

The Rt Hon Lord Mayor of London
The Mansion House
London

1 February 2021

Dear Alderman Russell,

It recently came to my attention that Transparency International UK's report, *Permission Accomplished: assessing corruption risks in local government*, has been raised by members of the City of London Corporation in discussions about transparency in planning.

Transparency International (TI) is the world's leading non-governmental anti-corruption organisation. With more than 100 chapters worldwide, TI has extensive global expertise and understanding of corruption. Transparency International UK (TI-UK) is the UK chapter of TI. We raise awareness about corruption; advocate legal and regulatory reform at national and international levels; design practical tools for institutions, individuals and companies wishing to combat corruption; and act as a leading centre of anti-corruption expertise in the UK. We are also based in the City of London.

Planning Decisions are often some of the most contentious and difficult aspects of Local Government. Local residents often feel that their power to intervene and influence planning decisions is limited by commercial and more wealthy interests. These tensions can be magnified in the City of London by the scale and profile of the developments, as well as the unique franchise.

The research for *Permission Accomplished* included a standardised assessment of corruption risks across 50 different local authorities in England with a responsibility for housing planning decisions. The City of London was not one of the councils included in the original research but given interest in the report, we have prepared a briefing, using the same methodology to show the areas where the Council meets good practice as well as where changes are needed.

This assessment covers three key areas:

1. [Councillors engaging external stakeholders](#) during the planning process.
2. [Managing private interests](#) held by councillors that may present a perceived or real conflict of interest.
3. [Regulating councillors' conduct](#), preferably through advice and guidance, but also through sanctioning misconduct if necessary.

While the City of London is either meeting good practice or is close to doing so in some respects, there are areas in all three of these categories where our research finds that more improvement is needed.

Transparency is key to mitigating the corruption risks in planning decisions, and we have identified ways in which this should be improved in the City of London. Some of these are cross cutting issues, such as information not being made available in accessible formats and not being held centrally, which limit the public's ability to access it.. We have also found areas where the commitment has been made to publish information, but the emphasis in the policies is on what should be excluded. This approach can undermine attempts at embedding transparency in an organisational culture.

There are also policy gaps, particularly on lobbying regulation, the revolving door and the code of conduct which should be addressed to ensure the City of London is doing all it can to reduce the risks of corruption in planning decisions.

The City of London Corporation holds a special place among local authorities because of its history and its significance to the UK economy. Unlike many other local authorities, the City also has a global leadership role. This unique position in influence also gives the City a special responsibility to take corruption risks seriously and put in place appropriate measures to mitigate them. We hope that this research will help stimulate discussion and that, through making the outlined changes, the City can provide leadership to other local authorities in embracing a culture of transparency in planning decisions.

Yours sincerely,



Alex Runswick
Senior Advocacy Manager