

Third-party Review Governance Guidance

For carbon optioneering and application stage whole life carbon assessments (WLCA)

1. How to use the third-party review process

To facilitate the third-party review of WLCA exercises, a simple Excel-based framework has been developed. The framework and its application are developed in response to the City of London’s members’ code of conduct principles. Objectives were identified following a review of a collection of City of London third-party reviews and evaluating the merits of many different processes against the principles.

The following is to be read in conjunction with the Excel workbook, with the focus being on the sheets identified in Figure 1.

Comment ID	Comment	Driver	Opening Status	Opening	Latest Status	Latest date
2001	[Methodology] The Applicant has applied the methodology aligned with the CoL PAN Guidance's recommendations to specify the development options.	CoL PAN Guidance				
2002	[Constraints] The Applicant has communicated any external constraints or drivers (e.g. local policy) related to the land use and building type, densification, and commerciality, in the selection of options for the optioneering study.	CoL PAN Guidance				
2003	[Redevelopment options, identification] The choice of options reflect realistic proposals for the maintenance, retrofit and development of the site, and cover clearly discernible scenarios.	CoL PAN Guidance				
2004	[Methodology] The methodology to calculate the carbon impacts is aligned with the CoL PAN Guidance's recommendations.	CoL PAN Guidance				
2005	[Redevelopment options, scope] The scope of building works which are considered in the study are clearly set out across options.	CoL PAN Guidance				
2006	[Redevelopment options, scope] The WLCA scope (i.e. building element categories and carbon assessment modules) is aligned across options.	CoL PAN Guidance				
2007	[Results] Carbon estimates are aligned with scope of works for each option.	CoL PAN Guidance				
2008	[B1-B5] Maintenance and replacement cycle assumptions are aligned with industry guidance, and consistent across options. Any deviations from the industry guidance are justified from a technical and economic perspective; justification is proportionate to the impact of the deviation.	CoL PAN Guidance				
2009	[Results, structural impact] Structural impacts are calculated for each option; and the calculations are robust and consistent across options i.e. comparable level of detail.	CoL PAN Guidance				
2010	[Results, structural impact] Structural impacts calculated for each option include a breakdown into structural elements e.g. RICS Categories 1, 2, 1-2, 4.	CoL PAN Guidance				
2011	[B6] The basis of EUl estimation is provided. Differences in energy use intensity (EUI) are reasonable and justified.	CoL PAN Guidance				
2012	[B6] The operational carbon factor adopted for Module B6 is aligned with the CoL PAN Guidance's recommendations. The fuel source for operational energy (gas, electricity, other) is provided on the Dashboard.	CoL PAN Guidance				
2013	[Assumptions, architecture] Assumptions for the Architectural elements are consistent between the development options. If this is different due to varying occupancies or fit-out strategies, this should be justified by the Applicant.	CoL PAN Guidance				
2014	[Assumptions, MEP] Assumptions for Building Services elements/ performance are aligned between the development options. If different due to system selection or constraints, this is clearly outlined.	CoL PAN Guidance				
2015	[Assumptions, benchmarks] Where benchmarks are adopted, this is clearly communicated, and: - The sources of benchmarks are aligned with the proposed occupancy e.g. Office. - They are aligned between options. - If there is a deviation differences are declared and justified.	CoL PAN Guidance				
9011	[Assumptions, benchmarks] In addition to the CoL PAN Guidance, the following complementary/non-contradictory context is considered: Where benchmarks are adopted, this is based on GLA Current or similar datasets. Consistent with good practice and RICS 2nd ed. guidance, early design baseline WLCA's should be based on "typical practice", as opposed to aspirations or targets.	CoL PAN Guidance - Good Practice				

Figure 1 Extract from the Excel tool complementing this report section

As a baseline, this framework is applicable to early-stage optioneering for City of London, and planning application submission assessments. However, it can equally be used by other WLCA third-party reviewers where a simple review framework is required.

This section refers to the following parties:

- Third-party reviewer
- Applicant
 - Carbon assessor, part of “applicant’s team”
- Local authority (e.g. City of London)
 - In cases where this process and guidance is used outside the context of a local authority, this may also be the party overseeing the process between the two parties above, e.g. a developer.

The high-level process is described in Figure 2, with reference to the Excel sheets identified in Figure 1.

All-party agreement on framework and principles of third-party review: Using this guidance and Excel framework

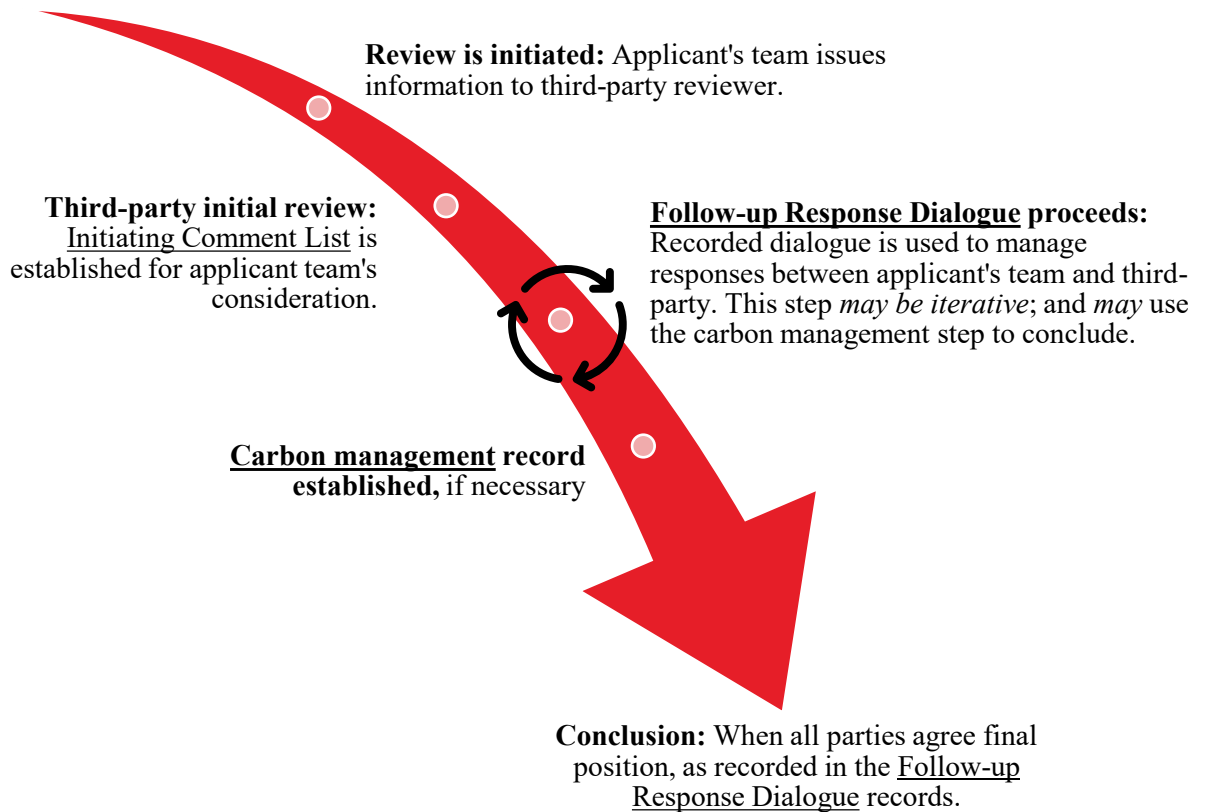


Figure 2 Third-party review process described by the application of this guidance and the complementary Excel workbook

General governance guidance is presented first, applicable to all reviews.

Additional guidance specific to the City of London carbon optioneering reviews and GLA planning application stage reviews are presented separately. The guidance is written as non-contradictory, supplementary guidance, and the relevant planning authority guidance should be considered first.

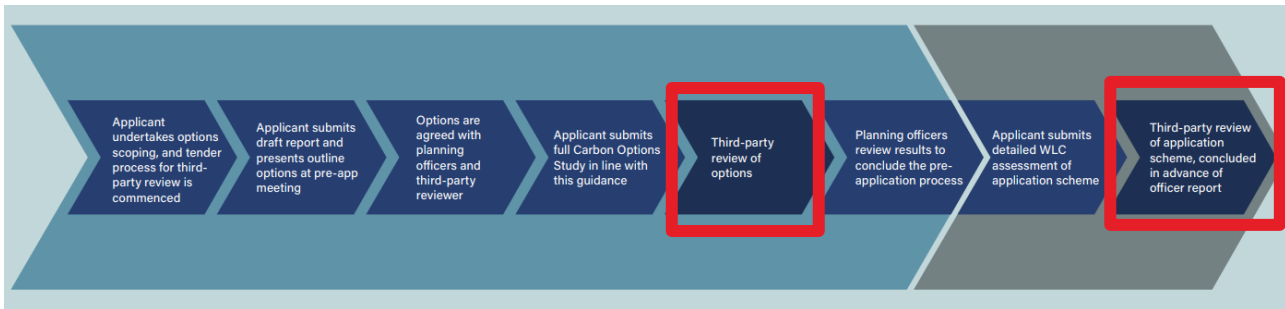
Note, the Excel workbook has been setup with Data Validation, and certain locked areas and formulas; but it is not completely locked:

Users must not change the table structures, data validation, or any other elements of the workbook. This is critical to achieving the overarching review principles and objectives set out in Appendix A.1.

1.1 Overview

Process

A third-party review, for City of London planning application purposes, is procured with coordination from the City of London planning officers and proceeds as described in the figure below.



However, there has been limited further underlying guidance on the principles and objectives for the framework and process for either third-party review stage identified above.

The following guidance builds on the context set out at the top of section 1, including Figure 1 and Figure 2, and applies to the use of the referenced Excel-based framework.

Initiation of review(s)

The third-party review exercise is to be completed once all information is available to be provided to the third-party for review. Information should be provided to the third-party reviewer over a short period of time (not more than 1 week); and the reviewer is entitled and encouraged to avoid any review based on partial information. The project team is responsible for developing/providing the information required, and the carbon assessor is responsible for coordinating and communicating the information.

Some additional supporting evidence may be required/requested during the review process, but it should reflect a minority of the information reviewed, and should not include any substantial and obvious omissions, which the third-party reviewer should be able to determine with a quick initial check of information received.

Note: A comprehensive, mandatory information required list cannot be identified for either pre-optioneering or planning application stage reviews. Each review has varying information requirements; and different projects package their deliverables in different ways. This is subject to the professional judgement of the applicant's team, and the maturity of the design development.

At the least, planning documents and forms (e.g. COL PAN Dashboards, GLA WLC Templates) relevant to the optioneering exercise or the planning application submission, should be provided. Any supporting documents cited should also be provided. If available, relevant plans and renders, existing building assessments/surveys, and any available presentations or communications to understand the project sustainability strategy or context, should be included.

For the optioneering studies, key carbon factors, assumptions, and technical input informing those assumptions, should be provided.

Premature review work can lead to discrepancies between early information and information received later, which may undergo development/changes in the interim. This can also lead to re-work, where extended periods elapse between receipt of information, and the availability of the individual third-party reviewer.

The initiating third-party review package is to be provided with the Excel-based review framework, with the *Review Details* sheet completed by the applicant.

	A	B	C
1	Parameter	Value	Supplementary Information
2	LCA Assessor (Company)	LCA Assessor	N/A
3	Third-party Reviewer (Company)		<i>GUIDANCE: Third-party reviewer to include a short statement on their qualifications, including experience relevant to the building industry, years experience with carbon assessment, and statement of independence from the project.</i>
4	Planning Officer (Sustainability)	Planning Officer	N/A
5	Scope of Third-party Review		<i>GUIDANCE: Reviewer to populate with Scope of the Review, for example City of London Carbon Optioneering</i>
6	Planning Officer (Case Officer)	Planning Officer	N/A
7	List of Information Received for Review	(1) ... (2) ... (3) ... (4)	<i>GUIDANCE: Record any supplementary note about information received, if necessary. Numbering information is recommended, to match the list and any supplementary information.</i>
8			

Figure 3 Review Details sheet is to be completed by the applicant, and provided to be reviewed by the third-party

Conducting the initial review(s)

The third-party reviewer is to populate the Initiating Comment List sheet, with due consideration for the READ ME sheet, the guidance notes, and colour coding included throughout the workbook.

The Initiating Comment List tab is pre-populated with mid-level comments driven by different carbon assessment scopes (City of London optioneering and GLA planning application scheme). The pre-populated comments include:

- Comments derived directly from GLA or City of London guidance
- Comments derived from experience with past third-party reviews. They are informed by a combination of the relevant guidance (e.g. GLA WLCA guidance, or CoL optioneering guidance) and awareness of contemporary best practice.

Some pre-populated comments are complemented by variable text, in {brackets} (see example in Figure 4 below, highlighted in yellow), for the reviewer to edit.

Some pre-populated comments include complementary narrative, in {brackets and italics}, to further clarify the comment, to support all parties who may use the list.

[CoL PAN Guidance] A pre-redevelopment audit {has/has not} informed the Optioneering Study. The reviewer has considered this in the context of the London Planning Guidance on Circular Economy Statements

{Reviewer to provide further comment based on the project context}

Figure 4 Example comment with variable text, and with complementary narrative

All pre-populated mid-level list items should be considered and concluded as a minimum.

Reviewers can add/append to the comment with the reviewer's comments, or they can add additional detail-level comments (new rows in the table); more on this in the section below, Guidance on writing effective detail-level commentary.

However, the pre-populated comments should not be edited (except where variable text is provided for the reviewer). These are either prescriptive requirements from relevant guidance, e.g. GLA WLCA guidance or a GLA checklist circulated to applicants, or they are descriptive requirements which serve to establish a consistent minimum standard of review.

Carbon assessor and reviewer follow-up

The carbon assessor should review all comments, regardless of Status, to understand all the reviewer's commendations, queries, or concerns.

The carbon assessor shall not change the Initiating Comment List sheet; they will work exclusively in the Follow-up Response Dialogue sheet. Further dialogue will be recorded and managed in the Follow-up Response Dialogue sheet.

Status A

No further action required.

Each row in the Follow-up Response Dialogue sheet represents a communication by a party to the review, regarding a comment in the Initiating Comment List sheet.

Status B

The assessor might also wish to respond to Status B comments, to address any of the reviewers concerns about best practice. However, as they are expected to be of low significance, it is acceptable to conclude the third-party verification with a few unresolved Status B findings, should this be deemed a reasonable approach agreed with the City Corporation officers.

Status C

The carbon assessor will need to review and respond to the comment IDs with a **Status C**, at least. After trying to resolve the comment, should a resolution not be found, the applicant team may, at their own risk, conclude the optioneering process with certain unresolved Status C findings³. In such instances, the applicant(s) are expected to substantiate their decision with robust justifications, providing valid reasons for not addressing the feedback from the reviewer(s).

See also, the opportunity to consider carbon management and transparency as a possible means to resolve Status C items.

Carbon management

Where projects aspire for carbon reductions, or a third-party identifies a risk in an assessment, this may result in some disagreement between assessors and reviewers. To facilitate managing any risks and opportunities, the Carbon Management sheet is provided.

Either and/or both parties can propose a compromise or a justification in the case of a disagreement, e.g. about a WLCA assumption. A detailed description of a risk/opportunity can be added as an item to the Carbon Management sheet. The item's description should identify the actions and responsible parties involved in management. Whether the item is achieved or not, a simple lesson learned explanation can then be provided in the post-construction WLCA update¹.

In the case of detailed carbon assessments (e.g. GLA planning application scheme), project teams looking to go beyond simply assessing their carbon, and looking to manage carbon risks and opportunities, may proactively implement such a tool. This is also an opportunity suggested within the GLA WLCA guidance (see quote below, from London Plan Guidance – WLCA, sections 3.2.7)².

It is good practice to set targets for WLC emissions reductions and to track progress against them throughout the project. Applicants can use the benchmarks as a basis for this but are encouraged to go further, where possible.

-- (London Plan Guidance – WLCA, sections 3.2.7)

The Carbon Management sheet is optional, but it is provided to support the overarching principles and objectives described in Appendix A.1, i.e. integrity, openness and leadership.

¹ Clients and project teams should be aware of the carbon risks and opportunities to be managed, and allow appropriate time to manage and follow-up on these risks, as they would project health & safety or commercial risks.

² In the case of the GLA planning application scheme, the GLA already require projects to identify a set of opportunities with a very high-level description and estimate; this could be used as the basis for Carbon Management entries.

Conclusion and deliverables

A third-party review is concluded when the “Latest status”, for every item in the Initiating Comment List, is either Status A or Status B³; this is visible from the Initiating Comment List sheet. This excludes items which are not relevant to the review, e.g. GLA WLCA items are generally not relevant to the options study for City of London (governed by CoL PAN Guidance).

The only general deliverable is the completed Excel workbook⁴. A statement confirming completion may be sent by e-mail, but a formal letter is not required or encouraged. Historically, the third-party review letters, statements, and reports have conveyed significant and widely varying meaning, which the City of London wishes to keep in a simple, consistent manner (i.e. conveyed in the Initiating Comment List).

³ **Exceptional cases:** If a satisfactory conclusion cannot be achieved (i.e. a Status C cannot be resolved), it is crucial that the third-party reviewer also retains the right to conclude their assessment with this note. The concluding comment should consider the principles set out in the section below, *Guidance on writing effective detail-level commentary*. The local authority (or other overseeing party procuring the review) is to make a decision on how to proceed, given the context of the project being reviewed, and the risks associated with the unresolved comment.

⁴ See sections 1.2 and 1.3 for deliverables which may be relevant to these specific reviews.

Using the workbook effectively

Review workbook hosting

The workbook ideally remains in one commonly accessible location, in the cloud, to which all parties to the review have access. This may be setup by the City of London or the reviewer. All parties would be free to download and archive a copy if they wished, but work ideally proceeds in a single, central file. This will avoid the need to circulate attachments in e-mails, renaming files with dates and version numbers, and so on, as typically seen in the third-party review process.

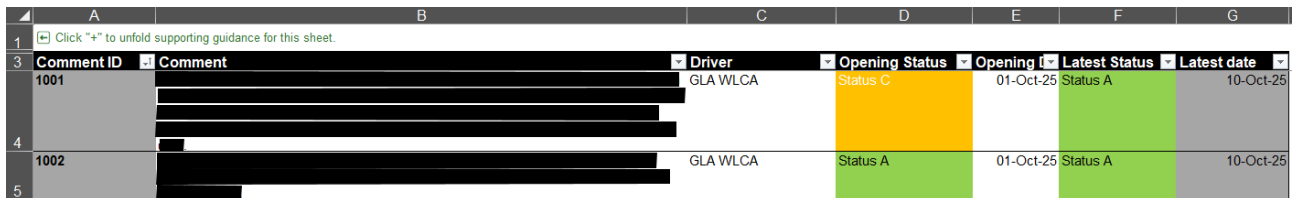
Visualising communications efficiently

Initiating Comment List

This sheet is setup to communicate the Opening status of a comment, and the “Latest status”. After the initial third-party review, once the response dialogue process begins, this sheet is effectively frozen, with all further work taking place in the Follow-up Response Dialogue sheet.

The opening status is assigned by the reviewer on this sheet. The Latest status reflects any newer status applied through the Follow-up Response Dialogue sheet.

Figure 5 presents an example of this visualisation. In this case, Comment 1002 has been resolved satisfactorily through Follow-up Response Dialogue sheet, and the Reviewer has assigned Status A (on the Follow-up Response Dialogue sheet).



Comment ID	Comment	Driver	Opening Status	Opening Date	Latest Status	Latest date
1001	[REDACTED]	GLA WLCA	Status C	01-Oct-25	Status A	10-Oct-25
1002	[REDACTED]	GLA WLCA	Status A	01-Oct-25	Status A	10-Oct-25

Figure 5 An example of the Latest Status and Opening Status columns

Follow-up Response Dialogue

This sheet is setup to group Comment IDs, and to present a timeline of the dialogue (sorting by Date, oldest to newest for each Comment ID). After a set of comments and response are added, it may be necessary to refresh the list, to show the correct order of comments, from oldest to newest. In the Excel ribbon, select View. In the drop-down Sheet View list (left of the ribbon) change to *Default* and then re-select *Response Dialogue - Default Sort*.

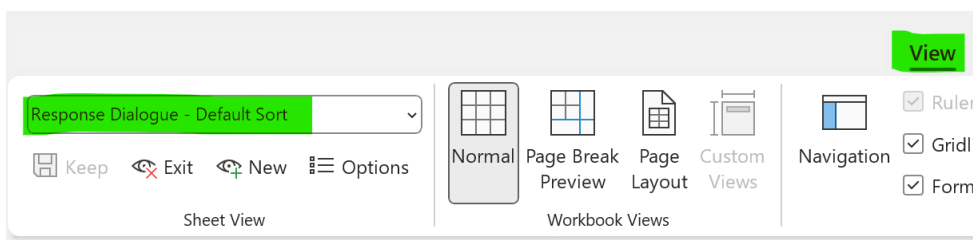


Figure 6 Use the Sheet View function in Excel to refresh the Follow-up Response Dialogue list, to group by Comment ID and sort from oldest to newest comments

A complete third-party review exercise should demonstrate a progression from the carbon assessor’s first response to the comment, through to Status A or Status B applied by the third-party reviewer. It will then be possible to follow any dialogue, read from left to right, top to bottom, in sequence.

See Figure 7 for an example which involves the third-party reviewer initially applying Status B; but the carbon assessor chose to provide further information, allowing the reviewer to upgrade to a Status A.

Comment ID	Responder	Response	Date	Status
2015	LCAssessors Ltd.	[Redacted]	07-Dec-24	[Redacted]
2015	Private Investigators Group	[Redacted]	08-Dec-24	Status B
2015	LCAssessors Ltd.	[Redacted]	09-Dec-24	[Redacted]
2015	Private Investigators Group	[Redacted]	10-Dec-24	Status A

Figure 7 Example of how the Follow-up Response Dialogue sheet is intended to be read

Viewing/hiding guidance and complementary information

To support end-users, guidance notes and data have been made available in (un)foldable columns and/or rows. The feature is accessible using the +/- buttons on the top or left side of each worksheet, where this is available; see Figure 8.

1	[+]					
2						
1	A	C	D	E	F	
1	Click "+" to unfold comment detail (Column B)					
2	Click "+" to unfold supporting guidance for this sheet.					
4	+	Comment ID	Responder	Response	Date	Status
5		[Redacted]	[Redacted]	[Redacted]	07-Dec-24	[Redacted]
6		[Redacted]	[Redacted]	[Redacted]	08-Dec-24	Status B
7		[Redacted]	[Redacted]	[Redacted]	09-Dec-24	[Redacted]
8		[Redacted]	[Redacted]	[Redacted]	10-Dec-24	Status A

Figure 8 (Un)foldable rows and columns accessible by clicking the buttons highlighted in green, above

Lists sheet

The Lists sheet includes the Driver table and Status code table, referenced in the Initiating Comment List sheet.

The Status Codes are not to be changed.

The Driver list remains accessible in case any party identifies a bespoke need for this resource, e.g. third-party reviews for client purposes, independent of GLA or City of London planning purposes.

For GLA and City of London review purposes, the Driver list **should not be changed by end-users**. This is to maintain consistency in the data the City of London collects over time.

Guidance on writing effective detail-level commentary

A WLCA third-party review exercise requires professional judgement and insight to be applied; however, the review process also needs to be able to respond to the evolution of best practice and emerging guidance.

As set out in the principles defined for this work (see Appendix A.1), standardisation, consistency, and subjectivity need to be balanced in the process.

To achieve this balance and maintain sensible boundaries for WLCAs, some key third-party review considerations are set-out below, for writing effective detail-level commentary.

Both third-part reviewers and assessors are to consider these principles in the governance of a review process. Third-party reviewers are to consider their comments in the light of these principles; and those being reviewed are encouraged to also be aware of these principles, and to cite them where needed, to moderate the time and resources expended to conclude a third-party review exercise.

Consistency with Industry Standards: Comments and suggestions should align with established industry standards and best practices. This helps maintain the credibility and reliability of the review process.

Transparency and Documentation: All comments, suggestions, and decisions should be well-documented and transparent. This includes providing clear rationales for any significant changes or recommendations.

Constructive Feedback: All comments should be constructive, including a recommendation for how a comment might be addressed to improve the quality of the work.

Prioritisation of Impact: Emphasise issues that have a significant impact on the overall results of the carbon assessment. Minor issues that do not substantially affect the outcome should then be managed appropriately.

Respect for Expertise: Acknowledge and respect the expertise of both the reviewers and those being reviewed. Ensure that comments and suggestions are made with an understanding of the technical complexities involved. The “N/A” comment relevance (instead of Status A, B, or C) is for reviewers to record observations and commendations; reviewers are strongly encouraged to use this.

1.2 City of London Carbon Optioneering Reviews

Context

Third party review is required to ensure that options have been designed, calculated and evaluated realistically and consistently.

The requirement for third party review introduces rigour and scrutiny into the process and to ensure that the optioneering forms a robust basis for the development of the application scheme.

— Carbon Options Guidance, Planning Advice Note, City of London. Appendix 7 Third Party Review Guidance

The City of London Planning Advice Note for Carbon Options Guidance requires a third-party review to be completed on the pre-application stage optioneering exercise in the earliest stage of planning application discussions. The appendix cited in the box above provides further context for this requirement.

A well-executed review can add value to a project as it proceeds towards a full planning application; and can establish best practice principles for the consideration of carbon and carbon management as the project moves through subsequent stages. The application of this third-party review guidance is seeking to support a well-executed review, supporting the delivery of the requirements of the Planning Advice Note cited above.

Applying the City of London’s third-party review framework and guidance

Timing

The optioneering third-party review should be initiated as soon as the conditions are ready, as described in Initiation of review(s). There should be a period between the carbon options study exercise completing, and the planning application submission, to minimise any risk that the third-party review exercise motivates reconsiderations, or that adverse comments (i.e. Status C) cannot be resolved to a satisfactory status (i.e. Status A or B).

If a third-party review is procured late in the process, the third-party reviewer may be implicitly pressured to arrive at a satisfactory conclusion, and the opportunity for an effective third-party review may be missed.

Developing comments in the Excel workbook

The Excel workbook for the third-party review is pre-populated with mid-level commentary, extracted from the City of London Carbon Options Guidance, and current best practice for early-stage carbon assessments.

Third-party reviewers are welcome to add further detail-level (specific, detailed, technical) comments, building on the mid-level list. However, **all mid-level list items should be considered and concluded as a minimum.**

Detail-level comments must also consider the sub-section above: Guidance on writing effective detail-level commentary, in section 1.1.

Further to the general guidance on detail-level commentary, it is useful for all project team members and parties to a review to remind themselves of both the limitations of these early-stage assessments, as well as the opportunities to use them to understand and manage the most important early-stage decisions. The following resources should be considered, as a minimum:

- “Optioneering Considerations” in City of London Carbon Options Guidance
- “WLC principles, Table 2.1” in GLA WLC Guidance (March 2022)

Section 2.4, in RICS 2nd ed. guidance also describes the value of setting building element and performance parameter priorities in early design options studies. It is particularly valuable to focus on understanding substructure, superstructure, and building envelope/façade, including degrees of retention/demolition, energy performance characteristics, durability, and carbon impact.

The third-party review exercise should be conducted with this context in mind. As the City of London describe, the exercise should bring objective rigour and scrutiny, to ensure that carbon assessments have been designed, calculated and evaluated realistically and consistently; and this should extend to the communication of both the risks and opportunities within or identified by the carbon assessment. This way, project teams, planning authorities, and the wider industry are informed regarding the decisions they need to make, and the levels of aspiration within the industry.

Conclusion and deliverables

In addition to the general deliverable described in section 1.1, the COL PAN guidance requires the third-party reviewer to provide a final sign-off on the dashboard. This should also be complete, simply citing the City of London third-party review framework.

The optioneering assessment is to be included in the planning submission, as per existing City of London requirements. Whether or not the third-party review is provided with the planning submission is up to the City of London. However, it is assumed that the value added from the third-party review, following this guidance and framework, is established in the applicant's optioneering report and other complementing planning submission deliverables.

1.3 GLA Planning Application Submission Stage

Context

The GLA planning application submission requires applicants and developers to adopt third-party quality assurance mechanisms “to ensure accuracy in their submissions”. Detailed guidance is not provided to complete this; it is for the applicant and developer to define the method.

The City of London also has a responsibility to scrutinise the assessment in accordance with the GLA guidance, for certain qualities⁵. The GLA guidance provides some high-level principles for itself (and local authorities) to consider. These high-level principles are:

Completeness: Has the WLC assessment template been completed in full?

Technical Quality: Does the assessment use the appropriate baseline, assessment tools, and methodology?

Reduction in WLC Emissions: Has the applicant demonstrated that actions have been taken to reduce WLC emissions?

Level of Ambition: Do the estimated and actual WLC emissions fall within or improve upon the benchmarks?

To steer and inform third-party review governance of the GLA planning application submission stage, these high-level principles are adopted within this framework.

Applying the City of London’s third-party review framework and guidance

In support of the City of London’s responsibilities, and consistent with the overarching review principles set out in Appendix A.1, the City of London’s third-party review framework and resource (the Excel workbook) is provided for applicants to use for GLA planning application submission stage. The Excel workbook is pre-populated with mid-level commentary, extracted from the GLA WLC guidance, and from the checklists the GLA has provided in response to applicants, previously.

Third-party reviewers are welcome to add further detail-level (specific, detailed, technical) comments, building on the mid-level list. However, **all mid-level list items should be considered and concluded as a minimum.**

Detail-level comments must also consider the sub-section above: Guidance on writing effective detail-level commentary, in section 1.1.

Further to the general guidance on detail-level commentary, it is useful for all project team members and parties to a review to remind themselves of both the limitations of building carbon assessments, as well as the opportunities to use them to understand and manage carbon on building projects. The following is a pertinent extract from the GLA’s consultation on the draft carbon guidance⁶.

“We agree that planners and design teams should be aware that results are likely to change throughout each stage of the assessment and that conditions (or legal agreements) should not enforce these predictions. It is widely recognised that WLC assessment and reporting is at the early stages of adoption and consistency between tools and assessment methods are needed. The GLA’s policy is intended to support this necessary evolution of WLC assessment over time. As stated above, the guidance has been updated to recognise that variations between stages are to be expected” (see Footnote 6)

The third-party review exercise should be conducted with this context in mind and proceed accordingly. As the City of London describes, the objective should be to bring objective rigour and scrutiny, aiming to verify that carbon assessments have been designed, calculated, and evaluated realistically and consistently; and this should extend to the communication of both the risks and opportunities within or identified by the carbon assessment. This way, project teams, planning authorities, and the wider industry are best informed for the decisions they need to make, and the levels of aspiration within the industry.

⁵ GLA WLC Guidance (March 2022), paragraph 3.4.1

⁶ Whole Life-Cycle Carbon Assessments LPG - [Consultation Summary Report](#) (March 2022)

Appendices

A.1 Principles and Objectives

This appendix was developed in parallel with a review of past third-party reviews from across a range of consultants, for both optioneering and detailed WLCAs. This appendix merges the observations and reflection following the review of past third-party reviews, with fundamentals principles defined by the City of London's members' code of conduct. This appendix has been used to inform the shape of the third-party review guidance document and process to which it is attached.

The City of London's members' code of conduct sets out seven principles; these are:

- **Integrity:** Be honest and act with integrity
- **Objectivity:** Make decisions based on merit, not personal bias
- **Accountability:** Be responsible for your decisions and answer to constituents
- **Openness:** Be transparent and share information with the public
- **Honesty:** Be truthful and avoid conflicts of interest
- **Leadership:** Take charge and guide the community

The themes which surfaced from the review notes above are presented below as objectives for a defined third-party review process. The objectives are also demonstrated to be linked with the principles above.

Objective(s): Standardisation and consistency.

Adopt more standardized parameters and formats. This approach would help ensure greater consistency across different reviews, minimize confusion from unique classification systems or comment styles, and make it easier to compare results.

- Aligned with CoL principle of objectivity.

Objective(s): Documentation and information management.

It would be helpful to improve documentation and information management. This could involve maintaining an archive of received information to avoid duplication and ensuring that all necessary supporting documentation is included to confirm that all relevant information has been considered.

- Aligned with CoL principles of accountability, objectivity, and openness.

Objective(s): Review process and communication.

It would be beneficial to focus on standardising the review process and communication. This could involve ensuring complete documentation from applicants to reduce uncertainty for assessors and prevent bespoke processes. Additionally, aligning exchanges with established guidance would help avoid individual interpretations and promote standardized practices.

- Aligned with CoL principles of accountability, objectivity, and openness.

Objective(s): Clarity and transparency.

It would be helpful to focus on improving clarity and transparency. This could involve using clear status indicators and avoiding manual colour coding or text formatting that might be misinterpreted. Additionally, clearly confirming the final status of comments would help prevent misunderstandings about issue resolution.

- Aligned with CoL principles of accountability, objectivity, and openness.

Objective(s): Professional judgment and subjectivity.

It would be beneficial to address the issue of professional judgment and subjectivity. This could involve minimizing subjective assessments based on individual experience and reducing supplementary commentary or questions that may create uncertainty for responders.

- Aligned with CoL principle of objectivity.

Objective(s): Efficiency and repeatability. It would be helpful to focus on improving mass repeatability and efficiency. This could be achieved by reducing unnecessary duplication and standardising review parameters.

- Aligned with CoL principles of accountability and objectivity.

These principles and objectives described above have guided the final development of the third-party review framework and detailed process defined in section 0 and the complementary Excel-workbook, the third-party review comment list in the complementary Excel-workbook.