different substations and secondary power supply through connections into energy networks where feasible. Innovative solutions, such as battery storage, generators using low carbon and low air polluting fuels or sharing emergency power with other developments nearby will be encouraged where feasible. Applicants should work through the hierarchy of technologies for the application proposal shown in the infographic on page 29. Details of the emergency power supply proposal will be requested by condition.’</p>	In response to an issue raised by Members.
Chapter 4: GHG Emissions &	Included further guidance on the calculation and monitoring of operational carbon:	In response to consultation comments received and

Energy Use – Operational Carbon	<p>‘All major developments should conduct predictive energy modelling in accordance with CIBSE TM54 methodology (Technical Memorandum) or a more thorough approach (e.g. NABERS UK Design for Performance) at planning stage and commit to an ambitious industry target for the respective building type. In-use operational energy data for the whole building must be disclosed to the GLA through ‘Be Seen’ reporting upon completion of the first year of occupation and on the following four anniversaries of that date. Applicants are expected to use the TM54 methodology and provide a copy of the report to the City Corporation. If a development does not achieve the target committed at planning stage, a report should set out the reason why, and detail a strategy for how it will be achieved in the following reporting period.’</p>	<p>further consultation with technical experts.</p>
Chapter 4: GHG Emissions & Energy Use – Operational Carbon	<p>Updated references to example climate clauses to: ‘Guidance is available from the Better Buildings Partnership and other sources.’</p>	<p>In response to consultation comments received.</p>
Chapter 4: GHG Emissions & Energy Use – Operational Carbon	<p>Updated guidance on BREEAM certification to: ‘Major developments are required to carry out a BREEAM assessment that demonstrates a minimum rating of ‘Excellent’ and the pathway to an ‘Outstanding’ rating (with the final rating to be confirmed after practical completion). Developments should maximise the achievement of credits in the City Corporation’s priority categories Energy, Materials, Water, Pollution and Waste. It is acknowledged that an ‘Excellent’ rating for non-office uses such as retail and leisure uses (shell and core) can be challenging. Strong justification should be provided if an alternative BREEAM rating is targeted in agreement with City Corporation planning officers.’</p>	<p>To improve detail following a review by officers.</p>
Chapter 4: GHG Emissions & Energy Use – Operational Carbon	<p>Updated guidance on NABERS UK Certification to: ‘Major office developments must commit to a minimum NABERS UK Energy rating (base-build) of 5 stars for new build projects or 4 stars for retrofit projects, when required by the Development Plan, unless otherwise agreed with planning officers. In the planning application, applicants of major developments are encouraged to provide</p>	<p>In response to consultation comments received and further consultation with technical experts.</p>

	<p>a written commitment to pursue a Design for Performance (DfP) route to a target rating, setting out the actions and measures to be pursued in order to achieve this. A formal registration for a DfP could be included at planning application, or this will be required by condition by RIBA stage 4 at the latest. The planning application and RIBA stage 4 submission should set out how the design intent for energy performance will be maintained from design through to occupation and formal rating. Estimated tenant consumption must be reported separately in addition to the base-build NABERS UK targets to provide a whole building consumption Energy Use Intensity (EUI). Alternatively, if the occupiers or tenants are known, a whole building DfP could be provided.</p> <p>The final certification and NABERS assessment should be submitted after the first or second 12-month rating period, as conditioned. If a development does not achieve a 5 stars certification (or 4 stars for retrofit), a report should set out the reasons why, and detail a strategy for how the development will achieve it's target certification.</p> <p>NABERS UK is an evolving rating scheme that currently only applies to office buildings. When and if it is made available for other building types, an appropriate NABERS target should be agreed at pre-application stage. In the interim, application of other industry benchmarks such as CRREM and the NZCBS are encouraged.'</p>	
<p>Chapter 4: GHG Emissions & Energy Use – Operational Carbon</p>	<p>Updated the infographic to:</p> <ul style="list-style-type: none"> • Re-order and re-format • Add: 'Avoid installation of any heating/cooling systems with high greenhouse gas emission potential or that degrade air quality.' • Edit: 'For emergency supply technology, use the following hierarchy: <ul style="list-style-type: none"> ○ secondary electrical supply ○ shared emergency provision ○ battery storage solutions ○ generators, non-diesel ○ generators, HVO (hydrotreated vegetable oil) ○ generators, diesel (compliant with emission rate in the Air Quality Strategy SPD)' 	<p>In response to consultation comments received and a review by Officers.</p>

	<ul style="list-style-type: none"> • Add: 'Maximise the installation of photovoltaic panels, on green roofs wherever possible. Explore innovative solutions for locations and appearance.' • Add: 'Avoid over-specification of structures and services e.g. lifts. Design for typical (rather than extreme) use, with a strategy to upgrade if required.' • Add: 'Explore options to facilitate the use of electric (or Ultra Low Emission) construction vehicle and machinery' • Add: 'Explore innovative solutions for low carbon/ renewable energy systems installations e.g geothermal pile foundations' 	
Chapter 5 - Circular Economy	Updated the waste targets to align with the GLA: 'Development and refurbishment projects within the City should follow the GLA's Circular Economy Hierarchy for Building Approaches (see policy D3 of the London Plan 2021). This prioritises use of existing assets and efficient use of materials, followed by use of low carbon alternatives.'	In response to consultation comments received.
Chapter 5 - Circular Economy	<p>Included 'reuse' and 'recycling' definitions:</p> <p>'Reuse: To use a material, product or component parts, either for their original purpose or for a new one, without significant alteration. For example, repairing or repurposing items instead of discarding them.</p> <p>Recycling: The process of converting waste materials into new products, preventing the waste of useful resources. It is important to assess whether the quality of the resource is maintained (e.g. it can be used for same purpose again) or if it will be cycled to a lower quality (downcycled) during the process e.g. bricks being downcycled for use as hardcore.'</p>	In response to consultation comments received.
Chapter 5 - Circular Economy	<p>Updated key actions:</p> <p>Edited:</p>	

	<ul style="list-style-type: none"> • ‘Demonstrate maximum retention and reuse of existing buildings and materials through a pre-redevelopment audit, including any options explored.’ • ‘Incorporate reuse items and recycled materials into the design of any new development, and support material efficiency by optimising the structure, floorspace arrangement, and the finishes and fit-out design, in accordance with circular economy principles.’ • ‘In cases of demolition, identify reuse potentials through a pre-deconstruction audit*. Prepare detailed information for a minimum of 5 key materials, components or fittings to enable reuse through materials markets as early as possible.’ • ‘Demonstrate principles of flexibility, adaptability and ease of repair and maintenance in the proposed design to support future adaptive reuse and to extend the useful life of the building in response to evolving working and living patterns.’ • ‘Where removal of a building is necessary, use deconstruction methods rather than demolition to maximise the quantity and types of items and materials that can be salvaged. Deconstruction method statements should be provided for key materials and elements.’ • ‘Seek coordination opportunities with nearby development sites and public realm works to increase opportunities for material reuse and exchange.’ <p>Added:</p> <ul style="list-style-type: none"> • ‘Prepare building material data (i.e. material passports) for a minimum of 5 carbon intensive new materials, components or fittings; set up an end-of-life strategy that incorporates as-built information management with ongoing updates, for the lifespan of the development.’ • ‘Seek partnerships with specialist manufacturers for works to modify, recertify and store materials for reuse from an early stage.’ 	
<p>Chapter 5 - Circular Economy</p>	<p>Included 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 audits encourage development of material passport-type information and for use on material exchange platforms.</p>	<p>In response to consultation comments received and further consultation with technical experts.</p>

Chapter 5 - Circular Economy	Updated sentence to 'GLA's Circular Economy Guidance recommends that all new construction should be designed and built considering layers.'	In response to consultation comments received.
Chapter 5 - Circular Economy	Update guidance on maintenance and deconstruction strategy to: 'As part of the access and maintenance strategy usually prepared by the design team for the developer, it is recommended that deconstruction is included as a key consideration (especially for building elements that require more frequent replacements, such as façade elements, building services, fit-out), as the reusability of materials depends on ease of disassembly and on how well they are maintained during the building life-cycle. To demonstrate best practice, an access, maintenance and deconstruction strategy is encouraged to be submitted with the detailed Circular Economy Statement.'	In response to consultation comments received.
Chapter 5 - Circular Economy	Update infographic to: <ul style="list-style-type: none"> • Re-order and format • Deleted 'Consider submitting axonometric drawings to clearly visualise which parts of the structure are retained/reused/new'. 	To improve detail following a review by officers.
Chapter 6 – Climate resilience	Restructured the introduction of the Chapter to include information on the City's climate resilience risk and reduce repetition.	To improve detail following a review by officers.
Chapter 6 – Climate resilience	Edited introductory sentence on Pests and Diseases to: 'provides guidance on managing the threat of pests and diseases which could be raised by milder, wetter winters and warmer summers.'	In response to consultation comments received.

<p>Chapter 6 – Climate resilience</p>	<p>Under ‘Key policies and guidance:</p> <p>Included: emerging City Plan 2040 policy ‘S14 Open space and green infrastructure’.</p> <p>Included the following policies under ‘other guidance’:</p> <ul style="list-style-type: none"> • ‘Riverside Strategy 2021 (CoLC)’ • ‘Strategic Flood Risk Assessment (CoLC)’ • ‘Local Flood Risk Management Strategy 2021-2027 (CoLC)’ • ‘Mayor’s Transport Strategy & Healthy Streets Approach’ • ‘Thames Estuary 2100 Plan (Environment Agency)’ • ‘Thames river basin district river basin management plan 2022 (Environment Agency)’ • ‘Water Framework Directive (European Union)’ 	<p>In response to consultation comments received and a review by Officers.</p>
<p>Chapter 6 – Climate resilience</p>	<p>Updated the key actions to:</p> <ul style="list-style-type: none"> • Edit: ‘Reduce the risk of all types of local flooding, including by attenuating water onsite and controlling the run-off rate’. • Edit: ‘Incorporate an integrated water management approach to minimise potable water demand’. • Edit: ‘Combat urban heat island effect through the design of the building envelope, building services and public realm. Reducing the risk of overheating in the building by incorporating passive solar shading and minimising the need for active cooling’. • Edit: ‘Design green spaces, building spaces and services with a focus on nature, health and well-being countering the risk of emerging pests and diseases becoming an issue’. • Add: ‘Raising of flood defences at riverside sites in line with the Thames Estuary 2100 plan’. 	<p>In response to consultation comments received and a review by Officers.</p>
<p>Chapter 6 – Climate resilience</p>	<p>Restructured each sub-topic chapter to align with other topic chapters in the SPD. This includes sections with ‘whole building’ and ‘beyond the building measures’.</p>	<p>To improve detail following a review by officers.</p>

Chapter 6 – Climate resilience	Edited sentence to: ‘It is important developments are designed for future climate scenarios with built-in resilience and adaption to these changes and disruptions. All developments are encouraged to assess future weather data sets (e.g. CIBSE TM49) and design for these future scenarios, rather than just meet current building regulations.’	In response to consultation comments received and a review by Officers.
Chapter 6 – Climate resilience	<p>Included further guidance on the requirements of Climate Change Resilience Sustainability Statement (CCRSS) and the BREEAM Wst 05 Credit:</p> <p>‘All developments should provide a Climate Change Resilience Sustainability Statement (CCRSS) to demonstrate the proposal is resilient and adaptable to predicted climate conditions during the lifetime of the development. For minor developments, this could be included in the Sustainability Statement or Design and Access Statement. Major development applications should submit a standalone report that includes details of applicable climate risks and adaptation measures that have been considered. The CCRSS should demonstrate how the proposed adaptation measures will be managed and maintained through the life of the development.’</p> <p>Major developments should achieve the BREEAM Wst 05 credit for ‘Adaptation to climate change’. This should include a systematic risk assessment that includes the following:</p> <ul style="list-style-type: none"> • Hazard identification • Hazard assessment • Risk estimation • Risk evaluation • Risk management’ 	In response to consultation comments received and a review by Officers.
Chapter 6 – Climate resilience - Flooding	Edited sentence to: ‘More information on applying the Exception Test and tidal breach mapping is available in the City Corporation’s Strategic Flood Risk Assessment.’	In response to consultation comments received.

Chapter 6 – Climate resilience - Flooding	Included sentence: ‘The Thames Estuary Plan 2100 Plan (TE2100) and the City Corporation’s Riverside Strategy 2021 outlines how flood defences along the Thames will be maintained and enhanced. Proposed development on riparian sites should maintain flood defences in line with these flood management policies.’	In response to consultation comments received.
Chapter 6 – Climate resilience - Flooding	Edited sentence to: ‘More information on applying the Exception Test and tidal breach mapping is available in the City Corporation’s Strategic Flood Risk Assessment.’	In response to consultation comments received.
Chapter 6 – Climate resilience - Flooding	Edited Flood Zone 3a Categorisation to: ‘ensuring no critical infrastructure or sleeping accommodation is located at basement level or below breach levels, ensuring podium levels are set above breach levels, and setting in place a Flood Emergency Plan.’	In response to consultation comments received.
Chapter 6 – Climate resilience - Flooding	Edited sentences to: <ul style="list-style-type: none"> • ‘Establish a risk threshold.’ • ‘Mitigate the risks.’ 	In response to consultation comments received.
Chapter 6 – Climate resilience - Flooding	Edited sentences to: ‘Developments within the City Flood Risk Area should undertake a site-specific Flood Risk Assessment. Developments on riparian sites are responsible for the maintenance of flood defences, and works that occur within 16 meters of any part of the flood defence will require a flood risk activity permit from the Environment Agency.’	In response to consultation comments received.
Chapter 6 – Climate resilience - Flooding	Included sentence: ‘Improve ecology - SuDS and BGI can prevent the deterioration of, and improve the ecological status of the Thames Middle Water Framework Directive water body and/or its associated elements.’	In response to consultation comments received.
Chapter 6 – Climate	Included sentence: ‘Positive pump devices can be used in developments located in areas at risk of sewer surcharge.’	In response to consultation comments received.

resilience - Flooding		
Chapter 6 – Climate resilience - Flooding	Included sentence: ‘SuDS systems should follow the drainage hierarchy included in London Plan Policy 5.13 - Sustainable Drainage.’	In response to consultation comments received.
Chapter 6 – Climate resilience – Water resource Management	Included measures for the management of potable water: <ul style="list-style-type: none"> • ‘Achieve an ‘excellent’ BREEAM rating (or equivalent) in the WAT 01 category (for major developments).’ • ‘Ensure supply network has sufficient capacity’. • “‘Actual water’ consumption calculations should be provided at planning submission.’ 	In response to consultation comments received.
Chapter 6 – Climate resilience – Building and overheating	Updated guidance on weather files to: <p>‘All developments should assess current and future weather scenarios to consider overheating impacts over the development lifespan. A future weather file portrays a location’s anticipated annual weather stream in 10, 25, 50, 80, and 100 years into the future. Based on projections derived from global climate models for scenarios of greenhouse gas emissions, future weather files should be utilised in building energy modelling and building performance analysis, to get insights into future energy requirements. The design approach for any development in the City should take into consideration future weather files and their impact, as recommended by BREEAM 2018 Hea 04: Thermal Comfort. As well as the City Corporation’s Thermal Comfort Guidelines, developments should consider the following weather files (as updated):</p> <ul style="list-style-type: none"> • TM49 CIBSE Design Summer Year (DSY) • TM52 CIBSE • TM59 CIBSE’ 	In response to consultation comments received.

Chapter 6 – Climate resilience – Building and overheating	<p>Edited sentence to: ‘Specifications for asphaltic surfaces should include appropriate non-toxic additives to reduce chances of failure and deformation in high temperatures.’</p>	
Chapter 6 – Climate resilience – Building and overheating	<p>Included paragraph: ‘All developments should actively contribute to reducing the UHI effect and improving thermal comfort within the City. Developments should avoid the expulsion of waste heat into the environment. Expulsion of waste heat could be minimised by connections to local heat networks, as discussed in Chapter 3.’</p>	<p>In response to consultation comments received.</p>
Chapter 6 – Climate resilience – Building and overheating	<p>Included guidance on cool routes:</p> <p>‘The City Corporation is implementing a Cool Streets and Greening Programme, involving the planting of designated tree-shaded cool routes that aim to offer a comfortable pedestrian experience. Cool routes prioritise the growth of biodiversity and the provision of shading (preferably by trees). In some cases, cool routes have reduced air temperatures between 3-8°C during heatwaves. Applicants are encouraged to integrate and support the expansion of these cool routes by:</p> <ul style="list-style-type: none"> • Maximising street level greening in both onsite and offsite public realm to provide natural shade and connect green pockets. • Designing for comfortable microclimatic conditions informed by the analysis of wind, pressure, humidity, and temperature. This analysis should incorporate future climate scenarios using weather files and climate predictions. • Developing a comfort framework in collaboration with the City Corporation, which could be used for extreme higher temperatures. • Choosing appropriate materials for external surfaces, informed by their influence on (e.g. heat absorption, reflection), location (proximity to pedestrians) and resilience (e.g. risk of deformation in high temperatures) in microclimatic conditions. 	<p>To improve detail following a review by officers.</p>

	<ul style="list-style-type: none"> • The resilience and suitability of the proposed planting scheme, in particular trees (access to rainwater, drainage of tree pits, canopy sizes and soil volumes). • Consideration of the ability to provide future ‘cool spaces’ within the development. • Opportunities to continue greening across the buildings via balconies and terraces that help create biodiversity corridors for important species, such as wild bees. • Continued microclimatic monitoring to determine the impact and success of the cool routes, and to inform lessons learnt that will support further development. <p>If cool routes are a key focus area of the development, it is strongly recommended that a stand-alone ‘Cool Routes Report’ is submitted in the application documentation. The report should include evidence, analysis, and assessment of the considerations outlined above.’</p>	
Chapter 6 – Climate resilience – Pests and diseases	Included sentence: ‘Measures to manage the risks of pests and diseases should protect biodiversity, not constrict the growth and management of biodiversity.’	In response to consultation comments received.
Chapter 6 – Climate resilience – Pests and diseases	Edited paragraph to: ‘Landscaping proposals should not include 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). It is illegal to plant Schedule 9 species in the wild, developments should not become a pathway for further spread of these specimens into London’s green spaces. Developments should seek to enhance biosecurity through actively taking steps to reduce the spread and impacts of INNS on habitats and species, including water bodies. This should follow the guidance of the Great Britain INNS Strategy, meeting objectives of the National 25-year Environment Plan.’	In response to consultation comments received.

Chapter 6 – Climate resilience – Pests and diseases	<p>Edited section on ‘Climate resilient planting’ to: ‘The City Corporation Climate Resilient Planting Catalogue provides guidance on the design of public realm and planting selection including species tolerances, response to pests and diseases and to extreme heat (and other weather events).’</p>	<p>Updated detail on Climate Resilient Planting Catalogue following review by Officers.</p>
Chapter 6 – Climate resilience	<p>Updated infographic:</p> <ul style="list-style-type: none"> • Edited sentence to: ‘Use renewable onsite energy generation such as photovoltaic panels to reduce demand and dependence on the grid’. • Edited sentence to: ‘Design ground surfaces to be resilient to heat and deformation e.g. use of light coloured or permeable paving, or nontoxic preventative additives in asphalt’. • Edited sentence to: ‘Reduce overheating through design.’ 	<p>In response to consultation comments received and following review by Officers.</p>
Chapter 7 – Urban Greening and Biodiversity	<p>Edited introductory detail on BNG to: ‘Proposals should provide high quality greening in open spaces and on buildings within the site to meet policy requirements. UGF is a requirement in the London Plan. BNG is mandated by the Environment Act (2021) for development assessed under the Town & Country Planning Act 1990 and for Nationally Significant Infrastructure Projects. The BNG is a statutory requirement since February 2024 and the City Corporation is introducing a policy requirement with a target score of three Biodiversity Units per hectare (BU/ha).’</p>	<p>To improve detail following a review by officers.</p>
Chapter 7 – Urban Greening and Biodiversity	<p>Included guidance on urban greening and biodiversity considerations that should be discussed with City Corporation Officers:</p> <p>‘Proposals submitted for development in the City should strive for best biodiversity outcomes on individual sites while showing consideration for the wider urban environment. Urban greening and biodiversity key actions and measures should be considered and integrated early in the design development. Applicants should engage with City Corporation officers before, during and after planning application submission to address:</p> <ul style="list-style-type: none"> • Context-specific urban greening and biodiversity risks and opportunities. 	<p>To improve detail following a review by officers.</p>

	<ul style="list-style-type: none"> • How high-quality greening, considered and meaningful space for biodiversity can be provided onsite. • How the site connects to wider green infrastructure and nature networks. • How the scheme responds to the BAP, policy, and other biodiversity objectives. • How the scheme can achieve and ideally exceed UGF and BNG requirements. • Ongoing maintenance and management considerations.’ 	
Chapter 7 – Urban Greening and Biodiversity	<p>Included a paragraph on document requirements:</p> <p>‘A biodiversity and ecological survey and report should be included in the planning submission. It should include a survey of existing biodiversity onsite, an assessment of impacts, and proposed measures to protect and enhance biodiversity and greening. An Ecological Impact Assessment is required when a proposal has a potential impact on either protected or priority species, or designated sites and priority habitats.’</p>	To improve detail following a review by officers.
Chapter 7 – Urban Greening and Biodiversity	<p>Included the following policies under ‘Key policies and Guidance’:</p> <ul style="list-style-type: none"> • ‘Riverside Strategy 2021 (CoLC)’ • ‘Mayor’s Transport Strategy & Healthy Streets Approach’ • ‘Sustainable Development Framework (Transport for London)’ 	In response to consultation comments received and a review by Officers.
Chapter 7 – Urban Greening and Biodiversity	<p>Updated key actions to:</p> <ul style="list-style-type: none"> • Edit: ‘Develop a strategy that maximises the extent and quality of urban greening and biodiversity on a site, complying with, and aiming to go beyond the requirements of the Urban Greening Factor and Biodiversity Net Gain.’ • Edit: ‘Incorporate nature-based solutions in the development that provide co-benefits for both humans and biodiversity such as bio-solar roofs, Sustainable Drainage Systems (SuDS) and green amenity spaces’. 	In response to consultation comments received and a review by Officers.

Chapter 7 – Urban Greening and Biodiversity	Restructured each sub-topic chapter to align with other topic chapters in the SPD. This includes sections with ‘whole building’ and ‘beyond the building’ measures.	To improve detail following a review by officers.
Chapter 7 – Urban Greening and Biodiversity – Urban Greening Factor	Edited sentence to: ‘The emerging City Plan 2040 introduces an adjusted UGF score of 0.3 for all major developments, in comparison to the GLA UGF scores of 0.4 for residential developments and 0.3 for commercial buildings.’	In response to consultation comments received and a review by Officers.
Chapter 7 – Urban Greening and Biodiversity – Urban Greening Factor	Included sentence: ‘Maintenance of small-scale food growing and/or public realm greening could be facilitated by a community of volunteers or building occupiers.’	In response to consultation comments received.
Chapter 7 – Urban Greening and Biodiversity – Urban Greening Factor	Introduced a table that summarises ‘Green Roof Types’.	In response to consultation comments received.
Chapter 7 – Urban Greening and Biodiversity	Included sentence: ‘To understand existing habitats on a site, London’s Local Environmental Records Centre (LERC) and Greenspace Information for Greater London (GiGL) should be consulted to provide comprehensive data on London’s habitats, species and protected sites, including SINC.’	In response to consultation comments received.
Chapter 7 – Urban Greening and Biodiversity - Biodiversity	Included further guidance on wildlife-friendly features: ‘As well as integrating urban greening measures outlined in previous sections, developments should integrate wildlife-friendly features, including: • Integral nests boxes (compliant with BS 42021) to provide nesting opportunities for birds, including black redstart, swifts and house sparrows	In response to consultation comments received and a review by Officers.

	<ul style="list-style-type: none"> • Free standing and integrated bat roosting boxes • Invertebrate habitat features, including as bug boxes, sandy/ stoney mounds, logs piles and standing water • Wild bee nesting habitats and bee bricks' 	
Chapter 7 – Urban Greening and Biodiversity - Biodiversity	<p>Included guidance on honeybee hives:</p> <p>'Honeybee hives should not be proposed or consented in the City. This is due to negative impacts on wild pollinators, including bumblebees and solitary bees, which are a target species in the BAP. Wild bee populations are facing serious decline due to a range of pressures including habitat loss, pesticide use and climate change. Honeybees are a major risk to wild bees in the City due to their abundance and competition which limits forage resources.'</p>	To improve detail following a review by officers.
Chapter 7 – Urban Greening and Biodiversity - Biodiversity	<p>Included paragraph on education initiatives:</p> <p>'Applicants are encouraged to incorporate educational initiatives in urban greening and biodiversity proposals, particularly in the public realm. Initiatives should provide accessible information, explanation, and/or learnings on what greening and biodiversity processes are present to advocate for the protection and celebration of biodiversity in the City.'</p>	In response to consultation comments received.
Chapter 7 – Urban Greening and Biodiversity - Biodiversity	<p>Included guidance on soil protection:</p> <p>'Applicants are encouraged to establish good practice in soil protection and the sustainable use of soils. Soil supports biodiversity and plays an important role in climate change mitigation, by storing carbon. Transport for London's Sustainable Development Framework outlines the following actions that could be considered for the management of soil on development sites:</p>	In response to consultation comments received.

	<ul style="list-style-type: none"> • Carry out an assessment of any existing soils onsite and set out a soil management plan, including a strategy for importing suitable soils and substrates or creating them onsite. • Safeguard areas where existing soils will be retained or reused onsite, and areas where any imported soils will be stored. • Strip soils identified for reuse and retain onsite in heaps no higher than 1.5 metres. • No soil from site is sent to landfill. • Check imported soils are compliant with BS 3882:2015 (Topsoil) and BS8601:2013 (Subsoil). • Retain crushed concrete or other suitable demolition byproducts (to five millimetres sieve size) and add Compost Quality Standard PAS 100 compliant compost (as necessary) to create suitable growing medium.' 	
Chapter 7 – Urban Greening and Biodiversity - Biodiversity	Included sentence: 'The City Corporation's Riverside Strategy highlights opportunities for development to enhance biodiversity through the conservation of existing features and integration of new features for aquatic and terrestrial biodiversity when flood defences are being raised, including utilising the Estuary Edges guidance by the Thames Estuary Partnership.'	In response to consultation comments received.
Chapter 7 – Urban Greening and Biodiversity - Biodiversity	Sections on 'Ecosystem services' and 'Future-proof the development' were moved from the BNG section to the Biodiversity section.	To improve detail following a review by officers.
Chapter 7 – Urban Greening and Biodiversity - Biodiversity	Included a section on 'Embodied Ecological Impacts': 'In a global nature and biodiversity crisis, it's important to recognise impacts from the construction industry beyond the Square Mile and UK, on areas such as deforestation, pollution, and water scarcity. Similar to embodied carbon, the City Corporation	In response to consultation comments received.

	<p>encourages applicants to consider embodied ecological impacts within their project whole life-cycle: resource extraction, manufacturing process, production and transportation process of new materials, and disposal of unused materials.</p> <p>Organisations have committed to TNFDs (Taskforce on Nature-related Financial Disclosures) to shift business and finance flows away from nature-negative outcomes to nature-positive outcomes. The UKGBC is releasing material on embodied ecological impacts. The World Business Council for Sustainable Development (WBCSD) released a Roadmap to Nature Positive: Foundations for the built environment system. Applicants are encouraged to consider and embed embodied ecological impact into existing reporting processes.'</p>	
Chapter 7 – Urban Greening and Biodiversity – Biodiversity Net Gain	The BNG section was reviewed in accordance with the updated regulations and emerging BNG policy in the City Plan. The City Corporation is conducting further research on the implementation of BNG which will include further guidance.	To improve detail following a review by officers.
Chapter 7 – Urban Greening and Biodiversity	<p>The infographic was updated to:</p> <ul style="list-style-type: none"> • Edit reference to 'integral nest bricks (complying with BS 42021)'. • Add 'Diversify water supply'. 	
Chapter 8 - Key considerations and submission requirements	Chapter 8 was thoroughly reviewed and redesigned to visually present the key considerations, required and recommended information requirements. It was also updated to include guidance on minor applications.	In response to consultation comments received and following review by officers.
Chapter 8 - Key considerations and submission requirements	<p>Introduction was edited to:</p> <p>'This section outlines key considerations, required application documents and recommended supplementary material to support planning applications in the City of London. The key considerations suggest key actions to ensure sustainability is successfully integrated in the development approach. The required information</p>	To improve detail following a review by officers.

	<p>outlines planning application submission requirements, as prescribed by the Development Plan. In the pre-application stages, the requested material will help proposals demonstrate that application requirements will be satisfied. The recommended material can demonstrate exemplary practice.</p> <p>The City Corporation Validation Checklists detail all items required to be submitted in a planning application.'</p>	
Chapter 8 - Key considerations and submission requirements	RIBA Stage 0 was updated to include recommended material research, encouraged to commence early in concept design.	In response to consultation comments received and following review by officers.
Chapter 8 - Key considerations and submission requirements	<p>RIBA Stages 2-3 was updated to:</p> <ul style="list-style-type: none"> clarify that confirmation of a NABERS UK DfP agreement is required at planning application. Move 'Be seen' operational modelling and BNG requirements to later RIBA stages. Include Air quality assessments and predictive energy modelling. 	In response to consultation comments received and following review by officers
Chapter 8 - Key considerations and submission requirements	<p>RIBA Stages 4 – 6 was split into RIBA Stage 4 (detailed design) and RIBA Stages 6-7 (completion/in use) to align with the conditions process.</p> <p>Reference to 'Circuland' was removed in relation to material exchange platforms to enable an open-market approach.</p>	In response to consultation comments received and following review by officers.
Appendix A – Recommended standards, certifications and guidelines	<p>Appendix A was thoroughly reviewed to:</p> <ul style="list-style-type: none"> Ensure document names and references were in consistent formatting Remove hyperlinks Include new guidance documents, e.g. Historic England Advice Note 18, DEFRA Non-statutory technical standards for SuDS, Forestry Commission London Urban Forest Resilience Project (2024). 	To improve detail following a review by officers.

Appendix C - Glossary	Appendix C was reviewed to update definitions, including but not limited to: <ul style="list-style-type: none"> • Green corridors • Major development • Retrofit 	To improve detail following a review by officers.
Appendix D – Case study inventory	Appendix D was included to provide a summary of all case studies. Application numbers were included as references for further application detail.	To improve detail following a review by officers.