



Policy and Resources Committee APPENDICES PACK

Date: THURSDAY, 2 MAY 2019
Time: 1.45 pm
Venue: COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

8. GENDER IDENTITY

- **Appendix 1:** Gender Identity Policy (Pages 1 – 4)
- **Appendix 2:** Gender Identity Survey Report (Pages 5 – 44)
- **Appendix 3:** Equality Impact Assessment (Pages 45 – 54)

9. TRANSPORT STRATEGY

- **Appendix 1:** Integrated Impact Assessment Non-Technical Summary (Pages 55 – 94)
- **Appendix 2:** Phase 3 Engagement Report (available online and on request)
- **Appendix 3:** Corporate Plan outcome mapping (Pages 95 – 96)
- **Appendix 4:** City of London Transport Strategy (tracked changes) (Pages 97 – 184)

10. COMMUNITY INFRASTRUCTURE LEVY – NEIGHBOURHOOD FUND

- **Appendix 1:** Key themes arising from consultation (Pages 185 – 190)
- **Appendix 2:** Proposed CIL Neighbourhood Fund (Pages 191 – 200)

11. CODE OF CONDUCT AND CONFLICTS OF INTEREST

- **Appendix 1:** Code of Conduct (Pages 201 – 212)
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**John Barradell
Town Clerk and Chief Executive**

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Gender Identity Policy

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Introduction

1. The issue of gender identity has relevance and importance for services across the City Corporation and for our members and staff. This policy is intended to support a consistent and coherent approach both in service delivery and in the workplace.
2. This policy contributes to the delivery of the City Corporation's Corporate Plan 2018-23. It contributes to the following key outcomes:
 - People are safe and feel safe
 - People enjoy good health and wellbeing
 - People have equal opportunities to enrich their lives and reach their full potential
 - Communities are cohesive and have the facilities they need
 - Businesses are trusted and socially and environmentally responsible

Equality and Inclusion Policy

3. The City Corporation is committed to delivering excellent customer service. We recognise the different needs of our customers and actively work to minimise potential issues of exclusion and to challenge discrimination. We aspire to be a leader in equality and inclusion, serving a wide range of communities including our members, staff, residents, businesses and workforce.

4. The City Corporation also aims to provide an inclusive, respectful and discrimination-free work environment for staff. We will use best practice in employment in accordance with legislation to ensure that employees feel respected and able to give their best. As far as possible, we want our workforce to be broadly representative of all sections of society.
5. The City Corporation's Equality Objectives for 2016-20 are to:
 - Increase community engagement and improve cohesion within our communities so that people feel safe;
 - Support the City's most disadvantaged groups and develop our understanding of communities;
 - Improve the way we listen to our communities and respond to their feedback to improve services; and
 - Promote staff development and career progression to ensure equality of opportunity for the promotion and development of a workforce that reflects the make-up of our communities.
6. The City Corporation is required to have due regard to the Public Sector Equality Duty (s.149 Equality Act 2010) and in particular:
 - To eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act;
 - To advance equality of opportunities between persons who share a relevant protected characteristic and persons who do not share it; and
 - To foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Gender Identity: Our Services

7. The protected characteristics under the Equality Act 2010 are: age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership and pregnancy and maternity.
8. The term 'gender reassignment' applies to a person who is proposing to undergo, is undergoing or has undergone a process (or part of a process) to reassign their sex by changing their physiological or other attributes. This is a personal process, and not a medical one, and may or may not involve medical interventions (e.g. surgery or hormone treatment).
9. The Equality and Human Rights Commission advises that the term 'gender reassignment' is outdated or misleading, and the preferred umbrella term is 'trans'. The City Corporation recognises that gender identity is complex and varied (e.g. some people identify as genderfluid), and this will be reflected in our approach.
10. The Equality Act requires that people with the protected characteristic of gender reassignment are not discriminated against in the provision of single-sex services and are able to access services aligning with their gender identity. In a few circumstances, services may lawfully discriminate if excluding trans people is a proportionate means to achieving a legitimate aim. The explanatory notes in the Equality Act provide single-sex

counselling services for survivors of sexual violence as an example of where lawful discrimination could take place.

11. The City of London Corporation is committed to trans inclusivity and to open dialogue with the people who use our services. We will consider any 'legitimate aim' on a case by case basis, only deviating from a presumption of inclusivity where this can be evidenced to fully comply with the Equality Act. Any action taken by the City Corporation to legally discriminate by excluding trans people would need to be rigorously justified under the Equality Act, taking account of all the circumstances of the case and informed by an Equality Impact Assessment.

Gender Identity: Our workforce

12. The City Corporation is committed to promoting equality and fairness in our employment practices. It is opposed to all unlawful discrimination, harassment and victimisation.
13. This policy should be read in conjunction with the City Corporation's Managers' [Guide to Transgender Equality](#) which provides a broad introduction for managers and guidance on supporting an individual who is transitioning, time off and use of facilities. A Trans Awareness course is available for staff online.
14. The Equality Act gives protection against less favourable treatment of employees in relation to an absence that is because of their gender reassignment. Our policy for staff makes clear that time off for medical or other treatment should be treated no less favourably than time off for illness or medical appointments. In addition, it states that a trans employee must be able to use the toilet or changing room of their expressed gender identity without fear of harassment.

Responsibilities

15. Chief Officers will be responsible for the provision, design and development of their services / departments to ensure compliance with the Equality Act. All Departments within the City Corporation will report on their progress on Gender Identity through the Equality and Inclusion Annual Report, which is publicly available on the City Corporation's website.
16. Departmental Leadership Teams are required to refer to the Managers Guide on Transgender Equality and ensure that all managers access and implement appropriate training.
17. The City Corporation's Human Resources Department will ensure that the Manager's Guide to Transgender Equality and this policy are included in mandatory equality training for managers and will facilitate appropriate training packages for staff.

Conclusion

18. The City Corporation takes its responsibilities under the Public Sector Equality Duty very seriously, and aspires to be a leader on equality and inclusion issues, including the implementation of our Equality Act responsibility for trans inclusion.

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City of London Gender Identity Survey: Report April 2019



FOR COMMITTEE

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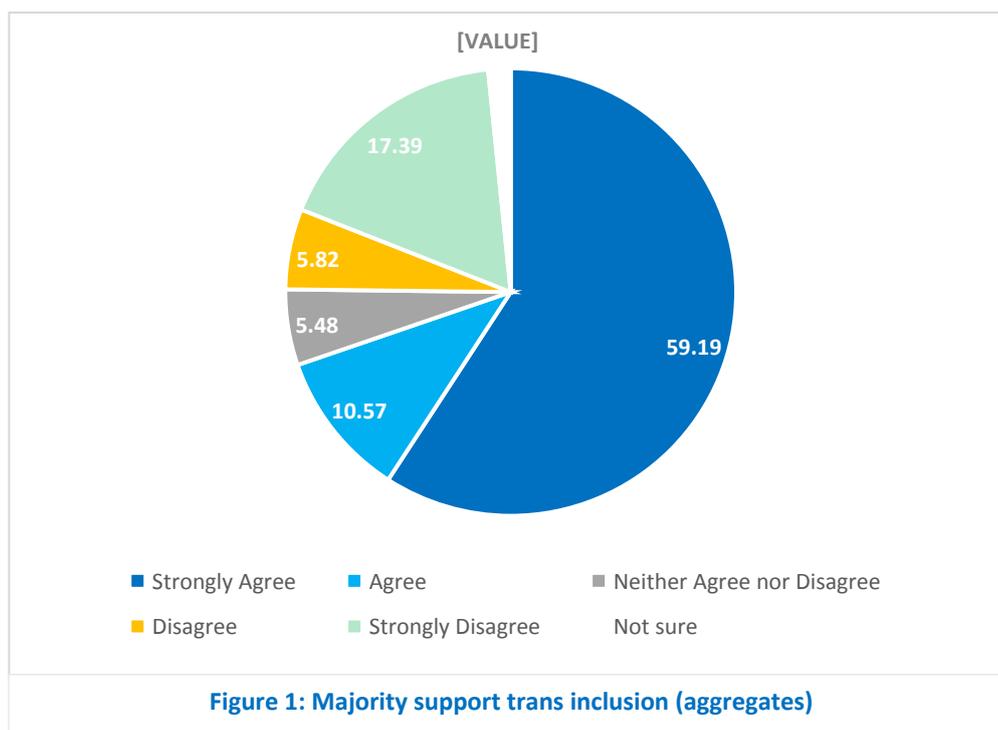
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Executive Summary

Survey findings

- For all stakeholder groups there was a clear majority in favour of the principles and propositions on gender identity that were set out in the survey, with between two and four times as many respondents strongly supporting or agreeing as said they opposed or strongly disagreed.



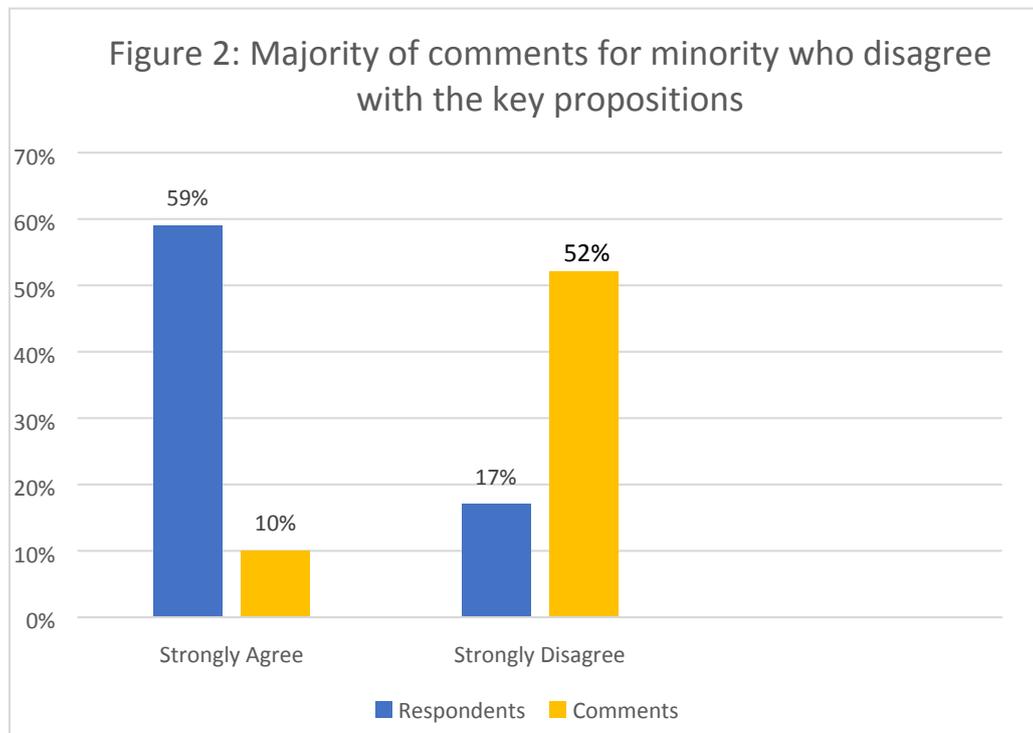
Responses

- There were 21,191 valid responses to the survey. 1,564 respondents identified as 'City Resident' and a further 3,148 as 'City Resident and Worker' (22% of responses in total). Analysis using postcode information to narrow this down to 'Square Mile' residents suggests that 318 responses were from 'City Residents' and 657 from 'City Residents and Workers'. Most of the rest of this self-identified group were Londoners.
- The demographic profile of respondents was similar across all groups, with women in the majority, and most respondents (a) aged 18 to 54 years and (b) of white British ethnicity.

Free text analysis

- While most respondents were supportive, those opposed to the proposals were much more likely to use free text facilities, and this is reflected in the balance of comments provided, which does not reflect the balance of opinion on the issues reflected in the survey.
- Many of these respondents took the opportunity to question the consultation process itself, with a recurrent theme being the use of language (particularly 'gender' and 'sex').

- The importance of appropriate safeguarding was a recurrent theme.
- A consistent message in the responses was the importance of respect, acceptance, ensuring the voices of all of those affected are heard and the need to involve and consider the views of all, particularly the most vulnerable.



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Key Findings

1. Introduction

- 1.1 This report was commissioned by the City of London Corporation (City Corporation) to provide an independent analysis of the findings of a Gender Identity Survey.
- 1.2 The survey ran on the Survey Monkey Platform from 25 July to 14 September 2018. It was widely publicised to provide those who accessed City services, both within and outside the Square Mile, with the opportunity to respond – whether as residents, visitors or workers. It also sought views from relevant experts and interested organisations.
- 1.3 The Survey was an action of the City Corporation’s Establishment Committee, which is responsible for all workforce and inclusion matters. It was designed to assist the City Corporation to develop an overarching Gender Identity Policy, and to discharge its duties under the Equality Act 2010.
- 1.4 The survey was constructed in four parts:
 - About You – including association to the City Corporation
 - Gender identity – Basic Principles
 - Gender Identity – Access to Services
 - Demographic and Equalities information.

In total there were 18 multiple response questions, of which 12 allowed for free text comments (see Appendix 1 for a full list of questions).
- 1.5 The survey generated nearly 40,000 responses of which 21,191 were valid responses (see below for criteria for validity).

2. Approach to Analysis

Respondents

2.1 There were 39,650 responses, with the large majority from members of the public. Almost half of these responses did not address any of the questions on gender identity. Once these were excluded there were 21,191 valid responses, which formed the basis for this evaluation.¹ For the purposes of this report this group are referred to as ‘all respondents’² Respondents were grouped according to whether they were responding as an individual, expert on gender identity or organisation representative.

TABLE 1: BREAK DOWN OF RESPONDENTS BY STAKEHOLDER STATUS

| Respondent | Valid | Invalid | Total |
|---|---------------|---------------|---------------|
| An individual member of the public | 19,333 | 17,467 | 36,800 |
| A relevant expert in respect to gender identity | 1,671 | 851 | 2,522 |
| A representative of a specific organisation | 167 | 133 | 300 |
| Not Stated | 20 | 8 | 28 |
| Grand Total | 21,191 | 18,459 | 39,650 |

2.2 The overall response from self-defined experts were regrettably of limited value, as many did not have genuine expertise (for example, many cited basic biological qualifications as constituting ‘expertise’ on physical sex differences). It did, however, include responses from people with relevant academic, professional and lived experience, which have been considered as part of the free text analysis. Expert opinion was considered as part of the wider research that was undertaken to inform the policy. The same broadly applies to organisational responses.

2.3 1,564 respondents identified as ‘City Resident’ and a further 3,148 as ‘City Resident and Worker’ (22% of responses in total). Postcode information suggests that in fact 318 responses were from ‘City Residents’ and 657 from ‘City Residents and Workers’, while others who self-identified as such were residents of Greater London.

Coding

2.4 The survey was a mixture of:

- Closed questions – multiple response questions with defined answers (e.g. agree, disagree), these received statistical analysis.
- Open questions - free text comments.

¹ The 46% (18,459) response which were deemed invalid were respondents who primarily answered the introduction About You section which sought to identify the respondent’s stakeholder status. The one question some of this group answered was Q10 which enquired about their interest in the survey. 5% (989) responded with answers to this question ranging from transgender rights, to protecting women’s spaces, feminism, equality, interest in the subject, being a visitor to London and social media promotion.

² To ensure that only relevant responses were included for analysis, and findings were not adversely skewed, the eligibility criteria for inclusion was determined as respondents who had answered one of the questions posed (in Section 2 and Section 3) rather than limited their contribution to commenting on Question 10². This group of valid responses is identified as the core cohort. For the purpose of this report they are referred to as all respondents.

As part of this analysis the open questions were coded into key themes and grouped by frequency using a text analytics approach.

2.5 While all questions were coded in this way, where the assertion is made in this report that a respondent agrees with the ‘basic principles’, this refers to those who answered Question 13 affirmatively³. Similarly, when there is reference to agreement with the access to City Corporation Services, this refers to those who answered Question 14 affirmatively⁴. Quotes from respondents have been used to help illustrate some of the key themes. The respondent’s stakeholder status and any other demographic information - for instance self-reported gender identity - is used here.

Other considerations

2.6 This was an open survey, so the respondents are a self-selecting group.

2.7 *GDPR*. The City Corporation excluded any data that could potentially identify individuals from the dataset that was provided for analysis by Smart Consult:

- Full Postcode information – first two characters were supplied for geographical analysis
- Position within organisation of people submitting on behalf of an organisation.

2.8 *Age Bands*. This was a free text question, which has been aggregated into standard age bands as part of the analysis.

2.9 *Percentages*. These have been rounded for this report, which is why there are respondent categories recorded as 0% when there were some responses from these stakeholder groups.

2.10 *Terminology*. A glossary of acronyms and terms used within the survey and analysis can be found at the end of this report.

2.11 *Quotations and free text comments*. Comments that are abusive, discriminatory and/or contrary to the Equality Act 2010 have not been used in this report. An Excel document containing free text comments received in response to the survey is available on request from the City Corporation.

³ Q.13. Do you agree or disagree with the following statement...?

A person who consistently identifies in a gender which is different to the one they were assigned at birth should be able to access services commonly provided to the gender with which they now identify?

⁴ Q.14. Do you support or oppose the following proposal...?

Where access to services or facilities are restricted by gender, the City Corporation has it in mind that the restriction should relate to the gender with which the service user consistently identifies now, regardless of whether that is the gender they were assigned at birth.

3. Key Messages: All responses

Stakeholder Groups

3.1 There were 21,191 valid responses to the survey, which were categorised according to their association to the City of London as outlined in Table 3. This broadly replicates the ratios of people who live, visit and work in the City. The resident population is relatively small at 7,500 people; over 500,000 people commute daily for work purposes. There are over 10 million tourists each year.

TABLE 2: BREAKDOWN OF RESPONDENTS BY RELATIONSHIP TO CITY OF LONDON

| Respondent | Total | Percentage % |
|--|---------------|--------------|
| City Resident (self-identified) | 1,564 | 7% |
| City Resident & Worker (self-identified) | 3,148 | 15% |
| Worker | 2,900 | 14% |
| Service User | 3,800 | 18% |
| Visitor | 692 | 3% |
| Member of Public | 15 | 0% |
| Interested Participant | 7,301 | 34% |
| Organisation Rep | 161 | 1% |
| Expert | 1,590 | 8% |
| Not stated | 20 | 0% |
| Grand Total | 21,191 | 100% |

TABLE 1 RESPONDENTS BY STAKEHOLDER STATUS

3.2 Interested Participant are the largest stakeholder group to respond to the survey. Over a third of the total number of respondents do not live or work in the City of London, or use Corporation services. The most common demographic features of respondents identified them as White British, female and aged between 18 and 54.

3.3 Those with no link to the City of London provided a number of reasons why they had chosen to complete the survey:

- The survey was accessible to all, so believed they should respond.
- Policies that are implemented in London may affect those that live in other cities in the UK.
- Because they had transgender friends.
- Members of the transgender community were contacted by their friends to participate.
- They responded to social media promotion.

3.4 While 22% of respondents stated that they lived in the City of London, this did not seem plausible given the small overall resident population. Postcode analysis was conducted and reduced this to 5%. The responses from respondents identifying as City Residents were comparable to other stakeholder groups in terms of levels of support for the key propositions.

Key findings: Overall results

3.5 There was a clear majority in favour of the principles and propositions on gender identity that were set out in the survey, with between two and four times as many respondents strongly

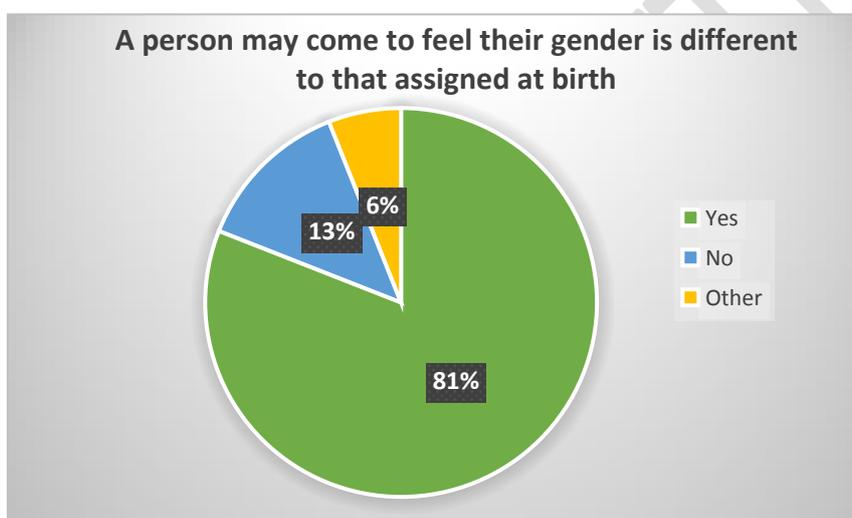
supporting or agreeing as said they opposed or strongly disagreed. This was the case for all six questions and for all the key stakeholder groups, including City Residents.

3.6 Most respondents had strongly held opinions, either in favour or against the principles and proposals, with between 70% and 82% saying they ‘strongly agreed’ or ‘strongly disagreed’.

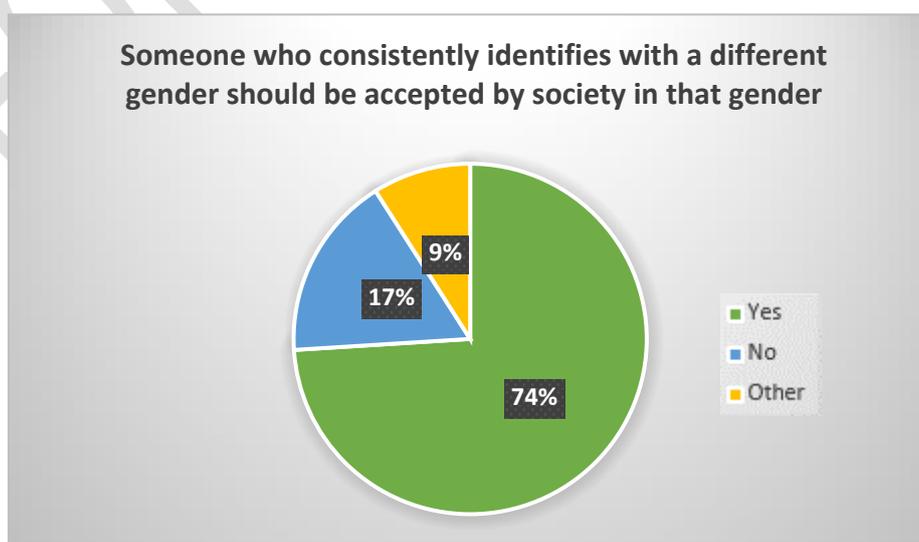
Gender Identity: Principles

3.7 Overall, on aggregate, three quarters of respondents (74%) agreed with the general principles, while one in five (19%) disagreed.

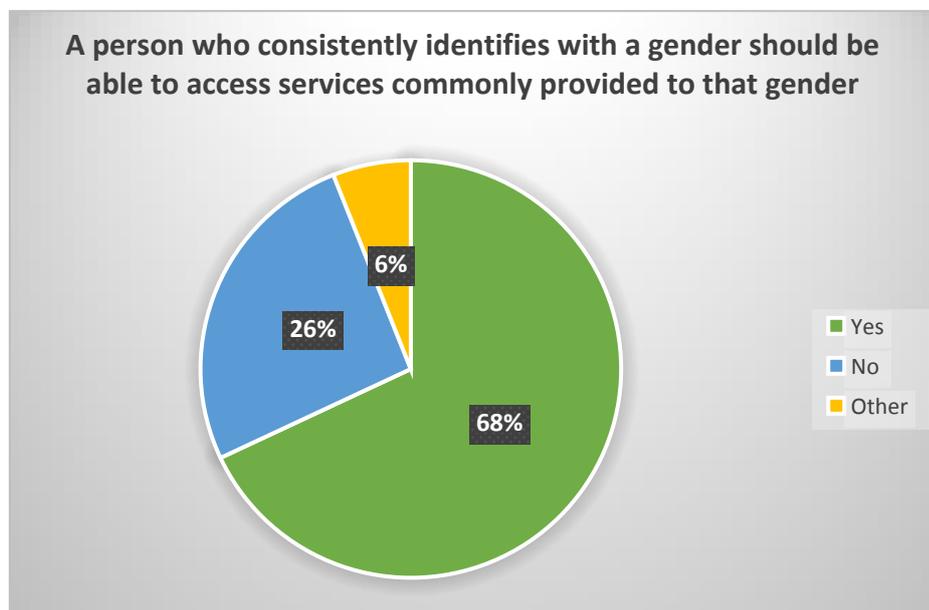
- 81% of respondents agreed that a person may come to feel their gender is different from that assigned to them at birth, with 65% strongly agreeing. 13% disagreed, with 9% strongly disagreeing.



- 74% agreed that a person who consistently identifies in a gender which is different to the one they were assigned at birth should be accepted by society in their stated gender identity, with 64% strongly agreeing. 17% disagreed, with 11% strongly disagreeing.



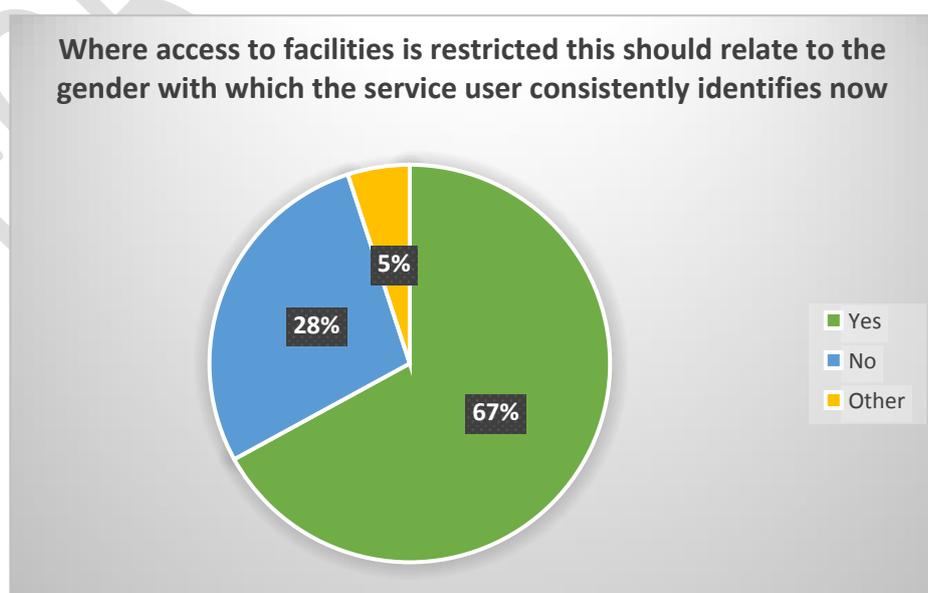
- 68% agreed that a person who consistently identifies in a gender which is different to the one they were assigned at birth should be able to access services commonly provided to the gender with which they now identify, with 61% strongly agreeing. 26% disagreed, with 18% strongly disagreeing.



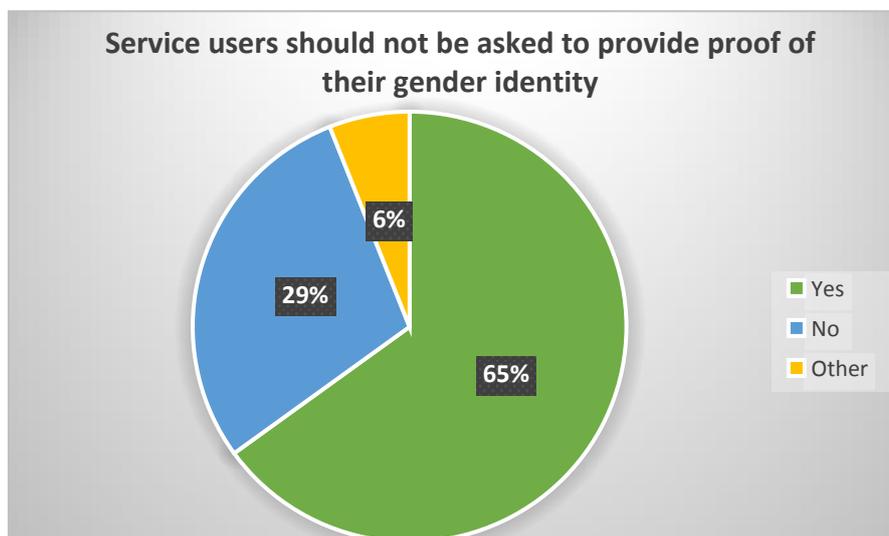
Gender Identity: Access to City Services

3.8 Overall, on aggregate, two thirds of respondents (65%) supported the proposals on access to City Corporation Services, while over a quarter (28%) opposed them.

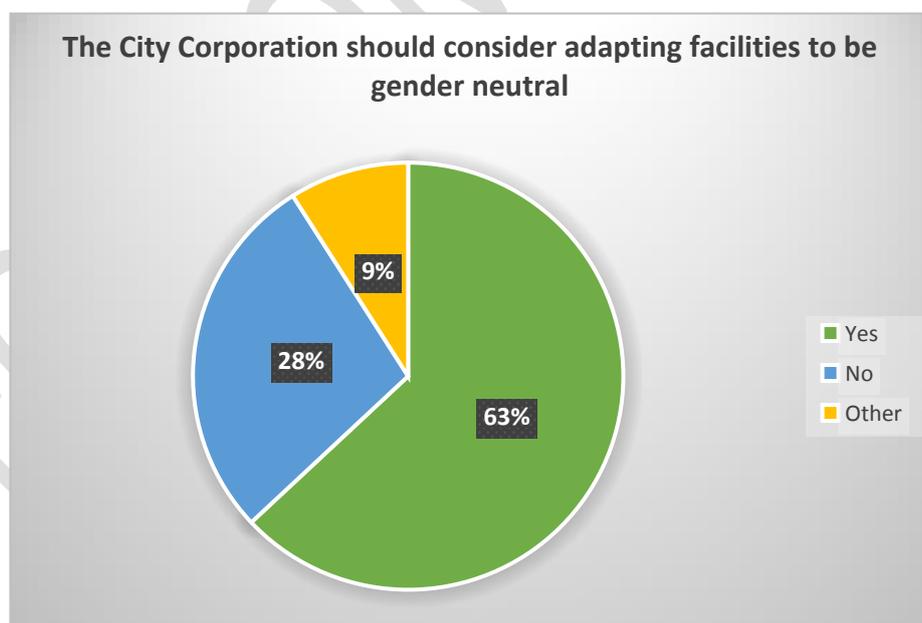
- 67% supported the proposal that where facilities are restricted by gender, those restriction should relate to the gender with which the service user consistently identifies now, with 60% strongly supporting this. 28% were against this, with 22% strongly opposed.



- 65% supported the proposal that service users should not be asked to provide ‘proof’ of their gender identity at single gender services and facilities but would rely on each service user to self-identify their gender, with 56% strongly agreeing. 29% were against this, with 23% strongly opposed.



- 63% agreed that the City Corporation should consider adapting facilities to be gender neutral, i.e. to enable anyone to use them regardless of their gender identity, with 49% strongly agreeing, 28% were against this, with 21% strongly opposed.



Free text comments

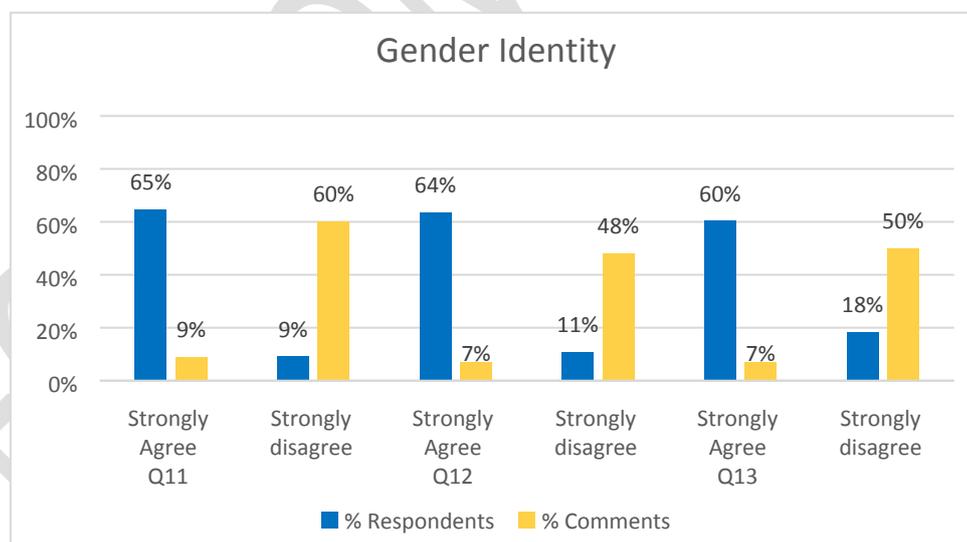
- 3.9 Each of these questions included a free text box to enable respondents to comment. Overall, the response rate to the survey was exceptionally high at 99% of valid responses. However, the MEAN average of respondents who provided free text comments on Gender Identity (Q11-13)

was 22%. Half of respondents provided further comments on the questions on Access to Corporation services (Q14, 16-17).

3.10 It is usually beneficial in surveys to use closed questions (quantitative) in conjunction with free text questions (qualitative), to improve understanding of respondents’ views and provide greater insight. However, in the case of this survey, this is problematic for two main reasons:

- I. The open nature of the survey attracted a high volume of response from people with well-established points of view on a controversial and polarizing issue. Some comments were off topic and flippant or presented offensive, abusive and vulgar views. These comments were often, but not exclusively, from respondents with no clear link to the City of London (e.g. non-UK, interested participants). Abusive comments were coded as such, but were retained in the dataset.
- II. While most respondents agreed with the key propositions in the survey, this is not reflected in the balance of free text comments. On the contrary, those who supported the principles and approach supplied few, if any, free text comments, while respondents who strongly opposed them were much more likely to add comments. It is a common issue that people are much more likely to provide critical than supportive comments. This is illustrated by the tables below which show the disparity between comments given dependent on whether the respondent strongly agreed or strongly disagreed. For example, of the 60% who strongly agreed that ‘people should be able to access services commonly provided to the gender with which they now identify’ (Q13) only 7% provided comments. Half of the 18% who strongly disagreed with this provided a comment.

TABLE 4 COMPARISON OF RESPONDENTS’ AGREEMENT TO PERCENTAGE OF COMMENTS RECEIVED - GENDER IDENTITY

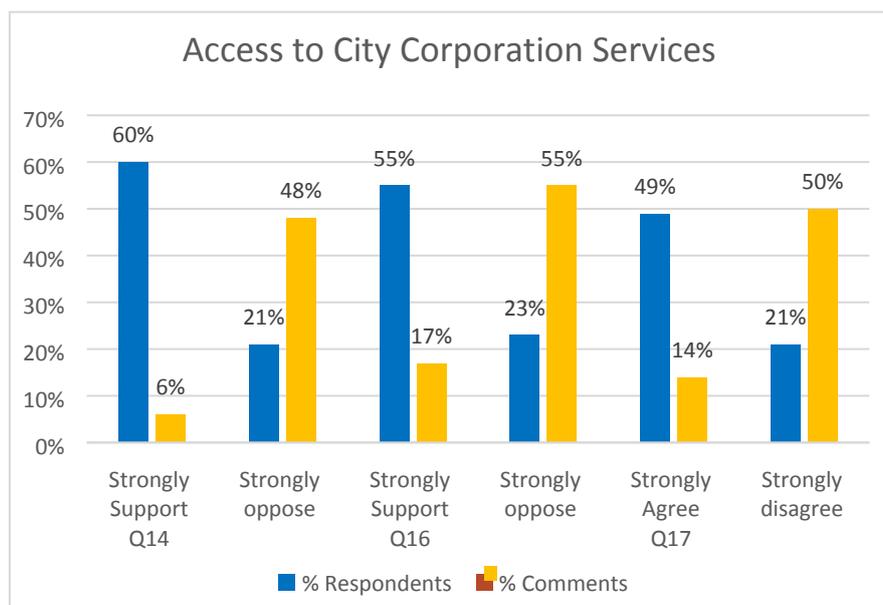


Q.11. Do you agree or disagree with the following statement...? A person may come to feel that their gender is different from that assigned to them at birth?

Q.12. Do you agree or disagree with the following statement...? A person who consistently identifies in a gender which is different to the one they were assigned at birth should be accepted by society in their stated gender identity

Q.13. Do you agree or disagree with the following statement...? A person who consistently identifies in a gender which is different to the one they were assigned at birth should be able to access services commonly provided to the gender with which they now identify?

TABLE 5 COMPARISON OF RESPONDENTS’ AGREEMENT TO PERCENTAGE OF COMMENTS RECEIVED - ACCESS TO SERVICES



Q.14. Do you support or oppose the following proposal...? Where access to particular services or facilities are restricted by gender, the City Corporation has it in mind that the restriction should relate to the gender with which the service user consistently identifies now, regardless of whether that is the gender they were assigned at birth.

Q.16. Do you support or oppose the following proposal...? The City Corporation proposes not asking service users to provide ‘proof’ of their gender identity at single gender services and facilities but would rely on each service user to self-identify their gender.

Q.17. Where the City Corporation provides services or facilities accessed according to the gender of the service user (for example male and female public lavatories), it should consider adapting those facilities to be gender neutral, i.e. to enable anyone to use them regardless of their gender identity?

3.11 Most respondents who provided free text comments raised issues about the consultation process itself – i.e. the dissemination, construct and format of the survey. A recurrent theme was challenge to the use of ‘sex’ and ‘gender’ within the survey, and the use and definition of these terms. Some felt that the consultation was inconsistent with the Equality Act 2010 in the way it used the terms ‘sex’ and ‘gender’, a claim that was considered and rejected by the City Corporation. Others felt that more should have been done to restrict responses to London residents. Respondents raised questions about the cost of implementing a gender identity policy. A common theme was the importance of respect and acceptance for all and the voices of all being heard, particularly vulnerable and equalities groups.

I object to the implication that I was 'assigned' a gender at birth. Genders are socially constructed roles based on sexist stereotypes to the (mainly) disadvantage of women.

Interested Participant, White British, Male, Heterosexual/Straight, 52

3.12 A common view among those who did not support the proposals was that biology is a given. Gender was portrayed as a social construct, a learned social phenomenon that shapes assumptions about behaviour, clothing, feelings and identity. It was felt that acceptance of other’s gender identity should not be at the expense of other vulnerable groups. A minority stated that acceptance should be contingent on transition – which is inconsistent with the legal

requirements of the Equality Act 2010. At the same time, there was a broad consensus that everyone deserves to be treated with equal respect, and on the need to adapt services so that they work for everyone, so long as people's rights are protected.

- 3.13** On access to City Corporation services some respondents said that they or others would feel awkward, uncomfortable or 'at risk' sharing services with people who were not biologically the same. There were also concerns about the potential for a gender identity policy to be abused by men who may harm women and girls. Others highlighted the risks to transgender people where they were required to continue to use services based on the gender assigned to them at birth. On proof of gender identity, some proposed restricting access to services depending on 'biological sex', which would be inconsistent with the Equality Act 2010, other than in exceptional circumstances. Others questioned the possibility of 'proof', given the complexities of gender identity. Some commented on the difficulties of relying on appearances, and the subjective nature of this approach, which could leave security personnel and other staff in an awkward situation.

'Transgender people just want to be treated like human beings. We are not dangerous, contagious, or doing anything to bother anyone. Not allowing us access to the recourses we need such as proper bathrooms is hurtful both on an individual level and to a large group of the people you serve.'

Expert, White, Agender, Bisexual, 22

- 3.14** Some respondents offered practical proposals for the design of inclusive services and facilities. Supplying individual cubicles and stalls in gender neutral toilets was one of the most frequent suggestions of this kind, and it was noted that these are available in many settings (e.g. educational institutions and airplanes). A number said that gender-neutral toilets with lockable cubicles and without urinals would be comfortable for most people, but a small minority canvassed for the inclusion of urinals to keep change to the minimum. Similar suggestions were made regarding the provision of changing areas/ cubicles in swimming areas.

I think gender neutral toilets should indicate whether they contain stalls, urinals or both and indicate gender neutral on the door or have no gender marker. Which is a working model I've seen on many occasions and has eradicated confusion and discomfort. I think that in general people like to have the option of cubicles anyway in terms of varying levels of personal comfort with their bodies and for trans women and non-binary folks this can be advantageous for safety as well, to avoid potential harassment or microaggressions from transphobic people which sadly is common in our society at present - which can be a traumatic situation and cause undue anxiety.

Visitor, Chinese Polish, Queer, 31

Summary of key issues raised

| | ISSUE | FOR | AGAINST | COMMON GROUND |
|-----------------------------------|---|--|--|--|
| GENDER IDENTITY ACCESS | <i>Restrictions should be based on gender identity</i> | <ul style="list-style-type: none"> • Safety risks for trans people • Transgender rights • Wellbeing and inclusion of transgender people | <ul style="list-style-type: none"> • People must complete transition first* • Restrict access based on biological sex* • Prioritise dignity of women and girls • Single sex provision is itself an equalities | <ul style="list-style-type: none"> • Safety risks • Respect for human rights |
| GENDER IDENTITY: BASIC PRINCIPLES | <i>A person may feel their gender is different than assigned at birth</i> | <ul style="list-style-type: none"> • Transgender people exist and should be recognised • Gender identity can be fluid | <ul style="list-style-type: none"> • Sex should be defined biologically • Gender is not 'assigned' but 'given' by sex* | <ul style="list-style-type: none"> • Importance of correct definition of sex and gender |
| | <i>Acceptance by society in that gender</i> | <ul style="list-style-type: none"> • Impact of gender dysphoria • Transgender people should be accepted • Transgender experience of victimisation and exclusion | <ul style="list-style-type: none"> • This may impact on other vulnerable groups • Acceptance should not be forced or an expectation • Acceptance should be contingent on complete transition* | <ul style="list-style-type: none"> • Gender as a social construct |
| | <i>Access to services should be based on the individual's gender identity</i> | <ul style="list-style-type: none"> • This will improve equality • This will improve the health and wellbeing of transgender people | <ul style="list-style-type: none"> • Access should be based on biological sex* • Transgender people are a small minority and 'can't program' for this group* • This would exclude others for religious and cultural reasons | <ul style="list-style-type: none"> • This should not be in ways that infringe the rights of other people • Adapt services for everyone • Put safeguards in place to protect vulnerable groups |

Note that free text comments were disproportionately from those who disagreed with/opposed the principles and proposals in the survey

Basic Principles

* These comments are inconsistent with the legal requirements of the Equality Act 2010.

| | | | | |
|-----------|---|--|---|--|
| TO CIT | <i>Safeguarding Measures (free text)</i> | | <p>issue</p> <ul style="list-style-type: none"> There should be separate pools for males and females | <ul style="list-style-type: none"> Prioritise safeguarding vulnerable groups Diverse options Importance of individual privacy Separate cubicles (for/against) Urinals (for/against) |
| | <i>Proof of gender identity</i> | <ul style="list-style-type: none"> No need for proof Proof should be only in instances of doubt/concern Proof of identification is discriminatory | <ul style="list-style-type: none"> Identity documents should be provided Self-identification should be discouraged Self-identification is subjective | <ul style="list-style-type: none"> Risks of assault Protect vulnerable groups |
| | <i>Gender Neutral Facilities and Services</i> | <ul style="list-style-type: none"> Hygiene issues | | <ul style="list-style-type: none"> Gender neutral facilities are a feasible option Gender neutral facilities are less stigmatising Protection of vulnerable groups |

Access to Corporation Services

* These comments are inconsistent with the legal requirements of the Equality Act 2010.

4. Key findings City Residents, Workers and Service Users

City Residents: Response

4.1 City residents will have identified as either ‘living in the City of London’ or ‘living and working in the City of London’. 1,564 respondents self-identified as a City resident and 3,184 as a City resident and worker. However, analysis by postcode suggested that most of these respondents lived in Greater London, rather than the Square Mile (see Table 6a and 6b below), and that a little under 1,000 respondents were residents on the narrower and intended definition.

TABLE 6A: SELF-IDENTIFIED CITY RESIDENTS BY HOME POSTCODE

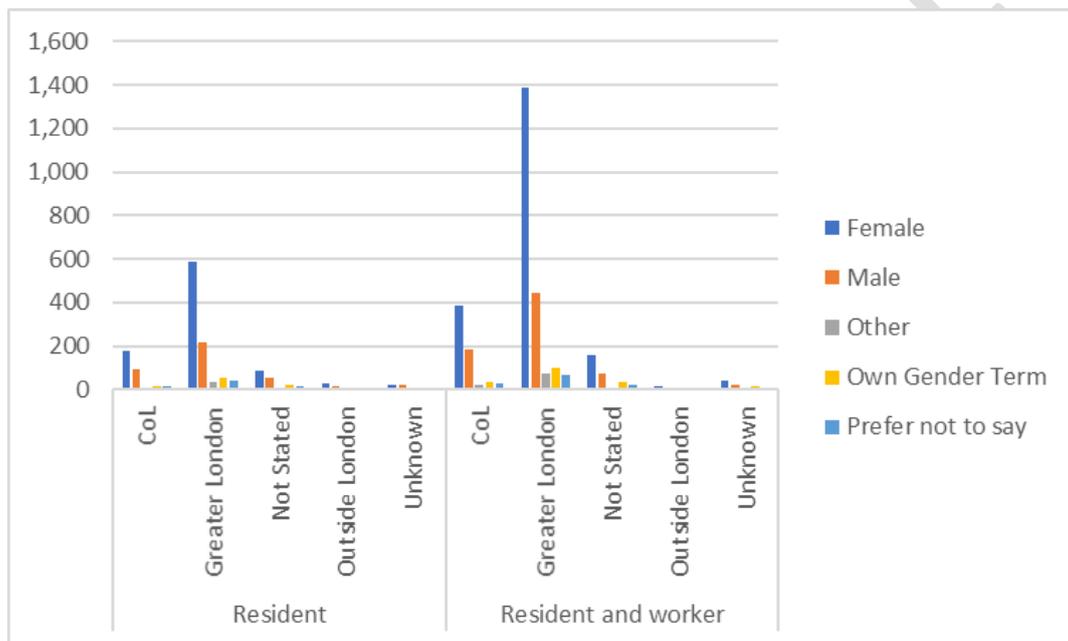


TABLE 6B: CITY RESIDENT NUMBERS BASED ON POSTCODE ANALYSIS: GRAPH

| Respondent | Female | Male | Other | Own Term | Prefer not to say | Grand Total | % Total Respondents |
|------------------------|------------|------------|-----------|-----------|-------------------|-------------|---------------------|
| City Resident | 181 | 93 | 12 | 17 | 15 | 318 | 2% |
| City Resident & Worker | 386 | 183 | 21 | 37 | 30 | 657 | 3% |
| Grand Total | 567 | 276 | 33 | 54 | 45 | 975 | 5% |

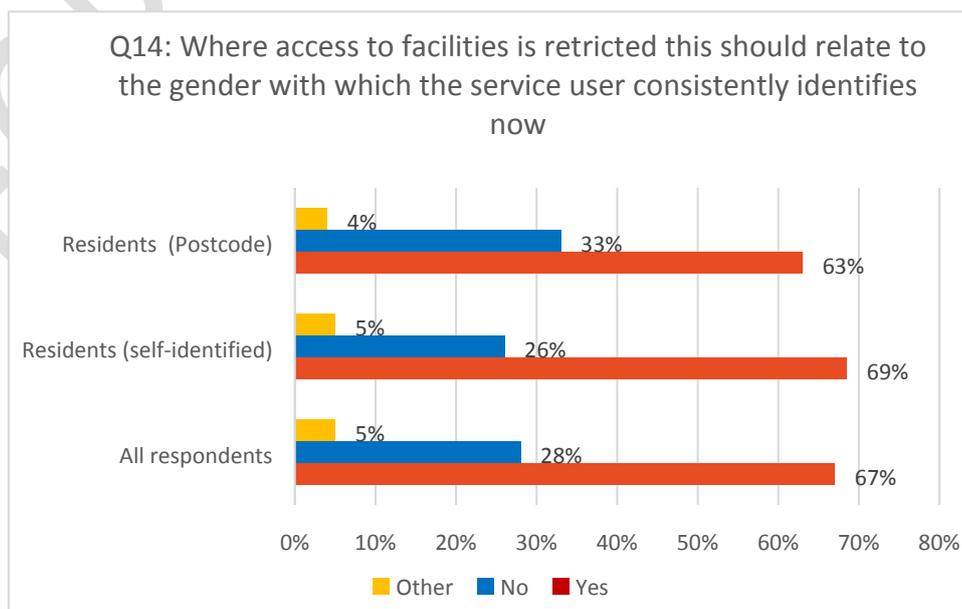
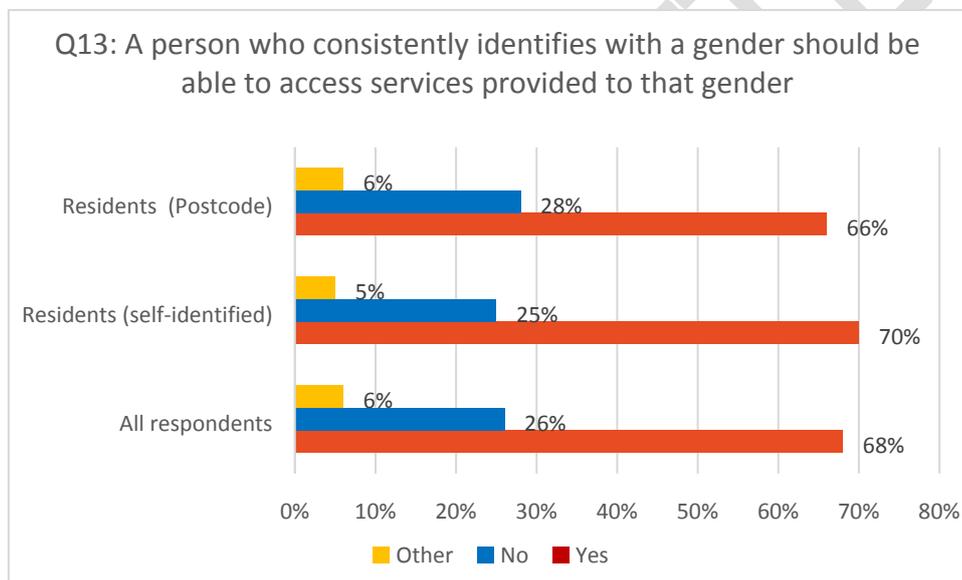
TABLE 2 CITY RESIDENTS, AS IDENTIFIED BY HOME POSTCODE

4.2 The demographic profile of this group is comparable to that for respondents generally, with 58% identifying as female, 56% as White British and 43% in the age range 25-34 (but, note, that 24% of City Residents did not provide information about their age).⁵

City Residents: Views on Gender Identity

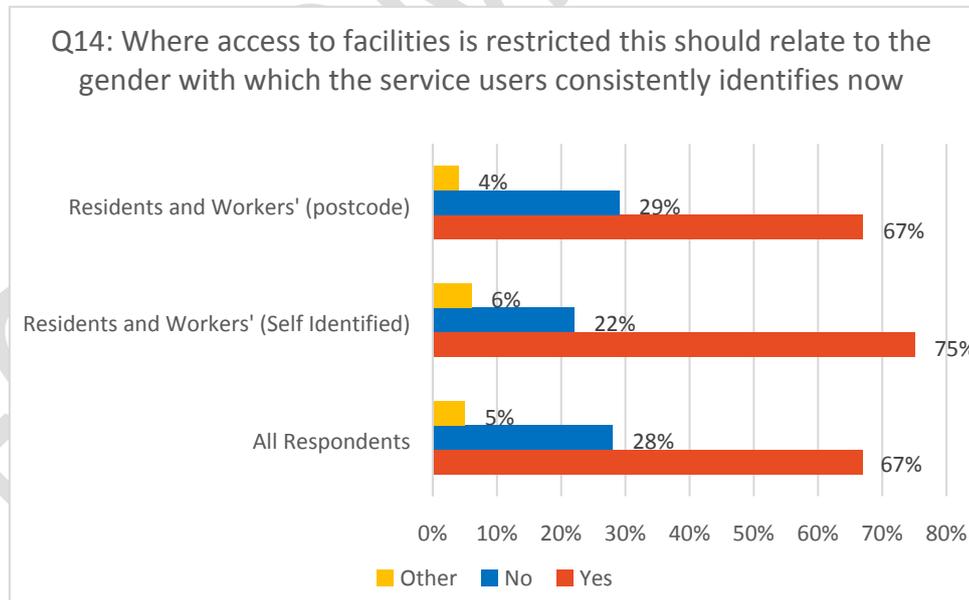
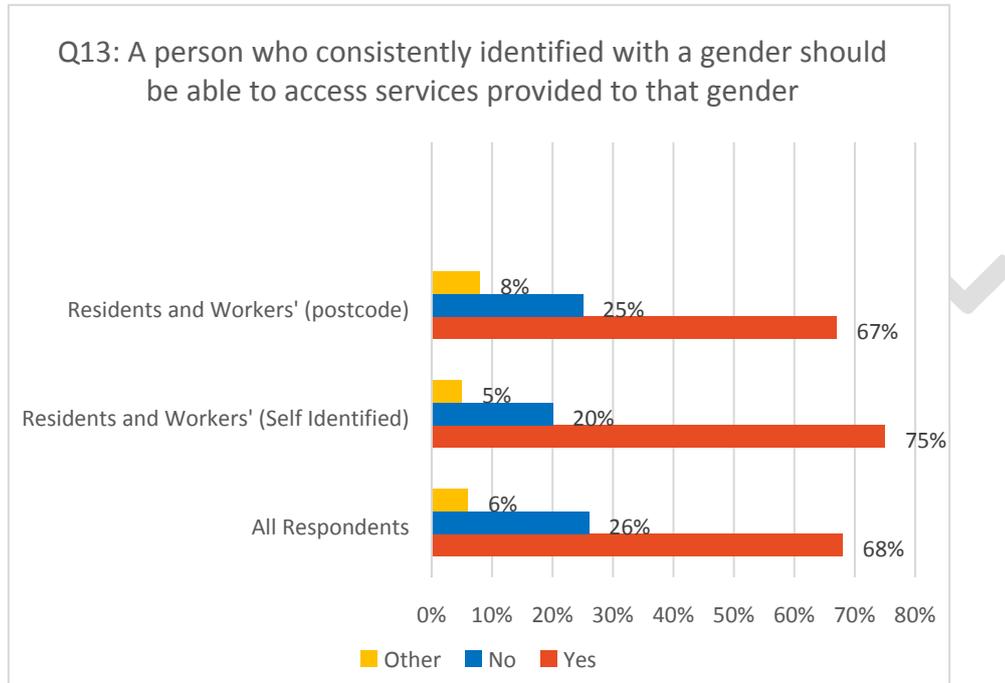
- 4.3 The views of City Residents were broadly in line with other stakeholders, with an aggregate of two thirds (65%) supporting the basic principles, contrasted with 15% who strongly disagreed with them. Two thirds of City residents strongly agreed that restrictions on access to services ‘should relate to the gender with which the service user consistently identifies now, regardless of whether that is the gender they were assigned at birth’.
- 4.4 Those who self-identified as City residents were marginally more likely to be supportive of the key propositions than respondents overall. Those identified as City residents following postcode analysis were a little less likely to be supportive, but with a majority in favour of the proposals.

‘Resident’ response compared to All Respondents – Q13 and Q14



4.5 The same overall pattern was reflected in the responses of those who self-identified as ‘Residents and Workers’ and following a postcode analysis of the responses from this group.

‘Resident and Worker’ response compared to all responses – Q13 and Q14



4.6 As with respondents in general, City residents who opposed the principles and/or proposals on access to services were much more likely to comment in the free text boxes. A sample of resident comments on access to City services on the basis of current gender identity is provided below.

| | |
|------------|----------------|
| For | Against |
|------------|----------------|

| | |
|---|---|
| <p><i>I am happy to share services for women with those not born into female bodies. I think their safety would be more compromised in male spaces than mine would be by having trans women (women) in a female space with me.</i></p> <p>City Resident and worker, White British, Female, Heterosexual - Straight, 31</p> | <p><i>I am a man (and nothing will change that) and I use male facilities - I do not expect to see ANYBODY of the opposite sex within those facilities regardless of whether they "identify as male" or not. And I'm sure most women (including my wife) don't want to see men in their facilities.</i></p> <p>City Resident and worker, White British Male, Heterosexual - straight</p> |
| <p><i>Not doing so [i.e. enabling access] would be unsafe for the person in question (i.e. women being forced to use men's facilities simply because they were assigned male at birth).</i></p> <p>City Resident and worker, Asian or Asian British: Pakistani, Female, Heterosexual - Straight, 34</p> | <p><i>I will no longer be able to use women only pool and changing area if men are allowed in. My nieces are not allowed to be uncovered around men and will not be able to learn to swim. Muslim girls are put at risk and discriminated against by this change.</i></p> <p>City Resident, Asian or Asian British: Pakistani, Female, Heterosexual-straight</p> |
| <p><i>I am "passing" meaning that others see me as a woman. For me to enter the men's room would be disruptive if not dangerous!</i></p> <p>Resident, Mixed - Asian and White, Female</p> | <p><i>This is opening-up opportunities and safe spaces for women to any man who claims to self-ID as a woman. Statistics show that women are at risk of male violence. This includes genuine transwomen - these transwomen with GRC and cis women need safe places and not to have misogynistic self-ID advocates trying to erode their rights and safe spaces.</i></p> <p>Resident and Worker, Female, (Ethnicity not stated)</p> |

- 4.7 Almost all City Residents answered Q15⁶ which requested that respondents note any safeguards that would be required if the policy under consultation was adopted.
- 4.8 City Residents noted the safeguards in the question (individual cubicle and gender-neutral toilets) and felt that these were reasonable options. Most of those who commented felt that gender neutral spaces would be the best option for inclusiveness (see para 3.14 above). Supplying individual cubicles and stalls in toilets was the most common practical suggestion for City Residents, along with changing areas/cubicles in swimming areas.

⁶ Q15 If this policy were adopted, what safeguards, if any, do you believe the City Corporation should put in place to preserve the dignity of all service users? *For example, at swimming facilities, should changing areas have individual cubicles to allow users to dress unseen by others? And where toilets are offered on gender neutral basis, should urinals be removed, and only individual stalls be made available?*

Service users: Response

- 4.9 18% (3781) of all respondents said that they used City Corporation Services (in addition, of course, it is a reasonable assumption that many of those identifying as City Residents or City Workers and Residents will also be users of City services).
- 4.10 A common challenge was that the survey had not provided a list of services which might be affected by the consultation, and had left it to respondents to establish this information for themselves. Comments ranged from it should not be the expectation of the respondent to list services and it was likely that the services they did use would be affected, to general terms such as 'Various', or 'All'.
- 4.11 Where respondents provide further information on their service use, by far the largest number focused on their use of swimming facilities - Hampstead Heath Ponds, Kenwood Ponds, the Parliament Hill Lido, Highgate/Female/Women's ponds/ Men's ponds/ changing rooms. This was followed by: arts centres, galleries and museums notably Barbican but also Guildhall; Public Toilets (Bathroom, Restrooms, lavatories and urinals); Green spaces (Epping Forest/Parks) and Transport services (Trains/Tube/Bus).

5. Conclusion

5.1 A substantial majority of respondents to the survey supported its six key propositions:

- ✓ a person may come to feel that their gender is different from that assigned at birth
- ✓ in these circumstances, they should be accepted in their stated gender identity
- ✓ in these circumstances, they should be able to access services commonly provided to the gender with which they now identify
- ✓ that, where access to services or facilities are restricted by gender, those restrictions should relate to the gender with which the service user consistently identifies now
- ✓ That the City Corporation should not require service users to provide 'proof' of their identity at single gender services and facilities but rely on each service user to self-identify their gender
- ✓ That the City Corporation should consider adapting facilities to be gender neutral.

This should be reflected in the development of the City Corporations approach to Gender Identity.

5.2 A significant minority of respondents did not support these propositions, and their views too should be considered. This group were much more likely to provide comments, and their views are therefore disproportionately represented in analysis of free text responses. Key messages were:

- The importance of language and clarity in the use of language (e.g. 'sex' and 'gender')
- The need to consider and address safeguarding risks.
- The need to balance the rights and interests of the transgender community against those of other protected groups under the Equality Act (e.g., sex and religion and belief)
- The need to consider the cost implications of any gender identity policy.

5.3 Respondents proposed constructive ways forward to address the issues they identified. For example, the benefits of individual lockable cubicles in gender neutral toilets. These views should be considered in the development and implementation of a Gender Identity policy.

5.4 To conclude, most respondents supported the statements posed in the survey and highlighted the need to respect all groups which would ensure equality and basic human rights were upheld. Those who were least supportive were also most 'vocal'. Despite the differences in views, a common thread in the free text responses was the importance of the Equality Act 2010 and the need for the voices of all to be heard and considered, particularly those of vulnerable groups.

Glossary

The following sets out a glossary of terms and acronyms used within this report

| TERM/ACRONYM | DESCRIPTION |
|-----------------------------------|---|
| BAME | Black, Asian, and minority ethnic (commonly used to refer to members of non-white communities in the UK) |
| Cisgender | A respondent whose gender identity matches their sex assigned at birth, e.g. who is not transgender |
| Core Cohort | A respondent who has answered one of the key questions in the survey Q11-Q13 Gender Identity – Basic Principles and Q14-17 Access to City Corporation Services Valid response to the survey |
| GDPR | The General Data Protection Regulation 2016/679 is a regulation in EU law on data protection and privacy for all individuals within the European Union and the European Economic Area |
| Gender fluid | Refers to someone who prefers to be flexible about their gender identity. They may fluctuate between genders or express multiple gender identities at the same time |
| Gender Neutral facilities | Facilities that can be accessed regardless of gender. |
| Interested Participant | A respondent who does not live, work, visit or use City Corporation service |
| Member of the Public (MoP) | An individual member of the public who did not supply their City Stakeholder status Did not answer Q7 |
| Non-Binary | An umbrella term used to describe gender identities where the individual does not identify exclusively as a man or a woman. There are many included within this, such as agender, genderqueer and gender fluid. |
| Non-Core Cohort | A respondent who has not answered one of the key questions in the survey Q11-Q13 Gender Identity – Basic Principles and Q14-17 Access to City Corporation Services. An invalid response to the survey |
| Not a gender | A respondent who identified as their biological sex not by gender. |
| Not stated | Not stated indicates that the answer was blank, and the respondent did not complete the question. |
| Relevant Expert | A respondent who self-identified as a relevant expert in respect to gender identity – Answering Q1a of survey |
| Representative | A respondent who has indicated that they are a representative of a specific organisation – Answering Q1b of survey |
| Resident | <i>Self-defined:</i> A respondent who has stated that they live in the City of London <i>By postcode:</i> A respondent who provided a postcode that is in the City of London |
| Resident and Worker | <i>Self-defined:</i> A respondent who has stated that they live and work in the City of London <i>By postcode:</i> A respondent who provided a postcode that is in the City of London |
| Respondent | An individual who has completed the survey |

| | |
|------------------------------|---|
| Service User | A respondent who has stated they regularly use City Corporation services which may be affected by this consultation |
| Text/Phrase (related) | Text or phrase relating to sex and/ or gender but not specifically noting the respondent's own gender |
| Text/Phrase (unrelated) | Text or phrase not relating to sex and/ or gender, nor stating respondent's own gender |
| Transgender | Umbrella terms used to describe individuals who have a gender identity that is different to the sex recorded at birth. This might lead to gender dysphoria. Non-binary people may or may not consider themselves to be trans. |
| Transsexual | Used in the past to refer to someone who transitioned to live in the 'opposite' gender to the one assigned to them at birth. Many now prefer trans or transgender |
| Valid response to the survey | A respondent who has answered one of the key questions in the survey Q11-Q13 Gender Identity – Basic Principles and Q14-17 Access to City Corporation Services Also known as the Core Cohort |
| Visitor | A respondent who has stated that they do not live or work in the City of London. Visitors who are also service users are those who supplied a home postcode. |
| Worker | A respondent who has stated that they work in the City of London but are not also a resident. |
| Visitor | A respondent who has stated that they do not live or work in the City of London. Visitors who are also service users are those who supplied a home postcode. |

Appendix 1: Survey Questions

About You

Question 1

1. In what capacity are you answering this consultation? As... (Please select the ONE option that best applies)

- a) A relevant expert in respect to gender identity
- b) A representative of a specific organisation
- c) An individual member of the public

Question 2

If 1=a

2. Using the box below, please tell us about your qualifications as an expert in this field

(Free text box)

Question 3

If 1=b

3. What is the name of the organisation you are submitting a response from?

(Free text box)

Question 4

4. What position do you hold in the organisation?

(Free text box)

Question 5

5. What is your organisation's interest in this consultation?

(Free text box)

Question 6

6. Please confirm that you have been authorised by the board, management committee, or chief executive to respond on behalf of your organisation and that this is the only response that your organisation will be submitting to this consultation.

- a. Yes, I have been authorised and this will be the only response from my organisation
- b. No, I have not been authorised or my organisation may be submitting other responses

Question 7

If 1 = c

7. Which of the following applies to you? Please select all that apply.

- a. I live in the City of London
- b. I work in the City of London
- c. I do not live or work in the City of London
- d. I live and work in the City of London

Question 8

If 7= a or b

8. Please enter your work and/or home postcodes into the boxes below

- a. Home (Free text box)
- b. Work (Free text box)

Question 9

9. Do you regularly use any of the City Corporation's services which may be affected by this consultation?

a. Yes, I do

- (Please specify) (Free text box)

b. No, I do not

Question 10

If 7 = c and 9=b

Q.10. You indicated that you do not live or work in the City and are not a service user. Using the box below, please explain your interest in this consultation. (Free text box)

FOR COMMITTEE

GENDER IDENTITY – BASIC PRINCIPLES

Looking at your views on gender identity to begin with.

Question 11

11. Do you agree or disagree with the following statement...?

A person may come to feel that their gender is different from that assigned to them at birth?

- Strongly Agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Not sure

Please feel free to use the box below if there is anything you wish to add to expand on your answer.

(Free text box)

Question 12

12. Do you agree or disagree with the following statement...?

A person who consistently identifies in a gender which is different to the one they were assigned at birth should be accepted by society in their stated gender identity

- Strongly Agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Not sure

Please feel free to use the box below if there is anything you wish to add to expand on your answer.

(Free text box)

Question 13

13. Do you agree or disagree with the following statement...?

A person who consistently identifies in a gender which is different to the one they were assigned at birth should be able to access services commonly provided to the gender with which they now identify?

- Strongly Agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Not sure

Please feel free to use the box below if there is anything you wish to add to expand on your answer.

(Free text box)

Access to City Corporation Services

Question 14a

14. Do you support or oppose the following proposal...?

Where access to particular services or facilities are restricted by gender, the City Corporation has it in mind that the restriction should relate to the gender with which the service user consistently identifies now, regardless of whether that is the gender they were assigned at birth.

- Strongly Support
- Support
- Neither support nor oppose
- Oppose
- Strongly oppose
- Not sure

Please feel free to use the box below if there is anything you wish to add to expand on your answer

. (Free text box)

Question 15

15. If this policy were adopted, what safeguards, if any, do you believe the City Corporation should put in place to preserve the dignity of all service users?

For example, at swimming facilities, should changing areas have individual cubicles to allow users to dress unseen by others? And where toilets are offered on gender neutral basis, should urinals be removed, and only individual stalls be made available?

(Free text box)

Question 16

16. Do you support or oppose the following proposal...?

The City Corporation proposes not asking service users to provide 'proof' of their gender identity at single gender services and facilities but would rely on each service user to self-identify their gender.

- Strongly Support
- Support
- Neither support nor oppose
- Oppose
- Strongly oppose
- Not sure

Please feel free to use the box below if there is anything you wish to add to expand on your answer.

(Free text box)

Question 17

17. Where the City Corporation provides services or facilities accessed according to the gender of the service user (for example male and female public lavatories), it should consider adapting those facilities to be gender neutral, i.e. to enable anyone to use them regardless of their gender identity?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly Disagree
- Not sure

Please feel free to use the box below if there is anything you wish to add to expand on your answer.

(Free text box)

Question 18

18. Please provide any further comments you would like to make about this consultation below

(Free text box)

Demographic Information

Gender

A1. Do you identify as

Female

Male

Other

Prefer not to say

If you prefer to use your own term, please provide this here: _____

A2. Is your gender now the same as the gender you were assigned at birth?

Yes

No

Prefer not to say

A3 Do you identify as trans?

Yes

No

If you prefer to use your own term, please provide this here: _____

Disability

B1. Do you consider yourself disabled?

Yes

No

Prefer not to say

Sexual Orientation

C1. Do you identify as

Bisexual?

Gay man

Gay woman/lesbian

Heterosexual/straight

Other

Prefer not to say

If you prefer to use your own term, please provide this here: _____

(Free text box)

Age

D1. What is your current age?

Prefer not to say

(Free text box)

Ethnicity

E1. Do you describe your race or ethnicity as:

Arab

Asian or Asian British: Indian

Asian or Asian British: Pakistani

Asian or Asian British: Bangladeshi

Asian or Asian British: Chinese

Asian or Asian British: Other

Black or Black British: African

Black or Black British: Caribbean

Black or Black British: Other

Mixed: Asian and White

Mixed: Black and White

Mixed: Other

White: British

White: Irish

White: European

White: Gypsy or Irish Traveller

White: Other

If 'Other' or if you would prefer to use your own definition, please specify: _____

Prefer not to say

(Free text box)

Citizenship

F1. Of which countries are you a Citizen:

United Kingdom

Other EU

Other

Please specify: _____

Prefer not to say

(Free text box)

Religion or Belief

G1. Do you consider yourself to be:

Buddhist

Christian

Hindu

Jewish

Muslim

Non-religious (including Atheist, Agnostic, Humanist)

Sikh

Other

If you prefer to use your own term, please provide this here: _____

Prefer not to say

(Free text box)

Appendix 2 – Survey Data

GENDER IDENTITY – BASIC PRINCIPLES

Looking at your views on gender identity to begin with.

Question 11

11. Do you agree or disagree with the following statement...?

A person may come to feel that their gender is different from that assigned to them at birth?

| Respondents | Female | Male | Other | Own Gender Term | Prefer not to say | Grand Total | Percentage % |
|----------------------------|---------------|--------------|--------------|-----------------|-------------------|---------------|--------------|
| Strongly Agree | 7,487 | 3,848 | 870 | 1,028 | 475 | 13,708 | 65% |
| Agree | 1,811 | 1,038 | 53 | 206 | 235 | 3,343 | 16% |
| Neither agree nor disagree | 621 | 224 | 22 | 111 | 84 | 1,062 | 5% |
| Disagree | 302 | 250 | 7 | 143 | 51 | 753 | 4% |
| Strongly disagree | 776 | 669 | 40 | 312 | 128 | 1,925 | 9% |
| Not sure | 128 | 49 | 4 | 28 | 15 | 224 | 1% |
| Not Stated | 99 | 20 | 4 | 44 | 9 | 175 | 1% |
| Grand Total | 11,224 | 6,098 | 1,000 | 1,872 | 997 | 21,191 | 100% |

TABLE 3 AGREEMENT TO Q11 BY GENDER

Question 12

12. Do you agree or disagree with the following statement...?

A person who consistently identifies in a gender which is different to the one they were assigned at birth should be accepted by society in their stated gender identity

| Respondents | Female | Male | Other | Own Gender Term | Prefer not to say | Grand Total | Percentage % |
|----------------------------|---------------|--------------|--------------|-----------------|-------------------|---------------|--------------|
| Strongly Agree | 7,410 | 3,765 | 860 | 990 | 445 | 13,470 | 64% |
| Agree | 1,094 | 691 | 39 | 173 | 124 | 2,121 | 10% |
| Neither agree nor disagree | 853 | 358 | 30 | 157 | 134 | 1,532 | 7% |
| Disagree | 646 | 379 | 15 | 120 | 102 | 1,262 | 6% |
| Strongly disagree | 930 | 831 | 45 | 334 | 164 | 2,304 | 11% |
| Not sure | 184 | 54 | 5 | 44 | 22 | 309 | 1% |
| Not Stated | 107 | 20 | 6 | 54 | 6 | 193 | 1% |
| Grand Total | 11,224 | 6,098 | 1,000 | 1,872 | 997 | 21,191 | 100% |

TABLE 4 AGREEMENT TO Q12 BY GENDER

Question 13

13. Do you agree or disagree with the following statement...?

A person who consistently identifies in a gender which is different to the one they were assigned at birth should be able to access services commonly provided to the gender with which they now identify?

| Respondents | Female | Male | Other | Own Term | Prefer not to say | Grand Total | Percentage % |
|----------------------------|---------------|--------------|--------------|--------------|-------------------|---------------|--------------|
| Strongly Agree | 7,025 | 3,555 | 828 | 950 | 424 | 12,782 | 60% |
| Agree | 789 | 564 | 44 | 83 | 62 | 1,542 | 7% |
| Neither agree nor disagree | 391 | 298 | 20 | 158 | 101 | 968 | 5% |
| Disagree | 802 | 444 | 27 | 135 | 121 | 1,529 | 7% |
| Strongly disagree | 1,947 | 1,146 | 67 | 445 | 251 | 3,856 | 18% |
| Not sure | 196 | 74 | 9 | 45 | 32 | 356 | 2% |
| Not Stated | 74 | 17 | 5 | 56 | 6 | 158 | 1% |
| Grand Total | 11,224 | 6,098 | 1,000 | 1,872 | 997 | 21,191 | 100% |

TABLE 5 AGREEMENT TO Q13 BY GENDER

Question 14

14. Do you support or oppose the following proposal...?

Where access to particular services or facilities are restricted by gender, the City Corporation has it in mind that the restriction should relate to the gender with which the service user consistently identifies now, regardless of whether that is the gender they were assigned at birth.

| Respondents | Female | Male | Other | Own Term | Prefer not to say | Grand Total | Percentage % |
|----------------------------|---------------|--------------|--------------|--------------|-------------------|---------------|--------------|
| Strongly support | 7,021 | 3,545 | 816 | 910 | 425 | 12,717 | 60% |
| Support | 663 | 530 | 38 | 117 | 50 | 1,398 | 7% |
| Neither support nor oppose | 266 | 269 | 28 | 120 | 72 | 755 | 4% |
| Oppose | 649 | 383 | 15 | 103 | 93 | 1,243 | 6% |
| Strongly oppose | 2,375 | 1,254 | 85 | 507 | 321 | 4,542 | 21% |
| Not sure | 190 | 89 | 14 | 48 | 32 | 373 | 2% |
| Not Stated | 60 | 28 | 4 | 67 | 4 | 163 | 1% |
| Grand Total | 11,224 | 6,098 | 1,000 | 1,872 | 997 | 21,191 | 100% |

TABLE 6 AGREEMENT TO Q14 BY GENDER

Question 16

16. Do you support or oppose the following proposal...?

The City Corporation proposes not asking service users to provide 'proof' of their gender identity at single gender services and facilities but would rely on each service user to self-identify their gender.

| Respondents | Female | Male | Other | Own Term | Prefer not to say | Grand Total | Percentage % |
|----------------------------|---------------|--------------|--------------|--------------|-------------------|---------------|--------------|
| Strongly support | 6,406 | 3,203 | 796 | 895 | 400 | 11,700 | 55% |
| Support | 663 | 530 | 38 | 117 | 50 | 1,398 | 7% |
| Neither support nor oppose | 266 | 269 | 28 | 120 | 72 | 755 | 4% |
| Oppose | 649 | 383 | 15 | 103 | 93 | 1,243 | 6% |
| Strongly oppose | 2,375 | 1,254 | 85 | 507 | 321 | 4,542 | 21% |
| Not sure | 190 | 89 | 14 | 48 | 32 | 373 | 2% |
| Not Stated | 60 | 28 | 4 | 67 | 4 | 163 | 1% |
| Grand Total | 10,609 | 6,098 | 1,000 | 1,872 | 997 | 21,191 | 100% |

TABLE 7 AGREEMENT TO Q16 BY GENDER

Question 17

17. Where the City Corporation provides services or facilities accessed according to the gender of the service user (for example male and female public lavatories), it should consider adapting those facilities to be gender neutral, i.e. to enable anyone to use them regardless of their gender identity?

| Respondents | Female | Male | Other | Own Term | Prefer not to say | Grand Total | Percentage % |
|----------------------------|---------------|--------------|--------------|--------------|-------------------|---------------|--------------|
| Strongly Agree | 5,445 | 2,934 | 736 | 857 | 389 | 10,361 | 49% |
| Agree | 1,557 | 907 | 102 | 169 | 115 | 2,850 | 13% |
| Neither agree nor disagree | 908 | 497 | 52 | 145 | 86 | 1,688 | 8% |
| Disagree | 696 | 374 | 25 | 105 | 79 | 1,279 | 6% |
| Strongly disagree | 2,338 | 1,281 | 73 | 456 | 303 | 4,451 | 21% |
| Not sure | 199 | 82 | 11 | 30 | 20 | 342 | 2% |
| Not stated | 81 | 23 | 1 | 110 | 5 | 220 | 1% |
| Grand Total | 11,224 | 6,098 | 1,000 | 1,872 | 997 | 21,191 | 100% |

TABLE 8 AGREEMENT TO Q17 BY GENDER

DEMOGRAPHIC INFORMATION

A LITTLE MORE ABOUT YOU

Gender

A1. Do you identify as

| Respondents | Number | Percentage% |
|---------------------|---------------|-------------|
| Female ⁷ | 11,224 | 53% |
| Male ⁸ | 6,098 | 29% |
| Other | 1,000 | 5% |
| Own Gender Term | 1,872 | 9% |
| Prefer not to say | 997 | 5% |
| Grand Total | 21,191 | 100% |

TABLE 9 RESPONDENTS BY GENDER

The graph below gives a breakdown of those respondents who choose to use their own gender term. This table also includes those who subsequently noted their identity as female or male.

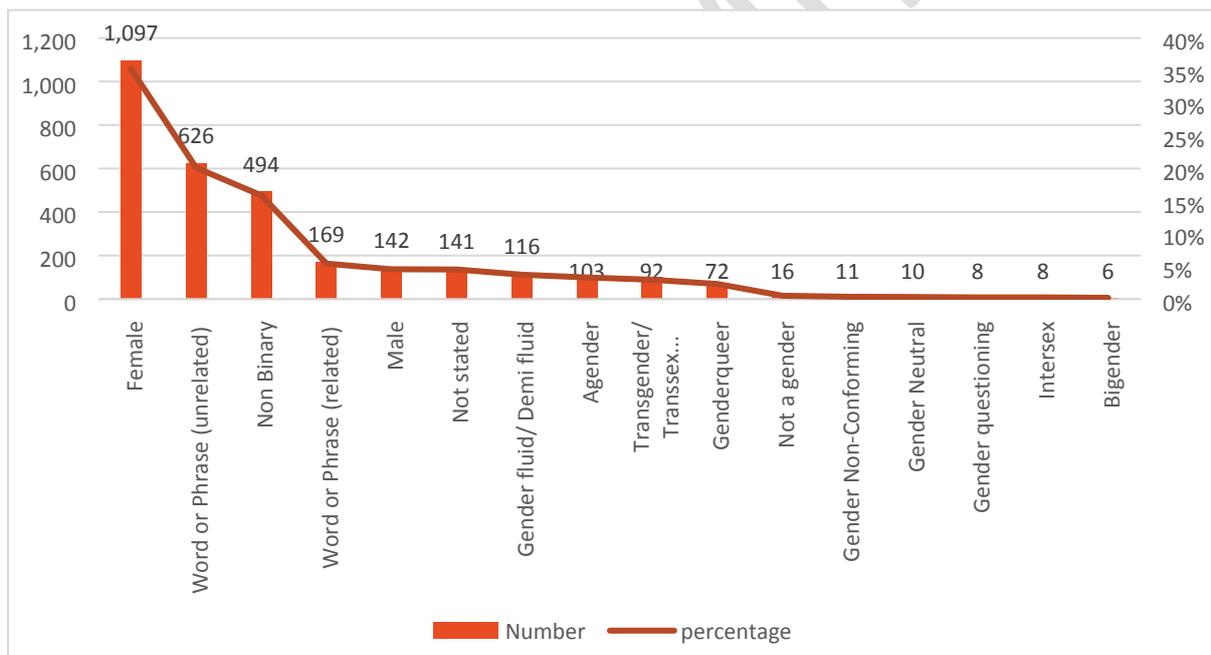


TABLE 10 RESPONDENT OWN GENDER TERM DETAILED

⁷ Includes respondents who initially indicated *Own Term*, then specified ‘female’ or ‘woman’. Original percentage was 48% (10,127) and increased to 53% when this group was added

⁸ Includes respondents who initially indicated *Own Term*, then specified ‘male’ or ‘man’. Original percentage was 28% (5,957) and increased to 29% when this group was added

A2. Is your gender now the same as the gender you were assigned at birth?

| Respondents | Number | Percentage% |
|--------------------|---------------|-------------|
| Yes | 15,459 | 73% |
| No | 3,270 | 15% |
| Prefer not to say | 2,085 | 10% |
| Not Stated | 377 | 2% |
| Grand Total | 21,191 | 100% |

TABLE 11 RESPONDENTS CONFIRMING IF CURRENT GENDER IS SAME AS THAT AT BIRTH

| Respondents | Female | Male | Other | Own Gender Term | Prefer not to say | Total | Percentage% |
|--------------------|---------------|--------------|--------------|-----------------|-------------------|---------------|-------------|
| Yes | 9,216 | 5,487 | 66 | 433 | 257 | 15,459 | 73% |
| No | 1,055 | 421 | 759 | 957 | 78 | 3,270 | 15% |
| Prefer not to say | 761 | 165 | 167 | 330 | 662 | 2,085 | 10% |
| Not Stated | 192 | 25 | 8 | 152 | | 377 | 2% |
| Grand Total | 11,224 | 6,098 | 1,000 | 1,872 | 997 | 21,191 | 100% |

TABLE 12 RESPONDENTS CONFIRMING IF CURRENT GENDER IS SAME AS THAT AT BIRTH DETAILED

A3 Do you identify as trans?

| Respondents | Female | Male | Other | Own Gender Term | Prefer not to say | Grand Total | Percentage% |
|--------------------|---------------|--------------|--------------|-----------------|-------------------|---------------|-------------|
| Yes | 930 | 400 | 545 | 712 | 56 | 2,643 | 12% |
| No | 9,821 | 5,539 | 299 | 737 | 314 | 16,710 | 79% |
| Prefer not to say | 390 | 141 | 153 | 281 | 626 | 1,591 | 8% |
| Not Stated | 83 | 18 | 3 | 142 | 1 | 247 | 1% |
| Grand Total | 11,224 | 6,098 | 1,000 | 1,872 | 997 | 21,191 | 100% |

TABLE 13 RESPONDENTS TRANSGENDER STATUS

The table below notes their transgender status in correlation to Question A1 (gender identity). 712 respondents who used the option of specifying their *Own Gender Term* also identified as transgender.

| Respondents | Female | Male | Other | Own Gender Term | Prefer not to say | Grand Total | Percentage% |
|--------------------|---------------|--------------|--------------|-----------------|-------------------|---------------|-------------|
| Yes | 930 | 400 | 545 | 712 | 56 | 2,643 | 12% |
| No | 9,821 | 5,539 | 299 | 737 | 314 | 16,710 | 79% |
| Prefer not to say | 390 | 141 | 153 | 281 | 626 | 1,591 | 8% |
| Not Stated | 83 | 18 | 3 | 142 | 1 | 247 | 1% |
| Grand Total | 11,224 | 6,098 | 1,000 | 1,872 | 997 | 21,191 | 100% |

TABLE 14 RESPONDENTS TRANSGENDER STATUS DETAILED

The table below considers the 12% of respondents who identified as transgender cross referenced by stakeholder group

| Respondents | Female | Male | Other | Own Term | Prefer not to say | Grand Total | Percentage% |
|------------------------|------------|------------|------------|------------|-------------------|--------------|-------------|
| Yes | 930 | 400 | 545 | 712 | 56 | 2643 | |
| City Resident | 34 | 29 | 31 | 34 | 6 | 134 | 5% |
| City Resident & Worker | 38 | 18 | 46 | 68 | 5 | 175 | 7% |
| Worker | 76 | 26 | 33 | 45 | 6 | 186 | 7% |
| Service User | 121 | 44 | 92 | 95 | 7 | 359 | 14% |
| Visitor | 39 | 16 | 20 | 16 | 3 | 94 | 4% |
| Expert | 144 | 64 | 76 | 143 | 12 | 439 | 17% |
| Member of Public | 1 | | | 1 | | 2 | 0% |
| Organisation Rep | 9 | 3 | 4 | 15 | 1 | 32 | 1% |
| Interested Participant | 467 | 200 | 243 | 294 | 16 | 1,220 | 46% |
| Not stated | 1 | | | 1 | | 2 | 0% |
| Grand Total | 930 | 400 | 545 | 712 | 56 | 2,643 | 100% |

TABLE 15 STAKEHOLDERS TRANSGENDER STATUS

Disability

B1. Do you consider yourself disabled?

99% of respondents consider the question of whether they were disabled and supplied an answer. 6% preferred not to say if they were or not, however 18% considered they were.

The table below illustrates respondent's confirmation on whether they are disabled. 46% (1,759) of who state yes were White British and 50% (1,903) are female.

| Respondents | Expert | Member of Public | Interested Participant | Not stated | Organisation Rep | City Resident | City Resident & Worker | Service User | Visitor | Worker | Grand Total | Percentage% |
|--------------------|--------------|------------------|------------------------|------------|------------------|---------------|------------------------|--------------|------------|--------------|---------------|-------------|
| Yes | 507 | 5 | 1,354 | 3 | 52 | 258 | 424 | 645 | 113 | 434 | 3,795 | 18% |
| No | 918 | 9 | 5,513 | 13 | 97 | 1,205 | 2,573 | 2,869 | 520 | 2,253 | 15,970 | 75% |
| Prefer not to say | 150 | 1 | 406 | 3 | 9 | 82 | 135 | 219 | 49 | 186 | 1,240 | 6% |
| Not stated | 15 | | 28 | 1 | 3 | 19 | 16 | 67 | 10 | 27 | 186 | 1% |
| Grand Total | 1,590 | 15 | 7,301 | 20 | 161 | 1,564 | 3,148 | 3,800 | 692 | 2,900 | 21,191 | 100% |

TABLE 16 STAKEHOLDERS DISABILITY STATUS

Sexual Orientation

C1. Do you identify as

| Respondents | Female | Male | Other | Own Term | Prefer not to say | Total | Percentage% |
|-----------------------|---------------|--------------|--------------|--------------|-------------------|---------------|-------------|
| Bisexual | 2,995 | 976 | 377 | 483 | 136 | 4,976 | 23% |
| Gay man | 11 | 1,018 | 15 | 20 | 10 | 1,074 | 5% |
| Gay woman/lesbian | 1,696 | 7 | 67 | 82 | 26 | 1,878 | 9% |
| Heterosexual/straight | 4,235 | 3,328 | 31 | 158 | 88 | 7,840 | 37% |
| Other | 375 | 137 | 251 | 104 | 61 | 928 | 4% |
| Prefer not to say | 931 | 273 | 61 | 101 | 607 | 1,973 | 9% |
| Not stated | 4,235 | 3,328 | 31 | 158 | 88 | 7,840 | 37% |
| Grand Total | 11,224 | 6,098 | 1,000 | 1,872 | 997 | 21,191 | 100% |

TABLE 17 RESPONDENTS SEXUAL ORIENTATION BY GENDER

Age

D1. What is your current age?

(Free text box)

Prefer not to say

This question allowed free text responses, which have been aggregated into standardised age bands. The response includes for the range of ages, including decimals, positive and negative numbers, in addition to text responses related and unrelated to age.

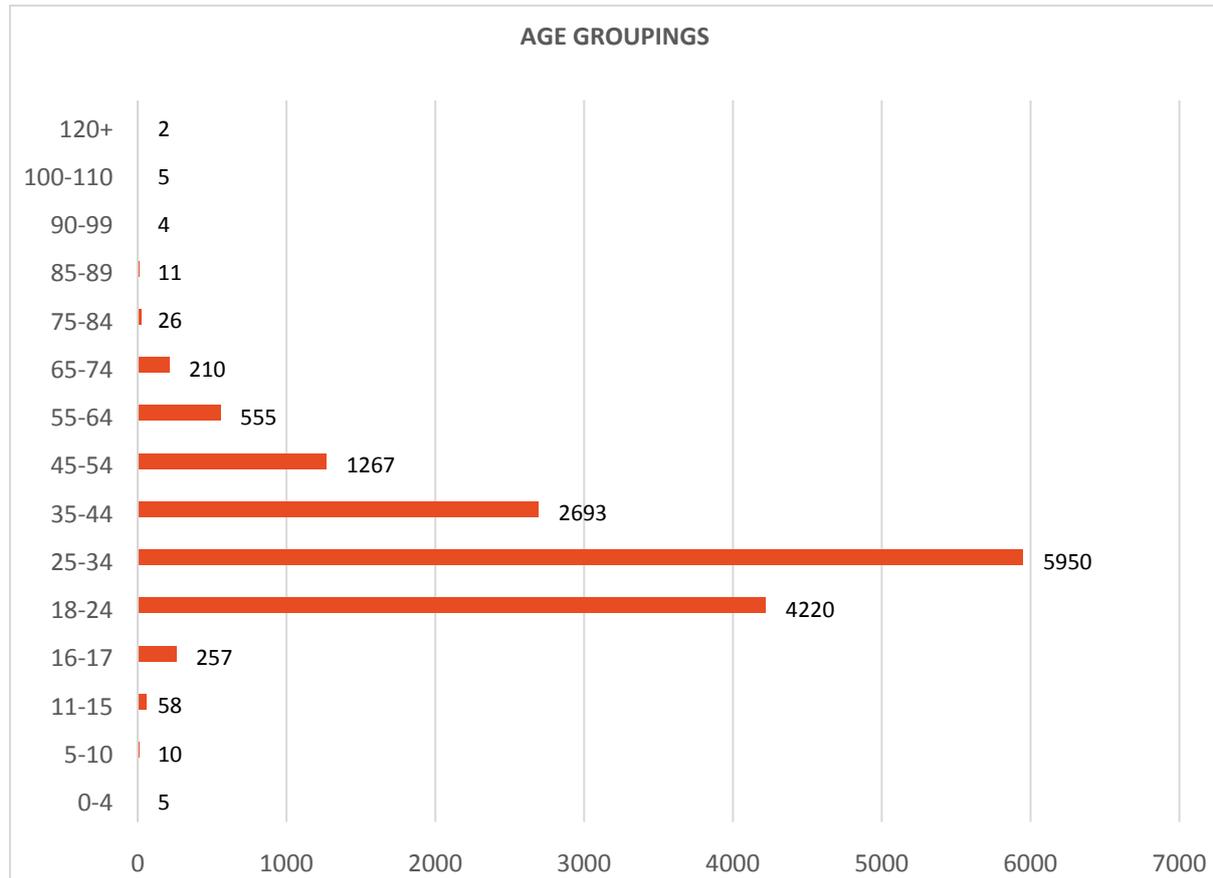


TABLE 18 RESPONDENTS AGE BANDS

A higher number of respondents were from 25-34 years age group. Not stated or information supplied in a format that couldn't be grouped into the standardised age bandings above were 5940 responses.

Ethnicity

E1. Do you describe your race or ethnicity as:

| Respondents | Female | Male | Other | Own Term | Prefer not to say | Grand Total | Percentage% |
|-------------------------------------|---------------|--------------|--------------|--------------|-------------------|---------------|-------------|
| Arab | 64 | 54 | 14 | 57 | 25 | 214 | 1% |
| Asian or Asian British: Indian | 112 | 41 | 2 | 11 | 6 | 172 | 1% |
| Asian or Asian British: Pakistani | 53 | 45 | 7 | 16 | 15 | 136 | 1% |
| Asian or Asian British: Bangladeshi | 21 | 9 | 4 | 3 | 2 | 39 | 0% |
| Asian or Asian British: Chinese | 51 | 22 | 7 | 9 | 4 | 93 | 0% |
| Asian or Asian British: Other | 56 | 32 | 10 | 7 | 6 | 111 | 1% |
| Black or Black British: African | 109 | 44 | 13 | 23 | 18 | 207 | 1% |
| Black or Black British: Caribbean | 63 | 24 | 7 | 13 | 8 | 115 | 1% |
| Black or Black British: Other | 28 | 15 | 7 | 14 | 8 | 72 | 0% |
| Mixed: Asian and White | 197 | 85 | 23 | 30 | 17 | 352 | 2% |
| Mixed: Black and White | 151 | 76 | 14 | 35 | 5 | 281 | 1% |
| Mixed: Other | 336 | 170 | 57 | 101 | 98 | 762 | 4% |
| White: British | 6,487 | 3,301 | 435 | 542 | 308 | 11,073 | 52% |
| White: Europe | 1,382 | 974 | 170 | 209 | 92 | 2,827 | 13% |
| White: Gypsy or Irish Traveller | 16 | 24 | 9 | 20 | 6 | 75 | 0% |
| White: Irish | 521 | 273 | 32 | 47 | 20 | 893 | 4% |
| White: Other | 1,126 | 665 | 144 | 265 | 97 | 2,297 | 11% |
| Prefer not to say | | | 1 | | | 1 | 0% |
| Not Stated | 451 | 244 | 44 | 470 | 262 | 1,471 | 7% |
| Grand Total | 11,224 | 6,098 | 1,000 | 1,872 | 997 | 21,191 | 100% |

TABLE 19 RESPONDENTS ETHNICITY BY GENDER

Citizenship

F1. Of which countries are you a Citizen:

| Respondents | Female | Male | Other | Own Term | Prefer not to say | Total | Percentage % |
|--------------------|---------------|--------------|--------------|--------------|-------------------|---------------|--------------|
| United Kingdom | 8,699 | 4,256 | 625 | 979 | 638 | 15,197 | 72% |
| Other EU | 926 | 645 | 115 | 182 | 72 | 1,940 | 9% |
| Prefer not to say | 661 | 469 | 113 | 196 | 240 | 1,679 | 8% |
| Not Stated | 938 | 728 | 147 | 515 | 47 | 2,375 | 11% |
| Grand Total | 11,224 | 6,098 | 1,000 | 1,872 | 997 | 21,191 | 100% |

TABLE 20 RESPONDENTS CITIZENSHIP STATUS BY GENDER

Religion or Belief

G1. Do you consider yourself to be:

| Respondents | Female | Male | Other | Own Term | Prefer not to say | Total | Percentage% |
|--|---------------|--------------|--------------|--------------|-------------------|---------------|-------------|
| Buddhist | 130 | 57 | 10 | 28 | 11 | 236 | 1% |
| Christian | 1,236 | 804 | 54 | 113 | 52 | 2,259 | 11% |
| Hindu | 40 | 13 | 2 | 5 | 1 | 61 | 0% |
| Jewish | 313 | 128 | 50 | 74 | 18 | 583 | 3% |
| Muslim | 178 | 122 | 39 | 85 | 41 | 465 | 2% |
| Non-religious (Atheist, Agnostic, Humanist) | 7,694 | 4,219 | 625 | 863 | 396 | 13,797 | 65% |
| Shinto | | | 1 | | | 1 | 0% |
| Sikh | 9 | 6 | | 5 | 3 | 23 | 0% |
| Other | 365 | 159 | 100 | 86 | 32 | 742 | 4% |
| Prefer not to say | 855 | 287 | 61 | 113 | 410 | 1,726 | 8% |
| Not Stated | 404 | 303 | 58 | 500 | 33 | 1,298 | 6% |
| Grand Total | 11,224 | 6,098 | 1,000 | 1,872 | 997 | 21,191 | 100% |

TABLE 21 RESPONDENTS RELIGION BY GENDER

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EQUALITY ANALYSIS (EA) TEMPLATE

What is the Public Sec

What is an Equality Ar

Decision

Date

How to demonstrate c

Deciding what needs to be assessed [Double click here for more information / Hide](#)

Role of the assessor [Double click here for more information / Hide](#)

How to carry out an Equality Analysis (EA) [Double click here for more information / Hide](#)

The Proposal *Click and hover over the questions to find more details on what is required*

Assessor name:

Contact details:

1. What is the Proposal?

A City Corporation Gender Identity (GI) Policy

2. What are the recommendations?

That the GI Policy will support the City Corporation to deliver its duties under the Equality Act 2010 effectively.

3. Who is affected by the Proposal? *Identify the main groups most likely to be directly or indirectly affected by the recommendations.*

The proposal will directly affect transgender City residents, workers and visitors (including those in transition). There will be an indirect impact for other service users, particularly those who use single sex facilities and services.

Age [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#)

Key Demographic statistics:

The Square Mile has proportionately more residents aged 25-69 than Greater London and fewer young people. Summaries of the City of London [age profiles from the 2011 Census can be found on our website](#)

The City resident population is projected to grow steadily, with greatest growth amongst the over 65 years group over the next decade.

Those under 18 and over 65 years are concentrated in areas of deprivation in the east and north of the City.

City Workers tend to be younger, aged between 20-50 years of age. The younger age profile is consistent with the findings of prior independent reports and reflects the fact that finance and insurance industries represent a large % of the City workforce.

Demographics projections and analysis can be found on the [Greater London Authority website in the London DataStore](#). The site details statistics for the City of London and other London authorities at a ward level:

- [Population projections](#)

NB: These statistics provide general data for these protected characteristics.

Age

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

There is no reliable data currently available on gender identity by age for residents, workers or visitors in the City of London. Some young people identify with a gender other than that assigned to them at birth.

What is the proposal's impact on the equalities aims?

The GI Policy does not have a disproportionate impact on a particular age group.

The GI Policy will not apply to schools who will develop their own policies.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

N/A

Key demographic statistics:

Day-to-day activities can be limited by disability or long-term illness - In the City of London as a whole, 89% of the residents feel they have no limitations in their activities – this is higher than both in England and Wales (82%) and Greater London (86%). In the areas outside the main housing estates, around 95% of the residents responded that their activities were not limited. Extract from summary of the [2011 Census relating to resident population health for the City of London can be found on our website](#).

City workers tend to be healthier than the general population and this is largely due to their younger age profile, although lifestyle choices (such as drinking, smoking and diet) may have a negative impact.

The 2011 Census identified that for the City of London’s resident population:

- 4.4% (328) had a disability that limited their day-to-day activities a lot
- 7.1% (520) had a disability that limited their day-to-day activities a little.

Source: 2011 Census: [Long-term health problem or disability, local authorities in England and Wales](#)

Disability and health inequality amongst residents tends to be geographically concentrated in pockets of deprivation such as Portsoken in the east and north of the City.

NB: These statistics provide general data for these protected characteristics.

Disability

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

There is no reliable data currently available on gender identity and disability for residents, workers or visitors in the City of London.

Some disabled people may identify with a gender other than that assigned to them at birth.

Research shows that trans people are more likely than the general population to experience mental health issues. The disability provisions under the Equality Act 2010 protect those with a ‘physical or mental impairment which has a substantial and long-term adverse effect on ... ability to carry out normal day-to-day activities.’

What is the proposal’s impact on the equalities aims?

The GI Policy may have a positive affect on the mental health of trans people, because it improves access to services and facilities and contributes to tackling stigma and discrimination.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Implement the GI policy and make sure that disabled trans people are aware of the policy and can access services/facilities.

Pregnancy and Maternity [Double click here to add impact / Hide](#)

Check box if NOT applicable

Key borough statistics:

Under the theme of population, the [ONS website](#) has a large number of data collections grouped under:

- [Conception and Fertility Rates](#)
- [Live Births and Still Births](#)
- [Maternities](#)

NB: These statistics provide general data for these protected characteristics.

[Double click here to show borough wide statistics / hide statistics](#)

Pregnancy and Maternity

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals.*

The GI Policy is not expected to impact pregnancy and maternity.

What is the proposal's impact on the equalities aims?

No impact.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Not applicable.

Race [Double click here to add impact / Hide](#)

Check box if NOT applicable

Key demographic statistics:

White British residents comprise 57.5% of the total population, followed by White – Other at 19%.

The second largest ethnic group amongst residents is Asian (12.7%), this group is divided between Asian-Indian (2.9%), Asian-Bangladeshi (3.1%), Asian-Chinese (3.6%) and Asian-Other (2.9%). The City has the highest % of Chinese people of any authority in London and the second highest in England & Wales.

These Asian communities tend to be concentrated geographically in the east and north of the City.

[See ONS Census information](#) or [Greater London Authority projections](#)

The City of London has a relatively small Black population comprising 2.6% of residents. This is considerably lower than the Greater London wide percentage of 13.3%.

City workers are largely white (79%), compared to Asian ethnicity (12%), black groups (5%), mixed race (3%) and Arab origins (1%).

NB: These statistics provide general data for these protected characteristics.

Race

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals.*

There is no reliable data currently available on gender identity by race for residents, workers or visitors in the City of London.

What is the proposal's impact on the equalities aims?

No direct impact on race or ethnicity.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Develop a better understanding of the potential impact of multiple levels of discrimination and mitigation to address these.

Religion or Belief [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#)

Key demographic statistics – sources include:

The ONS website has a number of data collections on [religion and belief](#), grouped under the theme of religion and identity.

[Religion in England and Wales provides a summary of the Census 2011 by ward level](#)

The City is a religiously diverse area, with a wider range of religious/faith identities than England as a whole. In the City, 45.3% of residents identify as Christian, with 34.2% stating that they have no religion. The next largest group is Islam (5.5%), followed by Judaism (2.3%), Hindus (2%), Buddhists (1.2%) and Sikhs (0.2%).

Since 2011 the Christian population has fallen by approximately 10% and those with no religion risen by roughly the same figure.

NB: These statistics provide general data for these protected characteristics.

Religion or Belief

Additional Equalities Data (Service level or Corporate)

There is no reliable data currently available on gender identity and religion or belief for residents, workers or visitors in the City of London.

The GI Policy may challenge beliefs about single sex services and facilities in some religious communities. The GI Policy could therefore have a challenging impact on the use of services and facilities by members of those communities.

What is the proposal's impact on the equalities aims?

The proposal is consistent with the Equality Act 2010 provisions on religion and belief.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Religious worship is exempt from the provisions of the Equality Act 2010.

The Public Sector Equality Duty includes a responsibility to 'foster good relations between people who share a relevant protected characteristics and persons who do not share it', and the City may want to consider what opportunities the GI Policy creates for dialogue with and between different communities.

Page 50

Sex [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#)

Key demographic statistics:

At the time of the [2011 Census the usual resident population of the City of London](#) could be broken up into:

- 4,091 males (55.5%)
- 3,284 females (44.5%)

A number of demographics and projections for demographics can be found on the [Greater London Authority website in the London DataStore](#). The site details statistics for the City of London and other London authorities at a ward level:

- [Population projections](#)

NB: These statistics provide general data for these protected characteristics.

Sex

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

Some males and females who use single-sex facilities have concerns about and/or are uncomfortable with trans access to those facilities (as illustrated by some of the responses to the City Corporation's GI Survey).

What is the proposal's impact on the equalities aims?

Sex is a protected characteristic under the Equality Act 2010.

The Act also has a strong inclusive presumption for trans people with respect to single sex services and facilities.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

The City Corporation should consider exclusion of trans people from single-sex services in exceptional circumstances where this is a proportionate means to a legitimate end.

The Public Sector Equality Duty includes a responsibility to 'foster good relations between people who share a relevant protected characteristics and persons who do not share it', and the City may want to consider what opportunities the GI Policy creates for dialogue with and between different groups in the community.

Page 5

Sexual Orientation and Gender Reassignment [Double click here to add impact / Hide](#)

Check box if NOT applicable

Key demographic statistics:

It is estimated that 10% of the UK population belong to the lesbian, gay and bisexual communities in the UK. Stonewall have estimated that 1% of the UK population are Transgender or identify as non-binary or gender fluid.

Please refer to:

- [Sexual Identity in the UK – ONS 2014](#)
- [Measuring Sexual Identity – ONS](#)

NB: These statistics provide general data for these protected characteristics.

Sexual Orientation and Gender Reassignment

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

There is currently no reliable data on the numbers of transgender people living, working or visiting the City of London.

The GI policy was strongly supported by trans respondents to the GI Survey.

What is the proposal's impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

The GI policy will have a positive impact on transgender inclusion, and for LGBTQ

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

As it implements the policy, the City Corporation may have opportunities to

Sexual Orientation and Gender Reassignment

rights (noting that this is a diverse community, and includes people who do not support the policy, as was reflected in a minority of responses to the GI Survey).

The policy highlights the challenges for public authorities of responding to new understandings of and expectations about gender, with implications for the Public Sector Equality Duty. For example, how people who identify themselves as 'non-binary' or 'gender fluid' are covered by a gender identity policy.

promote dialogue between Trans, LGBT and Women's groups, which would be beneficial in fostering good relationships.

It would be beneficial to have more data on gender identity in the City, while recognising the challenges of monitoring on a trans classification.

There are legal limits to the degree to which people who identify as non-binary or gender fluid can be covered by this policy. However, the policy can commit to do whatever is possible (within the current limits of the law) to address issues for people who identify as non-binary/gender fluid as a matter of policy.

Marriage and Civil Partnership [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#)

Key borough statistics - sources include:

[The 2011 Census contain data broken up by local authority on marital and civil partnership status](#)

NB: These statistics provide general data for these protected characteristics.

[Double click here to show borough wide statistics / hide statistics](#)

Marriage and Civil Partnership

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

There were no obvious impacts upon marriage and civil partnership arising from the proposed draft policy.

What is the proposal's impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

No negative impact

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Non-applicable

Additional Impacts on Advancing Equality & Fostering Good Relations [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#)

This section seeks to identify what additional steps can be taken to promote these aims or to mitigate any adverse impact. Analysis should be based on the data you have collected above for the protected characteristics covered by these aims. In addition to the sources of information highlighted above – you may also want to consider using:

- Equality monitoring data in relation to take-up and satisfaction of the service

- Equality related employment data where relevant
- Generic or targeted consultation results or research that is available locally, London-wide or nationally
- Complaints and feedback from different groups.

[Double click here to show borough wide statistics / hide statistics](#)

Additional Impacts on Advancing Equality & Fostering Good Relations

Additional Equalities Data (Service level or Corporate)

Are there any additional benefits or risks of the proposals on advancing equality and fostering good relations not considered above?

What actions can be taken to avoid or mitigate any negative impact on advancing equality or fostering good relations not considered above? Provide details of how effective the mitigation will be and how it will be monitored.

Non-applicable

Conclusion and Reporting Guidance

This analysis has concluded that...

The proposed policy provides a statement of the City Corporation's Public Sector Equality Duty under with the Equality Act 2010 with respect to Gender Assignment.

The City should also consider what opportunities the launch and implementation of a Gender Identity Policy creates for fostering understanding, dialogue and good relations between different equality groups.

The GI policy is an important tool in delivering the Equality Act 2010 and Chief Officers should draw up plans to promote trans equality in their service areas, with impact monitored and appropriate accountability and governance. Monitoring should also look out for evidence of any negative impact on service use by other protected groups.

There is little data on gender identity and how it intersects with other protected characteristics. It would be beneficial to build this evidence base where practicable.

Outcome of analysis - [check the one that applies](#)

Outcome 1

No change required where the assessment has not identified any potential for discrimination or adverse impact and all opportunities to advance equality have been taken.

Outcome 2

Adjustments to remove barriers identified by the assessment or to better advance equality. Are you satisfied that the proposed adjustments will remove the barriers identified?

Outcome 3

Continue despite having identified some potential adverse impacts or missed opportunities to advance equality. In this case, the justification should be included in the assessment and should in line with the duty have 'due regard'. For the most important relevant policies, compelling reasons will be needed. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact.

Outcome 4

Stop and rethink when an assessment shows actual or potential unlawful discrimination.

Signed off by Director:

Name:

Date:



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City of London Transport Strategy Integrated Impact Assessment

Non-Technical Summary

Prepared by LUC
March 2019

Project Title: City of London Transport Strategy IIA Non-Technical Summary

Client: City of London Corporation

| Version | Date | Version Details | Prepared by | Checked by | Approved by |
|---------|------------|---|-------------|-------------|-------------|
| V1.0 | 26/10/18 | Final draft report to accompany consultation of draft Transport Strategy | Alex Martin | Jeremy Owen | Jeremy Owen |
| V2.0 | 06/11/2018 | Final report to accompany consultation of draft Transport Strategy | Alex Martin | Jeremy Owen | Jeremy Owen |
| V3.0 | 08/11/2018 | Updated final report to accompany consultation of draft Transport Strategy | Alex Martin | Jeremy Owen | Jeremy Owen |
| V4.0 | 15/03/2019 | Final report following updates to Transport Strategy resulting from consultation. | Alex Martin | Jon Pearson | Jeremy Owen |



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City of London Transport Strategy Integrated Impact Assessment

Non-Technical Summary

Prepared by LUC
March 2019

Planning & EIA
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Landscape Planning
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Ecology
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1 Introduction

- 1.1 This Non-Technical Summary relates to the Integrated Impact Assessment (IIA) Report for the City of London Transport Strategy. The City of London Strategy is being produced by the City Corporation and will set out the City's vision for all aspects of City transport in the future, setting the 25 year framework for the future management of the streets and for improvements to transport connections. The City of London Transport Strategy should be read in conjunction with its Delivery Plan, which comprises the draft Local Implementation Plan (LIP) and which, when finalised will incorporate the City's wider transport projects. The Delivery Plan LIP has been subject to a separate IIA.
- 1.2 Integrated Impact Assessment brings together Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), Equality Impact Assessment (EqIA) and Health Impact Assessment (HIA) into a single assessment process based on SA methodology. The City Corporation has commissioned independent consultants (LUC) to carry out the IIA of the Transport Strategy on its behalf. The IIA Scoping Report, IIA Report and this Non-Technical Summary incorporate all of the work undertaken by LUC.
- 1.3 This Non-Technical Summary relates to the full IIA for the Transport Strategy.

The City of London Transport Strategy

- 1.4 How people and goods travel to and around the City has a significant impact on the experience of living, working and studying in or visiting the Square Mile. Facilitating the safe, clean and efficient movement of people and vehicles serving the City, alongside improving the quality of streets and public spaces, will be essential to the continued success of the City as a global centre for business and a cultural destination.
- 1.5 The City of London Transport Strategy provides a 25-year framework for future investment in and management of the City's streets, as well as measures to reduce the social, economic and environmental impacts of motor traffic and congestion. It also sets out the City's aspirations for improvements to the Transport for London Road Network (TLRN, also known as 'Red Routes') and local, national and international transport connections. It details an ambitious approach to transport and the design and management of streets in response to the challenges arising from significant growth, fast moving technological development and changing travel habits.
- 1.6 Additionally, the City Corporation, along with the London Boroughs, is required to produce a Local Implementation Plan (LIP) that details how it will support the delivery of the Mayor's Transport Strategy (MTS). The City's draft LIP Delivery Plan will be published alongside the City of London Transport Strategy and highlights the alignment between the vision, aims and outcomes of the City of London Transport Strategy and the MTS. Delivery Plan for the City of London Transport Strategy also provides a breakdown of the projects that will be delivered over the next three years with Transport for London funding. The final Delivery Plan will incorporate all the City's transport projects. The LIP Delivery Plan has been subject to a separate IIA.
- 1.7 As stated above, the Transport Strategy includes detailed proposals for achieving a number of outcomes. The main outcomes of the document and proposals for achieving these are:
 - Healthy Streets Approach.
 - The Square Mile's Streets are great places to walk and spend time.
 - Street space is used more efficiently and effectively.
 - The Square Mile is accessible to all.
 - People using our streets and public spaces are safe and feel safe.

- A wide range of people choose to cycle.
- The Square Mile's air and streets are cleaner and quieter.
- Delivery and servicing needs are met more efficiently and impacts are minimised.
- Our street network is resilient to changing circumstances.
- Emerging transport technologies benefit the Square Mile.
- The Square Mile benefits from better transport connections.

2 Integrated Impact Assessment

- 2.1 IIA brings together Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), Equality Impact Assessment (EqIA) and Health Impact Assessment (HIA) into a single assessment process based on the SA methodology.
- 2.2 SA is a statutory requirement of the Planning and Compulsory Purchase Act 2004. It is designed to ensure that plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals within a plan from the outset of its development.
- 2.3 SEA is also a statutory assessment process, required under SEA Directive, transposed in the UK by the SEA Regulations (Statutory Instrument 2004, No 1633). The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment and which set the framework for future consent of projects requiring Environmental Impact Assessment (EIA).
- 2.4 SEA and SA are separate processes but have similar aims and objectives. SEA focuses on the likely environmental effects of a plan, while SA includes a wider range of considerations, extending to social and economic impacts.
- 2.5 The requirement to undertake EqIA of plans was introduced in the Equality Act 2010, but was abolished in 2012 as part of a Government bid to reduce bureaucracy. Despite this authorities are still required to have regard to the provisions of the Equality Act, namely the Public Sector Duty which requires public authorities to have due regard for equalities considerations when exercising their functions.
- 2.6 HIA is not a statutory requirement but can support decision making by identifying possible impacts of a plan on the health of a community.
- 2.7 In addition to complying with legal requirements, the approach taken to the IIA of the Transport Strategy is based on current best practice and guidance set out in the National Planning Practice Guidance. The following paragraphs describe the approach that has been taken to the IIA and provides information on the subsequent stages of the process.

Stage A: Scoping

- 2.8 The IIA process began in April 2018 with the production by LUC of a Scoping Report for the Transport Strategy and Local Implementation Plan (LIP).
- 2.9 The scoping stage involved collating information about the environmental baseline for the Transport Strategy area and the key environmental issues facing it, as well as information about the policy context for the preparation of the Strategy. The IIA Scoping Report presented the outputs of the following tasks:
 - Policies, plans and programmes of relevance to the Transport Strategy were identified and the relationships between them were considered. The policy, plan and programme review can be found in **Chapter 3** and **Appendix 2** of the main IIA report.
 - In line with the requirements of the SEA Regulations, baseline information was collected on the following 'SEA topics': biodiversity, (including flora and fauna); population; human health; soil; water; air; climatic factors; material assets; cultural heritage including architectural and archaeological heritage and landscape. This baseline information, (presented in **Chapter 3** and **Appendix 3** of the main IIA report), provides the basis for predicting and monitoring the likely effects of the Strategy and helps to identify alternative ways of dealing with any adverse effects identified.
 - Drawing on the review of relevant plans, policies and programmes and the baseline information, key environmental issues for the City were identified (including environmental

problems, as required by the SEA Regulations). Consideration was given to the likely evolution of each issue if the Transport Strategy were not to be implemented. If, drawing on the baseline information and relevant plans, policies and programmes it was considered that the Transport Strategy was unlikely to have significant effects upon certain SEA topics, they were scoped out.

- An IIA 'framework' was then presented, setting out the IIA objectives against those which the proposals of the Transport Strategy would be appraised. The IIA framework provides a way in which the impacts of implementing a plan and reasonable alternatives (i.e. options) can be described, analysed and compared. The IIA framework comprises a series of sustainability objectives and associated questions that can be used to 'interrogate' options during the plan-making process. These IIA objectives define the long-term aspirations of the City with regard to sustainability issues. During the IIA, the performance of the options is assessed against these IIA objectives and questions.

2.10 **Table 2.1** presents the IIA objectives in the Transport Strategy IIA framework and shows how the SEA Regulations topics have been covered by these. It also shows which objectives relate to which element of the IIA (Sustainability Appraisal, Equality Impact Assessment and Health Impact Assessment).

Table 2.1 IIA Framework

| IIA Objectives | SEA Regulations Topic(s) covered | Appraisal question | SA | EqIA | HIA |
|--|--|--|----|------|-----|
| <p>Economic growth</p> <p>To sustain economic growth and employment opportunities locally, nationally and internationally maintaining the City’s status as a leading international financial and business centre and to help enable the continuing success of its historic visitor attractions.</p> | Population | Will the strategy / plan provide the business environment to attract and retain global financial, business services and TMT companies? | X | | |
| | | Will the strategy / plan provide the business environment to attract, retain and support SMEs? | X | | |
| | | Will the policy provide employment in supporting businesses and services providing a range of job opportunities? | X | | |
| | | Will the strategy / plan enable the City to grow and compete with other global financial and business centres? | X | | |
| | | Will the strategy / plan help to sustain and increase the City’s contribution to the London and UK economies? | X | | |
| | | Will the strategy / plan enable the successful management of pedestrian and visitor movements and support the continuing growth of the tourism sector and visitor attractions? | X | | |
| | | Will the strategy / plan unlock heritage-led regeneration opportunities? | X | | |
| <p>Built environment and public realm</p> <p>To provide an attractive, efficient, accessible and digitally connected built environment and public realm for business, visitor, student and residential communities that respects and enhances local character and distinctiveness.</p> | Landscape Population Human health Material assets | Will the strategy / plan provide an attractive public realm? | X | | |
| | | Will the strategy / plan secure high-quality design that enhances the built environment and character of the City? | X | | |
| | | Will the strategy / plan enable the efficient use of land? | X | | |
| | | Will the strategy / plan enable accessibility for everyone? | X | X | X |
| | | Will the strategy / plan facilitate integrated urban solutions to problems such as congestion, waste, resource use and demographic changes? | X | | |
| | | Will the strategy / plan enable effective enforcement of planning conditions to reduce adverse impacts of development? | X | | |
| | | Will the strategy / plan make better use of the river for transport? | X | | |
| <p>Safe environment and crime reduction</p> <p>To reduce crime and antisocial behaviour and to manage and respond to the security challenges</p> | Population Human health | Will the plan / strategy reduce crime and fear of crime? | X | | X |
| | | Will the plan / strategy tackle anti-social behaviour through design, use and management of buildings and spaces? | X | | |
| | | Will the plan / strategy provide effective security in the public realm beyond individual buildings? | X | | |

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| IIA Objectives | SEA Regulations Topic(s) covered | Appraisal question | SA | EqIA | HIA |
|---|--|---|----|------|-----|
| that the City faces. | | Will the plan / strategy help to reduce moped crime in the City? | X | | X |
| Heritage assets To conserve and enhance the significance of heritage assets and their settings enabling public appreciation and access wherever possible. | Cultural heritage Landscape | Will the plan / strategy conserve or enhance the significance of heritage assets (listed buildings, conservation areas, historic street furniture, scheduled monuments, historic parks and gardens, historic trees, world heritage sites and archaeological remains) and their settings in and around the City? | X | | |
| | | Will the plan / strategy preserve archaeological remains and other heritage assets in situ and allow access for viewing? | X | | |
| | | Will the strategy / plan protect the views of historically important landmarks and buildings? | X | | |
| | | Will the strategy / plan successfully balance access, energy efficiency and digital connectivity requirements with the need to conserve and enhance heritage assets? | X | | |
| | | Will the strategy / plan contribute to the better management of heritage assets and tackle heritage at risk? | X | | |
| Waste management To decouple waste generation from economic growth enabling a circular economy in the City that minimises waste arisings. | Material assets | Will the policy enable waste to be managed further up the waste hierarchy? | X | | |
| | | Will the strategy / plan facilitate sustainable waste transport? | X | | |
| | | Will the strategy / plan provide opportunities for businesses to benefit from the circular economy? | X | | |
| | | Will the strategy / plan encourage the transport of materials by rail or river where possible? | X | | |
| | | Will the strategy / plan safeguard existing wharves, particularly Walbrook Wharf? | X | | |
| Environmental protection (pollution) To maximise protection and enhancement of the natural environment. | Biodiversity, flora and fauna Water Soil | Will the strategy /plan improve air quality? | X | | X |
| | | Will the strategy / plan improve water quality and prevent contamination? | X | | X |
| | | Will the strategy / plan improve water quality by reducing diffuse urban pollution? | X | | X |
| | | Will the strategy / plan reduce waste water volumes and the risk of sewer flooding, for example through the use of SuDS? | X | | X |

| IIA Objectives | SEA Regulations Topic(s) covered | Appraisal question | SA | EqIA | HIA |
|---|---|---|----|------|-----|
| | | Will the strategy / plan result in minimisation of noise and light pollution and nuisance? | X | | X |
| Climate change mitigation and resilience To mitigate climate change, assist in maintaining energy security and promote climate change resilience. | Climatic factors Air | Will the strategy / plan reduce harmful emissions from transport? | X | | X |
| | | Will the strategy / plan improve energy efficiency or reduce carbon emissions associated with buildings or transport? | X | | |
| | | Will the strategy / plan enable the use of low and zero carbon technologies including decentralised energy networks? | X | | |
| | | Will the strategy / plan improve energy security for City premises? | X | | |
| | | Will the strategy / plan make the City's buildings and spaces more resilient to climate impacts (flooding, storm damage, drought, overheating)? | X | | X |
| | | Will the strategy / plan improve the microclimate and ameliorate the heat island effect? | X | | X |
| | | Will the strategy / plan assist in reducing vulnerability to flood risk within and beyond the City (e.g. by supporting TE2100 plan)? | X | | X |
| Open spaces To increase provision and enhance the quality of open spaces enabling public access to them wherever possible. | Landscape Population Human health | Will the strategy / plan protect existing open spaces and streets? | X | | X |
| | | Will the strategy / plan increase the amount of publicly accessible open space? | X | X | X |
| | | Will the strategy / plan improve the quality and design of existing open spaces and streets? | X | X | X |
| | | Will the strategy / plan enhance tranquillity of open spaces and streets? | X | | X |
| | | Will the strategy / plan encourage multiple uses for open spaces such as sport, recreation, relaxation, food growing, public and private events (subject to local byelaws)? | X | | X |
| | | Will the strategy / plan ensure that open spaces reflect and interpret the local distinctiveness of an area, particularly in historic places? | X | | |
| | | Will the strategy / plan provide new or improve existing amenity space? | X | | X |
| | | Will the strategy / plan improve access for all to the City's public realm and open spaces? | X | X | X |

| IIA Objectives | SEA Regulations Topic(s) covered | Appraisal question | SA | EqIA | HIA |
|---|----------------------------------|--|----|------|-----|
| Biodiversity and urban greening To improve opportunities for biodiversity and increase the provision of natural environments. | Biodiversity, flora and fauna | Will the strategy / plan increase protection and improve opportunities for biodiversity in particular black redstarts, sparrows, bats and stag beetles? | X | | |
| | | Will the strategy / plan enhance the River Thames as a Site of Metropolitan Importance for Nature Conservation (e.g. through the provision of roosting structures for birds and bats)? | X | | |
| | | Will the strategy / plan affect any other Sites of Importance for Nature Conservation? | X | | |
| | | Will the strategy / plan protect existing trees and increase tree planting? | X | | |
| | | Will the strategy / plan increase green roofs, green walls and soft landscaping and lead to their positive management for biodiversity? | X | | |
| | | Will the strategy / plan affect any Natura 2000 sites? | X | | |
| | | Will the strategy / plan protect or improve residential amenity? | X | | X |
| Social and cultural facilities To provide suitable social and cultural facilities for all the City's communities. | Population | Will the strategy / plan encourage a vibrant social environment which attracts workers to the City whilst respecting the needs of residents? | X | | |
| | | Will the strategy / plan decrease social isolation and improve the provision of opportunities for social interaction, leisure and sport? | X | X | X |
| | | Will the strategy / plan ensure the City's historic environment continues to contribute significantly to social and cultural life in the square mile? | X | | |
| Health To improve the health of the City's resident, worker and student populations. | Human health | Will the strategy / plan enable and encourage healthy lifestyles – exercise, healthy food, social interaction etc.? | X | | X |
| | | Will the strategy / plan maintain or improve access to health facilities? | X | | X |
| | | Will the strategy / plan reduce exposure to poor air quality? | X | | X |
| | | Will the strategy / plan provide opportunities for stress reduction? | X | | X |
| | | Will the strategy / plan reduce intrusive noise levels? | X | | X |
| | | Will the strategy / plan improve health and wellbeing through the provision of cultural facilities and activities? | X | | X |
| | | Will the strategy / plan have negative health impacts beyond the City? | X | | X |
| | | Will the strategy / plan improve road safety for all, particularly vulnerable road users (pedestrians, cyclists and motor cyclists)? | X | X | X |

| IIA Objectives | SEA Regulations Topic(s) covered | Appraisal question | SA | EqIA | HIA |
|--|----------------------------------|---|----|------|-----|
| | | Will the strategy / plan encourage active transport (walking and cycling)? | X | | X |
| Education To enable excellence in education for all the City's communities. | Population | Will the strategy / plan enable access to educational facilities in the City? | X | X | |
| Equality and inclusion To enable social and economic inclusion in and around the City for workers, residents and visitors. | Population Human health | Will the strategy / plan contribute to the elimination of discrimination, harassment & victimisation? | X | X | |
| | | Will the strategy / plan advance equality of opportunity between people who share a protected characteristics and those who don't, particularly the disabled and elderly? | X | X | |
| | | Will the strategy / plan reduce economic inequality for individuals and communities in and around the City? | X | X | |
| | | Will the strategy / plan improve the accessibility of the City's transport network? | X | X | |
| | | Will the strategy / plan encourage safe, convenient, accessible, economic and efficient public transport? | X | X | X |

Stage B: Developing and refining options and assessing effects

- 2.11 Developing options for a plan is an iterative process, which can involve a number of rounds of consultation with stakeholders and the public. Consultation responses and the IIA process can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan. In terms of the Transport Strategy, options include different proposals for improving transport and public realm within the City.
- 2.12 Alternative options have been considered for proposals 9, 10, 16, 20, 22, 29, 30 and 36 and include: the continuation of current measures; the use of traditional road safety approaches; and the banning of all motor vehicles in a zone. The alternatives for proposals 9 and 10 were unachievable and so were not considered reasonable alternatives and were not assessed.
- 2.13 The City of London Corporation's reasons for either taking forward each reasonable alternative in the Transport Strategy or for rejecting it are described in **Appendix 4** of the main IIA Report.

Stage C: Preparing the Integrated Impact Assessment Report

- 2.14 The IIA report describes the process that has been undertaken in carrying out the IIA of the Transport Strategy. It sets out the findings of the appraisal of the Transport Strategy's outcomes / proposals. Where any significant negative effects are identified, recommendations are made for preventing, reducing or offsetting these.

Stage D: Consultation on the Transport Strategy

- 2.15 The City of London invited comments on the draft Vision, Aims and Outcomes for the Transport Strategy and the accompanying IIA commentary in June / July 2018. No comments were received on the IIA commentary.
- 2.16 The draft Transport Strategy and the accompanying IIA were consulted on between November 2018 and January 2019. Again, no comments were received on the IIA, and this IIA has been updated only to reflect the minor changes made to the Transport Strategy.

Stage E: Monitoring implementation of the Transport Strategy

- 2.17 Monitoring of the significant sustainability effects of implementing the Strategy should be carried out after its adoption. Initial suggestions for monitoring are presented in **Chapter 5** of the main IIA Report.

Methodology

- 2.18 The reasonable alternative proposals and the selected proposals set out in the Transport Strategy have been appraised against the IIA objectives in the IIA framework with scores being attributed to each option to indicate its likely effects on the baseline in relation to achievement of each objective as set out in **Figure 2.1**.

Figure 2.1 Key to symbols and colour coding used in the IIA

| | |
|-----|------------------------------------|
| ++ | Significant positive effect likely |
| + | Minor positive effect likely |
| 0 | Negligible effect likely |
| - | Minor negative effect likely |
| -- | Significant negative effect likely |
| ? | Likely effect uncertain |
| +/- | Mixed effect likely |

- 2.19 The dividing line in making a decision about the significance of an effect is often quite small. Where either ‘++’ or ‘--’ has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option in relation to the SEA objective in question is considered to be of such a magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. However, scores are relative to the scale of proposals under consideration.

Consultation

- 2.20 Public and stakeholder participation is an important element of the IIA and wider plan/making process. It helps to ensure that the IIA report is robust and has due regard for all appropriate information that will support the Transport Strategy in making a contribution to sustainable development. The IIA Scoping Report for the Transport Strategy was published in April 2018 for a five week consultation period with the statutory consultees (Natural England, the Environment Agency and Historic England) and Transport for London / Greater London Authority. The comments received were then reviewed and addressed as appropriate in subsequent stages of the IIA. **Appendix 1** of the main IIA report lists the comments that were received during the IIA scoping consultation and describes how each one was addressed.
- 2.21 The draft Vision, Aims and Outcomes document and the accompany IIA commentary were consulted on between June and July 2018, and the final draft Transport Strategy and IIA were consulted on between November 2018 and January 2019. No comments were received in regards to the IIA from either consultation.

Difficulties encountered

- 2.22 It is a requirement of the SEA Regulations that the SA Report describes any data limitations or other difficulties that are encountered during the SEA process.
- 2.23 There were very few difficulties encountered during the IIA of the Transport Strategy. However, due to the high level nature of the outcomes and proposals in the Strategy, at times it has been more difficult to assess in detail or with great certainty the likely effects of the outcomes and proposals in relation to each IIA objective.

3 Environmental Context

Review of plans, policies and programmes

- 3.1 The Transport Strategy is not prepared in isolation but should seek to address relevant sustainability objectives set at an international and national level as well as sustainability issues facing the City of London. The IIA therefore gathers information on relevant international and national plans, policies, and programmes and on the sustainability baseline and uses this information to inform the framework of objectives against which the Transport Strategy is assessed.

International policy

- 3.2 At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive') is particularly important as it sets out the requirements for SEA. SEA should be undertaken iteratively and integrated into the production of the Transport Strategy in order to ensure that any potential negative environmental effects are identified and can be mitigated.
- 3.3 There are a wide range of EU Directives, most of which have been transposed into UK law through national-level policy; the international directives have been summarised in **Appendix 2** of the main IIA report for completeness.

National policy

- 3.4 There is also a wide range of national level plans, policies and programmes with relevant objectives for the IIA, which are summarised in **Appendix 2** of the main IIA report. Amongst the most significant national policy documents providing context for the Transport Strategy are the Transport Investment Strategy (2017), the Air Quality Strategy for England (2007), and the National Planning Policy Framework (2018) and associated Planning Practice Guidance¹.

Regional policy

- 3.5 There are a number of regional policy documents that the Transport Strategy will need to have due regard to. These are summarised in **Appendix 2** of the full IIA report and include:
- The London Plan² and the new London Plan³.
 - The Mayor's Transport Strategy 2018⁴.
 - The Mayor of London River Action Plan 2013⁵.
 - A City for all Londoners 2016⁶.
 - Environment Strategy (2018)⁷.
 - Housing Strategy (2018)⁸.

¹ <http://planningguidance.planningportal.gov.uk/>

² The London Plan, The Spatial Development Strategy for London Consolidated with Alterations Since 2011, Mayor of London, March 2016

³ The London Plan, The Spatial Development Strategy for Greater London, Draft for Public Consultation, December 2017

⁴ The Mayor's Transport Strategy, March 2018

⁵ River Action Plan, Mayor of London and Transport for London, February 2013

⁶ A City for all Londoners, Mayor of London, October 2016

⁷ Mayor of London, London Environment Strategy, May 2018.

⁸ Mayor of London, London Housing Strategy, May 2018.

City of London policy

- 3.6 The following is a list of relevant City of London Policy and documents that the Transport Strategy and LIP should be guided by and be in conformity with. Outlines of the documents are included in **Appendix 2** of the full IIA report.
- City of London Local Plan 2015⁹.
 - The Standard Highway and Servicing Requirements for Developments in the City of London¹⁰.
 - The City of London Air Quality Strategy 2015-2020¹¹.
 - The City of London Noise Strategy 2016–2026¹².
 - The City of London Road Danger Reduction and Active Travel Plan¹³.
 - The Thames Strategy Supplementary Planning Document ¹⁴.
 - The City of London Public Realm Supplementary Planning Document ¹⁵.
 - Freight and Servicing Supplementary Planning Document¹⁶.

Baseline information and key sustainability issues

Baseline information

- 3.7 Baseline information provides the basis for predicting and monitoring the likely sustainability effects of a plan and helps identify key sustainability issues and means of dealing with them.
- 3.8 The baseline information for the City of London, which was originally presented in the Scoping Report is set out in **Appendix 3** of the full IIA report.

Key sustainability issues

- 3.9 Together with the sustainability objectives set by other plans, policies and programmes, the sustainability issues facing the City of London inform the framework of objectives against which the Transport Strategy is assessed.
- 3.10 The key sustainability issues facing the City of London and their evolution without the Transport Strategy were identified during the scoping stage of the IIA and are presented in the Scoping Report. This information is reproduced in **Table 3.1**.

⁹ The City of London Local Plan, January 2015

¹⁰ Standard Highway and Servicing Requirements for Developments in the City of London, City of London, 2007

¹¹ City of London Air Quality Strategy 2015-2020, City of London, June 2015

¹² City of London Noise Strategy 2016 to 2026,

¹³ City of London Road Danger and Active Travel Plan 2018-2023

¹⁴ City of London Thames Strategy Supplementary Planning Document, June 2015

¹⁵ City Public Realm, People Places Projects Supplementary Planning Document, July 2016

¹⁶ City of London Freight and Servicing Supplementary Planning Document, February 2018

Table 3.1 Key sustainability issues for the City of London and their likely evolution without the Transport Strategy

| Sustainability issues of relevance to the Transport Strategy | Likely evolution without the Transport Strategy | IIA objective |
|---|--|---|
| Climatic Factors | | |
| <p>While total energy consumption and associated carbon emissions for the City show a declining trend, they continue to result in significant carbon emissions which contribute to climate change.</p> <p>While the most of the City's emissions are from its commercial activities, motorised transport also contributes and the Transport Strategy and LIP provide a means of reducing transport emissions.</p> | <p>The implementation of the Transport Strategy and LIP offer opportunities to further tackle this issue through measures to reduce motorised transport – a major contributor to carbon emissions, and promote and improve active travel and public transport. Without the implementation of the Transport Strategy and LIP it is considered that a reduction in carbon emissions is still achievable with the support of policies in the Local Plan but this may be to a lesser extent or be achieved over a longer time scale as the issues associated with motorised transport will not be as well addressed. However as a global issue, climate change will continue to be a key consideration, regardless of the policies and measures within both the Local Plan and the Transport Strategy and LIP.</p> | <p>Objective 6 – Environmental protection (pollution)</p> <p>Objective 7 – Climate change mitigation and resilience</p> |
| Biodiversity, Flora and Fauna | | |
| <p>The baseline information identifies a number of priority habitats, Sites of Metropolitan Importance for Nature Conservation (Tidal Thames) and Sites of Importance for Nature Conservation.</p> <p>Changes to streets, the public realm, river transport and / or vehicle movements may have the potential to impact upon these habitats.</p> | <p>The implementation of the Transport Strategy and LIP may further benefit these habitats through its aims, such as the reduction in road traffic however, the impact is unknown. If the Transport Strategy were not to be implemented it is considered that adequate protection would be afforded to the City's habitats and species through policies within the Local Plan as well as supporting documents such as the Biodiversity Action Plan.</p> | <p>Objective 9 – Biodiversity and urban greening</p> |

| Sustainability issues of relevance to the Transport Strategy | Likely evolution without the Transport Strategy | IIA objective |
|--|--|---|
| Cultural Heritage and Landscape | | |
| <p>The City is the historic core from which London developed. Consequently it is an area of great archaeological importance and contains many buildings and areas of historic and architectural value.</p> <p>Changes to streets and / or vehicle movements, including public realm improvement proposals designed to manage increasing numbers of pedestrians, may affect the settings and views of city landmarks, listed buildings and other heritage assets and can affect archaeological remains.</p> | <p>The implementation of the Transport Strategy and LIP may add further protection to these assets through its aims, such as the reduction in road traffic however, the impact is unknown. If the Transport Strategy were not to be implemented it is considered that more than adequate protection would still be afforded to the City's heritage and archaeological assets through policies within the Local Plan as well as supporting documents such as Conservation Area Plans.</p> | <p>Objective 2 – Built environment and public realm Objective 4 – Heritage assets</p> |
| Air quality | | |
| <p>The City has some of the highest levels of air pollution in the country due to its location at the heart of London and the density of development. Levels of pollutants in the City such as sulphur dioxide, carbon monoxide and benzene have reduced over the past decade but levels of fine particulates (PM10) and nitrogen dioxide (NO₂) remain high. For this reason the City of London is a designated AQMA. Exposure to these pollutants is considered to be a significant cause of ill health.</p> | <p>The implementation of the Transport Strategy offers an opportunity to further improve air quality in the City through, for example the reduction in vehicular traffic and congestion. Although it is considered that the issue of air quality is addressed in the Local Plan, the Transport Strategy would lend further measures and support to this and ensure that vehicular traffic does not contribute to a decline in air quality. In terms of a reduction in traffic, the Local Plan sets out a number of policies to this effect and it is considered that the Transport Strategy and LIP would lend further support to these policies in the reduction in traffic and congestion and a decrease in pollution. In the absence of the Transport Strategy and LIP, the policies in the</p> | <p>Objective 6 – Environmental protection (pollution) Objective 12 - Health</p> |

| Sustainability issues of relevance to the Transport Strategy | Likely evolution without the Transport Strategy | IIA objective |
|--|--|--|
| <p>Much of the air pollution in the City is associated with vehicle emissions, and so a reduction in emissions should be sought.</p> | <p>Local Plan will work towards this reduction with support from forthcoming GLA policies such as the Ultra Low Emissions Zone but the Strategy will further support these measures.</p> | |
| Water and soils | | |
| <p>Vehicular transport has the potential to pollute water in the City. Pollutants from transport can enter surface or ground water either directly or indirectly and can spread to other water bodies, such as the River Thames. The water quality of the Thames has been decreasing in recent years and is now classed as moderate.</p> | <p>Whilst not setting out specific aims in regards to water quality, the Transport Strategy and LIP have the potential to reduce pollution of water in the City through its aim to cut motorised transport. It is considered that without the transport strategy the Local Plan would provide adequate protection however, reducing water pollution from transport may not be so easily achieved without the Transport Strategy and LIP.</p> | <p>Objective 6 – Environmental protection (pollution)</p> |
| Population | | |
| <p>The baseline information shows that the resident, working and visitor populations of the City are expected to rise. An efficient transport network is required to accommodate these additional people and protect against traffic congestion.</p> | <p>The current population trends of the City are expected to continue with or without the implementation of the Transport Strategy, supported by policies in the Local Plan. The Transport Strategy and LIP are expected to support and facilitate the rise in population.</p> | <p>Objective 1 – Economic growth Objective 2 – Built environment and public realm Objective 3 – Safe environment and crime reduction Objective 8 – Open spaces Objective 10 - Housing Objective 11 – Social and cultural facilities Objective 12 – Health Objective 13 – Education Objective 14 – Equality and inclusion</p> |

| Sustainability issues of relevance to the Transport Strategy | Likely evolution without the Transport Strategy | IIA objective |
|---|---|--|
| Health | | |
| <p>Consideration of health for the City must take account of the health of the resident, working and visitor populations. Therefore the City must be designed to encourage healthy lifestyles through the provision of facilities for walking and cycling as well as improving safety for pedestrians and cyclists and improving air quality.</p> | <p>The Transport Strategy and LIP have the potential to further improve the health of the City's residents and working population through the reduction in road traffic, congestion and air pollution, and the promotion of active travel. Without the implementation of the Transport Strategy and LIP, health targets will still be in place but the effects of air quality may be more of a barrier to meeting these, along with road traffic and noise pollution.</p> | <p>Objective 3 – Safe environment and crime reduction Objective 12 – Health Objective 14 – Equality and inclusion</p> |
| Equality | | |
| <p>The City of London is generally affluent however, areas around it fall into some of the most deprived areas in the country.</p> <p>Some Index of Multiple Deprivation domains illustrate the issues the City currently has with housing, air quality and road traffic incidents.</p> | <p>Without the implementation of the Transport Strategy and LIP, the policies in the Local Plan will continue to address these issues. However, the Transport Strategy and LIP, particularly in regards to air quality and road traffic incidents, will make meeting targets much more achievable.</p> | <p>Objective 8 – Open spaces Objective 10 – Housing Objective 11 – Social and cultural facilities Objective 13 – Education Objective 14 – Equality and inclusion</p> |
| Material assets | | |
| <p>Office space is the predominant land use in the City, serving its large working day population. The City Corporation aims to ensure that people have a range of sustainable modes of transport to choose from when travelling to and from work and is working to ensure that a high</p> | <p>Although the Local Plan includes policies aimed at promoting sustainable transport, the Transport Strategy and LIP will build upon and add further weight to this. Without the production of the Transport Strategy and LIP the Local Plan policies will still be in place, but could be harder to meet.</p> | <p>Objective 1 – Economic growth Objective 2 – Built environment and public realm Objective 8 – Open spaces</p> |

| Sustainability issues of relevance to the Transport Strategy | Likely evolution without the Transport Strategy | IIA objective |
|--|---|--------------------------------|
| quality public realm is provided. | | |
| Waste | | |
| <p>The City itself has no waste management sites so all waste has to be transported elsewhere.</p> <p>The high rate of redevelopment in the City means that large quantities of demolition and construction waste are generated.</p> | <p>In the absence of the Transport Strategy and LIP, the Local Plan and supporting documents provide a range of policies and measures that will work to reduce waste and waste transfer in the City.</p> | Objective 5 – Waste management |
| Economy | | |
| <p>The City of London is a leading financial and business centre. Offices are the predominant land use and the largest industrial sector is business services and banking. Economic growth in the City is expected to continue and accelerate.</p> | <p>The Local Plan will support the economic development of the City with or without the implementation of the Transport Strategy. However, the Transport Strategy and LIP will support and assist in the continued economic development of the City through improved accessibility and transport infrastructure for those who work in the area, potentially making the City a more attractive place for businesses and workers.</p> | Objective 1 – Economic growth |

4 IIA Findings for the Transport Strategy

- 4.1 This chapter presents the IIA findings for the proposals selected by the City of London for inclusion under each outcome in the Transport Strategy and for the reasonable alternatives to these proposals considered by the City but not taken forward in the Strategy.
- 4.2 A total of 11 outcomes with associated proposals have been set out in the Strategy and are subject to IIA. A summary table is provided in **Table 4.1** below, which sets out the scores for each proposal against each IIA objective. The table is followed by a narrative summary of the IIA results.
- 4.3 It is noted that there is a section at the end of the Transport Strategy titled 'Delivering the Strategy' which contains three proposals. Unlike all of the other proposals in the Strategy these three have not been assessed as they relate only to how the Strategy will be delivered and monitored and do not specifically propose anything new or any changes to transport and streets in the City.

Cumulative effects

- 4.4 Cumulative effects have been considered in terms of the impact of the Transport Strategy as whole (i.e. all of the outcomes and proposals within each outcome) on each IIA objective, as well as the cumulative effect of the Transport Strategy in combination with other London wide plans and schemes. For this the Integrated Impact Assessment of the draft London Plan prepared by Arup in November 2017 has been considered, and it is the results of the IIA of the preferred strategic options and emerging policies of the draft London Plan that have been reviewed.
- 4.5 **Table 4.1** below shows all of the scores for the outcomes and proposals in the Transport Strategy and the narrative summary following the table considers the overall impact on the IIA objectives and the cumulative effect of the Transport Strategy with the draft London Plan on the IIA objectives.

Table 4.1 Summary of IIA scores

| Proposals | IIA objectives | | | | | | | | | | | | |
|--|-----------------|------------------------------------|--------------------------------------|-----------------|------------------|--------------------------|--|-------------|---------------------------------|--------------------------------|--------|-----------|------------------------|
| | Economic growth | Built environment and public realm | Safe environment and crime reduction | Heritage assets | Waste management | Environmental protection | Climate change mitigation and resilience | Open spaces | Biodiversity and urban greening | Social and cultural facilities | Health | Education | Equality and inclusion |
| Outcome: Healthy Streets Approach | | | | | | | | | | | | | |
| 1 Embed the Healthy Streets Approach in transport planning and delivery | + | ++ | + | + | 0 | ++ | ++ | ++ | + | + | ++ | 0 | ++ |
| Outcome: The Square Mile’s streets are great places to walk and spend time | | | | | | | | | | | | | |
| 2 Put the needs of people walking first when designing and manging our streets | +/- | ++ | ++ | 0 | 0 | ++ | ++ | + | 0 | + | ++ | 0 | + |
| 3 Complete the riverside walkway and improve walking connections between the riverside and the rest of the City | + | ++ | + | 0 | 0 | + | + | ++ | 0 | ++ | + | 0 | 0 |
| 4 Enhance the Barbican high walks | 0 | + | + | 0 | 0 | 0 | 0 | + | 0 | 0 | + | 0 | + |
| 5 Ensure new developments contribute to improving the experience of walking and spending time on the City’s streets | + | ++ | 0 | + | 0 | + | + | + | 0 | + | ++ | 0 | + |
| 6 Promote and celebrate walking | 0 | + | + | 0 | 0 | ++ | ++ | + | 0 | 0 | ++ | 0 | + |

| Proposals | IIA objectives | | | | | | | | | | | | |
|--|-----------------|------------------------------------|--------------------------------------|-----------------|------------------|--------------------------|--|-------------|---------------------------------|--------------------------------|--------|-----------|------------------------|
| | Economic growth | Built environment and public realm | Safe environment and crime reduction | Heritage assets | Waste management | Environmental protection | Climate change mitigation and resilience | Open spaces | Biodiversity and urban greening | Social and cultural facilities | Health | Education | Equality and inclusion |
| 7 Provide more public space and deliver world-class public realm | +? | ++ | + | ++ | 0 | + | + | ++ | + | + | ++ | 0 | + |
| 8 Incorporate more greenery into the City's streets and public spaces | 0 | ++ | 0 | + | 0 | ++ | ++ | ++ | ++ | 0 | ++ | 0 | 0 |
| 9 Reduce rainwater run-off on City streets and public realm | 0 | + | 0 | 0 | 0 | ++ | ++ | + | ++ | 0 | + | 0 | 0 |
| 10 Incorporate protection from adverse weather in the design of streets and the public realm | 0 | ++ | 0 | 0 | 0 | 0 | ++ | + | + | 0 | + | 0 | 0 |
| Outcome: Street space is used more efficiently and effectively | | | | | | | | | | | | | |
| 11 Take a proactive approach to reducing motor traffic | +/-? | + | 0 | + | ++ | ++ | ++ | + | 0 | 0 | ++ | 0 | 0 |
| 12. Design and manage the street network in accordance with the City of London street hierarchy | + | ++ | + | + | ++ | + | + | + | 0 | + | + | 0 | ++ |
| 13 Use timed and temporary street closures to help make streets safer and more attractive places to walk, cycle and | + | ++ | + | + | 0 | + | + | + | 0 | ++ | ++ | 0 | + |

| Proposals | IIA objectives | | | | | | | | | | | | |
|---|-----------------|------------------------------------|--------------------------------------|-----------------|------------------|--------------------------|--|-------------|---------------------------------|--------------------------------|--------|-----------|------------------------|
| | Economic growth | Built environment and public realm | Safe environment and crime reduction | Heritage assets | Waste management | Environmental protection | Climate change mitigation and resilience | Open spaces | Biodiversity and urban greening | Social and cultural facilities | Health | Education | Equality and inclusion |
| spend time | | | | | | | | | | | | | |
| 14 Make the best and most efficient use of the kerbside and car parks | + | ++ | 0 | 0 | + | + | + | + | 0 | + | ++ | 0 | + |
| 15 Support and champion the 'Turning the Corner' Campaign | 0 | + | 0 | 0 | 0 | + | + | 0 | 0 | 0 | ++ | 0 | + |
| Outcome: The Square Mile is accessible to all | | | | | | | | | | | | | |
| 16 Develop and apply the City of London Street Accessibility Standard | 0 | ++ | + | 0 | 0 | 0 | 0 | + | 0 | ++ | ++ | 0 | ++ |
| 17 Keep pavements free of obstructions | 0 | ++ | 0 | + | 0 | 0 | 0 | + | 0 | 0 | ++ | 0 | 0 |
| 18 Keep pedestrian crossings clear of vehicles | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 |
| 19 Support and champion accessibility improvement to underground stations | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | + | 0 | ++ |
| Outcome: People using our streets and public spaces are safe and feel safe | | | | | | | | | | | | | |
| 20 Apply the safe system approach and the principals of road danger reduction to | 0 | + | + | 0 | + | 0 | 0 | 0 | 0 | 0 | ++ | 0 | + |

| Proposals | IIA objectives | | | | | | | | | | | | |
|---|-----------------|------------------------------------|--------------------------------------|-----------------|------------------|--------------------------|--|-------------|---------------------------------|--------------------------------|--------|-----------|------------------------|
| | Economic growth | Built environment and public realm | Safe environment and crime reduction | Heritage assets | Waste management | Environmental protection | Climate change mitigation and resilience | Open spaces | Biodiversity and urban greening | Social and cultural facilities | Health | Education | Equality and inclusion |
| deliver Vision Zero | | | | | | | | | | | | | |
| 21 Work with the City of London Police to reduce crime and fear of crime | + | + | ++ | 0 | 0 | 0 | 0 | 0 | 0 | + | + | 0 | ++ |
| 22 Ensure on-street security measures are proportionate and enhance the experience of spending time on our streets | 0 | + | ++ | 0 | 0 | +? | +? | + | + | + | + | 0 | ++ |
| 23 Improve the quality and functionality of street lighting | 0 | ++ | ++ | 0 | 0 | 0 | 0 | + | 0 | 0 | ++ | 0 | ++ |
| Outcome: More people choose to cycle in the City | | | | | | | | | | | | | |
| 24 Apply a minimum cycling level of service to all streets | +? | + | 0 | 0 | + | ++ | ++ | + | 0 | + | ++ | 0 | + |
| 25 Increase the amount of cycle parking in the City | +? | + | 0 | 0 | 0 | + | + | 0 | 0 | + | ++ | 0 | + |
| 26 Ensure new developments contribute to improving the experience of cycling in the City | +? | + | 0 | 0 | 0 | ++ | ++ | 0 | 0 | + | ++ | 0 | + |

| Proposals | IIA objectives | | | | | | | | | | | | |
|---|-----------------|------------------------------------|--------------------------------------|-----------------|------------------|--------------------------|--|-------------|---------------------------------|--------------------------------|--------|-----------|------------------------|
| | Economic growth | Built environment and public realm | Safe environment and crime reduction | Heritage assets | Waste management | Environmental protection | Climate change mitigation and resilience | Open spaces | Biodiversity and urban greening | Social and cultural facilities | Health | Education | Equality and inclusion |
| 27 Promote and celebrate cycling | 0 | + | 0 | 0 | 0 | ++ | ++ | 0 | 0 | 0 | ++ | 0 | + |
| 28 Improve cycle hire in the City | +? | + | 0 | 0 | 0 | ++ | + | 0 | 0 | + | ++ | 0 | + |
| Outcome: The Square Mile's air and streets are cleaner and quieter | | | | | | | | | | | | | |
| 29 Support and champion a central London Zero Emission Zone | +/-? | + | 0 | 0 | + | ++ | ++ | 0 | 0 | 0 | ++ | 0 | 0 |
| 30 Install additional electric vehicle charging infrastructure | 0 | 0 | 0 | 0 | 0 | ++ | ++ | 0 | 0 | 0 | + | 0 | 0 |
| 31 Request an accelerated roll out of zero emission capable buses | 0 | + | 0 | 0 | 0 | ++ | ++ | 0 | 0 | 0 | + | 0 | 0 |
| 32 Support small businesses to accelerate the transition to zero emission capable vehicles | + | 0 | 0 | 0 | 0 | + | + | 0 | 0 | 0 | + | 0 | 0 |
| 33 Make the City of London's own vehicle fleet zero emissions | 0 | + | 0 | 0 | 0 | ++ | ++ | 0 | 0 | 0 | ++ | 0 | 0 |
| 34 Reduce the level of noise from motor vehicles | 0 | + | 0 | + | 0 | ++ | 0 | + | 0 | 0 | ++ | 0 | 0 |

| Proposals | IIA objectives | | | | | | | | | | | | |
|--|-----------------|------------------------------------|--------------------------------------|-----------------|------------------|--------------------------|--|-------------|---------------------------------|--------------------------------|--------|-----------|------------------------|
| | Economic growth | Built environment and public realm | Safe environment and crime reduction | Heritage assets | Waste management | Environmental protection | Climate change mitigation and resilience | Open spaces | Biodiversity and urban greening | Social and cultural facilities | Health | Education | Equality and inclusion |
| 35 Reduce noise from streetworks | 0 | + | 0 | + | 0 | ++ | 0 | + | 0 | 0 | ++ | 0 | 0 |
| 36 Encourage innovation in air quality improvements and noise reduction | + | + | 0 | + | 0 | ++ | ++ | + | 0 | 0 | ++ | 0 | 0 |
| 37 Ensure street cleansing regimes support the provision of a world-class public realm | 0 | ++ | 0 | + | +++? | ++ | 0 | ++ | 0 | + | + | 0 | 0 |
| Outcome: Delivery and servicing needs are met more efficiently and impacts are minimised | | | | | | | | | | | | | |
| 38 Reduce the number of freight vehicles in the Square Mile | +? | + | 0 | + | ++ | ++ | ++ | 0 | 0 | 0 | ++ | 0 | 0 |
| 39 Develop a sustainable servicing programme | 0 | + | 0 | + | + | ++ | ++ | 0 | 0 | 0 | ++ | 0 | 0 |
| Outcome: Our street network is resilient to changing circumstances | | | | | | | | | | | | | |
| 40 Allow some Local Access streets to function as City Access streets during significant disruption | + | + | 0 | + | 0 | + | + | 0 | 0 | 0 | 0 | 0 | 0 |
| 41 Reduce the impact of construction and | 0 | + | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | + | 0 | + |

| Proposals | IIA objectives | | | | | | | | | | | | |
|---|-----------------|------------------------------------|--------------------------------------|-----------------|------------------|--------------------------|--|-------------|---------------------------------|--------------------------------|--------|-----------|------------------------|
| | Economic growth | Built environment and public realm | Safe environment and crime reduction | Heritage assets | Waste management | Environmental protection | Climate change mitigation and resilience | Open spaces | Biodiversity and urban greening | Social and cultural facilities | Health | Education | Equality and inclusion |
| streetworks | | | | | | | | | | | | | |
| 42 Make the street network resilient to severe weather events | + | 0 | 0 | + | 0 | + | ++ | + | + | 0 | + | 0 | + |
| Outcome: Emerging transport technologies benefit the Square Mile | | | | | | | | | | | | | |
| 43 Establish a Future Transport Programme | + | ++ | ++ | + | 0 | ++ | ++ | ++ | 0 | 0 | ++ | 0 | ++ |
| 44. Establish a Future Transport Advisory Board | +? | +? | +? | +? | 0 | +? | +? | +? | 0 | 0 | +? | 0 | +? |
| 45 Explore the need for legislative change to ensure emerging technology and innovation benefits the Square Mile | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | + |
| Outcome: The Square Mile benefits from better transport connections | | | | | | | | | | | | | |
| 46. Support and champion better national and international connections to the Square Mile | ++ | 0 | 0 | ? | 0 | +/- | +/- | 0 | -? | 0 | 0 | 0 | ++ |
| 47 Support and champion improved connections to the Square Mile from | ++ | + | 0 | ? | 0 | ++ | ++ | 0 | -? | 0 | ++ | 0 | ++ |

| Proposals | IIA objectives | | | | | | | | | | | | |
|--|-----------------|------------------------------------|--------------------------------------|-----------------|------------------|--------------------------|--|-------------|---------------------------------|--------------------------------|--------|-----------|------------------------|
| | Economic growth | Built environment and public realm | Safe environment and crime reduction | Heritage assets | Waste management | Environmental protection | Climate change mitigation and resilience | Open spaces | Biodiversity and urban greening | Social and cultural facilities | Health | Education | Equality and inclusion |
| Greater London and the surrounding region | | | | | | | | | | | | | |
| 48 Support the increased use of the Thames for passenger services | 0 | ++ | 0 | 0 | 0 | + | + | 0 | 0 | 0 | + | 0 | 0 |
| 49 Review bus provision across the City | + | +? | 0 | 0 | 0 | + | + | 0 | 0 | 0 | + | 0 | ++ |
| 50 Support the Mayor of London in retaining locally-generated taxation | + | +? | 0 | 0 | 0 | +? | +? | 0 | 0 | 0 | +? | 0 | +? |
| 51 Encourage continued central government investment in major London transport projects | + | 0 | 0 | 0 | 0 | + | + | 0 | -? | 0 | + | 0 | ++ |

Economic growth

- 4.6 The proposals within the Transport Strategy are expected to have mainly minor positive or negligible effects on economic growth. Significant positive effects are expected as a result of proposals 46 and 47 because they will help to improve regional, national and international connections to the City, making it a more attractive place for businesses to locate and a more accessible place for people to work and visit. Uncertain mixed effects are possible for this IIA objective, in relation to proposals 2, 11 and 29 as it is considered possible that some businesses may be put off locating in the City if access for vehicles is restricted, while on the other hand the restrictions will make the City a more healthy and attractive place to work and will improve driving for those vehicles still permitted access. Overall, the Strategy is expected to have positive effects in relation to the economic growth IIA objective.
- 4.7 These positive effects on the economy that will result from the Transport Strategy are likely to combine with the draft London Plan to create a more significant positive effect on the economy of the City.

Built environment and the public realm

- 4.8 The proposals within the Transport Strategy are considered likely to result in a mix of minor positive and significant positive effects on the built environment and public realm. This is generally because the Strategy will work to enhance the public realm, making it more attractive and accessible. Therefore, cumulatively, all of the proposals within the Strategy are expected to have positive effects on the built environment and public realm IIA objective.
- 4.9 The positive effects that the Strategy is likely to have in relation to the built environment and public realm, will be made more significant through strategic options and emerging policies in the draft London Plan.

Safe environment and crime reduction

- 4.10 Mainly negligible and minor positive effects are expected on the safe environment and crime reduction objective as a result of the proposals within the Transport Strategy, although a number of significant positive effects are considered likely as a result of proposals that include measures to reduce crime and improve safety on the City's streets. Overall, the Strategy is expected to have positive effects on the safe environment and crime reduction IIA objective.
- 4.11 The positive effects in relation to a safe environment and crime reduction as a result of the Transport Strategy are likely to be increased by strategic options and policies in the draft London Plan.

Heritage assets

- 4.12 The impacts of the Transport Strategy on heritage within the City are expected to be mainly negligible and minor positive. However, significant positive effects are expected to result from proposal 7 as it aims to enhance the settings of significant heritage assets. Uncertain effects are expected from proposals 46 and 47 as the effects of high level schemes on heritage assets are unknown at this stage. However, it is considered that they may present the opportunity to enhance assets. Overall therefore, the Strategy is expected to have positive effects in relation to the heritage assets IIA objective.
- 4.13 The positive effects in relation to heritage in the City which will arise as a result of the Transport Strategy will be further increased by emerging policy in the draft London Plan.

Waste management

- 4.14 A mixture of negligible and minor positive effects is expected to result from the Transport Strategy in relation to the waste objective. Four proposals are likely to have significant positive effects: 11, 12, 37 and 38. This is because these proposals will result in a reduction in the number of servicing vehicles and more sustainable waste collection. Therefore, the Strategy is expected to have positive effects in relation to the waste IIA objective.
- 4.15 Positive impacts in relation to the waste objective that will arise from the implementation of the Transport Strategy are likely to be supported and further strengthened by emerging policies in the draft London Plan.

Environmental protection

- 4.16 The majority of proposals within the Transport Strategy are expected to have significant positive, minor positive or negligible effects in relation to the environmental protection objective. These positive effects are generally because many of the proposals promote a reduction in road traffic, which will reduce air and noise pollution in the City. Overall the Strategy is likely to have a positive impact in relation to the environmental protection IIA objective.
- 4.17 The positive effects of the Transport Strategy in relation to the environmental protection objective are expected to be supported and enhanced by strategic options and policies in the draft London Plan.

Climate change mitigation and resilience

- 4.18 The Transport Strategy is likely to have a mixture of significant positive, minor positive and negligible effects in relation to the climate change mitigation and resilience objective. Similarly to environmental protection, this is mainly due to the emphasis on reducing road traffic and congestion in the City and a modal shift to walking and cycling, which will result in a reduction in transport emissions. A number of the proposals also promote urban greening, and require the City to be resilient to severe weather events. Overall therefore the Strategy is likely to have positive effects in relation to the IIA objective.
- 4.19 Positive impacts in relation to the climate change and mitigation objective from the Transport Strategy will be increased by strategic options and emerging policies included within the draft London Plan.

Open spaces

- 4.20 Mainly negligible and minor positive effects are expected in relation to the open spaces objective as result of the Transport Strategy, although significant positive effects are expected as a result of a number of proposals. This is because these proposals promote the enhancement of open space, or a reduction in traffic which will improve the tranquillity of open space. Positive effects therefore are expected overall as a result of the Transport Strategy.
- 4.21 The positive impacts on open spaces resulting from the implementation of the Transport Strategy are likely to be further improved through a number of strategic options and emerging policies in the draft London Plan.

Biodiversity and urban greening

- 4.22 The proposals within the Transport Strategy are anticipated to have mainly negligible effects on biodiversity and urban greening, although some minor positive effects are expected and significant positive effects are considered likely as a result of proposals 8 and 9 as these proposals

promote additional greenery in the City. Uncertain minor negative effects are considered possible as a result of proposals 46, 47, and 51 because of the impacts major transport infrastructure projects, such as new stations and station and rail expansions are likely to have some impact on habitats in, or around the City. However, this is uncertain because the specifics of the projects are unknown. Overall therefore it is expected that the effect of the Transport Strategy in relation to this objective will be mainly positive.

- 4.23 The draft London Plan will improve on the positive effects that the Transport Strategy is anticipated to have in relation to this IIA objective.

Social and cultural facilities

- 4.24 The Transport Strategy is expected to have a mixture of negligible and minor positive effects in relation to the social and cultural facilities objective, although significant positive effects are considered likely as a result of proposals 3, 13 and 16 through the provision of accessible streets, improved leisure facilities and the promotion of lunchtime streets events. Therefore, the impact of the Strategy in relation to the social and cultural facilities objective will be positive.
- 4.25 The positive impacts in relation to the social and cultural facilities objective that are expected to arise as a result of the implementation of the Transport Strategy will be further enhanced through a number of strategic options and policies in the draft London Plan.

Health

- 4.26 The impact of the Transport Strategy in relation to the health objective is anticipated to be a mixture of minor positive and significant positive effects. This is mainly due to the proposals which reduce road traffic thus improving air pollution, noise pollution and road safety. Overall the Strategy will have a positive effect on the health of the City's residents and visitors.
- 4.27 The positive impact that the Transport Strategy is anticipated to have on the health of the City's residents and visitors is expected to be further enhanced by strategic options and emerging policies in the draft new London Plan.

Education

- 4.28 The Transport Strategy is anticipated to have a negligible effect in relation to the education objective as this is unlikely to be affected by the implementation of the outcomes and proposals within the Strategy.
- 4.29 While the Transport Strategy is anticipated to have a negligible effect on education, the London Plan is expected to have positive effects and therefore cumulatively the Strategy and draft London Plan are likely to have positive effects.

Equality and inclusion

- 4.30 The proposals within the Transport Strategy are anticipated to have a mixture of negligible, minor positive and significant positive effects in relation to the equality and inclusion objective. Significant positive effects are considered likely as a number of proposals aim to make the streets in the City and public transport more accessible to all. Therefore, overall the Strategy will have positive effects in relation to the equality and inclusion IIA objective.
- 4.31 The positive effects arising from the Transport Strategy in relation to the equality and inclusion objective are expected to be further improved by the draft London Plan.

Reasonable alternatives

- 4.32 The City Corporation identified an alternative to proposal 9. The alternative being for all transport and public realm schemes to incorporate Sustainable Drainage Systems, aiming for a green field site run-off rate. However, the Corporation has stated that the reason that this alternative proposal was not selected is due to severe space constraints on and below the City's streets, meaning that it is nearly always impossible to install Sustainable Drainage infrastructure on streets in the City, making the proposal unlikely to be deliverable. For this reason, this option is not considered to be a reasonable alternative for the purposes of the IIA and has not been assessed.
- 4.33 An alternative was also considered to proposal 10 and was for the City's streets and public realm to be designed to provide protection from all weather. The Corporation stated that the reason that this alternative proposal was not selected is because providing protection from all weather is possibly unattainable. Therefore, as above, this is not considered to be a reasonable alternative option and has not been assessed.
- 4.34 A reasonable alternative to proposal 16 has been considered by the City Corporation. The reasonable alternative is to 'continue with minimum accessibility standards as per the Design Manual for Roads and Bridges (DMRB)'. This will only have negligible effects on the IIA objectives, as it is a continuation of the current approach. Therefore, the selected proposal 16 is more likely to have positive effects.
- 4.35 A reasonable alternative has also been identified to proposal 20. It is considered that an alternative method of reducing road danger is a traditional road safety approach. Rather than aiming to remove the danger on roads, it seeks to mitigate it, for example by increasing segregation between vehicles and pedestrians with guard railing. This is expected to have mainly negligible effects on the IIA objectives. Significant positive effects are considered likely in relation to health through the mitigation of road danger. However, the alternative option to proposal 20 is anticipated to have fewer positive effects than the selected proposal.
- 4.36 The alternative considered to proposal 22 is to continue with the use of bollards for all hostile vehicle mitigation (HVM). The alternative to proposal 22 is a continuation of the current measure, therefore it will have negligible effects on the IIA objectives. The selected proposal is anticipated to have a number of positive effects.
- 4.37 Reasonable alternatives have also been identified to proposals 29, 30 and 36. For proposal 29 it is considered that an alternative to championing a central London Zero Emission Zone would be to ban all motor vehicles. An alternative to selected proposal 30 would be to rely on the private installation of EV charge points, while the alternative to selected proposal 36 would be to allow the market to lead in air quality improvements and noise reduction, rather than this being encouraged by the City.
- 4.38 The alternative to proposal 29 is anticipated to have a range of effects. The impact on the built environment and public realm; safe environment and crime reduction; heritage assets; and open space is expected to be more beneficial than the selected option. However, the impact on waste management, social and cultural facilities and equality and inclusion is expected to be more adverse. A significant negative effect is considered likely in regards to waste management as a total ban on vehicles in the City would not allow for appropriate and convenient deliveries and servicing. As highlighted in **Appendix 4** of the main IIA report, this is the main reason why this reasonable alternative has not been selected.
- 4.39 The alternatives to proposals 30 and 36 are a continuation of the current situation and therefore will have negligible effects on the IIA objectives. The selected proposals are anticipated to have a number of positive effects.

5 Conclusions and monitoring

Conclusions

- 5.1 The selected proposals and reasonable alternatives for the City of London Transport Strategy have been subject to a detailed appraisal against the IIA objectives, which were developed at the scoping stage of the IIA process.
- 5.2 The IIA has identified the potential for significant effects (positive) for proposals under all of the outcomes contained within the Transport Strategy. The scores are set out in **Table 4.1**. No significant negative effects have been identified as a result of the proposals in the Transport Strategy.
- 5.3 Cumulatively all of the proposals within the Transport Strategy are expected to have positive effects on the baseline in relation to achievement of all of the IIA objectives apart from education for which negligible effects are anticipated. These positive effects are, for the majority of IIA objectives, expected to be enhanced when the Strategy is considered in combination with the draft London Plan.
- 5.4 The IIA has been undertaken alongside the preparation of the Transport Strategy and therefore has been able to feed into the proposals and ensure that sustainability considerations are integrated within the Strategy.

Monitoring proposals

- 5.5 Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision making.
- 5.6 Monitoring should be focussed on the significant environmental effects of a plan or programme and so based on this, monitoring indicators have been proposed for effects on all of the IIA objectives apart from education; this is not included as it is unlikely to be significantly affected by the implementation of the Transport Strategy. It is noted that no significant negative effects are considered likely as a result of the plan and so the monitoring is based on significant positive effects, with the aim of validating that these effects do indeed arise when the Transport Strategy is implemented.
- 5.7 **Table 5.1** sets out a number of suggested indicators for monitoring the potential significant effects of implementing the Transport Strategy. Indicators are proposed in relation to the IIA objectives for which potential significant positive effects were identified as a result of any of the proposals.
- 5.8 The data used for monitoring in many cases will be provided by outside bodies. Information collected by other organisations can also be used as a source of indicators. It is therefore recommended that that City of London continues the dialogue with the statutory consultees and other stakeholders described in the Transport Strategy, and works with them to agree the relevant environmental effects to be monitored and to obtain information that is appropriate, up to date and reliable.

Table 5.1 Proposed monitoring framework for the Transport Strategy

| IIA objectives | Proposed monitoring indicators |
|--------------------------------------|--|
| Economic growth | <ul style="list-style-type: none"> New business registration rate Overall change in employment floorspace Commuting numbers / statistics to the City Number of international businesses located in the City |
| Built environment and public realm | <ul style="list-style-type: none"> Number of people walking or cycling Public perception of public realm in the City Amount of street clutter and cleanliness of the streets Passenger numbers using river transport |
| Safe environment and crime reduction | <ul style="list-style-type: none"> Number of reported crimes |
| Heritage assets | <ul style="list-style-type: none"> Quality and usage of the Barbican high walks Number of visits to heritage assets in the City, in particular the Barbican Applications refused due to impact on the historic environment Number of heritage assets at risk |
| Waste management | <ul style="list-style-type: none"> Percentage and delivery and servicing trips made by zero emission transport The number of large delivery and servicing vehicles using the transport network |
| Environmental protection | <ul style="list-style-type: none"> Changes in the concentration of air pollutants in the City Number of planning applications that include an air quality assessment¹⁷ Number of complaints regarding noise |

¹⁷ Air quality assessment should demonstrate how the development has met air quality challenges thereby avoiding refusal.

| IIA objectives | Proposed monitoring indicators |
|--|--|
| | Changes in water quality at the River Thames SINC |
| Climate change mitigation and resilience | <p>The number of vehicles that meet the Zero Emissions Zone standards</p> <p>The percentage of Zero Emission Capable buses on the network</p> <p>The modal shift from private car use to walking, cycling or public transport</p> <p>Changes in greenhouse gas emissions from the City</p> <p>Net increase in Green Infrastructure</p> |
| Open spaces | <p>Open space / parks usage</p> <p>Amount of public open space as percentage of total land use</p> |
| Biodiversity and urban greening | <p>Net increase in Green Infrastructure, parks and open spaces</p> <p>Number of sites designated for nature conservation and their quality</p> <p>Changes in areas of biodiversity importance</p> |
| Social and cultural facilities | <p>Adults participating in sports, recreation and cultural activities</p> <p>Number of 'lunchtime streets' events taking place</p> |
| Health | <p>Number of hospital admissions in relation to road accidents</p> <p>Number of accidents involving cyclists and pedestrians</p> <p>Number of complaints regarding amenity (e.g. in relation to noise)</p> <p>Proportion of residents reporting their health as 'good' or 'very good' (source: Census)</p> |
| Equality and inclusion | <p>Number of new or extended bus services</p> <p>Number of step free rail stations</p> <p>Public transport usage by the elderly or disabled</p> |

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Appendix 3: Corporate Plan outcome mapping

| Transport Strategy outcome | Corporate Plan outcome |
|--|---|
| The Square Mile's streets are great places to walk and spend time | 9. We are digitally and physically well-connected |
| Street space is used more efficiently and effectively | 9. We are digitally and physically well-connected |
| The Square Mile is accessible to all | 3. People have equal opportunities to enrich their lives and reach their full potential 8. We have access to the skills and talent we need |
| People using our streets and public spaces are safe and feel safe | 1. People are safe and feel safe |
| A wider range of people choose to cycle | 9. We are digitally and physically well-connected |
| Our air and streets are cleaner and quieter | 11. We have clean air, land and water and a thriving and sustainable natural environment |
| Delivery and servicing are more efficient, and impacts are minimised | 5. Businesses are trusted and socially and environmentally responsible |
| Our street network is resilient to changing circumstances | 12. Our spaces are secure, resilient and well-maintained |
| The Square Mile benefits from better transport connections | 9. We are digitally and physically well-connected |
| Emerging transport technologies benefit the Square Mile | 9. We are digitally and physically well-connected |

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City Streets: Transport for a changing Square Mile

City of London Transport Strategy

~~Draft for Consultation~~

~~November~~ May 2018

Chairman's foreword

TO FOLLOW

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Introduction

The City of London, also known as the Square Mile, is the historic heart of London and one of the world's leading financial centres. It is home to 8,000 residents and a working population of over 489,500,000 people. Each year the City also welcomes over 10 million tourists, in addition to those visiting for business.

How people and goods travel to and around the City has a significant impact on the experience of living, working and studying in or visiting the Square Mile. Facilitating the safe, clean and efficient movement of people and vehicles serving the City, alongside improving the quality of streets and public spaces, will be essential to ensuring the continued success of the City as a global centre for business and cultural destination.

As the highway authority for the Square Mile, the City of London Corporation (City Corporation) is responsible for the management of most streets within the City. Transport for London (TfL), the integrated transport authority for Greater London, manages the Transport for London Road Network (TLRN, also known as 'Red Routes'), of which there are several miles within the Square Mile. TfL also manages and operates London's public transport, the Congestion Charge and Emission Zones.



Figure 1: Map of the City of London boundary and the Transport for London Road Network (larger map available on the City of London Transport Strategy webpage)

This Transport Strategy provides a 25-year framework for future investment in and management of the City's streets, as well as measures to reduce the social, economic and environmental impacts of motor traffic and congestion. It also sets out our aspirations for improvements to the TLRN and local, national and international transport connections. It details an ambitious approach to transport and the design and management of streets in response to the challenges arising from significant growth, fast-moving technological development and changing travel habits.

The Square Mile's workforce is forecast to increase to 570,000 by 2030 and to over 620,000 by 2044. The residential population will also grow, with nearly 3,000 more people living in the Square Mile by 2044. This growth will lead to more people travelling on the City's streets, and in particular more people walking, and increased demand for high quality public spaces. More residents, workers and visitors will also mean more deliveries and servicing of offices, homes, shops, pubs, cafes and restaurants.

This extra demand must be accommodated within a fixed amount of street space. The Square Mile's streets must enable the movement of people and vehicles to and through the City while also providing space for parking and loading. Our streets are also public spaces that provide workers, residents and visitors with places to meet, eat and drink, or just appreciate the unique character of the Square Mile. Attractive and safe public spaces, with seating and things to see and do are a vital ingredient of a modern city.

The next 25 years will see major changes in transport technology. Vehicles will increasingly be connected, and automated, and new mobility services will emerge. New technology can present great opportunities for travel and transport, but also presents challenges over how these new advancements are managed and controlled. Automated vehicles, for example, may be able to use street space more efficiently and reduce collisions, but the availability of relatively cheap private transport could lead to more people choosing not to use public transport.

As the City grows it will be essential to reduce motor traffic and facilitate the movement of people by the most efficient modes of transport. Reductions in traffic will also help improve air quality and make our streets safer. Fortunately, most people already travel to and around the Square Mile on foot, by cycle or public transport. These travel trends are likely to continue in the future, but only if walking, cycling and using public transport are convenient, attractive, inclusive and safe ways to travel.

Travel and transport in the Square Mile

The City is one of the best-connected places in the world. TfL rates the whole of the Square Mile as having a Public Transport Accessibility rating of above 6 – the highest possible score. This is made possible by an extensive public transport network with six mainline railway stations, 12 Underground and DLR stations and a high density and frequency of bus services.

Large numbers of commuters also use stations near the City, including London Bridge and Waterloo. There are also river bus services which stop at Blackfriars Pier and at Tower Pier just outside the City.

Significant improvements have and are being made to public transport provision, particularly with the construction of the Elizabeth line which will operate trains to the City at Farringdon and Liverpool Street/Moorgate from ~~autumn 2019~~2020.

93% of commuter travel to the Square Mile is by public transport (84%), walking (5%) or cycling (4%). Fewer than 5% of City workers drive to work. Walking is by far the main mode of travel within the City, with over 750,000 walked journeys a day. In recent years investment in cycling infrastructure has resulted in an estimated tripling in the number of people cycling in the Square Mile. People cycling now make up a quarter of vehicles and this figure can rise to over 50% on major streets during rush hour.

Traffic in the City has changed significantly since the late 1990s, both in terms of total volume and overall composition. Traffic counts across the City show that overall motor traffic volumes have reduced by approximately 50%, with the greatest reduction being in the number of cars and taxis. The greatest observed reductions have coincided with key events such as the introduction of the Congestion Charge, the global recession and the introduction of Cycle Superhighways.

The most recent traffic counts in autumn 2017 found a slight increase in car volumes, probably caused by the increasing volumes of private hire vehicles. Freight volumes, after dropping significantly between 1999 and 2004, have levelled off in recent years.

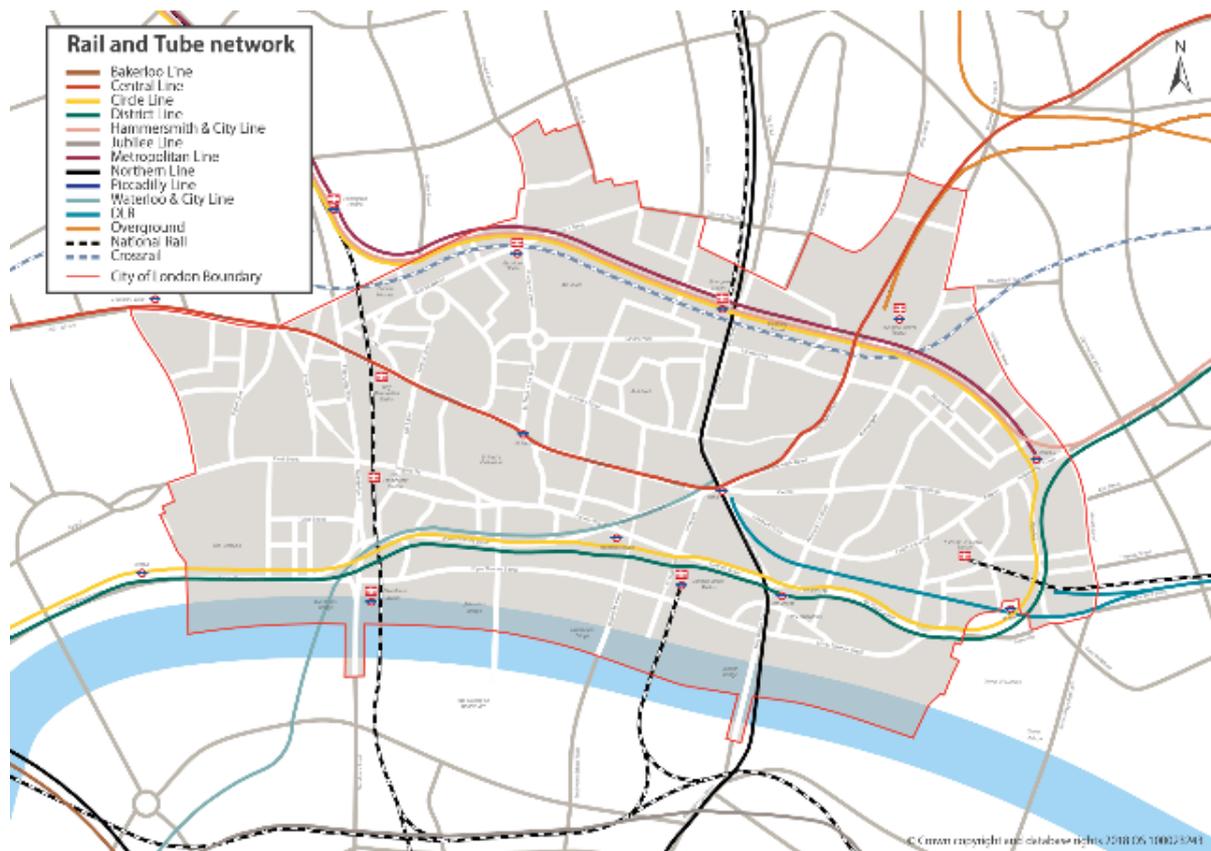


Figure 2: City of London rail, Underground, and DLR networks (larger map available on the City of London Transport Strategy webpage)

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How the Square Mile's streets have changed over the last 25 years

In common with cities around the world, the focus of transport planning and traffic management in Square Mile during the 1960s, 70s and 80s was accommodating motor vehicles. Streets such as London Wall, Upper and Lower Thames Street and the Aldgate gyratory were rebuilt to maximise the flow of motor traffic. People walking were expected to cross these streets via bridges and subways. A thirty-mile network of walkways was planned, but never completed. Very few junctions had pedestrian crossings and pavement widths were kept to a minimum.

This approach began to change in the early 1990s, when the City Corporation approved an experiment to close Bank Junction to through movement and to retime traffic signals throughout the Square Mile. Twenty-five years later these aspirations are beginning to be realised with the Bank on Safety project, which restricts access to general motor traffic during the day. The proposals for Bank were part of a wider plan, 'Key to the future', which sought to reduce motor traffic in the centre of the City. These proposals took on an extra urgency following the IRA bombings of the Baltic Exchange and Bishopsgate in 1992 and 1993, leading to the introduction of a temporary 'Ring of Steel' in July 1993.

Officially known as the 'Traffic and Environment Zone', the Ring of Steel was made permanent in 1994. It significantly reduced the number of places where motor vehicles could enter the City, with many smaller streets closed to through traffic. This, together with carriageway narrowing and the installation of check points at the remaining access points, meant that fewer motor vehicles could enter the City. Motor traffic in the centre of the Square Mile fell by 30% as a result. Associated changes made key junctions outside the Ring of Steel more efficient by cutting out some of the movements, for example the Southwark Bridge/Queen Street/Upper Thames Street junction.

The Ring of Steel was extended in 1996 to incorporate St Paul's and Old Bailey and in 2000 to include Broadgate and a slight extension into Hackney. A further extension in 2003 brought the west of the City into the traffic management zone. Other functional changes through the 1990s and early 2000s, saw pedestrian crossings added to 10 junctions and the installation of dropped kerbs and pedestrian refuges.

The last 15 years has seen an increased focus on improving the quality of the Square Mile's streets as places to walk, cycle and spend time. Overall, almost a third of the City's streets have been improved over this period. 99% of guard railing was removed through the 2000s and around 100 granite courtesy crossings installed at junctions. Two-way cycling began to be introduced on one-way streets in 2006, with over 100 streets made two-way for people cycling by 2015. In partnership with Transport for London, two Cycle Superhighways and a Quietway through the City have been completed. These have helped make cycling safer and allow more people to choose this increasingly popular mode of transport.

Starting in 2003, the Street Scene Challenge matched money generated from on-street parking and penalty charges to contributions from developers and occupiers - funding the delivery of multiple small schemes to improve the public realm across the Square Mile, such as Devonshire Square and Mitre Square. This collaborative approach has also funded significant improvements to:

- The area south of St Paul's, including converting the coach park into a new garden (completed 2011)
- The Cheapside quarter, including wider pavements to make Cheapside a more attractive place to shop and spend time (completed 2012)
- Holborn Circus, with more public space and seating and improved pedestrian crossings (completed 2014)
- The removal of the gyratory at Aldgate, which has enabled the creation of Aldgate Square – one of the largest public spaces in the Square Mile (completed 2018)
- Widening pavements, improving pedestrian and cycle crossings and creating new public spaces as part of the London Wall Place development (completed 2018)
- Public realm improvements around new offices for Bloomberg (completed 2018) and Goldman Sachs (due to complete in 2019)

Most recently, Bank on Safety, the experimental scheme to improve safety for people walking and cycling through Bank Junction, has been made permanent and plans for further improvements to the junction are now being prepared. This will be just one of the many large and small projects that will continue the transformation of the Square Mile's streets over the next 25-years.

-----TEXT BOX END-----

Understanding people's views of transport and streets in the Square Mile

The development of this Strategy has been informed by extensive engagement with the public and organisations with an interest in transport in the Square Mile. The first phase of engagement, held in February and March 2018, included:

- City Streets survey: 1,949 people accessed this survey which included questions on perceptions of the City's streets, priorities for the use of streets and kerb-side space, and ideas and suggestions for future street and transport improvements.
- City Streets exhibition: A supporting exhibition was held at the City Centre on Basinghall Street. The exhibition took visitors through historic and recent changes to the City's streets and presented future challenges. More than 7,000 people visited the City Centre over the two-month period.
- Stakeholder workshops: 77 representatives from City businesses, transport user groups and other organisations with an interest in transport in the Square Mile attended workshops in February and March 2018 to share their views on the transport challenges and opportunities.

The key themes emerging from this first phase of engagement were that:

- Motor traffic levels on the City's streets are too high
- People walking in the Square Mile are not given enough priority or space
- Conditions for cycling in the Square Mile need to be improved and made safer
- More greenery and seating should be provided on streets and the quality of the public realm improved
- Air quality in the Square Mile needs to be urgently improved
- There is potential to use streets more flexibly to accommodate the various demands on them at different times of the day
- The City's streets are not accessible to all
- The management of freight needs to be improved

A second phase of engagement, in June and July 2018, consulted on the proposed vision, aims and outcomes for this Strategy. Over 500 people and organisations responded to this consultation. The draft vision, aims and outcomes received high levels of support, with each being supported or supported with changes by between 77% and 92% of respondents.

The third and final phase of engagement, which took place between November 2018 and January 2019, consulted on the draft Transport Strategy. This included seeking feedback through a bespoke consultation website, holding briefing sessions for stakeholders and public drop-in sessions.

Promotion of the consultation was undertaken through a variety of channels, including:

- on the City of London Corporation website homepage, Twitter and to the Transport Strategy mailing list
- through partnership communications, including on the Active City Network website and through 10 external newsletters
- articles in Ward newsletters and adverts in City A.M and City Matters
- letters to all City of London residents and 4500 businesses, in conjunction with the draft Local Plan consultation
- posters displayed throughout the Barbican estate, Middlesex Street estate and at City Corporation libraries
- flyers distributed at libraries, in Guildhall reception areas, at the City Centre and on streets

Almost 2,900 individual responses and 6,900 comments were received through the consultation website, with a further 42 comments from public drop-in sessions and 70 submissions by email. Over 60 organisations also responded to the consultation.

Over 500 people submitted template responses through the Unblock the Embankment website and the more than 1500 people submitted template responses via the Square Mile Cycling Campaign.

Of all responses received through the website 77% were supportive of the proposals, with 15% opposing.

An independently recruited panel of City workers and residents also met three times during the development of the Strategy. This panel, which was facilitated by Populus, provided an opportunity to gain a deeper understanding of residents and workers' transport needs and concerns.

A Strategy Board made up of City business representatives, representatives from the Greater London Authority and TfL, and transport experts, also met ~~three~~ four times during the development of the Strategy. This Board provided advice and acted as a sounding board for emerging proposals and response to the consultation.

Reports of each phase of engagement, providing more details of feedback received, can be found on our website.

Supporting the delivery of the City of London Corporate Plan

The Transport Strategy is one of a suite of strategies that help to deliver the City of London Corporation's Corporate Plan. The Corporate Plan sets out the City Corporation's aims to:

- Contribute to a flourishing society
- Support a thriving economy
- Shape outstanding environments

The Transport Strategy will help contribute to a flourishing society by:

- Making streets safer and reducing the number of traffic related deaths and serious injuries
- Enabling people to walk and cycle and reducing the negative health impacts of transport
- Ensuring streets are accessible to all and provide an attractive space for the City's diverse community to come together

A thriving economy will be supported by:

- Enabling the City to continue to grow and accommodating the associated increase in demand for our limited street space
- Improving the quality of streets and transport connections to help attract talent and investment
- Helping create a smarter City, that supports and enables innovative transport technology and other mobility solutions

The Transport Strategy will help shape outstanding environments by:

- Advocating for improved local, national and international transport connections.
- Reducing motor traffic levels to enable space to be reallocated to walking, cycling, greenery and public spaces
- Improving air quality and reducing noise from motor traffic
- Ensuring streets are well maintained and resilient to natural and man-made threats

The Transport Strategy also supports the City of London Police Corporate Plan, which seeks to make the City of London the safest city area in the world by protecting people, businesses and infrastructure.

In addition to the Corporate Plans, the City Corporation have identified risks to the organisation at an institutional level. The Transport Strategy will help mitigate the following corporate risks:

1. An increase in the number of casualties on City streets will pose a risk to the credibility and reputation of the City Corporation

2. Air quality will continue to be detrimental to the health of residents, workers and visitors to the City. This will cause strain on our hospitals through long term health conditions and make the City a less attractive

-----TEXT BOX START -----

Culture Mile

Culture Mile is a partnership between four UK leading arts, culture and learning institutions and the City Corporation to create a vibrant, cultural quarter. Stretching over just under a mile, from Farringdon to Moorgate, Culture Mile covers 15% of the total area of the Square Mile. Culture Mile incorporates the Barbican Centre and the new Museum for London and proposed Centre for Music. Several proposals in this Transport Strategy will directly support the delivery of Culture Mile by improving the public realm and enhancing walking and cycling routes to and within the area.

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Alignment with the City of London Local Plan

The new City of London Local Plan, called City Plan 2036, sets out the planning policies that will guide future growth and decisions on planning applications for the next 20 years.

Transport plays a key role in enabling and accommodating development, and the way the City grows affects demand for travel and public space. Reflecting this interrelationship, relevant policies and proposals in City Plan 2036 and this Strategy are aligned. Several proposals support and respond to the significant change anticipated in the following 'Key Areas of Change' (Figure 3);

- **Aldgate and Tower:** major hotel and office developments are under construction on Minories, as well as the Chinese Embassy relocating to the area's vicinity and proposals for redevelopment of the Mansell Street estate
- **Blackfriars:** public realm enhancements are proposed along the Riverside walk, and the development of the Thames Tideway Tunnel will create a large new public space
- **City Cluster:** a number of significant tall buildings are under construction, with further tall buildings permitted but not yet commenced. Employment in the Cluster is expected to nearly double once all current permissions are built and occupied
- **Fleet Street:** significant occupational change in major buildings is expected in the short to medium term as existing occupiers relocate to other buildings. [A new combined court and City of London Police headquarters is also proposed.](#)

- **Pool of London:** several buildings are likely to be vacated in the short-term, providing an opportunity for redevelopment in the area
- **Liverpool Street:** increased retail space at Broadgate, the completion of Crossrail at Liverpool Street station and linkages to Culture Mile will initiate change in this area
- **Smithfield and Barbican:** the delivery of the Culture Mile initiative, relocation of Museum of London to Smithfield, the potential development of a new Centre for Music on the site of the existing Museum of London and the possible relocation of Smithfield Market will see this area undergo significant change

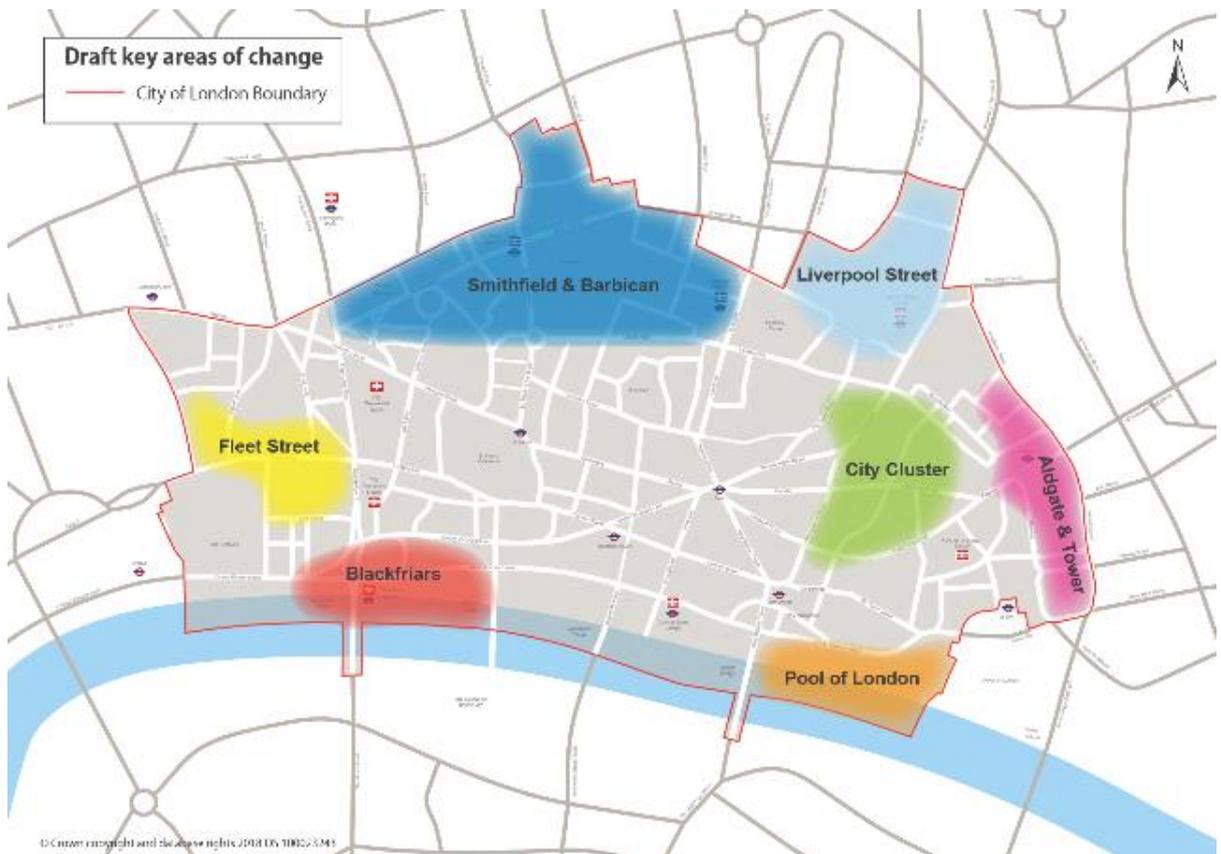


Figure 3: City Plan 2036 draft Key Areas of Change (larger map available on the City of London Transport Strategy webpage)

Supporting the delivery of the Mayor's Transport Strategy

The Mayor's Transport Strategy (MTS) sets out the Mayor of London's policies and proposals to reshape transport in London by transforming the Capital's streets, improving public transport and creating opportunities for new homes and jobs. To achieve this, the Mayor wants to encourage more people to walk, cycle and use public transport.

The three key themes of the MTS are:

- Healthy Streets and healthy people: Creating streets and street networks that encourage walking, cycling and public transport to reduce car dependency and the health problems it creates
- A good public transport experience: Enabling more people to travel by public transport, the most efficient way for people to travel over distances that are too long to walk or cycle
- New homes and jobs: Planning the city around walking, cycling and public transport use to unlock growth in new areas and ensure that London grows in a way that benefits everyone

Local Implementation Plan

The City Corporation, along with London's 32 boroughs, is required to produce a Local Implementation Plan that details how we will support the delivery of the MTS. This Strategy, together with a separate LIP Delivery Plan, ~~will~~ form the City of London Corporation's Local Implementation Plan (LIP). ~~The City Corporation, along with London's 32 boroughs, is required to produce a LIP that details how we will support the delivery of the MTS. Our~~ The draft LIP Delivery Plan is published alongside this ~~draft~~ Strategy and is available on our website. ~~and~~ The LIP Delivery Plan provides more details of the alignment between our visions, aims, outcomes and proposals and the MTS. It also sets out the projects that will be funded in full or in part by contributions from TfL.

Vision, aims and outcomes

Our vision

Streets that inspire and delight, world-class connections and a Square Mile that is accessible to all.

By delivering this vision we aim to...

- Ensure the Square Mile is a healthy, attractive and easy place to live, work, learn and visit.
- Support the development of the Square Mile as a vibrant commercial centre and cultural destination, and protect and enhance its unique character and heritage.

To create a future where ...

- The Square Mile's streets are great places to walk and spend time
- Street space is used more efficiently and effectively
- The Square Mile is accessible to all
- People using our streets and public spaces are safe and feel safe
- More people choose to cycle
- The Square Mile's air and streets are cleaner and quieter
- Delivery and servicing are more efficient, and impacts are minimised
- Our street network is resilient to changing circumstances
- The Square Mile benefits from better transport connections
- Emerging transport technologies benefit the Square Mile

Proposals

For each of the 10 outcomes, this chapter outlines our ambitions, summarises the key issues and challenges and sets out proposals for delivery.

Where appropriate proposals include delivery timescales using the following milestones:

- 2022 (to align with the [first Transport Strategy LIP Delivery Plan](#)))
- 2025
- 2030
- 2040
- 2044 (the end date for this Strategy)

[These milestones indicate the latest planned delivery date. Wherever possible we will seek to deliver ahead of the indicated milestone.](#)

Healthy Streets Approach

The Healthy Streets Approach provides the framework for this Strategy. This means we will place improving people's health and their experience of using streets at the heart of our transport decision making.

The 10 Healthy Streets Indicators (Figure X) capture the elements that are essential for making streets ~~better~~[attractive and accessible](#) places to walk, cycle and spend time, and for supporting social and economic activity. All the proposals set out in this Strategy will contribute to the delivery of Healthy Streets.

Using the Healthy Streets Check helps ensure that the factors that influence people's experience of being on street are properly considered. It also allows for easy comparison of different design options to help inform decision making

- Designers on all developments that will have a significant impact on surrounding streets
- Assessing the health impacts of projects as part of the design process and post-implementation monitoring

Proposal 1: Embed the Healthy Streets Approach in transport planning and delivery

We will ensure that the Healthy Streets Approach is embedded in our transport planning and the design and delivery of projects by:

- Using the Healthy Streets Approach to inform strategic decision making and project prioritisation
- Using the Healthy Streets Check for Designers to assess proposals for projects that will have a significant impact on people's experience of using the City's streets and publishing the results

- Assessing planning applications against the Healthy Streets Indicators and requiring the use of the Healthy Streets Check for Designers on all developments that will have a significant impact on surrounding streets
- Assessing the health impacts of projects as part of the design process and post-implementation monitoring
- Including questions relating to the Healthy Streets Indicators in project monitoring and public perceptions surveys

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Healthy Streets Check for Designers

TfL's Healthy Streets Check for Designers is a tool that uses 31 metrics to assess how a street performs against the 10 Healthy Streets Indicators. It can be used to assess an existing street, proposed changes to a street or a completed project.

Using the Healthy Streets Check helps ensure that the factors that influence people's experience of being on street are properly considered. It also allows easy comparison of different design options to help inform decision making and make it easier for people to understand the relative benefits of different proposals during consultations.

An example of the results from a Healthy Streets Check demonstrating improvements against each Indicator is shown on the right.

-----TEXT BOX END-----

The Square Mile's streets are great places to walk and spend time

Walking is, and will remain, the main way that people travel around the Square Mile. We want people walking in the City to feel that their needs have been prioritised. By delivering this Strategy we will make the experience of walking on our streets a more enjoyable and rewarding experience – a great way to travel and to discover all that the City has to offer.

Fewer, cleaner and quieter motor vehicles will mean that streets are less dominated by traffic and easier to cross. People driving and riding in the City will recognise the Square Mile as a place where people on foot come first – they will travel slowly and be prepared to give way to people walking. Pavements will be wide enough to avoid feeling uncomfortably crowded, even during the hustle and bustle of the morning and evening commute. High quality public realm, more seating, greenery, public art and events will mean that streets are also great places to stop, rest and relax.

Today, only 10% of people rate the experience of walking in the Square Mile as pleasant. Our ambition is that this will increase to 75% by 2044. The City's streets are busy with people walking at all times of the day, and between 7am and 11pm there are more people walking on our streets than travelling by any other mode. 65% of all travel movements in the Square Mile are made on foot and almost all of the 8,000 residents and 480,000 workers in the City will walk at least once during the day. These numbers will increase as the City grows, with potentially a further 125,000 people walking on our streets within the next 25 years. The completion of the Elizabeth line in 2019 will intensify the arrival of people into the City – with each Crossrail train capable of accommodating 1,500 passengers.

Nearly three quarters of respondents to our City Street's survey think that people walking should be prioritised first out of all street users. However, almost two thirds of respondents feel that people on foot are currently under prioritised and four in five thinks that pavements are overcrowded at some point during the day. Respondents also want a more pleasant and attractive street environment; when asked to suggest one change to improve the City's streets, the most frequent non-transport request was for more greenery.

Pedestrian Comfort Levels

Pedestrian Comfort Levels are used to assess the level of crowding on a pavement or at a pedestrian crossing. The level of comfort, which is graded between A+ (most comfortable) and E (least comfortable), is based on the number of people walking and the space available, taking account of street furniture and other restrictions.

Transport for London's Pedestrian Comfort Guidance recommends a minimum comfort level of B+. This provides enough space for people to feel comfortable when walking at a typical pace and for them to be able to choose where to walk. Below this level, conflicts between people walking become frequent, walking is increasingly uncomfortable and frustrating and can lead to people stepping into the carriageway.

Proposal 2: Put the needs of people walking first when designing and managing our streets.

We will ensure that the needs of people walking are prioritised by:

- Applying the Healthy Streets Approach (Proposal 1) and considering the needs of people walking first when delivering changes to streets
- Accepting that delivering priority for people walking may result in delays or reduced capacity for other street users, while seeking to minimise the impact on essential traffic through general traffic reduction (Proposal 11)
- Increasing the number of pedestrianised or pedestrian priority streets from 25 kilometres at present, to 35 kilometres by 2030, and aiming for at least 50% (by length) of streets to be pedestrian priority by 2044
- Making streets easier to cross and giving people on foot greater priority at the entrances to side streets
- Widening pavements to provide more space for people walking, with the aim that all pavements will have a minimum Pedestrian Comfort Level of B+

Key walking routes

We will prioritise improvements to junctions and routes that are busiest with people walking and where pavement width and pedestrian crossings are inadequate for current or forecast demand. Improvements to the following routes and junctions will be delivered by 2030 to make walking quicker, safer and more comfortable. The first phase of delivery will include the completion of Globe View by 2020 and changes to Bank Junction by 2022.

- The area around Moorgate and Liverpool Street Stations (including Moorgate/London Wall junction) and the routes between these stations and key destinations, including the City Cluster, Culture Mile and Bank
- Bank Junction and streets between the junction and the City Cluster
- To support Culture Mile and coincide with the opening of the new Museum for London and proposed Centre for Music:

- The route from the Millennium Bridge to Culture Mile, including changes to St Paul's Gyrotory
- The route between the Barbican and the new Museum for London, including Beech Street and Long Lane
- Fleet Street, including potential further changes to Ludgate Circus (in partnership with TfL)
- The Bishopsgate corridor, including Monument junction (in partnership with TfL)
- The Globe View section of the Riverside Walkway

Pedestrian priority streets

New pedestrian priority streets will be introduced across the Square Mile. The initial focus for introducing pedestrian priority streets will be within the City Cluster and Culture Mile. We will also identify opportunities to introduce pedestrian priority on streets with a pavement width of less than two metres.

An indicative map of these streets is shown below. We will use traffic orders, temporary measures to change the look and feel of streets and signage to accelerate delivery of pedestrian priority streets in advance of permanent changes.

Pedestrian priority streets will ~~be allow~~ access ~~only~~ for motor vehicles, with all vehicles, including cycles, expected to give way to people walking. In some instances, streets will be fully pedestrianised or not allow motor vehicle access at certain times. The access requirements for each pedestrian priority, fully pedestrianised or timed pedestrianised street will be fully assessed as part of the project delivery process. The use of pedestrianised streets by cycles will be decided on a case-by-case basis to ensure people walking and cycling feel safe and comfortable. Pedestrian priority will be supported by design measures to encourage slow and courteous driving and riding.

-----TEXT BOX START-----

There are already 25 kilometres of streets in the Square Mile that, through various restrictions, limit access to motor vehicles to prioritise people walking. Examples include.

PHOTOS OF EACH WITH DESCRIPTION

Timed pedestrianised: Watling St – pedestrians and cycles only between 8am and 6pm

Vehicle access only: Throgmorton St – vehicles restricted to access only

Fully pedestrianised: London Street – no vehicles at any time

-----TEXT BOX END-----

Pedestrian crossings

We will work with Transport for London to make it easier for people walking to cross streets by reviewing all signalised pedestrian crossings with the aim of:

- Reducing the amount of time people wait for a green man, initially to a maximum of 60 seconds, followed by further reductions in waiting time over the life of this Strategy
- Giving people more time to cross by using a walking speed of 0.8 metres per second to determine crossing times (currently 1.2 metres per second)
- Installing sensors (Pedestrian SCOOT) to allow the amount of green man time to be automatically adjusted according to the number of people crossing
- Reducing overcrowding by widening crossings to provide a minimum pedestrian comfort level of B+
- Introducing formal diagonal crossings at all crossroads, ensuring pedestrian crossings are on desire lines and removing multi-stage crossings
- Installing raised tables to improve accessibility and ease crossing
- Introducing 'Green man authority' at appropriate locations – providing a default green man for people walking rather than a default green light for motor traffic

Continuous footways and courtesy crossings

We will give people walking greater priority and make streets easier to cross by:

- Providing courtesy crossings or continuous footways across all side street entrances
- Installing raised tables at junctions
- Installing raised tables at existing informal crossings and identifying locations for additional crossing points

Campaigns and promotion

Campaigns and promotional activities will raise awareness among all street users of the priority being given to people walking in the Square Mile. Physical changes to streets will be supported by education, engagement and enforcement to reinforce positive behaviours by drivers and riders towards people walking.

Proposal 3: Complete the riverside walkway and improve walking connections between the riverside and the rest of the City.

We will complete the Globe View section of the riverside walkway by ~~2022~~2020. We will also work with Transport for London, landowners, developers and other partners to:

- Improve the connections between the riverside and the rest of the City by making it easier to cross Upper and Lower Thames Street. Improvements will include installing a new pedestrian crossing at the junction with Puddle Dock by 2022, to provide direct access to Blackfriars Pier. We will also work with

Transport for London to explore the potential to install additional street-level crossings as an alternative to existing bridges

- Improve the quality of the public realm along the riverfront and identify opportunities to create new open spaces. Opportunities will be identified and delivered through an updated Riverside Walkway Enhancement Strategy that will be published in 2022
- Wherever feasible use the redevelopment of sites along the riverside to widen the walkway
- Use the planning process to activate the riverfront by introducing more ground floor leisure uses such as restaurants and cafes where they will not adversely affect residents

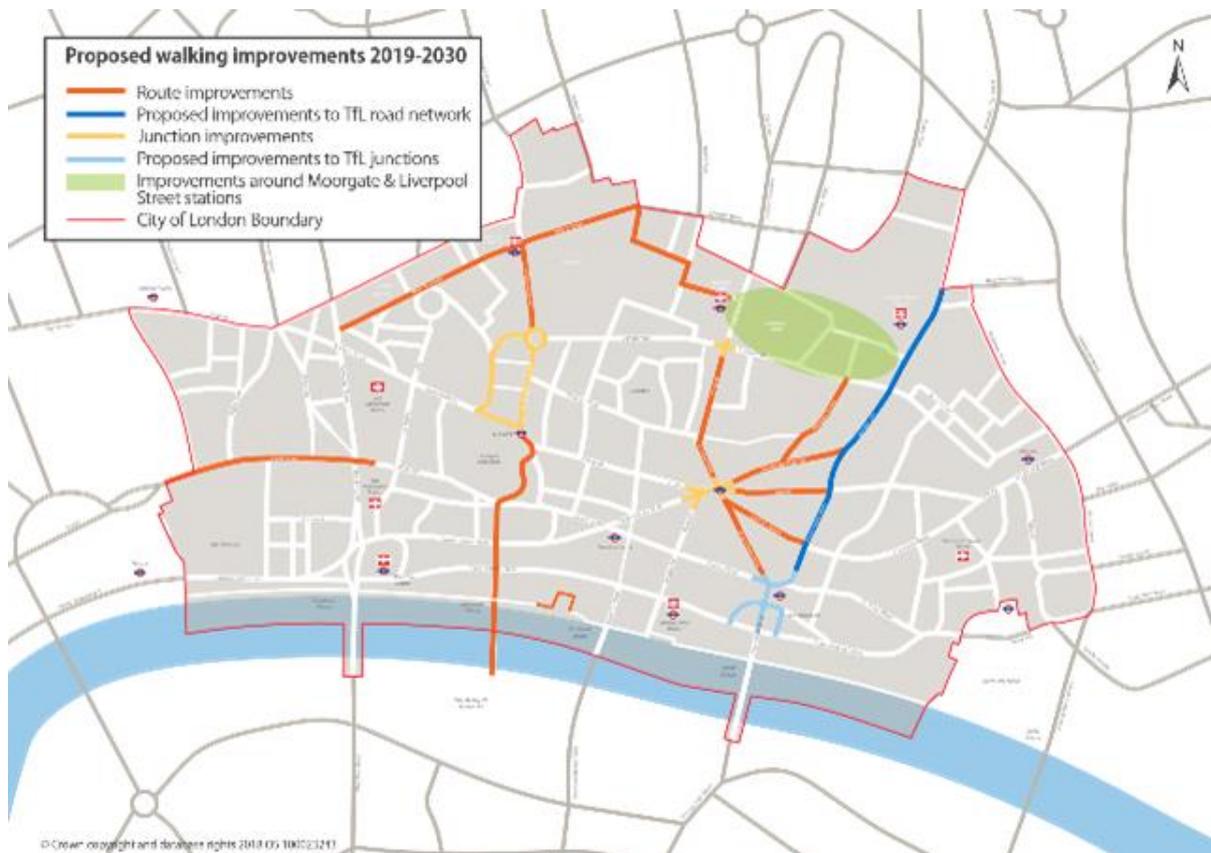


Figure 4: Proposed walking improvements 2019-2030 (larger map available on the City of London Transport Strategy webpage)

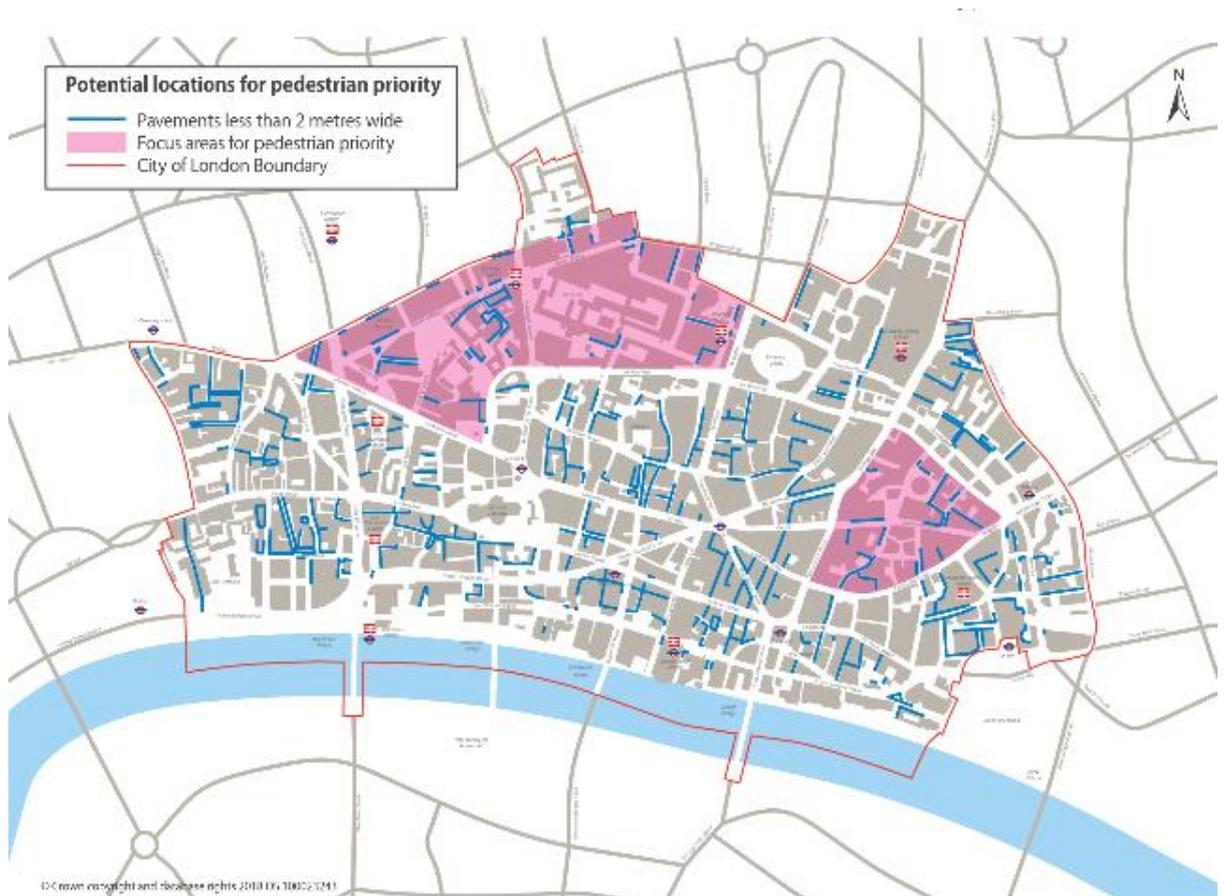


Figure 5: Potential locations for pedestrian priority (larger map available on the City of London Transport Strategy webpage)

Proposal 4: Enhance the Barbican high walks

We will ensure that the Barbican high walks are well maintained and enhanced where necessary. This will include improving signage and the visibility of access points to make them easier to navigate, particularly along the key north-south link from Wood Street. Any enhancements made to the high walks will be in line with the special architectural and historic interest of the Barbican and the requirements of the Barbican Listed Building Management Guidelines SPD.

We will maintain existing public lifts that provide access to the high walks and other walking routes. We will explore the potential to add new public and publicly accessible lifts where required through the development process.

Proposal 5: Ensure new developments contribute to improving the experience of walking and spending time on the City’s streets.

Through the planning process we will work with developers and future occupiers to ensure all new developments provide world-class public realm and contribute to improvements to surrounding streets and walking routes. Existing walking routes and public access across private land will be maintained and major developments will be expected to create new walking routes through their site.

Proposal 6: Promote and celebrate walking

We will encourage residents, workers and visitors to explore the Square Mile on foot by:

- Completing the roll out of Legible London maps and directional signs across the Square Mile by 2022
- Improving people’s awareness of traffic free walking routes, such as alleyways and routes through parks and gardens, through promotional activities and dedicated wayfinding
- Organising led walks, working with businesses and heritage and cultural institutions to promote walking and exploring the potential for an annual City walking festival
- Supporting London-wide, national and international walking campaigns

-----TEXT BOX START-----

Legible London

Legible London maps and signs were developed by Transport for London to make it easier for people to walk around London. They provide a consistent approach to wayfinding, with over 1,700 signs and maps already installed across the Capital. Legible London maps are also provided in Underground stations, and at bus stops and cycle hire docking stations.

-----TEXT BOX END-----

Proposal 7: Provide more public space and deliver world-class public realm

We will improve the experience of spending time on the City’s streets by:

- Identifying opportunities to create new public spaces by reallocating carriageway
- Increasing the amount of formal and informal seating on-street and in squares, public spaces and parks. The amount and location of additional on-street seating will be carefully considered to maximise opportunities for social interaction while maintaining adequate width and comfort for people walking. Where necessary space will be reallocated from the carriageway

- Implementing a high standard of design when delivering improvements to streets and public spaces and ensuring streets and public spaces are clean and well maintained
- Working with partners to ~~activate~~ make the public realm in locations where there is a poor sense of place, and making the experience of walking and spending time on streets and public spaces more interesting and engaging, for example through planting, public art, temporary installations and events.
- Improving the public realm in areas where there are buildings and structures of significant historical ~~and~~ architectural and archaeological importance. Improvements will respect, protect and enhance the setting of significant buildings and other heritage assets and improve accessibility to historic attractions

The City of London Public Realm Supplementary Planning Document (SPD) provides detailed guidance on designing, delivering and managing world-class public realm in the Square Mile. The Public Realm SPD will be reviewed and updated by 2022 following the adoption of the City Plan 2036.

Proposal 8: Incorporate more greenery into the City's streets and public spaces

We will work with occupiers, businesses, residents and other partners to provide and maintain more permanent and seasonal greenery on the City's streets. This will include incorporating greenery and planting when making changes to streets and the public realm, including measures that deliver pedestrian priority, traffic calming and vehicle access restrictions. Where possible new planting will incorporate sustainable drainage. Plants will be chosen to maximise biodiversity and create a more interesting and engaging streetscape.

Proposal 9: Reduce rainwater run-off on City streets and public realm

Opportunities to incorporate sustainable drainage systems will be reviewed for all transport and public realm schemes, with projects designed to minimise the volume and discharge rate of rainwater run-off. The inclusion of soft landscaping, planters, green walls and trees in all schemes where space permits will also contribute to reducing run-off rates.

Proposal 10: Incorporate protection from adverse weather in the design of streets and the public realm

Where possible, transport and public realm projects will incorporate features that provide people walking, cycling and spending time on streets with protection from rain, wind and high temperatures. For example, shade and shelter provided by trees, building canopies and awnings and other street furniture, such as bus stop shelters.

Designs will be carefully considered to ensure features to provide shade and shelter help make streets and public space more attractive and engaging.

The potential impact on street users of sun exposure and any increase in wind speeds and tunnel effects from new developments (particularly tall buildings) will be assessed and mitigated through the planning process.

Street space is used more efficiently and effectively

We want the use of the Square Mile's streets to better match the priorities of residents, workers and businesses. Street space will be used more efficiently, with more space and time provided for people walking, cycling and travelling by bus. General reductions in the number of motor vehicles will help reduce delays for the essential traffic that remains.

Some streets will be used in different ways at different times of the day. For example, by providing space for people to walk and relax during the day, while allowing deliveries overnight. Temporary closures of streets to motor vehicles will provide opportunities for cultural and community events and simply enjoying the City. The kerbside will also be used more dynamically and effectively, with commercial vehicles having priority access to parking and loading no longer causing an obstruction, particularly at the busiest times of day.

The most common suggestion, made by a third of City Streets survey respondents, for one change people would like to see on the City's streets was for a reduction, cap, targeted or City-wide ban of motor vehicles. The second and third most requested changes were for more space for walking and more space for cycling respectively. When asked how different uses of the City's streets should be prioritised, respondents ranked people walking, cycling and using buses as the highest priorities.

Over the last two decades there has been a 50% reduction of motor traffic levels in the Square Mile while the number of workers in the City has increased by 50%. Currently, 45% of motor vehicles in the Square Mile are cars (including private hire vehicles), 21% are taxis and 22% vans and goods vehicles.

Cycles and buses represent the most space efficient modes of vehicular transport. Based on average occupancy, they require 200m² and 250m² of street space respectively to move 100 people. The same number of people travelling in a car or taxi would need 760m².

Proposal 11: Take a proactive approach to reducing motor traffic

Delivering this Strategy will result in a reallocation of street space from motor vehicles to provide more space for people walking, cycling and spending time on the City's streets. To avoid unreasonably impacting the movement of essential motor traffic it will be necessary to reduce the overall volume of motor vehicles on the City's streets. Reducing motor traffic is also key to improving air quality and delivering Vision Zero.

We will proactively seek to reduce motor traffic to support the delivery of this Strategy, with the aim of achieving at least a 25% reduction by 2030. Reductions in all types of motor traffic will be required to achieve this, with the most significant

reductions being in the number of private cars and private hire vehicles using the City's streets.

To achieve this reduction, we will champion and support the development of the next generation of road user charging for London and encourage the Mayor of London and TfL to accelerate the development of new charging mechanisms.

This new approach to charging should be implemented within the next Mayoral term. All income should be reinvested in the delivery of Healthy Streets, with a proportion of income generated ring fenced to provide funding for City of London and borough projects.

While the new charging mechanism is being developed, we will encourage TfL to undertake a further review of the existing Congestion Charge. This review should be wide-ranging and consider charging levels, boundaries, timings and exemptions.

If a clear commitment to road user charging is not set out in the next Mayor's election manifesto, we will explore the feasibility of developing an appropriate charging mechanism for the Square Mile, working with London Councils and London's boroughs to ensure a coordinated approach.

Additional measures and initiatives to reduce motor traffic in the Square Mile will include:

- Supporting TfL's efforts to reduce the number of Private Hire Vehicles operating in central London. We will also work with TfL and large operators to reduce circulation and empty running and promote ridesharing
- Working with the taxi industry to reduce empty running of taxis within the Square Mile, including a City-wide review of taxi ranks and promotion of ride hailing apps
- Delivering Proposals 38 and 39 to reduce the number of delivery and servicing vehicles in the Square Mile, particularly at peak travel times
- Working with TfL to identify opportunities to reduce the number of buses travelling through the City without compromising public transport accessibility (Proposal 49)
- Not providing any additional on-street car and motorcycle parking, identifying opportunities to use parking reductions and restrictions to discourage private vehicle use and continuing to require all new developments to be car-free
- Working with businesses to reduce the use of private cars, private hire vehicles and taxis for commuting and for trips within the Square Mile and central London
- Introducing access restrictions and other measures to reduce through traffic in line with the City of London Street Hierarchy (Proposal 12)

In addition to reducing traffic by 25% by 2030 we will aim for a reduction in motor traffic volumes of at least 50% by 2044.

We will publish more details about how we plan to achieve this level of reduction, including working with TfL to develop coordinated measures across central London, following the next Mayoral election and clarification of how the next Mayor will approach road user charging in central London.

Achieving this level of traffic reduction is likely to require new shared mobility services and other transport technology innovations, which the City Corporation will support and champion through our Future Transport Programme (Proposal 43).

-----TEXT BOX START-----

Road User Charging

London was a global leader in road user charging when the Congestion Charge was introduced to central London in 2003. There was an immediate reduction in congestion of 30% and 15% less circulating traffic.

The Congestion Charge is now 15 years old and has only been subject to minor alterations since it was introduced. In this time, the challenges facing central London have changed considerably. A thriving weekend and night time economy now means that evening and weekend traffic levels (when the Congestion Charge is not in operation) are now similar to those on weekdays. In addition, the proportion of vehicles in the zone that are subject to the charge continues to reduce; particularly because of increasing numbers of licensed private hire vehicles, which are currently exempt from the charge.

An updated road user charge, that could be varied according to patterns of demand, vehicle type or by distance travelled, would be more effective in reducing traffic levels and congestion in central London. A central London or London-wide approach, compared to a City specific charge, would be the most beneficial model. This will help reduce traffic over a much wider area and avoid a 'patchwork' approach to traffic management by different authorities.

-----TEXT BOX END-----

Proposal 12: Design and manage the street network in accordance with the City of London Street Hierarchy

The City of London Street Hierarchy describes the function of every street in terms of motor traffic movement. We will design and manage the street network in accordance with the hierarchy shown in Figure 6 below to encourage drivers to use the right street for the right journey.

The categories in the hierarchy are:

- | | |
|-----------------------|--|
| London Access streets | Preferred streets for motor vehicles that do not have a destination in, or immediately adjacent to, the Square Mile. |
| City Access streets | Preferred streets for motor vehicles that are travelling around the Square Mile or to immediately adjacent destinations. |
| Local Access streets | Primarily used for the first or final part of a journey, providing access for vehicles to properties. |



Figure 6: Proposed City of London Street Hierarchy (larger map available on the City of London Transport Strategy webpage)

A street's position in the hierarchy will be one factor that helps inform decisions on how space is allocated between different users and uses of that street. Alongside the street hierarchy we will also consider:

- The views and aspirations of different street users and City residents, workers and businesses
- How to best prioritise walking, cycling and buses as the most efficient ways to move people
- How to incorporate the street's role as a public space and reflect the types of buildings and uses along it, including planned development

- How to provide appropriate access for delivery, servicing and other commercial activities
- How to provide access for residents, people of all abilities and people with access requirements, such as heavy luggage or injuries and illness
- How to maintain emergency response times and access for emergency services

Traffic management measures to implement the street hierarchy will be identified through the development of area based Healthy Streets Plans. These will consider:

- How to reduce the use of Local Access streets by through traffic, while maintaining access
- Opportunities to introduce pedestrian priority, improve the experience of walking and cycling, enhance the public realm and create new public space
- Potential changes to kerbside uses including loading and parking
- Opportunities for area-based approaches to the management of freight and servicing, including consolidation and retiming of deliveries
- The need for network changes to support planned and future development

The first ~~three~~four plans, to be developed by 2022, will cover the following areas (shown in Figure 7):

- Barbican and Smithfield: supporting the delivery of the Culture Mile Look and Feel Strategy and the new Museum for London. The area covered will align with City Plan 2036 Barbican and Smithfield key area of change
- Bank and Guildhall: incorporating the transformation of Bank Junction and supporting the delivery of the proposed Centre for Music and associated changes to the Museum of London roundabout and St Paul's Gyratory
- City Cluster and Fenchurch Street: responding to the growth of the City Cluster and the proposed upgrade of Fenchurch Street station and enabling the delivery of the City Cluster Area Strategy. This will align with the City Plan 2036 City Cluster key area of change and incorporate part of the Aldgate and Tower key area of change
- Temple and Fleet Street: in response to the Fleet Street Estate Project, which comprises of the new Magistrates court and City of London Police headquarters, and enhancement of Fleet Street and the Temples area.

Healthy Street Plans will be developed in consultation with residents, businesses and other partners and stakeholders. Initial delivery will focus on implementing functional network changes, small scale projects and temporary interventions to change the look and feel of streets and provide additional public space. This will be followed by full implementation, including major transformational projects, that will be programmed to correspond with major developments in the area.

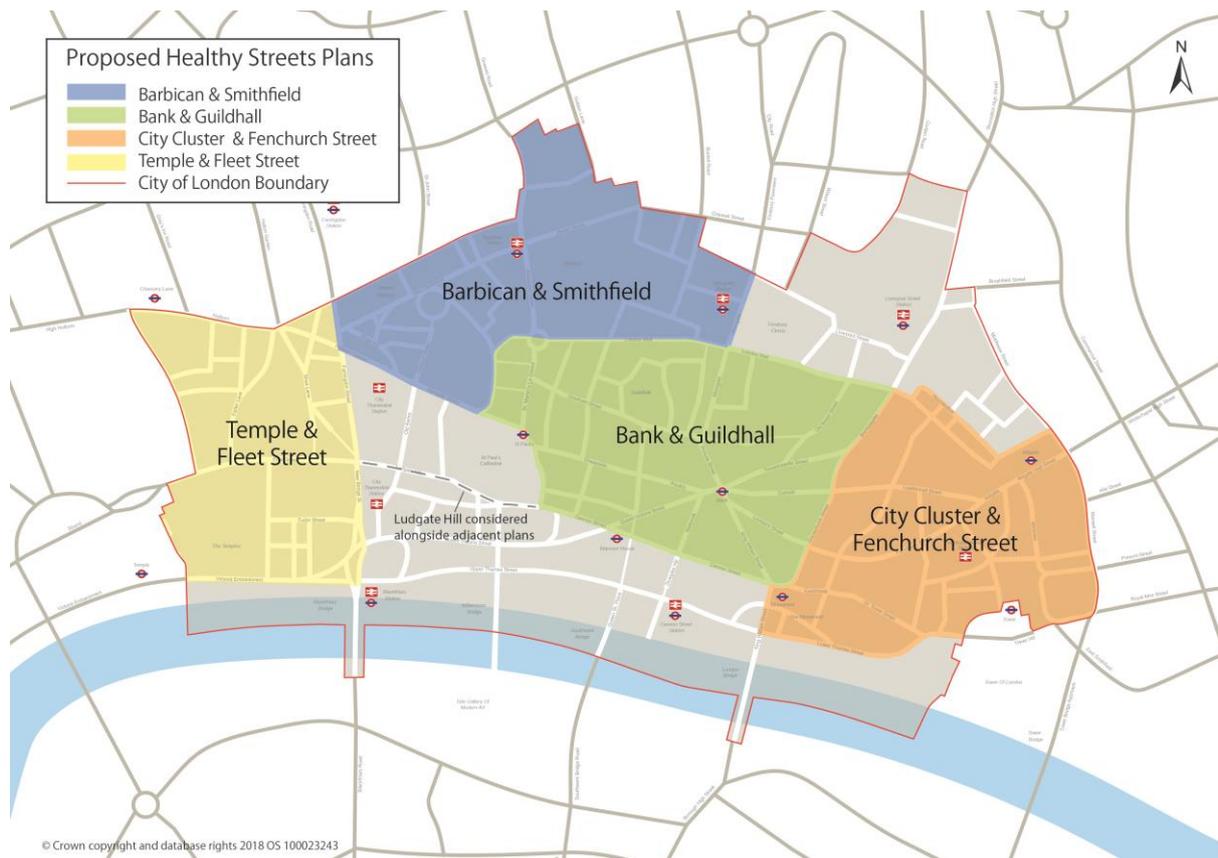


Figure 7: Proposed Healthy Streets Plan areas (larger map available on the City of London Transport Strategy webpage) UPDATED

Proposal 13: Use timed and temporary street closures to help make streets safer and more attractive places to walk, cycle and spend time

Where necessary and appropriate, we will introduce timed restrictions to motor vehicle access to support the implementation of pedestrian priority streets; make walking and cycling safer and more accessible; and improve the experience of spending time on the City’s streets. The potential for timed closures to general motor traffic to improve bus journey times will also be explored. The extent of timed restrictions and types of vehicles excluded will be decided on a case-by-case basis, applying the approach outlined in Proposal 12, and subject to modelling, impact assessments and consultation prior to implementation.

We will also seek to improve the experience of walking and spending time on the City’s streets by:

- Launching a Lunchtime Streets programme in 2019 to provide additional space for people using streets at lunchtime during the summer months. At least five Lunchtime Streets will be in operation by 2025
- Supporting the leisure and cultural offer of the City by holding ‘car-free’ weekends and days, with streets only open to people walking and cycling. We will aim to hold the first car-free day, covering the area around Guildhall and Bank, in 2019

- Supporting and facilitating closures by third parties and residents, particularly those that help promote walking and cycling and allow residents, workers and visitors to enjoy the City's leisure, cultural and historical offer
- Exploring the potential to make better use of street closures already required to facilitate existing events, such as the Lord Mayor's Show and City Run. For example, by extending the time closures are in place or increasing the number of streets that are closed to traffic

Proposal 14: Make the best and most efficient use of the kerbside and car parks

~~We will undertake regular reviews of the City's kerbside to understand the use and need of all kerbside facilities. The first review will be completed and consulted on by 2022, with further reviews conducted at least every five years. review will include a comprehensive data collection exercise current use of the kerbside and City Corporation Car Parks to:~~

We will keep the use and management of the kerbside and City Corporation car parks under frequent review to:

- Identify opportunities to reallocate space from on-street car and motorcycle parking to increase the space available for people walking, support the delivery of cycle infrastructure and provide additional public space and cycle parking
- Ensure adequate on-street provision of short stay commercial parking, disabled bays, taxi ranks, loading bays and coach bays
- Identify spare capacity in City Corporation car parks and explore alternative uses for this space
- ~~Identify opportunities to reduce obstructions caused by vehicles loading or waiting to pick up passengers, particularly on bus and cycle routes and at at~~ peak travel times
- Ensure cycle and bus lanes are kept clear of obstructions from stationary or parked vehicles

We will complete and consult on the outcomes of the first City-wide kerbside review by 2022, ~~with further reviews conducted at least every five years. Each review will include a comprehensive data collection exercise to understand current use of the kerbside and City Corporation Car Parks. No strategic changes to the provision of kerbside facilities will be implemented before the review is completed or consulted on.~~

In addition to the items outlined above, this review will consider the potential to:

- Extend the charging period for on-street parking bays to include evenings and weekends for non-commercial vehicles
- Introduce variable charging for motorcycle parking based on motorcycle size and emissions

- Encourage the use of car parks for long stay parking by reducing the maximum parking time for cars and vans on-street and introducing a maximum on-street parking time for motorcycles
- Extend the Controlled Parking Zone hours to evenings and weekends
- Designate on-street car parking as ‘service bays’ during the working day (7am-7pm), with parking restricted for use by commercial vehicles
- Reduce the maximum loading period from the current 40 minutes when the City’s Controlled Parking Zone restrictions apply
- Introduce more dedicated loading bays and use technology to allow real-time management of loading activity
- Implement multi-use spaces, for example loading bay during off-peak hours, additional pavement space during the morning, lunchtime and evening peaks and a taxi rank during the evening

Proposal 15: Support and champion the ‘Turning the corner’ campaign

We will support efforts to secure changes to the Highway Code and national legislation to give people walking and cycling priority at all types of junctions over traffic turning across their path. This arrangement enables simpler junction designs and reduces waiting times at signal-controlled junctions for all users, including drivers. By reducing conflicts between left turning vehicles and people walking and cycling, these changes will support proposals to prioritise people walking and deliver Vision Zero.

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Turning the corner campaign

‘Turning the Corner’ is a campaign led by British Cycling, encouraging the Government to update the Highway Code and national legislation to change the way priority is given at junctions to people walking and cycling. These changes would bring benefits to all street users by improving safety for people walking and cycling and allowing junction layouts to be simpler and clearer and more efficient for all users.

Example changes to junctions:

At a signal-controlled crossing, the changes would mean people walking, people cycling and motor traffic going in the same direction would all receive a green signal at the same time. Vehicles turning across those walking and cycling would have to give way. Most other countries, including the rest of Europe, operate their signal-controlled crossings in this manner.

At a T-junction, vehicles entering and exiting the minor road would have to give way to both people walking across the minor road and people cycling going straight ahead on the major road. This arrangement is used across much of Europe.

-----TEXT BOX END-----

The Square Mile is accessible to all

Everybody must be able to travel easily, comfortably and confidently to and around the Square Mile. Delivering the Strategy will help remove obstacles to walking, cycling and using public transport. Pavements and crossings will be smooth, level and wide enough to avoid uncomfortable crowding. People using cycles as mobility aids or mobility scooters and powered wheelchairs will be able to use new and improved cycle lanes. Streets will be cleaner, quieter and less stressful places that offer more opportunities to stop and rest. Changes to streets will be supported by new transport technologies that will emerge over the next 25 years, including new shared transport services. Advancements in app-based technologies and other transport innovations will help provide specialised and tailored accessibility support for anyone who may benefit from them. An accessible public transport network will mean that people with limited mobility are no longer penalised by having to make longer or more expensive journeys.

14% of Londoners currently consider themselves to have a disability that impacts their day to day activities 'a little' or 'a lot'. This is expected to rise to 17% by 2030. Walking is the main mode of travel for disabled Londoners, with 78% reporting they walk at least once a week. However, 65% of disabled Londoners consider the condition of pavements to be a barrier to walking more frequently.

London-wide the proportion of disabled Londoners who travel by Underground and National Rail is considerably lower than for non-disabled Londoners. Gaps in the step-free public transport network mean that a step-free journey is on average 11 minutes slower than a journey using the full network. Transport has been identified as the biggest challenge to living in the Capital for people with Dementia (an estimated 72,000 Londoners currently live with Dementia).

Respondents to our City Streets survey who identified as having a disability or long-term health conditions, highlighted particular concerns about poor air quality, motor traffic volumes and public transport crowding

Proposal 16: Develop and apply the City of London Street Accessibility Standard

We will work with City residents, workers, the City of London Access Group (COLAG), our internal access team and groups representing the needs of different street users to develop the City of London Street Accessibility Standard (COLSAS). COLSAS will set minimum and desired standards for the design of streets to ensure they provide an environment where all current and potential users feel welcome and safe and can travel comfortably and confidently. Vehicle access requirements will also be considered during the development of COLSAS.

The standard will be applicable to all City Corporation managed streets and we will work with TfL to apply the standard to the Transport for London Road Network. We will apply COLSAS by carrying out a detailed access audit of all City streets to assess the current level of accessibility. Details of necessary improvements, including a delivery timetable, will be set out in a Streets Accessibility Action Plan. COLSAS and the Streets Accessibility Action Plan will be published in 2020 by 2022. Improvements to streets that do not meet the minimum COLSAS standard will be prioritised, with all critical improvements delivered by 2025.

Proposal 17: Keep pavements free of obstructions

We will ensure that pavements are free of obstructions by:

- Not permitting a-boards on the pavement and encouraging owners and occupiers to not place a-boards on private land adjacent to the pavement
- Only allowing outdoor seating where businesses can demonstrate that adequate width will be maintained during the busiest time of day
- Working with owners and landlords and using the licensing system to prevent pavements and streets being blocked by people standing outside bars and pubs
- Ensuring operators of dockless cycle hire schemes require users to leave bikes in designated parking locations and promptly remove any cycles not left in these locations (see Proposal 28)
- Continuing to reduce clutter by removing unnecessary street furniture and ensuring remaining furniture is positioned to maintain a clear walking route, including identifying opportunities to affix street lights and signs to buildings
- Seeking to maintain a pedestrian comfort level of B+ when installing new street furniture, signage, trees and greenery, bollards and security features (see Proposal 2)
- Ensuring that temporary signage does not significantly reduce pavement width and work with contractors, utilities and developers to ensure signs are placed in carriageway when they will not pose risk to other road users
- Review the role of pavement obstructions in incidences of trips, falls and claims against the City Corporation
- Where it is essential to locate electric vehicle charging infrastructure on-street, charge points will be installed in the carriageway rather than on the pavement (see Proposal 30)

Proposal 18: Keep pedestrian and cycle crossings clear of vehicles

We will work with the City of London Police, TfL and London Councils to encourage the Government to change the Highway Code and introduce new legislation to prevent queuing vehicles blocking pedestrian and cycle crossings. Any new offences should be decriminalised to allow both civil and City of London Police enforcement through issuing a penalty charge notice.

While awaiting legislative change, we will encourage drivers to leave crossings clear through targeted campaigns and trialling changes to crossing design, such as coloured markings or box junction style hatching.

Proposal 19: Support and champion accessibility improvement to Underground stations

We will work with TfL to prioritise investment in accessibility improvements to Underground and DLR stations within the Square Mile, beginning with making Bank Station accessible. Through the planning process we will identify opportunities to introduce step free access as part of new developments and major refurbishments. We will also work with Network Rail to introduce step free access at Moorgate national rail platforms. Our ambition is that all stations within the Square Mile are accessible by 2044. We will liaise with TfL to identify the programme of investment required to achieve this. ~~and include further details the final version of this Strategy.~~

People using our streets and public spaces are safe and feel safe

No one should be prevented from choosing a particular mode of transport because of concerns for their personal safety. Delivering this Strategy will result in fewer motor vehicles on our streets and those vehicles will be moving at slower speeds. Collisions will occur less often and will not result in death or serious injury. Fewer, slower vehicles, together with high quality street lighting, will also mean that streets feel safer at all times of the day. Motor vehicles themselves will be equipped with advanced sensors and better automatic safety features that will further reduce or eliminate human driving error. Security features will be sensitively incorporated into the streetscape and will incorporate features that help make streets more attractive places to walk and spend time. The Square Mile will continue to experience a low rate of crime and fear of crime, supported by reductions in thefts of and from vehicles.

In 2017, 54 people were [reported](#) killed or seriously injured in traffic collisions on the City's streets, including 26 while walking, 15 while cycling and nine while riding a moped or motorcycle. The number of people [reported](#) killed and seriously injured in the Square Mile has unfortunately remained relatively consistent at approximately 50 a year, since 2010ⁱ. Nine out of 10 collisions in the Square Mile that result in a death or serious injury involve a motor vehicleⁱⁱ.

The City is fortunate to experience low levels of crime and fear of crime, with 80% of people reporting that they feel safe from crime and terrorismⁱⁱⁱ. While this is encouraging, we must continue to provide [effective and proactive high-quality](#) policing, well designed and maintained public spaces and proportionate security measures that ensure people are safe and feel safe.

Proposal 20: Apply the safe system approach and the principles of road danger reduction to deliver Vision Zero

We will deliver Vision Zero to eliminate death and serious injuries on the City's streets by 2040. Our interim targets are that no more than 35 people a year are killed or seriously injured by 2022 and that there are fewer than 16 deaths or serious injuries a year by 2030

Measures to deliver Vision Zero and reduce road danger will be delivered across four themes:

- Safer streets
- Safer speeds
- Safer vehicles
- Safer behaviours

We will work in partnership with the City of London Police, TfL and organisations representing different street users to apply the safe system approach and the principles of road danger reduction. This means:

- Being proportional in our efforts to tackle the sources of road danger, focussing on those users of our streets who have the greatest potential to harm others due to the size and speed of their vehicle
- Recognising that people will always make mistakes and that collisions can never be entirely eliminated. Our streets must therefore be designed, managed and used to cater for an element of human error and unpredictability
- Reducing vehicle speeds on our streets to minimise the energy involved in collisions and protect people from death or injury
- Seeking to reduce slight injuries and fear of road danger alongside the principal focus on eliminating death and serious injuries

We will publish a comprehensive Road Danger Reduction Action Plan every five years. The 2018 – 2023 plan will be updated in 2019 immediately following the adoption of this Strategy.

Safer streets

We will redesign our streets to reduce the likelihood and severity of collisions. Locations for change will be identified and prioritised based on the risk to people walking, cycling and riding powered two wheelers, and the number and severity of collisions. Locations will be reviewed on an annual basis.

Priority locations for change by 2030, using analysis of data from 2012 to 2017 data, are:

- Moorgate (London Wall to Eldon Street)
- High Holborn (Holborn Circus to Warwick Lane)
- Cannon Street (Mansion House Station to New Change)
- St Paul's Gyratory
- Aldersgate Street/Beech Street
- Fleet Street/New Fetter Lane Junction
- Lombard Street – Fenchurch Street Corridor
- Old Broad Street/London Wall
- Camomile Street/St Mary's Axe

In addition, we will work with TfL to deliver changes at the following priority locations on the TLRN:

- Bishopsgate
- Monument Junction
- Embankment (Temple Avenue to Puddle Dock)
- Mansell Street
- Southwark Bridge/Lower Thames Street
- Upper Thames Street (London Bridge to Eastcheap)

In addition to the above we will work with TfL to monitor and if necessary, further improve Farringdon Street and New Bridge Street (including Ludgate Circus).

Other measures to change streets to reduce the likelihood and severity of collisions will include:

- Narrowing and raising the entrances to side streets to require drivers and riders to manoeuvre more slowly
- Exploring the potential for changing the look and feel of streets to reinforce positive behaviours by people driving and riding in the Square Mile, including appropriate speed, acceleration and overtaking. Innovative techniques that use road markings and temporary or light touch changes to give behavioural cues will be trialled and assessed in up to five locations by 2022
- Continuing to maintain a smooth and level surface on pavements and carriageways to reduce the risk of trips and falls by people walking and riding in the City

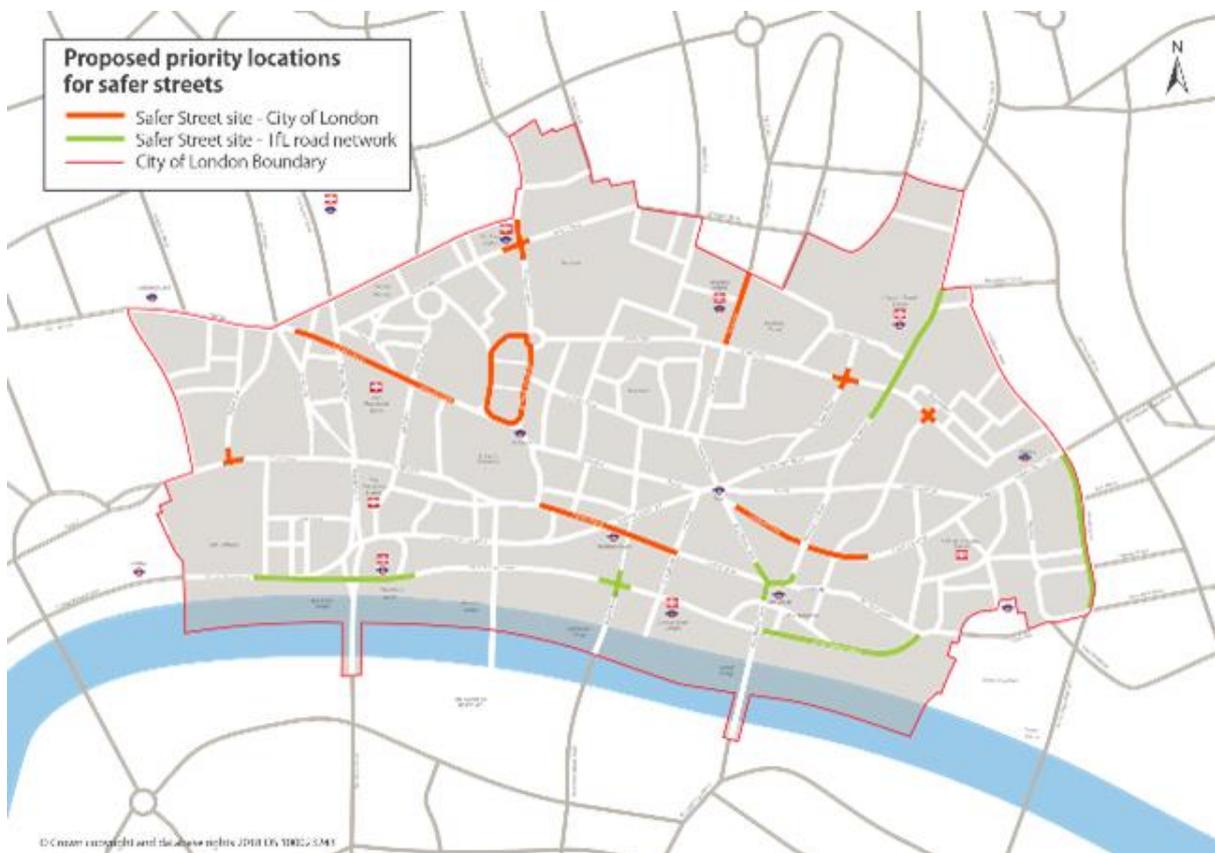


Figure 8: Proposed priority locations for safer streets (larger map available on the City of London Transport Strategy webpage)

Safer speeds

Reducing the speed of vehicles decreases the likelihood of a collision and the severity of injury in the event of one.

To ensure people drive and ride at speeds appropriate to the City context we will seek permission from the Department for Transport to adopt a City-wide 15mph

speed limit by 2022. If successful, we will encourage TfL to seek permission to deliver this new limit on the TLRN, particularly along the Bishopsgate corridor.

We will work with the City of London Police to deliver engagement, education and enforcement to support the implementation of the 15mph speed limit.

To make it easier for drivers to comply with the existing 20mph and proposed 15mph speed limits we will encourage the uptake of intelligent speed adaptation (ISA) in the Square Mile by:

- Asking TfL to prioritise the roll out of bus ISA on routes which operate in the Square Mile, with the aim of bus ISA operating on all routes by 2022.
- Adopting ISA in our own fleet procurement practices as part of our renewal programme. Insurance savings will be quantified and shared as best practice guidance for City suppliers and through the Fleet Operator Recognition Scheme (FORS)
- Ensuring ISA is a standard requirement for any service procured by the City Corporation with a fleet requirement
- Promoting the installation of ISA in taxis and private hire vehicles and encouraging TfL to make ISA a requirement for new taxis and private hire licensing.
- Encouraging the uptake of ISA in other fleets, such as hauliers, construction firms and coach operators
- Working with the insurance industry and vehicle manufacturers to promote and encourage the use of ISA in private vehicles

-----TEXT BOX START-----

Intelligent Speed Adaptation

Intelligent speed adaptation (ISA) is an in-vehicle system which uses GPS and a database of speed restrictions to limit vehicle speeds. Studies have shown that ISA delivers a substantial decrease in average speed and speed variances and eliminates speed limit violations. It is estimated that non-voluntary ISA could halve the number of fatal collisions in the UK¹.

-----TEXT BOX END-----

Safer vehicles

We will improve the safety of motor vehicles which use City's streets by:

- Using fleet accreditation schemes, such as the Fleet Operator Recognition Scheme (FORS), to integrate safety into fleets by:
 - Continuing the CityMark accreditation programme to ensure vehicles at City construction sites meet ~~FORS~~ standards. We will encourage the inclusion of CityMark in Construction Logistic Plans (CLP).
 - Encouraging TfL and industry stakeholders to develop FORS or similar standards for coaches and vans by 2022.

- Encouraging the integration direct vision standards as part of [FORSS all accreditation schemes](#). This will also be mandated through CLPs and CityMark for City construction sites once the standards are implemented and normalised.
- Supporting TfL with developing a motorcycle [fleet accreditation](#) FORS standard for couriers and delivery riders, which will include improved safety training.
- Continuing to inspect over 1000 vehicles each year with the City Police Commercial Vehicles Unit [and continue support the London Freight Enforcement partnership alongside Transport for London, the Metropolitan Police and the Driver and Vehicle Standards Agency](#). We will identify opportunities to intensify the programme and map enforcement related to development density by 2022.
- Work with industry, sector associations and motorcycle riders to identify and understand levers for motorcyclists to choose lighter, less powered vehicles when riding to and around the City.
- Identifying any potential risks associated with the uptake of new technologies, including the increased use of quieter zero emission capable vehicles.

-----TEXT BOX START-----

Case study: Fleet Operator Recognition Scheme and CityMark

The Fleet Operator Recognition Scheme (FORS) is a voluntary accreditation scheme for fleet operators. The scheme aims to raise the level of quality within fleet operations, and to demonstrate which operators are achieving best practice in safety, efficiency, and environmental protection.

CityMark is a project developed by the City Corporation to improve monitoring of vehicle standard compliance at construction sites in the Square Mile.

All construction projects in the City are members of the Considerate Contractors Scheme (CCS) and CityMark is an addition to that scheme. This keeps the CCS up to date with the leading related safety initiatives, FORS and the Construction Logistics for Community Safety (CLOCS) standard.

-----TEXT BOX END-----

Safer behaviours

We will encourage all the users of our streets to travel safely by:

- Expanding the ‘exchanging places’ training course for professional drivers to include the experience of walking, as well as cycling, in the Square Mile
- Encouraging TfL to require safety training as part of private hire and taxi licensing. This will include Bikeability Level 3 training
- Providing and promoting free cycle training for people who live, work and study in the City; working closely with City businesses to offer this training in a convenient and easily accessible way

- Encouraging TfL to include safety-based performance measures instead of timetable performance measures in bus contracts. We will work with TfL and operators to implement these changes as part of its Bus Safety Standard
- Working with the City of London Police to deliver targeted enforcement of dangerous and reckless driving and riding, including using plain clothed officers
- Promoting safe driving and riding through targeted behaviour change campaigns.
- Identifying and targeting poor behaviours from use of emerging mobility technologies, such as e-scooters.
- Work with the freight industry and research partners to understand the impact of delivery schedules on driving style and speeds

Proposal 21: Work with the City of London Police to reduce crime and fear of crime

We will work with the City of London Police to ensure the design and management of streets helps everyone feel safe and reduces opportunities for crime at all times of the day. Quarterly meetings will review crime trends, hotspots and methods and crowded places and identify opportunities to reduce crime through changes to street design and management, enforcement and awareness campaigns.

Initial measures to reduce vehicle theft and vehicle enabled crime will include:

- Trialling ground anchors at motorcycle theft hotspots to reduce thefts and help tackle motorcycle enabled crime. We will initiate the trial in 2019 and review the utilisation of anchors and impact on theft rates ahead of proposed roll out
- Running campaigns with motorcycle and cycle groups to promote best practice locking and security measures
- Reviewing security provision in City Corporation car parks and other assets as part of the development and delivery of last mile logistics facilities (see Proposal 38)

Proposal 22: Ensure on-street security measures are proportionate and enhance the experience of spending time on our streets

We will work with the City of London Police, developers and City businesses to support-deliver the Secure City programme. This initiative ~~by~~ takesing a risk-based approach to implementing appropriate and proportionate on-street security measures. We will aim to ensure that security measures are:

- Discreet and installed to avoid reducing the space available to people walking and cycling, including those using non-standard cycles (see proposal 24)
- Multi-functional, incorporating seating, greenery or public art where possible to improve the experience of walking, cycling and spending time on streets
- Designed and installed to take account of the access needs of people with disabilities

- Designed and installed to take account of access requirements for servicing

We will review existing security provision against these criteria as part of delivering the Secure City programme. We will also work with industry partners to develop hostile vehicle mitigation standard benches, planters, fountains and other street furniture. This will include moveable security features to support timed access restrictions for motor vehicles.

Proposal 23: Improve the quality and functionality of street lighting

By 20202 the City Corporation will have upgraded its street lighting in accordance with the City of London Lighting Strategy. The following principles will be embedded across our transportation and public realm schemes as well as developments through the planning process.

- Use street lighting to improve the look, feel and ambience of streets
- Improve the quality of lighting for people walking and cycling
- Reduce road danger through appropriate lighting at areas of higher risk, such as junctions
- Match lighting provision to the City of London Street Hierarchy and the character of streets
- Ensure lighting supports CCTV operation
- Allow flexible and intelligent lighting control to support City of London Police operations

More people choose to cycle in the City

Most of the vehicles on the City's streets will be cycles, with more people choosing to cycle and cycles being used for more types of journeys. We want the range of people choosing to cycle to match the diversity of people who live, work and study in or visit the City. Most people, whether they choose to cycle or not, will consider cycling to be a safe, easy and pleasant way to travel around the Square Mile. Reduced traffic, slower speeds and a dense network of cycle friendly streets will mean that anyone who wishes to cycle is not prevented from doing so because of concerns about safety. The cycle network will cater for all types of cycles, including cycles as mobility aids and cargo cycles. Different types of cycles will also be available for hire across the City, supporting more flexible cycling. A safer and more relaxed cycling experience will in turn encourage safer and more relaxed cycling behaviour that reflects the priority given to people walking on the City's streets.

Our City Streets survey found that only 4% of people currently consider the experience of cycling in the City to be pleasant (and 56% consider it to be unpleasant). We want this figure to be 75% by 2044. More than half of people cycling in the City scored their feeling of safety while cycling as a 1 or 2 out of 5^{iv}. On average 19 people cycling have been killed or seriously injured on our streets every year for the last five years^v. We recognise that the current situation on many of our streets is also leading to perceived and real conflicts between people who cycle and other streets users, with negative interactions between people walking and cycling being raised as a significant issue in public consultations.

Despite these challenges, the number of people choosing to cycle in the Square Mile has grown significantly over the last 20 years. People cycling now make up nearly a third of all vehicular traffic during the daytime in the City, compared with less than 4% in 1999^{vi}. There is significant potential to further increase the number of people cycling. Analysis by TfL has found that up to 15,700 trips a day to the City that are currently made by motorised modes could potentially be cycled in part or full. Over two thirds of these trips are currently made by taxi or car.

Proposal 24: Apply a minimum cycling level of service to all streets

We will make the Square Mile a safe, attractive, and accessible place to cycle by applying a minimum cycling level of service to all streets by 2035⁴⁴.

On the streets shown in Figure 9 below, which will form a core cycling network, we will ensure that either:

- Motor traffic volumes are kept below 150 vehicles an hour in each direction at the busiest time of day and priority is given to people cycling over motor vehicles. If necessary, we will introduce traffic management measures to reduce the number of vehicles on these streets

or

- Protected cycle lanes that are a minimum of 1.5m wide per direction of travel are provided, with 2m wide protected cycle lanes wherever possible

We recognise that initially it may not be possible to achieve these levels of service at all locations and will identify mitigating measures in the short and medium term to manage this.

We will prioritise cycling improvements and interventions on the core cycle network. This will ensure that nearly all property entrances are within 250m of the network, providing access to destinations across the Square Mile and linking with the wider London cycle network. We will explore the potential to use temporary measures and interventions to accelerate the pace of delivering the network and allow changes to street layout to be tested and refined before being made permanent.

We will support cycle logistics and the use of cycles as mobility aids by ensuring that all parts of this network are designed to be accessible to non-standard cycles, such as cargo cycles or adapted cycles.

~~The delivery of the core cycling network will take place in two Phases. We will deliver the Bank the Bishopsgate to Blackfriars (including improvements at Mansion House junction) via Bank and CS1 to Monument Junction sections of the the following parts of the core cycle network by 2030/2025.:~~

- ~~• Aldgate to Holborn Circus via Bank including connecting the City Cluster to Cycle Superhighway (CS) 2 and CS6~~
- ~~• CS3 to St Paul's via the City Cluster and London Wall (in conjunction with planned network improvements at St Paul's Gyratory)~~
- ~~• CS1 to CS4 via Bank (including working with TfL to make improvements to Monument Junction)~~
- ~~• Bank to Blackfriars (including improvements at Mansion House junction)~~
- ~~• CS2 to CS3 via Mansell Street (in partnership with TfL)~~

~~The following parts of the core cycle network will be delivered by 2030:~~

- ~~• Holborn Circus via Bank including connecting the City Cluster to Cycle Superhighway (CS) 2 and CS6~~
- ~~• CS3 to St Paul's via the City Cluster and London Wall (in conjunction with planned network improvements at St Paul's Gyratory)~~
- ~~• Monument Junction to CS4 via London Bridge in partnership with TfL~~
- ~~• CS2 to CS3 via Mansell Street (in partnership with TfL)~~

~~The remaining sections of the core cycle network will be delivered by 2035.~~

On Local Access streets that do not form part of the core cycling network, we will aim to keep motor traffic volumes below 150 vehicles an hour in each direction at the busiest time of day to give priority to people cycling over motor vehicles. For the majority of Local Access streets this will require relatively little intervention, other than junction improvements. Traffic levels are already low, and this Strategy will deliver reductions in traffic volumes (Proposal 11) and introduce a City-wide 15mph speed limit (Proposal 20). In cases where traffic volumes exceed this limit we will seek to reduce traffic volumes through changes to access and traffic management.

On City Access streets, we will aim to meet the standards described above but recognise this may not be possible on all streets due to their role in traffic movement or space constraints. Other proposals in this Strategy, such as the introduction of a City-wide 15mph speed limit, will help make these streets safer, more attractive, and more accessible places to cycle.

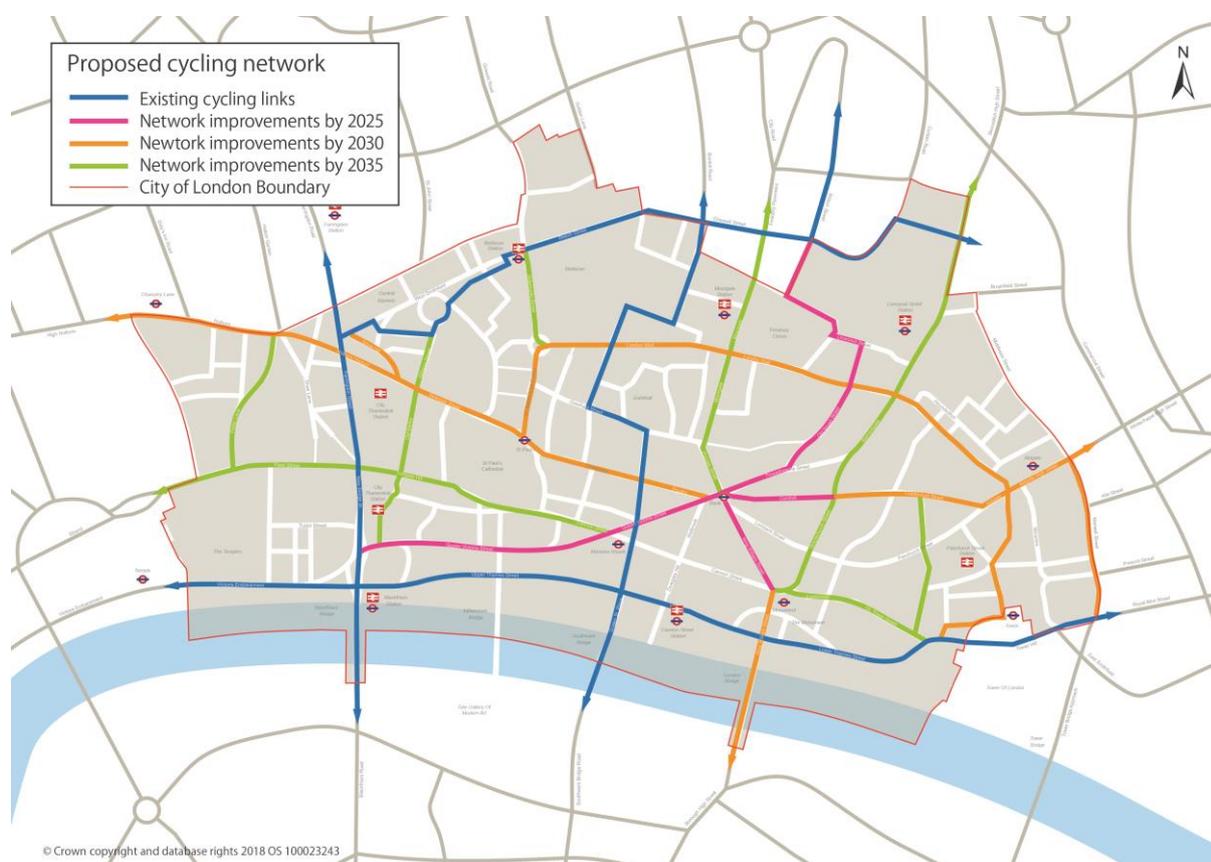


Figure 9: Proposed core cycling network and phasing (larger map available on the City of London Transport Strategy webpage) **UPDATED**

To support the new cycling levels of service we will also:

- Review all shared pedestrian/cycle spaces, such as Queen Street, and where necessary propose physical changes, campaigns, education, engagement and enforcement to improve interactions between people walking and cycling
- Use signage and road markings to emphasise priority for people cycling over motor vehicles
- Introduce safety improvements at the priority locations identified in Proposal 20 to ensure they are safe and easy places to cycle

- Trial temporary schemes and infrastructure wherever possible to review impacts on other street users and accelerate the delivery of the cycle network
- Learn from and incorporate design standards and guidance, such as the London Cycling Design Standard and the Dutch CROW manual, when designing and delivering cycling infrastructure improvements in the City

Additional measures to support the delivery of the core cycle network will include:

- The use of Construction Logistics Plans and Delivery and Servicing Plans to manage the number of freight vehicles using the network, particularly at peak times
- Enhanced cycle wayfinding and signage, including signage at eye level wherever suitable
- Working with boroughs neighbouring the City and TfL to improve continuity and connectivity between our cycle networks

Proposal 25: Increase the amount of cycle parking in the City

We will conduct a City-wide cycle parking review and publish a Cycle Parking Delivery Plan by 20202. This will:

- Review the availability and distribution of both on and off-street public and residential cycle parking provision to ensure adequate provision, taking account of forecast demand. This will include working with National Rail to review parking at stations
- Assess-Identify requirements for public and residential cycle parking that can accommodate cargo cycles and adapted cycles, including retrofitting existing cycle parking
- Promote the use of City Corporation car parks for long stay cycle parking.
- Explore the potential for innovative parking solutions that increase the space efficiency, security, and quality of cycle parking
- Assess the potential for commercially operated cycle parking hubs that provide enhanced security and facilities
- Assess occupancy levels of cycle parking in recently completed commercial buildings to understand current use and inform future planning policy on workplace cycle parking

Further reviews will be conducted on a regular basis, and at least every 5-years

Proposal 26: Ensure new developments contribute to improving the experience of cycling in the City

Through the planning process we will work with developers and future occupiers to:

- Ensure all new developments provide secure cycle parking facilities, that are at least in line with the London Plan's minimum standards for cycle parking, have step free access and include lockers and showers in commercial developments

- Ensure that development proposals demonstrate how cycle parking facilities will cater for non-standard cycles, including adapted cycles for disabled people
- Encourage the provision of parking facilities that are suitable for non-standard cycles, including providing off-street storage for cargo bikes and hand carts in developments that include ground floor retail and takeaway food outlets
- Provide on-site short stay cycle parking for visitors and, where possible, additional public cycle parking in the public realm
- Contribute to improving conditions for cycling on adjacent streets, particularly those that connect to or form part of the core cycling network
- Ensure that cycle parking in new developments minimises potential negative interactions between people walking and cycling, particularly on pavements

Proposal 27: Promote and celebrate cycling

We will encourage residents, workers and visitors to cycle to and around the Square Mile by:

- Connecting businesses and residents to additional cycling support services, such as maintenance and insurance
- Support City of London Corporation employees to cycle more and work with businesses and heritage and cultural institutions in the Square Mile to encourage more of their workers and visitors to cycle
- Improving people's awareness of the cycling network and cycle routes to the City through promotional activities and wayfinding
- Organising led rides, working with businesses and heritage and cultural institutions to promote cycling
- Exploring the potential for an annual City cycling festival
- Supporting London-wide, national and international cycling campaigns and hosting periodic cycling events
- Targeted campaigns and promotional activities to encourage a more diverse range of people to cycle

Proposal 28: Improve cycle hire in the City

We will work with TfL and cycle hire providers to improve the quality and accessibility of all cycle hire facilities including docked, dockless, and cargo cycles for residents, workers, and visitors. In doing so, we will ensure that:

- Cycles for hire are readily accessible in suitable numbers and in appropriate locations across the City
- There are adequate parking and docking facilities and that these are managed to respond to peaks in demand
- Hire cycles and associated infrastructure do not obstruct pavements or pedestrian crossings or pose a danger to street users

- Operators cover the costs of any additional infrastructure required to facilitate cycle hire
- Any redistribution of hire cycles by vans or other motorised modes are done with zero emission capable vehicles
- Dockless cycle operators actively restrict their users from parking outside designated areas and quickly remove cycles that are parked in these areas
- Cycle hire parking and docking locations and total spaces provided are reviewed and enhanced as demand changes

We will work with TfL and London Councils to secure a byelaw that grants local authorities in London regulatory powers to effectively manage current and future cycle hire activities on our streets.

The Square Mile's air and streets are cleaner and quieter

By 2044, transport related local air pollution and carbon emissions will have been cut to virtually zero and streets will be quieter more relaxing places. Together with wider action to reduce emissions from buildings and development, this will mean that the City enjoys some of the cleanest urban air in the world. There will be fewer motor vehicles and those remaining will be powered by electricity or other zero emission technologies. Emerging automation technology will reduce speeds and avoid aggressive acceleration and braking, leading to less tyre and brake wear. New approaches to noise management will mean that street works cause less disturbance.

A recent study commissioned for the Greater London Authority identified that up to 9,500 premature deaths a year were attributable to air pollution. Exposure to high concentrations of Nitrogen Dioxide (NO₂) can irritate the airways of the lungs, increasing the symptoms of those suffering from lung diseases. Fine particles can be carried deep into the lungs where they can cause inflammation and a worsening of heart and lung diseases.

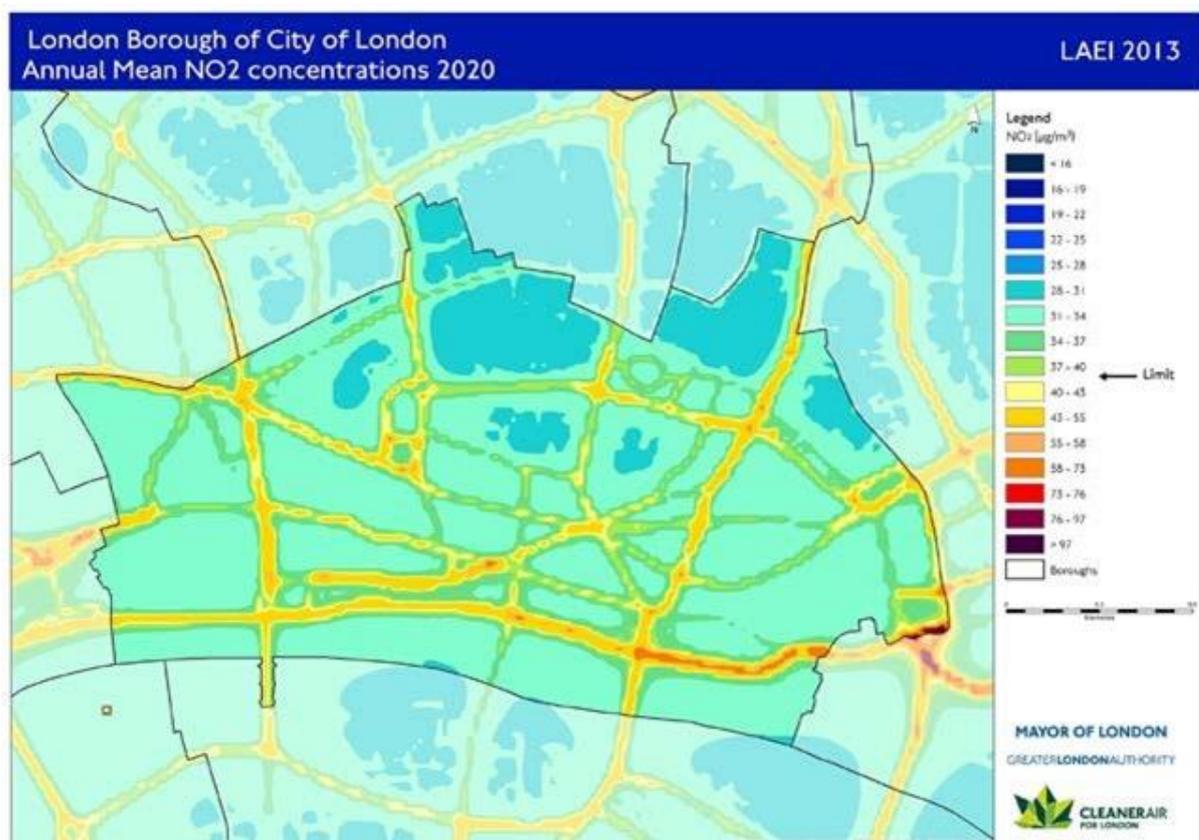


Figure 10: City of London Annual mean NO₂ concentrations 2020 (LAEI 2013)

Air quality in the Square Mile does not currently meet the safe limits set by the European Union or World Health Organisation (WHO) for NO₂. Levels of exposure to particle matter (PM₁₀ and PM_{2.5}) are within the UK/EU limit value, however they exceed more stringent WHO standards and the WHO recognises that there is no safe limit for these types of pollutants 10). Brake and tyre wear mean that motor vehicles will also continue to be a significant source of particulate matter even once the majority of vehicles are zero emission capable.

Road transport is responsible for 26% of NO_x emissions, 48% of PM₁₀ and 60% of PM_{2.5}, in the Square Mile. Current air quality monitoring records limit breaches for NO₂ on our busiest streets. In some locations recorded concentrations are twice the safe limit value. Projections show that NO₂ levels will still exceed safe limits on many of our busiest streets after the central London Ultra-Low Emission Zone's (ULEZ) restrictions on the most polluting vehicles come into effect (Figure 10) ^{xxxvii}. Brake and tyre wear mean that motor vehicles will also continue to be a significant source of particulate matter even once the majority of vehicles are zero emission capable.

In 2018, 7% of the Square Mile's CO₂ emissions are produced by motor vehicles. The carbon emissions from electric vehicles are dependent on the source of electricity. However, electric vehicles are far more efficient in fuel use/CO₂ output than combustion engines. An EU study based on expected performance in 2020 found that an electric car using electricity generated solely by an oil-fired power station would use only two-thirds of the energy of a petrol car travelling the same distance. ^{xxxix}

The direct health impacts of noise pollution include sleep disturbance, stress, anxiety, high blood pressure, poor mental health and school performance, and cognitive impairment in children. Risk of cardiovascular disease increases significantly when noise levels exceed 60 decibels, as they often do on urban streets. Noise can also discourage people from walking, cycling and spending time on streets. 41% of respondents to a recent survey on people's experience and perceptions of noise in the Square Mile cited noise from traffic as a negative factor. Traffic noise was the most significant negative noise or sound identified, followed by noise from construction/building works, which was identified by 12% as an issue.

[These proposals relating to air quality directly support the City of London Air Quality Strategy 2019-2024. The Air Quality Strategy addresses all sources of air pollution in the Square Mile, such as construction site machinery and heating boilers. Work to monitor and manage cross boundary pollution is also included in the Strategy.](#)

[The Air Quality Strategy includes a full monitoring programme which is supported by some additional monitoring directly related to anticipated changes resulting from Transport Strategy proposals. This will inform the actions and outcomes in the Transport Strategy.](#)

Proposal 29: Support and champion a central London Zero Emission Zone

We will support and champion the introduction of a Zero Emission Zone (ZEZ) covering central London within the next Mayoral term

We will seek a phased introduction of ZEZ restrictions with the aim of ensuring that 90% of motor vehicles entering the Square Mile are zero emission capable by 2030. This is likely to be achieved through a combination of access restrictions and charging for non-zero emission capable vehicles.

If a clear commitment to introduce a central London ZEZ is not set out in the next Mayor's election manifesto, or commitments are insufficiently ambitious, we will explore the feasibility of implementing a City-wide ZEZ, working with London Councils and boroughs neighbouring the City to ensure a coordinated approach.

Local Zero Emission Zones

While the Central London ZEZ is being developed, we will introduce local ZEZs covering the Barbican and Golden Lane estates and the City Cluster by 2022. Proposals will be developed in consultation with residents and businesses and will reflect the availability of zero emission capable vehicles, while seeking to accelerate their uptake. We will coordinate proposals with TfL, London Councils and London's boroughs to ensure alignment with other existing and planned zero emissions areas and streets.

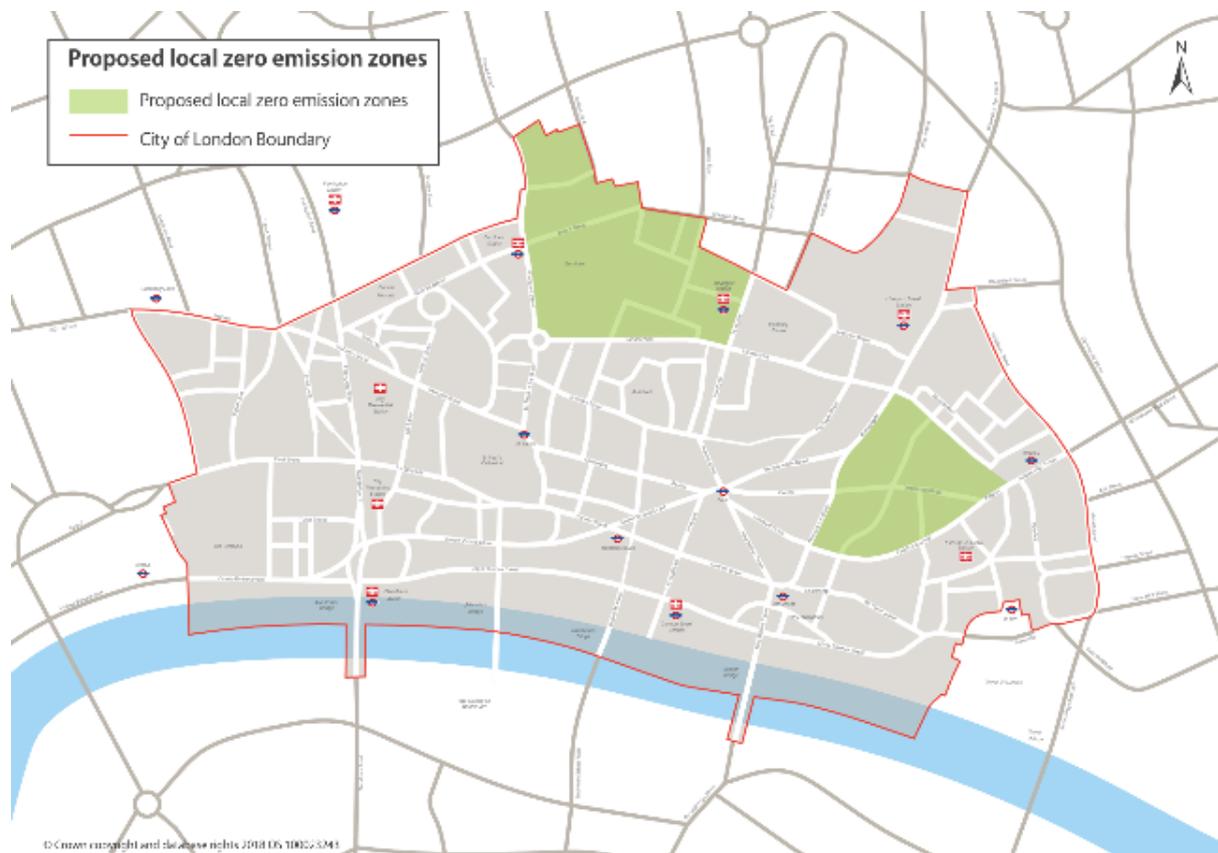


Figure 11: Proposed Local Zero Emission Zones (larger map available on the City of London Transport Strategy webpage)

Proposal 30: Install additional electric vehicle charging infrastructure

We will install additional publicly accessible electric vehicle (EV) rapid charge points ~~by 2025~~ to support the transition to zero emission capable vehicles. An EV Charging Action Plan will be published by December 2019. This will identify how many charge points, including charging hubs, are required up to 2022, as well as longer-term forecasts. In developing the plan we will consider the charging needs of:

- Residents;
- Blue Badge holders;
- taxis;
- freight and servicing;
- electric motor cycles and mopeds
- electric bikes

~~_, including exploring the potential for a charging hub with priority access for commercial vehicles. We will assess the need for additional charge points for taxis and investigate the charging infrastructure required to encourage a transition to electric powered two wheelers.~~

Locations will be identified through engagement with the TfL EV Infrastructure Taskforce and wider consultation. The first preference will be to install any charge points in car parks or other suitable off-street locations. Where it is essential to locate on-street, charge points will be installed in the carriageway rather than on the pavement and in a way that is sensitive to the streetscape and public realm.

Through the planning process we will require the installation of rapid charge points in new developments with off-street loading. We will also encourage the owners, managers and occupiers of existing buildings with loading bays to install rapid charge points.

The provision of charging infrastructure will be kept under review to ensure it is sufficient to meet the needs of residents and vehicles serving the City without generating additional traffic. Reviews will also consider the need to update, and potentially reduce, charging infrastructure as battery technology improves.

-----TEXT BOX START-----

Existing electric vehicle charging provision

Fast charge points are currently available in all City Corporation public car parks and in the Barbican residents' car park. We are working in partnership with TfL to deliver a rapid charging hub for taxis in Baynard House car park and a single taxi only rapid charge point on Noble Street.

-----TEXT BOX END-----

Proposal 31: Request an accelerated roll out of zero emission capable buses

We will urge TfL to prioritise zero emission capable buses on routes through the Square Mile, with the expectation that all buses serving the City will be hybrid or zero emission by 2020. In the longer-term, we will request that all buses serving the City are electric or hydrogen by 2030~~zero emission capable by 2030~~2030, ahead of TfL's current commitment for all single deck and 80% of double deck buses to be ~~zero emission or hybrid by 2035~~electric or hydrogen by 2035.

Proposal 32: Support small businesses to accelerate the transition to zero emission capable vehicles

We will work with the Government, TfL and manufacturers to develop incentive schemes and favourable leasing arrangements that support small businesses in acquiring zero emission capable vehicles. This will include supporting the switch to non-motor vehicle alternatives, such as cargo bikes. We will consider opportunities, such as preferential pricing for parking/loading for vehicles in this category, to provide time limited incentives to invest in zero emission capable vehicles.

~~We will encourage the Government to introduce legislative change to exclude battery weight from vehicle weight limits.~~

Proposal 33: Make the City of London's own vehicle fleet zero emissions

The City Corporation will upgrade its vehicles, including City Police vehicles where appropriate, which operate in the Square Mile to meet the standards we set for local ZEZs. Contractors vehicles that operate within the Square Mile will also be required to meet these standards. Where possible EV charging infrastructure in City Corporation operational sites will be made available to contractors' vehicles.

Proposal 34: Reduce the level of noise from motor vehicles

The transition to zero emission capable vehicles and general traffic reduction will help to reduce noise from motor traffic. Other measures to reduce noise will include: well-maintained carriageway surfaces and utility access covers; campaigns to reduce engine idling and the inappropriate use of horns; and working with the emergency services to reduce the use and volume of sirens.

We will work with the City of London Police to undertake targeted noise enforcement of motor vehicles that do not comply with legal requirements to maintain an appropriate/type approved exhaust or are not within legal decibel limits for the vehicle type.

Proposal 35: Reduce noise from streetworks

The City Corporation will manage and seek to reduce the noise impacts of streetworks through the Code of Practice: Minimising the Environmental Impact of Streetworks. This requires contractors working for the City Corporation and third parties to use the 'best practicable means to minimise the effects of noise and dust, including:

- Restricting periods of operation of noisy activities
- Undertaking liaison with neighbours
- Using less noisy methods and equipment
- Reducing transmission and propagation of noise, for example by using noise enclosures or barriers
- Managing arrangements including contract management, planning of works, training and supervision of employees to ensure measures are implemented

A review of the Code of Practice will be undertaken by 2020 to ensure it reflects best practice, with further updates as required. The review will also consider how we can better work with TfL, utility companies and contractors to improve the level of adherence to the Code.

Proposal 36: Encourage innovation in air quality improvements and noise reduction

We will work with the Government, TfL, industry and other partners to encourage the development of innovative solutions to reduce transport related noise and emissions. For example, by supporting trials, sponsoring competitions and awards, and hosting conferences and seminars.

Proposal 37: Ensure street cleansing regimes support the provision of a world-class public realm

Ensure street cleansing regimes support the provision of a world-class public realm. The City's street cleansing regime will ensure all walking routes, cycle routes and public realm areas as well as streets are cleaned to a high standard and kept free of litter.

We will reduce litter from smoking, working with Public Health to support campaigns and initiatives to stop smoking and, if necessary, prosecuting offenders.

We will continue to work with businesses to minimise the impact of waste collection on the public realm, including through time banded collections that restrict the times when rubbish and recycling can be left on the street.

Delivery and servicing needs are met more efficiently, and impacts are minimised

Deliveries and servicing are an essential part of a thriving business district. Delivering this Strategy will ensure these needs are met by fewer, quieter, safer and cleaner lorries and vans. Deliveries for buildings or areas of the City will be grouped together at consolidation centres, meaning fewer, fuller lorries and vans. The lorries and vans making these deliveries will use the return journey to transport waste and recycling. The Thames will also carry goods into the City as well as waste out, including the materials needed for construction projects. Logistics hubs within the City will enable deliveries to be made by cargo cycles and pedestrian porters. Cargo cycles will also be used for servicing businesses and buildings, with tools and parts securely stored at locations within the Square Mile. New technologies will help improve the routing of deliveries and make it easier to find a place to park or unload.

Freight and servicing vehicles make up 25% of motorised traffic in the Square Mile. This proportion increases to 32% between 7am and 10am, coinciding with the busiest times of day for walking and cycling. 40% of respondents to the City Streets survey felt that the number of lorries and vans on the City's streets is too high, the second highest response after private cars

Even after the Ultra-low Emission Zone for central London comes into effect freight and servicing activities are still expected to contribute 26% of transport related NOx and 28% of PM2.5 emissions from motor vehicles

Large goods vehicles make up only 4% of vehicles on the City's streets. However, 38% of collisions that result in someone being killed involved a large goods vehicle as do 21% that result in a serious injury.

Proposal 38: Reduce the number of freight vehicles in the Square Mile

We will seek to reduce the number of motorised freight vehicles in the Square Mile by 30% by 2044 and facilitate the transition to ultra-low emission and zero emission delivery vehicles.

To achieve this target, we will work with businesses, suppliers, the freight industry and other relevant partners to deliver an integrated freight programme that incorporates retiming, consolidation, last mile logistics, construction logistics, better use of the river and smarter procurement practices. These solutions are not unifotmally applicaple to all types of delivieries and we will work with the freight industry to target intervetions at the most appropriate types of delivery.

Retiming deliveries

We will explore the potential for area and City-wide timed access and loading restrictions for motorised freight vehicles. Our aim is to reduce the number of these vehicles on our streets in the peak periods by 50% by 2030 and by 90% by 2044, while ensuring businesses and residents can still receive essential deliveries.

Measures to encourage retiming will include:

- Permitting night-time deliveries where there will be negligible impact on residents both en route and in the City. Through the planning process we will ensure all appropriate new developments have restrictions to limit deliveries between 7am-10am, 12pm-2pm and 4pm-7pm
- Engaging with property managers, occupiers and businesses which may wish to retime deliveries and seeking to remove any restrictions in their planning consents where there will be negligible impact on residents
- Integrating out of peak deliveries as part of the sustainable logistics programme and identify opportunities for retiming freight on an area basis within Healthy Streets Plans (see Proposal 12)
- Working with London Councils, TfL and neighbouring local authorities to modernise the London Lorry Control Scheme (LLCS) to generate more opportunities for out of peak and night time deliveries.

Consolidation

Using established best practice, we will work with a partner haulier to provide a consolidation service for the Square Mile by 2022. A major engagement exercise with City businesses will promote and encourage the use of this consolidation service. This will include developing a consolidation toolkit for City businesses, informed by monitoring of the benefits arising from consolidating deliveries to the Guildhall complex.

We will also continue to use the planning process to require all new major developments to use a consolidation service to reduce deliveries to their buildings.

In the longer term we will develop a commercially sustainable approach to consolidation for the Square Mile and establish a sustainable logistics centre to serve the City by 2030. This centre will co-locate major suppliers in a single warehouse, alongside consolidation, waste collection and couriership services.

Last mile logistics hubs

We will enable more deliveries within the Square Mile to be made by cargo cycles, on foot and by small electric vehicles by:

- Delivering two last mile logistics hubs in underutilised City Corporation assets by 2022. A further three hubs will be delivered by 2025.
- Establishing additional last mile logistics hubs if appropriate underutilised assets are identified.

- Exploring opportunities to acquire new sites within or adjacent to the Square Mile for last mile logistics hubs.
- Working with developers and land owners to integrate last mile logistics hubs as part of major City developments.

Increase the use of the River Thames for freight

We will maximise the potential to use the Thames for the movement of freight by:

- Maintaining the commercial waste operation at Walbrook Wharf and supporting additional waste carried through the Wharf
- Identifying opportunities to increase the use of the river for freight deliveries to the Square Mile
- Working closely with Thames Tideway to identify future opportunities for their wharves and barges once construction is completed.
- Working with river freight operators to ensure that their fleets meet Port of London Authority air quality standards and avoid adverse impacts on water quality and biodiversity.
- Exploring the use of Blackfriars and Tower Piers and a reinstated Swan Lane Pier as points to transfer freight for last mile delivery on foot or by cargo cycle.

-----TEXT BOX START-----

Freight consolidation

Freight consolidation involves routing deliveries to a business, building or area via a warehouse where they are grouped together prior to final delivery. This approach means that the final stage of delivery is made by fewer, fuller vehicles, significantly reducing the number of lorries and vans making deliveries.

Case studies have shown that freight consolidation can reduce the number of delivery trips by 46 – 80%^{vii}. Enabling freight consolidation is critical to achieving our targets for reducing freight vehicles.

Examples of this consolidation include the Bristol and Bath Consolidation Centre, the London Borough Consolidation Centre and Regent Street Clipper Consolidation. The City Corporation already mandates the use of consolidation centres in planning consents, including 22 Bishopsgate and 1 Undershaft, to mitigate the impact of new development on City streets.

-----TEXT BOX END-----

Reducing the impact of construction logistics

To facilitate future development while minimising the impact of construction logistics, we will:

- Work with TfL to update Construction Logistics Plan guidance by 20~~19~~22. This updated guidance will include stricter expectations for construction consolidation and on-site waste compaction. It will also review the potential for emerging technology, such as 3D printing or higher payload and carrying potential of new rigid axle vehicles to reduce the number of deliveries.
- Work with developers and contractors to adapt and develop construction delivery management systems to facilitate retiming of deliveries to outside the 7-10am peak.
- Through the planning process, all development within the City must consider use of the River Thames for the movement of construction materials and waste.

Procurement and personal deliveries

To encourage smarter commercial decision making for our businesses and influence how residents and workers get goods delivered, we will:

- Share information on the impact of personal deliveries on traffic in the City, including air quality and road danger and promote the use of click and collect services.
- Establish a collaborative procurement programme for the Square Mile by 20~~20~~20. This will allow businesses, particularly small and medium sized businesses, to share suppliers and waste services. We will work with Cheapside Business Alliance and the Aldgate Partnership to trial the programme prior to a City-wide roll out.
- Identify opportunities for other City Corporation initiatives, such as Plastic Free City and our Responsible Business Strategy, to support efforts to reduce the number of deliveries and waste collections

Proposal 39: Develop a sustainable servicing programme

We will work with servicing businesses and facility and property managers to develop a Servicing Action Plan, to be published by 20~~20~~20. This will identify opportunities to reduce the number of vans and other service vehicles in the Square Mile while seeking to improve response times and quality of service. We will also explore the potential to provide secure storage space for tools and materials as part of last mile delivery hubs to reduce the need for engineers to travel to and around the Square Mile by van.

Our street network is resilient to changing circumstances

It is inevitable that people using our streets and transport networks will experience occasional disruption. This includes disruption caused by construction and streetworks, breakdowns and severe weather. By delivering this Strategy we will ensure that these disruptions have as little impact on the ease and experience of travelling in the City as possible. Streets will be kept open to people walking and cycling during construction and streetworks. Long-term works that require streets to be closed to traffic will provide an opportunity for people to enjoy the benefits of a traffic-free environment, and to assess the potential for permanent change. When necessary, alternative routes will be made available for motor traffic on streets that are normally only used for access. The Square Mile will be prepared for the impacts of a changing climate or more extreme weather events; enabling people to comfortably use the City streets regardless of the weather.

Every year the City Corporation receives around 9,500 applications for permits to work on the highway, approximately half of these are from utility companies, and half for street maintenance and improvements. 85% of these applications are approved. In 2015/16 combining streetworks through collaborative working 'saved' 763 excavation days. Using TfL's calculation on the economic benefit to London as a result of days of disruption saved, the estimated saving for the Square Mile is in the region on £1.1m based on an average benefit of £1,500 per day.

Extreme weather events, including higher rainfall and temperatures, are increasing as a result of a changing climate.^{viii} Further details of the likely impacts of climate change on transport in the Square Mile will be included in the final version of this Strategy, following publication of the Met Office's Climate 2018 projections in November 2018.

Proposal 40: Allow some Local Access streets to function as City Access streets during significant disruption

We will maintain a primary 'resilience network' for motor vehicles that can be 'switched on' in response to significant planned or unplanned disruption. Local Access streets on the resilience network will be designed to allow temporary reopening to through traffic or occasionally accommodate higher volumes of motor vehicles. This approach will also ensure that emergency services can use these streets when necessary.

Appropriate management arrangements will ensure streets remain safe for all users, such as a clear demarcation of pedestrian space, lower speed limits and marshalling. We will explore the use of technology for advance messaging both on-street for all users and through in-vehicle navigation systems to communicate and manage changing or temporary arrangements. Monitoring of any uses of Local Access streets in this way will be included to ensure management arrangements are

working well and to ensure any negative effects on the built environment and air quality are mitigated.

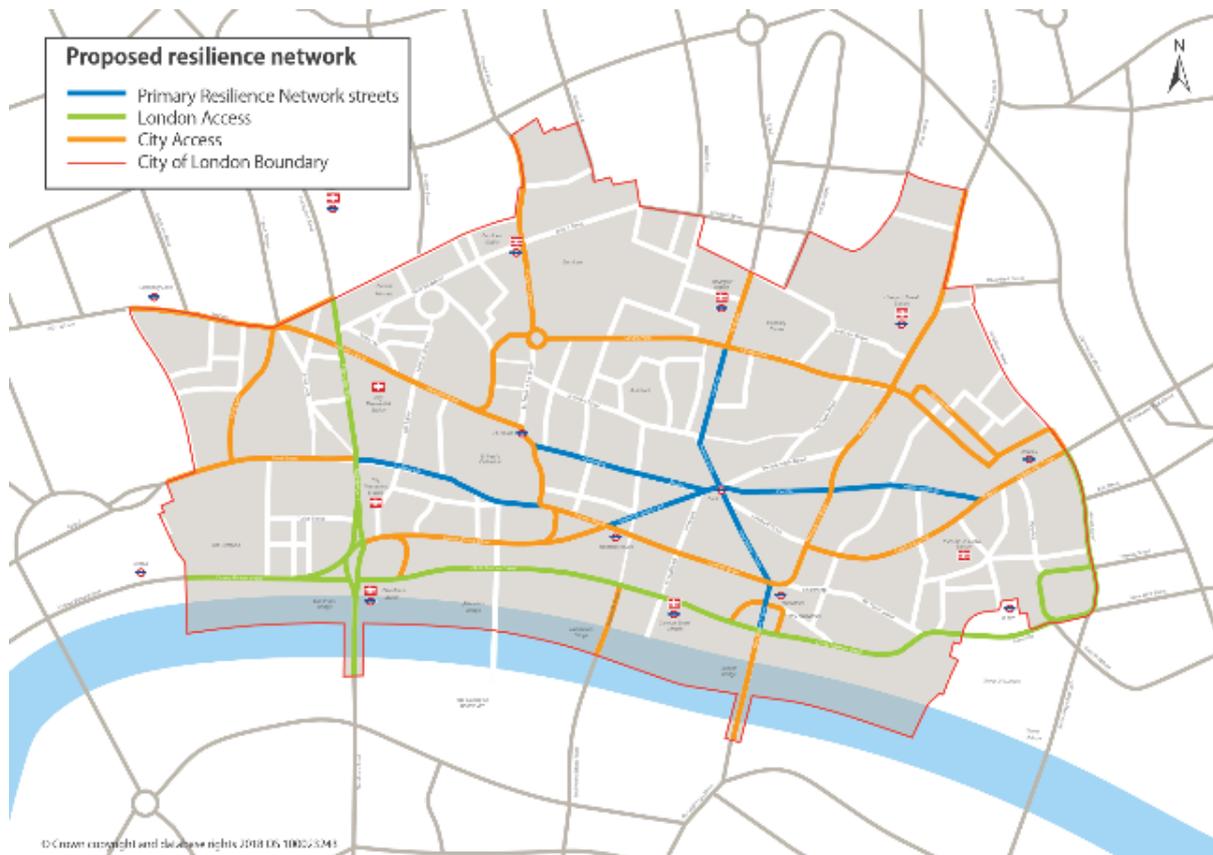


Figure 12: Proposed primary resilience network (larger map available on the City of London Transport Strategy webpage)

Proposal 41: Reduce the impact of construction and streetworks

The needs of people walking will be prioritised during streetworks and construction, with the aim of maintaining a comfortable and accessible walking route on both sides of the street, with space reallocated from general traffic as necessary. Accessible diversions must be provided if space constraints do not allow an acceptable level of temporary provision.

We will work with utility companies, contractors and developers to minimise the impact of construction and streetworks on people walking and cycling. Traffic management plans for construction sites and streetworks will maintain access for different users in accordance with the following hierarchy:

- Walking
- ~~Cycling and buses~~
- Buses and taxis
- Freight access
- General traffic

We have a Network Management Duty which requires us to ensure we apply best practice to managing streetworks. We will review this in 2019 and on a regular basis to ensure our activity and processes remain up to date and effective.

Within the context of the Network Management Duty, we will encourage the drafting of legislation to allow penalties to be charged against developments that overrun their agreed licence periods for scaffolds and hoardings.

We will review the City's Guidance Notes for Activities on the Public Highway in 2019 to ensure that guidance is in line with best practice and the requirements outlined above. A review will include considering the opportunity to introduce lane rental controls on our major streets to further reduce the impact of street works.

We will seek to minimise disruption caused by streetworks by:

- Encouraging collaborative working and coordinating street works
- Exploring the potential for new technology to reduce noise and the extent of works and speed up delivery
- Reducing the duration of works by allowing extended and night-time working where noise considerations allow, while maintaining protection for residents.
- Improving signage and permit information, to include contact details, purpose of works and other information such as reason for site inactivity
- Improving communication through better engagement with businesses and residents for longer duration works
- Work with TfL to improve communication on the impact of streetworks and other maintenance on public transport services
- We will work with TfL to explore the potential to further adjust traffic signal timings to reflect actual and modelled traffic flows during periods of network disruption. We will also explore new adaptive traffic control technologies as they emerge through our Future Transport Programme (Proposal 43)

We will use medium and long-term street closures as an opportunity to open streets to people, for example working with businesses to provide temporary seating or programmed events. We will also monitor the traffic impacts of long-term street works to inform transport and resilience planning and assess the potential for retaining capacity reductions or access restrictions.

Proposal 42: Make the street network resilient to severe weather events

We will work with the London Climate Change Partnership Transport Adaptation Sector Group (TASG) to ensure the street network and transport system remains open during severe weather events. With TASG, we will undertake risk assessments based on current and predicted impacts of climate change and develop mitigating measures that will be implemented when thresholds are reached, including temperature change or levels of rainfall. This process will ensure the City

Corporation and TfL are prepared to respond to extreme weather events that may affect our streets, the TLRN and rail and Underground networks.

The initial programme for the TASG first stage assessment is set out below. Further detailed assessments and mitigation plans will be informed by the Met Office's 2018 Climate projections, which will be released in November 2018.

- Agree indicators and complete transport sector assessments (autumn/winter 2018)
- Publish assessments (late 2018)
- Review and update every two years

Further detailed assessments and mitigation plans will be informed by the Met Office's 2018 Climate projections, which will be released in November 2018.

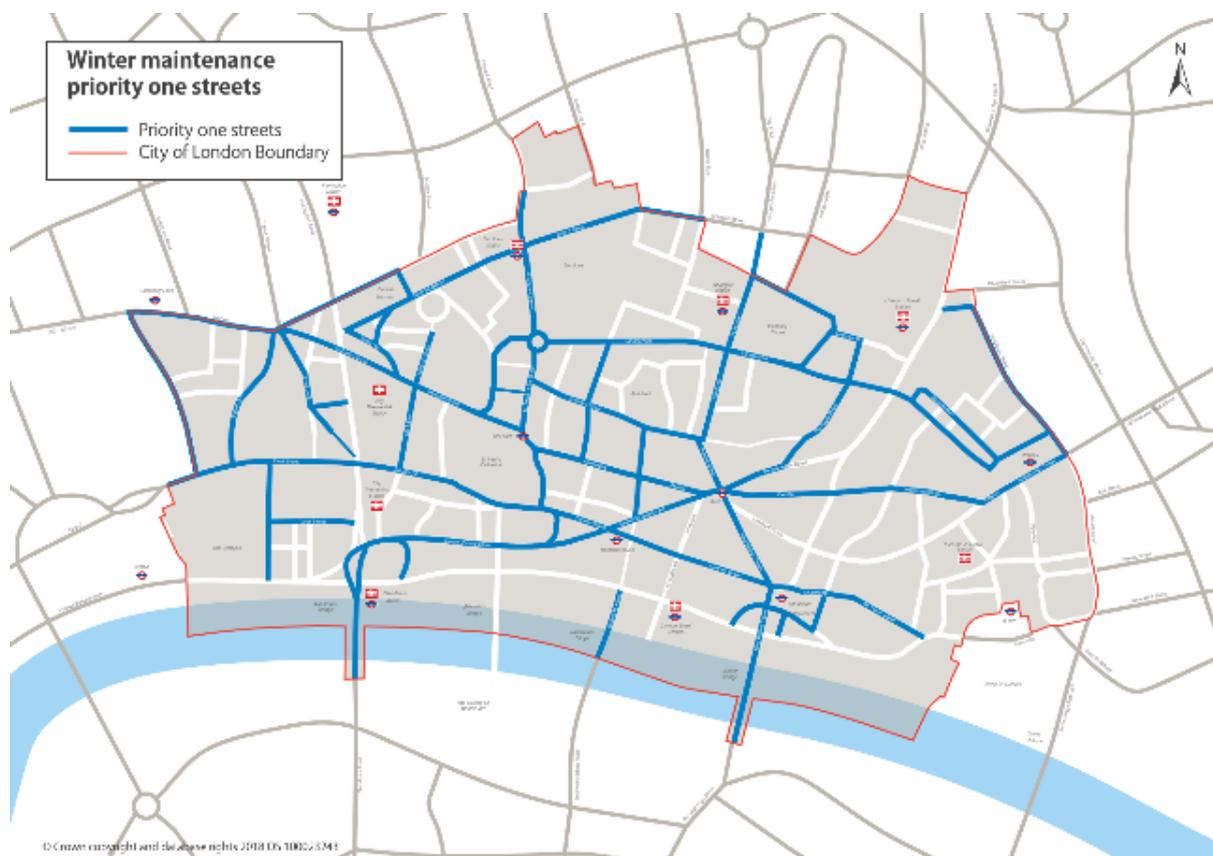


Figure 13: Winter maintenance priority one streets (larger map available on the City of London Transport Strategy webpage)

-----TEXT BOX START-----

Emerging transport technologies benefit the Square Mile

The advent of new transport technology innovations, such as autonomous vehicles (AVs) and new apps and services, promise to change the way our streets function and the way we choose to travel on them. Delivering this Strategy will ensure that transport innovations are seamlessly integrated into the fabric of the City and improve the experience of travelling and spending time on the Square Mile's streets. A proactive rather than reactive approach to policy making will ensure appropriate policy and legislation is in place while supporting and accelerating beneficial innovations. The City will be a test-bed for urban transport innovations and seen as a world leader in improving people's personal mobility and livelihoods through new technologies.

Close to £1 billion is being spent on AV development in the UK alone and industry experts (alongside the UK's Chancellor Phillip Hammond) are now suggesting that self-driving cars will be running on our streets in less than four years. Transport Systems Catapult forecasts that a quarter of global new vehicle sales in 2035 will be AVs. Disruptive technologies, such as Uber, have already demonstrated their ability to rapidly change how people travel. They have also highlighted the potential negative impacts of these changes, leading to more motor vehicles on London's streets. While no one is certain of what the future holds the City must be ready to respond to support the successful implementation of this Strategy.

Proposal 43: Establish a Future Transport Programme

We will establish a Future Transport Programme to work with developers of mobility innovations. This programme will:

- Engage with industry, academia, government Catapults, local governments, and local and international ~~and~~ partners to deliver transport innovation and technology trials across the City, including trials on:
 - App-based parking and un/loading permitting and enforcement
 - Technology-assisted kerbside space reallocation
 - On-demand accessible shuttles and shared transport services
 - App-assisted pedestrian crossing technologies for the partially sighted and people who require more time to cross
 - Geofencing and permitting
 - Use of drones to support the emergency services and make urgent deliveries to hospitals
 - Technology to support the delivery of Vision Zero by reducing the likelihood and severity of collisions
- Identify measures required to support the uptake of appropriate mobility solutions, such as off-street storage of shared autonomous vehicles
- Host conferences and seminars and support competitions and awards for transport innovations and technologies

- Explore the potential for commercial opportunities and partnerships within the transport technology and innovation industry.

~~A Publish a more detailed programme of activities will A Future Transport Action Plan will be developed and published by 2020, be developed shortly after the publication of the Transport Strategy and in consultation with the Future Transport Advisory Board (Proposal 44), city workers, residents, and other interested groups and published by 2020.~~

We recognise the significant potential for new technologies to improve the City's streets and will openly enter into discussion with any innovators. Future transport innovations will be considered appropriate for trial and use in the City context if they support the delivery of Healthy Streets and adhere to the following requirements (when applicable):

1. Support priority for people walking and efforts to enable more people to choose to walk, ~~and~~ cycle and take public transport, and not shift people from these sustainable travel modes ~~to~~ unsustainable travel modes
2. Contribute to efforts to reduce motor vehicle volumes and mileage and not increase motor traffic volumes
- 2.3. Ensure that all users, including disabled users, are accommodated and that no street user is excluded
- 3.4. Lead to an overall increase in vehicle occupancy and loading
- 4.5. Help make our streets safer and not increase road danger, collision rates, collision severity, terrorism risk, or the need for additional policing or enforcement
- 5.6. Reduce vehicle speeds and ensure vehicles travel at speeds appropriate to conditions and the City context
- 6.7. Minimise obstructions to vehicles and people walking, and not permanently obstruct pavements or add clutter
- 7.8. Improve the efficiency of kerbside use and not increase parking or loading space requirements
- 8.9. Help spread travel demand, for both people and goods, more evenly across the day, such as outside morning, lunchtime and evening peaks and overnight
- 9.10. Help make streets and the City's air cleaner and quieter by reducing transport related emissions and noise
- 10.11. Improve the experience of using the City's streets and open spaces and support efforts to increase the amount of public space

Additional requirements apply to the introduction of connected and autonomous vehicles, drones and droids on our streets.

- **Connected and autonomous vehicles** must not require any changes or infrastructure that have a negative impact on our streets, such as bollards or barriers
- **Drones** must not operate without CAA and City of London permission
- **Droids** must not operate on pavements or in such a way as to obstruct or pose a danger to any user of our streets

Developers and operators of new transport innovations and services are expected to:

- Share all beneficial data generated or collected with the City Corporation to aid in policy and decision making
- Not discriminate against any potential user, either through active discrimination or through profiling or algorithmic/AI discrimination or bias
- Accommodate every user, especially those requiring wheelchairs or mobility aids when innovations and technologies incorporate motor vehicles
- Not generate any unreasonable additional costs for the City Corporation or users
- Ensure any supporting digital software and hardware is sufficiently and rigorously safeguarded from malicious use or intent that could pose a risk to physical or digital safety in the City
- Readily and proactively engage with the City Corporation ~~and~~, City residents, and workers, students, and other interested parties .

-----TEXT BOX START-----

Emerging transport technologies

Autonomous vehicles, also known as driverless cars or AVs, are vehicles equipped with sensors and on-board computers that allow them to effectively drive themselves. There are many levels of automation, from partial automation, which can include self-parking cars and adaptive cruise control, to full automation and a hands-off driving experience. The autonomous operation of motor vehicles on our streets could significantly reduce road danger and improve traffic flow.

Drones, also known as unmanned aerial vehicles or UAVs, are small flying vehicles which rely on remote-controlled piloting or fly using onboard sensors and GPS. The operation of drones in the City could improve delivery times of sensitive or high-value goods such as medical supplies and may aid in asset inspection, construction site monitoring, and emergency services activities. Droids are small wheeled vehicles that are controlled by remote-controlled piloting or onboard sensors and GPS. The use of droids in the City could include couriering and deliveries.

Shared mobility services are transport services that share the use of a vehicle for personal travel, examples include ridesharing and pooled rides.

-----TEXT BOX END-----

Proposal 44: Establish a Future Transport Advisory Board

To ensure that we can identify and proactively respond to future transport innovations we will establish a Future Transport Advisory Board. Board membership will include the City of London Police, industry partners and experts, academics, and user groups.

-The Future Transport Advisory Board will meet twice a year to:

- Support and advise on the activities of the Future Transport Programme-

- Advise on emerging transport technology and innovation industry trends, and suitable responses to them
- Act as a sounding board on the City's approach to managing upcoming innovations and technological launches
- Review the City's future mobility policies, positions, and trials
- Help facilitate connections and relationships between City officials and the wider transport technology industry

Proposal 45: Explore the need for legislative change to ensure emerging technology and innovation benefits the Square Mile

We will support and engage with all levels of government, industry and sector representatives to develop frameworks and legislation for future transport and ensure overall positive outcomes for the Square Mile, London and other cities. Initially we will seek local and national legislative action on:

- Licensing for the semi and fully-autonomous vehicle market, alongside the development of safety, design, digital security, and supporting infrastructure regulations
- Strengthening existing Civil Aviation Authority regulations on small remotely-piloted aircraft and drones
- Clarifying the operating parameters of droids and other small autonomous vehicles
- Regulating the dockless cycle hire industry, as outlined in Proposal 28

The Square Mile benefits from better transport connections

Public transport will remain the main way that people travel to the Square Mile and continued investment will ensure that the City remains one of the most well-connected business districts in the world. Public transport will provide efficient and direct 24-hour connectivity to major local, regional, national, and international destinations. The building of new rail and underground connections, including Crossrail 2 and High-Speed 2, will provide the additional capacity people need to get to the City quickly and comfortably from across Greater London and the UK. Expanded Night Tube and 24-hour bus networks will serve and grow the City's thriving cultural offer and night-time economy

The recent economic success of the City and London in general is attracting more jobs and residents than ever before to greater London and the surrounding region. The Mayor and TfL have laid out ambitious plans for expanding the Capital's public transport networks to address the additional pressures this growth will place on these services. [We will work with TfL to support the delivery of these aspirations to ensure the public transport network continues to meet the needs of people travelling to and through the Square Mile.](#)

Planned network improvements are forecasted to increase the number of people within a 60-minute commute of the City by nearly two million. Modelling projections suggest that, without further investment, Londoners will still be faced with deteriorating network conditions over the next 25 years. TfL forecasts an increase in travel by all rail modes of 50% by 2041. Delays from overcrowding on the underground have tripled in the past five years and 8 of the 10 most overcrowded rail services across the UK are now in London.

Proposal 46: Support and champion better national and international connections to the Square Mile

We will work with the Mayor of London, TfL, the Government, airport and rail operators and other related partners to improve national and international connectivity to the City, including through supporting:

- Increased airport capacity in the South East, recognising that this will most efficiently be delivered through a third runway at Heathrow to be delivered as soon as possible.
- Improved connectivity to London's airports through:
 - Increased capacity and additional frequency on the West Anglia Main Line to Stansted Airport
 - A new Crossrail station at City Airport, constructed at the same time as the delivery of the Ebbsfleet extension
 - Increased DLR frequency to City Airport
- The delivery of High Speed 2 as quickly as reasonably possible

- Improved national rail access to London, including electrification, station expansions and general service improvements

Proposal 47: Support and champion improved connections to the Square Mile from Greater London and the surrounding region

We will work with the Mayor of London, TfL, Government, boroughs neighbouring the City and other related partners to improve regional connectivity to the Square Mile, including through supporting:

- Devolution of suburban rail service franchising to TfL, with a view to providing a London Suburban Metro service by 2030
- Accessibility improvements to rail and Underground stations in the Square Mile, as outlined in Proposal 19
- Extending the Overground to Barking Riverside
- The delivery of Crossrail 2 as soon as reasonably possible
- Enhancing the coverage and frequency of 24-hour public transport services in central London, including increasing the number of lines operating night-tube services, enhancing the 24-hour bus network, and improving night-time DLR and rail operations, including Crossrail. Any extensions to operating hours must take account of the need to minimise-avoid noise and other impacts on people living in, working in, studying in, and visiting the City. residents.
- Enhanced 24-hour bus services to/from the City
- Improvements to Liverpool Street Rail ~~Station and Bus Station~~, including enhancing step free access and improving entry points and reviewing bus interchange
- Exploring the feasibility of Sunday operation of the Waterloo and City Line
- Immediate improvements to street-level interchange between Fenchurch Street and Tower Hill, Tower Gateway and Aldgate stations, including wayfinding. Exploration of the feasibility of a direct interchange route between Fenchurch Street and Tower Gateway and Tower Hill
- Access and capacity improvements at Aldgate Station and exploration of the feasibility of a direct interchange between Aldgate and Aldgate East stations.
- Extending the Metropolitan Line to Watford Junction and the Bakerloo Line to Lewisham
- The delivery of more high-quality cycling routes to and through central London including Quietways and Cycle Superhighways
- Improved walking connections to boroughs neighbouring the City

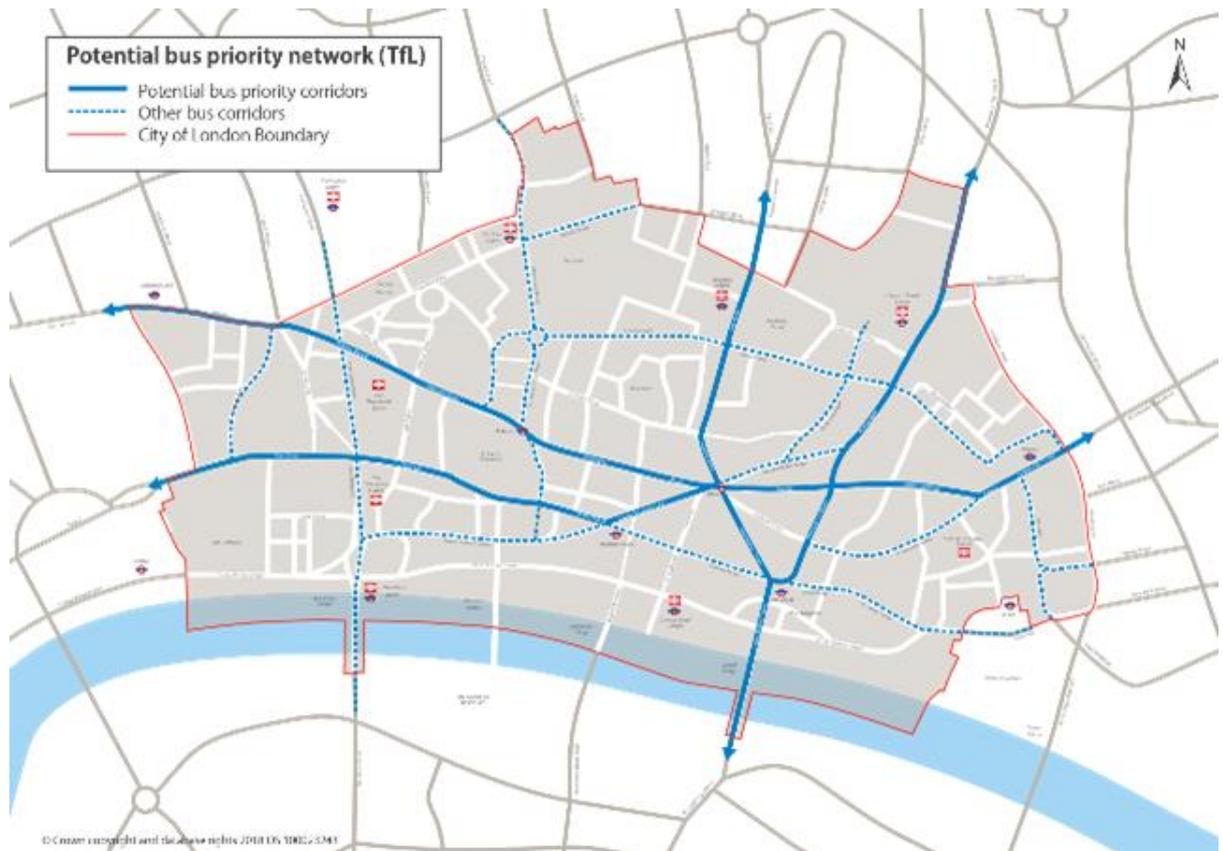


Figure 14: Potential bus priority network (larger map available on the City of London Transport Strategy webpage)

Proposal 48: Support the increased use of the Thames for passenger services

We will work with partners including TfL River Services, the Port of London Authority and riverboat operators to increase the use of the River Thames for passenger services. Activities will include promotion of river services, enhancing walking routes to Blackfriars and Tower piers and improving overall pier efficiency and accessibility. We will explore the potential to reinstate Swan Lane pier for leisure and passenger services. We will also work with river passenger service operators to ensure that their fleets meet Port of London Authority air quality standards and avoid adverse impacts on water quality and biodiversity.

Proposal 49: Review bus provision across the City

We will support TfL's ambitions to adjust bus services in Central London, taking account of the forecast fall in demand following the opening of the Elizabeth Line.

We will work with TfL to improve bus journey times to and connectivity through the Square Mile by:

- Reviewing bus routing and frequency throughout the City to optimise routing
- Introducing targeted junction improvements to enhance bus priority

- Identifying opportunities to improve bus priority when developing and implementing Traffic Management and Healthy Streets plans (see Proposal 12) and major projects

The key routes for bus priority measures are shown in Figure 14. Improvements to these routes will be delivered by 2030.

Proposal 50: Support the Mayor of London in retaining locally-generated taxation

We will support the Mayor of London and TfL's efforts to retain additional locally-generated taxation, such as vehicle excise duty, to fund investment in transport infrastructure across the Capital, including investment to help deliver the outcomes of this Strategy.

Proposal 51: Encourage continued Government investment in major London transport projects

We will continue to encourage the Government to invest directly in strategic Healthy Streets projects and programmes and large transport infrastructure projects, such as Crossrail 2. Significant investment across Greater London is required to ensure the Capital remains an attractive place to live, work, study and invest and protect the significant contribution London makes to the national economy.

Delivering the Strategy

Projects and programmes

The major projects and programmes that will be delivered by the Transport Strategy are summarised below. Further details on the projects that will be delivered in the first three years will be set out in the Transport Strategy Delivery Plan. [The Delivery Plan](#), which will be published [on our website by the end of 2019 and then updated on an annual basis, alongside the final version of this Transport Strategy.](#)

Table 1: Key projects and programmes

| Project | 2022 | 2025 | 2030 | 2040 | 2044 | Key area of change |
|--|------|------|------|------|------|---|
| City-wide 15mph speed limit | | | | | | |
| Legible London roll out | | | | | | |
| Kerbside uses review | | | | | | |
| Lunchtime Streets | | | | | | |
| Last-mile delivery hubs | | | | | | |
| Streets Accessibility Programme | | | | | | |
| Sustainable logistics centre | | | | | | |
| Road Danger Reduction priority schemes | | | | | | |
| Pedestrian Priority/Healthy Streets projects | | | | | | |
| Road Danger Reduction campaigns | | | | | | |
| Location specific | | | | | | |
| City Cluster Zero Emission Zone | | | | | | City Cluster |
| Barbican & Golden Lane Zero Emission Zone | | | | | | Smithfield & Barbican |
| Core cycle network Phase 1 | | | | | | City Cluster; Smithfield & Barbican; Liverpool Street |
| Core cycle network Phase 2 | | | | | | Fleet Street; Smithfield and Barbican |
| Bank Junction area | | | | | | |
| Moorgate area | | | | | | Moorgate and Liverpool St. |
| Culture Mile | | | | | | Smithfield & Barbican |
| Museum of London roundabout, St Paul's | | | | | | Smithfield & Barbican |

| | | | |
|------------------------------|--|--|--------------|
| City Cluster area strategy | | | City Cluster |
| Fleet Street and Courts area | | | Fleet Street |

Managing delivery

Further details on the actions and programmes to deliver elements of this Strategy will be set out in a series of reviews and delivery plans, including:

- The Transport Strategy Delivery Plan, a rolling three-year delivery plan that will be updated on an annual basis
- Healthy Streets Plans, providing details of how we will manage the street network in areas the City in accordance with our proposed Street Hierarchy (Proposal 12)
- A City-wide kerbside review to better understand and manage kerbside activities on our streets (Proposal 14)
- Streets Accessibility Delivery Plan, which will set out the timetable for delivering necessary improvements needed to meet the proposed COLSAS standards (Proposal 16)
- Road Danger Reduction Action Plan, a five-year delivery plan for measures to achieve Vision Zero and implement the Safe Systems approach (Proposal 20)
- Servicing Action Plan, which will identify opportunities to reduce the number of vans and other motorised service vehicles in the Square Mile (Proposal 39)
- Future Transport Action Plan, assessing and identifying opportunities to support transport technologies that will help deliver this Strategy (Proposal 43)

We will continue to engage and consult with City residents, workers, businesses and other relevant street users and partner organisations as we develop and deliver this Strategy. Any projects that will lead to significant and permanent changes to the form or function of our street network will also undergo transport and traffic modelling. Impact assessments, including Environmental Impact Assessments and Equality Impact Assessments, will be conducted for all relevant projects and proposals. These will test options and ensure potential benefits are maximised and any potential negative impacts are identified and mitigated. Modelling and assessments will consider potential impacts beyond the Square Mile.

Proposal 52: Using temporary interventions and trials to accelerate the pace of delivery

Delivering changes to our streets can take time. We will use temporary and experimental measures to quickly deliver functional changes to our streets and allow people to begin enjoying the benefits of change as we work towards full delivery. If appropriate, will also use temporary interventions to 'live trial' major change, allowing proposal to be tested and, where necessary, refined. We will consult on any changes made to our streets in this way prior to any trials becoming permanent. We will also work closely with our neighbouring boroughs to ensure the impacts of our trials are understood both within and beyond our borders. This approach will allow people to better understand the nature of proposed changes and provide feedback based on real experience.

Funding delivery

The delivery of this Transport Strategy will be funded from a range of sources, including:

- Money received from TfL, including:
 - LIP Corridors and Neighbourhoods – an annual allocation that contributes to projects identified in our LIP
 - Liveable Neighbourhoods – funding for large projects that encourage walking, cycling and the use of public transport, allocated through a bidding process
 - Strategic funding – funding for specific priorities or initiatives, such as cycling infrastructure, air quality improvements and bus priority
- The City Corporation's on-street parking reserve – reinvesting revenue from parking charges and penalty charge notices
- Contributions from developers through the Community Infrastructure Levy, Section 106 and Section 278

The long-term nature of this Strategy means we have not scoped the full cost for all projects and programmes outlined above. However, a core principle will be to generate the necessary revenue/funding to make the delivery of this Strategy largely self-supporting.

-----TEXT BOX START-----

Bank on Safety

The Bank on Safety experimental scheme closed Bank Junction to traffic – except buses and cycles – between 7am and 7pm, Monday to Friday. Using an experimental traffic order meant that safety improvements could be delivered quickly while allowing the wider impacts of the scheme to be monitored before deciding on permanent change.

Hackney Parklet

This ‘parklet’, delivered with funding from the Mayor of London as part of Hackney Council’s Low Emission Neighbourhood, provides eight cycle parking spaces, seating, shade, planting and lighting - transforming a space that would normally be occupied by two cars. The design allows it to be constructed in two days.

-----TEXT BOX END-----

Measuring and reporting progress

Progress on delivering this Strategy will be publicly reported to the City Corporation’s Planning and Transportation Committee on an annual basis from March 2020. Every two years we will publish a City Streets Report which will include data on our targets set out in Table 2, the key performance indicators set out in Table 3, and analysis of traffic trends based on our biennial vehicular and pedestrian traffic counts.

Proposal 53: Improve our monitoring of transport in the Square Mile

We will improve the quantity and quality of data we hold on transport in the City by:

- Exploring the potential to improve our City-wide database of vehicular and pedestrian traffic counts by increasing count locations and the number of count days
- Repeating the City Streets survey every two years to understand what people who live and work in, or travel through the Square Mile think about transport and streets in the City
- Exploring the potential to gather ongoing feedback through web or app-based surveys and interactive maps
- Making best use of technological advancements in sensors and other monitoring methods to improve both the quality and the quantity of data we collect, reduce of the cost of data collection, and increase the speed of data processing
- Sharing data with other organisations that collect metrics on relevant indicators
- Ensuring our data is standardised whenever possible and protected from inappropriate use or exploitation

- [Exploring opportunities to make our databases more publicly accessible \(in compliance with GDPR\) when relevant](#)

Some of the data used for monitoring and evaluating the Strategy will be provided by outside organisations. We will engage with these data owners and sources to review our targets and performance indicators as new datasets become available, and work with them to obtain data and information that is appropriate, up to date, and reliable.

Table 2: Key targets

| Metric | Baseline | 2030 Target | 2044 Target |
|---|----------|-------------|-------------|
| Reduction in motor vehicle traffic (counted in our traffic composition survey counts) | 185k | 139k (-25%) | 93k (-50%) |
| <p>Motor vehicle volumes have dropped by more than 50% in the last 20 years. Further reductions are needed to support the delivery of this Strategy and address the concerns of City residents, workers, and visitors - more than four in five feel motor vehicle volumes in the City are too high. We are aiming for a 25% reduction in motor vehicle volumes across the City by 2030. This aspiration recognises that the City has historically low levels of traffic and that further reductions will be challenging and require proactive intervention. By 2044, we have aimed to reduce motor vehicle volumes by at least 50% from current levels. This level of reduction seeks to remove nearly all non-essential motor traffic on City streets while acknowledging that a modest level of essential traffic will remain to support personal accessibility, delivery and servicing activities and other functions.</p> | | | |
| People rating experience of walking in the City as pleasant | 10% | 35% | 75% |
| <p>90% of all journeys made on the City’s streets are partially or entirely walked. At present, only 10% of people rate the experience of walking on the City’s streets as pleasant, with 63% and 27% rating the experience as acceptable and unpleasant respectively. We are aiming for over a third of people to find our streets pleasant places to walk by 2030. This aspiration recognises that significant changes to streets are required to improve the walking experience and that some of these will take time to implement. By 2044, we aim for at least three quarters of people to rate the experience of walking as pleasant. This figure recognises that a range of factors can influence the experience of walking, including adverse weather, streetworks and construction, and that these may affect survey responses.</p> | | | |

| Number of kilometres of pedestrian priority streets | 25km (25%) | 35km (33%) | 55km (55%) |
|--|------------|------------|------------|
| <p>There are just over 100 kilometres of streets and walking routes in the City. 25 kilometres of these are already pedestrian priority or pedestrianised. This includes the City’s high walks, alleyways and publicly accessible routes through City gardens and developments.</p> <p>By 2030, we aim to increase the number of pedestrian priority or pedestrianised streets by 10 kilometres. This will be achieved by converting over 12% of City streets currently open to motor traffic to access only, full pedestrianisation or timed pedestrianisation. By 2044, we aim for at least half of the City’s streets and routes to be pedestrian priority or pedestrianised. These targets recognise that some streets will still need to facilitate the movement of essential traffic around the Square Mile (these streets will be subject to separate measures that will significantly improve the experience for people walking such as widening footways and improving pedestrian crossings).</p> | | | |
| Number of people killed and seriously injured on our streets | 54 KSIs | <16 KSIs | 0 KSIs |
| <p>For the last 10 years there have been more than 50 deaths or serious injuries per year on the City’s streets. We aim to deliver Vision Zero and eliminate death and serious injuries by no later than 2040. This target reflects the scale of intervention required to design and implement road danger reduction projects across the Square Mile. We will deliver a pace of change that achieves a 70% reduction in death and serious injuries by 2030. These targets are also in line with the Mayor’s ambitions for Vision Zero and the trajectory identified in the MTS.</p> | | | |
| People rating experience of cycling in the City as pleasant | 4% | 35% | 75% |
| <p>At present, only 4% of people cycling on our streets rate the experience as pleasant, with 40% and 56% rating the experience as acceptable and unpleasant respectively. We have aimed for over a third of people to find our streets pleasant places to cycle by 2030. This aspiration recognises that significant changes to streets are required to improve the cycling experience and that some of these will take time to implement. By 2044, we aim for at least three quarters of people to rate the experience of cycling as pleasant. This figure recognises that that a range of factors can influence the experience of cycling, including adverse weather, streetworks and construction, and that these may affect survey responses.</p> | | | |

| | | | |
|---|-----|------------|-------------|
| Increase in the number of people cycling (counted in our traffic composition survey counts) | 44k | 66k (+50%) | 88k (+100%) |
|---|-----|------------|-------------|

The number of people cycling has quadrupled across the Square Mile since 1999 but has not grown significantly in the last five years. Transport for London have identified that there are over 15,000 journeys each day that are currently made by motorised modes to, from and around the Square Mile that could be cycled in part or in full. We are aiming for a 50% increase in cycling by 2030, This aspiration recognises that significant changes to streets are required to deliver our core cycling network and that changes are also required on routes to the City. By 2044, we aim for cycling rates to be at least double what they are today. We believe this can be delivered through converting most potentially cyclable trips, encouraging cycling for a wider range of purposes and maintaining or improving existing rates of cycling as the City's workforce grows.

| | | | |
|--|-----|-----|------|
| Proportion of zero emission capable vehicles entering the City | N/A | 90% | 100% |
|--|-----|-----|------|

Our target is that 90% of all vehicles entering the Square Mile will be zero emission capable by 2030. This will be reflected in the phasing of access restrictions through the implementation of local and central London Zero Emission Zones. The target recognises that for zero emission capability may not be available for some vehicle types, such as goods vehicles. By 2044, we anticipate that manufacturers will have zero emission capable models available for all vehicle types.

| | | | |
|---|-----|------|------|
| Overall reduction in motorised freight vehicle volumes (counted in our traffic composition survey counts) | 39k | -15% | -30% |
|---|-----|------|------|

Freight vehicle numbers have decreased by more than a third since 1999. However, without intervention they are likely to increase in the future due to the projected growth in the working population of the Square Mile and the changing nature of e-commerce and purchasing patterns. Half of freight vehicles pass through the City without stopping, mostly using the TLRN. These are included in the target figures. Given this context, we are aiming for at least a 15% reduction by 2030 and a 30% reduction by 2040. These figures reflect the timescales for implementing new freight infrastructure and operating models and recognise that there is always likely to be a need for some deliveries to be made by motor vehicles.

| | | | |
|--|-----|------|------|
| Reduction in motorised freight vehicle volumes during peak periods (counted in our traffic composition survey counts) | 18k | -50% | -90% |
| <p>Freight and servicing accounts for 25% of motor vehicles across the day, however this proportion increases to 32% during the morning peak. The targets of a 50% reduction in motorised peak time freight vehicles by 2030 and a 90% reduction by 2040 reflect the need to work with City businesses and the freight industry to enable significant retiming of deliveries. The longer-term target also recognises that some freight, such as construction materials and some exceptional business critical deliveries will not be able to be retimed.</p> | | | |

Table 3: Additional key performance indicators

| Indicator | Baseline data source | Data collection method |
|---|---------------------------------------|---|
| <i>The City's streets are great places to walk and spend time</i> | | |
| Key target: People rating experience of walking in the City as <i>pleasant</i> | City Streets Survey | City-wide public survey |
| People rating pedestrians on our streets as being <i>prioritised</i> | City Streets Survey | City-wide public survey |
| People rating the space given to pedestrians on our streets as <i>adequate</i> | City Streets Survey | City-wide public survey |
| Key target: Number of kilometres of pedestrian priority streets | Current City of London street network | GIS surveying and Upgraded TCS |
| Pavements with Pedestrian Comfort Level of B+ | City Pedestrian Model output | GIS surveying |
| Number of crossings with 60 second cycle times | Transport for London | Transport for London |
| <i>Street space is used more efficiently and effectively</i> | | |
| Key target: Reduction in motor vehicle traffic | Traffic Composition Survey | Traffic Composition Survey/Upgraded TCS/Congestion charging |

| | | |
|---|------------------------------------|---|
| <i>The Square Mile is accessible to all</i> | | |
| Number of streets not meeting COLSAS minimum standard | --- | Annual review |
| Number of streets not meeting COLSAS desired standard | --- | Annual review |
| <i>People using our streets and public spaces are safe and feel safe</i> | | |
| People rating experience of safety from crime and terrorism as <i>safe</i> | City Streets Survey | City-wide public survey |
| Number of people slightly hurt in a collision | ACCSTATS/STATS19 | --- |
| Key target: Number of people killed and seriously injured in a collision | ACCSTATS/STATS19 | --- |
| <i>More people choose to cycle in the City</i> | | |
| People rating experience of cycling in the City as <i>safe</i> | City Streets Survey | City-wide public survey |
| Key target: People rating experience of cycling in the City as <i>pleasant</i> | City Streets Survey | City-wide public survey |
| Key target: Increase in cycling traffic | Traffic Composition Survey | Traffic Composition Survey/Upgraded TCS/Congestion charging |
| Gender ratio in cycling traffic | --- | City-wide public survey |
| <i>The City's air and streets are cleaner and quieter</i> | | |
| NO _x , PM ₁₀ , PM _{2.5} , levels and limit breaches | LAEI & CoL monitoring sites | --- |
| <u>Public perception of street clutter and cleanliness</u> | <u>City Streets Survey</u> | <u>City-wide public survey</u> |
| <u>Proportion of zero emission capable vehicles entering the City</u> | <u>Future Local ZEZ baselining</u> | <u>Local ZEZ monitoring</u> |

| | | |
|---|------------------------------------|---|
| <i>Delivery and servicing needs are met more efficiently, and impacts are minimised</i> | | |
| Key target: <u>Overall reduction in freight and servicing vehicle traffic</u> Reduction in freight and servicing vehicle traffic | Traffic Composition Survey | Traffic Composition Survey/Upgraded TCS/Congestion charging |
| Key target: <u>Reduction in freight and servicing vehicle traffic during peak periods</u> Proportion of freight traffic operating outside peak hours | Traffic Composition Survey | Traffic Composition Survey/Upgraded TCS/Congestion charging |
| <i>Our street network is resilient to changing circumstances</i> | | |
| Number of days saved from joined-up roadworks | City of London Highways Monitoring | --- |
| <i>Emerging transport technologies benefit the Square Mile</i> | | |
| Number of future transport trials and joint projects initiated | --- | Annual reporting |

Partnerships and Leadership

We recognise that we cannot deliver this Strategy on our own and will work with a range of partners to achieve the vision, aims and outcomes for streets and transport in the Square Mile. This will include working in partnership with:

- City residents and residents' associations
- City businesses and institutions
- The City of London Police
- The Mayor of London and TfL
- London Councils and London's boroughs
- Property developers and the construction industry
- National rail and river service operators
- Transport industry and representative bodies
- Campaign organisations and special interest groups
- Developers of new transport technologies

We recognise that our unique position as a global financial district allows us to be particularly bold in our proposals for changing and improving streets and transport. Nevertheless, the lessons we will learn from delivering this Strategy may be insightful and relevant to London's boroughs and other cities and transport authorities. Likewise, we can learn from and be inspired by the experiences of others.

We will share our experiences and identify transferable best practice by:

- Hosting and contributing to conferences, seminars and other events that highlight and discuss best practice
- Networking and developing knowledge-sharing relationships with London's boroughs to capture lessons learnt from the development and delivery of this strategy
- Establishing and maintaining relationships with other cities, both in the UK and internationally, and participating in local, national and international networks.
- Sharing knowledge with relevant private sector, academic and third sector organisations

Proposal 54: Support change across London that is aligned with this Strategy

The Square Mile does not exist in isolation and change across the Capital is required to maintain City's attractiveness as a place to live, work, learn and visit. We will support projects and initiatives delivered by TfL and London's boroughs that align with the vision, aims and outcomes of this Strategy. We will also support changes to relevant national policy and legislation that will positively impact on transport in and connections to London.

Updating the Transport Strategy

This Strategy will be reviewed and updated every five years to ensure it reflects the priorities of City residents, workers and businesses, changing circumstances and developments in transport technology. Updates will be informed by in depth engagement and analysis of economic, social and transport trends, and will be subject to formal consultation prior to adoption.

References

TO BE UPDATED

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City of London Community Infrastructure Levy**Neighbourhood Fund – Key Themes arising from public consultation****General Comments**

A number of comments were made about the use of CIL generally and overall priorities for spending. Whilst helpful to consider in the context of the next review of the City's CIL, these were not considered relevant to the design and implementation of the Neighbourhood Fund.

Three key issues emerged from other general comments:

1. Transparency of the process

Concern was expressed that the decision-making process was not transparent and there were no opportunities for community groups to be involved in the process. To address this concern, changes are proposed to clarify the annual reporting process (which is set out in Regulations) and that applications and decisions on funding will be published on the City's website. Where decisions are taken by Members, these should be within public agendas of the Resource Allocation Sub-Committee.

2. Definition of a Neighbourhood

There were conflicting views, with some support for a single City-wide definition, but other comments suggesting that individual residential areas should be defined as neighbourhoods for CIL purposes. CIL Regulations limit the use of neighbourhood CIL to the neighbourhood in which development takes place. Identifying separate neighbourhoods across the City would limit both the scale of funds available to individual communities and reduce flexibility to use the Fund to deliver improvements which benefit the wider City community. No change is proposed to the definition of the City as a single neighbourhood.

3. Use of the Fund to meet maintenance costs

There was concern that proposed Fund was limited to capital expenditure only. Although national regulations and guidance indicate that CIL should be used principally for the delivery of new infrastructure, the Fund can be used for a wider range of projects identified by the community. Amendments are proposed to clarify the Regulatory requirements, including the use of the Fund for time limited revenue expenditure and reasonable maintenance costs associated with new infrastructure.

Question 1: Do you agree that City CIL Neighbourhood Fund spending should be guided by the spending priorities set out in the City's Regulation 123 List?

There were a number of responses to this question, with responses either supporting the use of the City's Regulation 123 List to guide spending or suggesting that the Regulation 123 List unnecessarily constrained the use of the Neighbourhood Fund. Comments were also received on suggested amendments to the Regulation 123 List, largely to ensure that it reflected community ambitions.

The Regulation 123 List is a statutory requirement and is subject to public consultation, so did reflect wider community views at the time it was adopted (in 2014). However, it is recognised that the List, although setting out broad categories of infrastructure that could be funded through CIL, might not reflect community views or support for the wider range of projects allowed for neighbourhood CIL in Regulations. Amendments are proposed which allow for a wider range of projects to be funded where funding of under £50,000 is sought, but for projects over £50,000 the Regulation 123 List will continue to provide a broad guide.

Q2: Do you have other suggestions for spending priorities for the City CIL Neighbourhood Fund?

A wide range of spending priorities were suggested, many of which would be capable of funding under the existing CIL regime in the City. Others were more relevant to Departmental responsibilities and not capable of funding through CIL. Respondents highlighted the need for the Fund to be flexible to respond to community needs. To respond to the suggested priorities, amendments are proposed to the Fund to clarify how it can be used, with reference to national regulations and community-led projects. Some of the suggested priorities could be reflected in future amendments to the City's CIL Regulation 123 List. The priorities suggested by respondents included:

- Crime prevention
- Dealing with homelessness
- Street cleansing
- Public transport services
- Community facilities (including halls and meeting places)
- Open spaces
- Heritage assets
- Air quality
- Public realm improvements, including improved biodiversity
- Education facilities
- Improvements to retail centres and streets
- Revenue funding for staff to allow facilities to be open for longer

Q3: Can you suggest any specific projects that you consider should be funded through the City CIL Neighbourhood Fund?

A number of specific projects were put forward by respondents, alongside the broader priorities identified under Question 2. It is expected that some of the projects suggested will come forward as applications for funding once the City's Neighbourhood Fund is operational. It is not proposed to identify individual projects as part of the guidance for the Neighbourhood Fund, but the projects suggested are an indication of current community priorities, which can assist consideration of funding bids to the Neighbourhood Fund, as well as informing other Corporation strategies and use of mainstream CIL and s106 monies.

Specific projects identified by respondents as potential recipients of CIL Neighbourhood Funding were:

- Community Centre for the Barbican and wider residential community in the NW of the City
- Ensure free access to facilities that provide community benefit
- Improve physical access to halls and venues and fund staff to keep them open
- Enhance open spaces to deal with high level of demand and ensure spaces are open 24/7
- Open new public spaces and places where none currently exist
- Open educational facilities to the wider community
- Create additional green space within the City
- Provision of childrens' play space
- Improved seating in Church Entry churchyard
- Improvements to St Peter's Westcheap churchyard garden
- Delivery of Area Strategy for St Paul's, Cheapside & Guildhall and Fleet Street
- Connecting St Paul's to Citigen CHP network
- Further pedestrianisation around St Paul's as part of the World Square project
- Public realm improvements around Liverpool Street Station
- Healthy Streets and other TfL projects
- Improvements to Fortune Street Park
- Improvements to the City's river wall

Q4: Do you think that there should be an upper ceiling on bids for the CIL Neighbourhood Fund, or a minimum level? If so, what should these levels be?

There was some support for a minimum level for project applications, with suggestions separately of £10,000 and of 2.5% of available funds. There was also support for no minimum level as it was felt that this could discourage applications. In responding, it is proposed that there should be a minimum application threshold of £1,000 to avoid very small-scale applications being submitted where the administrative cost of processing the application would be greater than the funds being sought.

There was wider support for a maximum level for applications to avoid a small number of projects utilising the bulk of the Fund. A number of suggested levels were put forward, including £100,000, and 25% of available funds. To provide scope for larger projects to come forward, whilst mitigating against a small number of schemes using up most of the funds, an upper limit of 15% of the available Neighbourhood Fund is proposed.

Q5: Do you agree with the list of groups and organisations that would be eligible to bid for CIL Neighbourhood Funds? Are there other organisations that should be eligible?

There was general support for the list of eligible organisations, but a divergence of opinion over the potential for the business community and developers to be eligible for funding. Resident and community organisations considered that businesses and developers should be excluded, whereas the business community considered that they should be eligible. There were also requests for GLA/TfL and for individuals to be eligible.

The criteria as set out includes constituted business organisations as a key part of the City's community. Inclusion of local business is in line with the approach in the City's Corporate Plan. Developers are excluded from the list of eligible organisations as any mitigation or improvements needed as a result of their proposed developments should continue to be funded through other s106, s278 and CIL general funding. Similarly, TfL receives funding from development in the City to mitigate the transport impacts of development and benefits from wider public realm and transportation improvements funded by s106, s278 and CIL. Neither group is proposed to be included in the list of eligible organisations.

With regard to individuals, the requirement for bids to be submitted through constituted organisations ensures that funds will be used appropriately. Amendments have been proposed to clarify that individuals cannot bid, unless it is through and with the support of a constituted organisation.

Q6: Do you agree with the proposed assessment criteria for the CIL neighbourhood Fund?

There were a number of comments made about proposed criteria. Key suggestions that were raised include:

- Need for transparency in terms of the bidding process and how decisions are made
- Suggestions that independent community representatives should sit on decision making boards
- Delegated authority for lower value applications
- Applications should not need to have ward member support
- Requirement for match funding should allow non-financial contributions
- Bids should be able to be submitted more than twice a year
- Assistance in making applications should be provided
- Time limits on decision making

A number of changes are proposed to address these issues. Questions of transparency have been addressed by setting out clearer reporting structures. CIL decision making processes have been amended to include officer delegated decisions on applications under £25,000, Chairman and Deputy Chairman consultation for applications between £25,000 and £50,000 and committee approval, through the public agenda, for applications in excess of £50,000. The delegated

decision thresholds are in line with those adopted by the City Bridge Trust. Although this process does not allow for independent representation on decision making bodies, there is a requirement for public reporting and public decision making for larger applications which will ensure that the Fund is publicly accountable. Introducing an element of delegated authority allows for a quicker turnaround of smaller scale applications, with larger applications to be determined on a quarterly basis. It is expected that delegated decisions can be made within 12 weeks of receipt of a valid application for projects under £25,000 and within 16 weeks for those between £25,000 and £50,000. Committee decisions will take longer. The application process will be managed by the City Corporation's Central Grants Unit and clarification has been provided on the role of the Unit and the assistance available to help complete application forms. The requirement for ward member support has been deleted.

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City of London

Community Infrastructure Levy

Neighbourhood Fund



City of London Community Infrastructure Levy

Neighbourhood Fund

Introduction and legislative background

1. The Community Infrastructure Levy is a charge levied on new development, introduced by the Planning Act 2008. It is intended to help local authorities deliver the infrastructure needed to support development. The power to set a charge came into effect from April 2010, through the Community Infrastructure Levy Regulations 2010, which have subsequently been amended.
2. The City of London Corporation implemented a Community Infrastructure Levy (CIL) for the City of London from 1 July 2014.
3. Further information on the City CIL is available on the City Corporation's website at: <https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-policy/Pages/Community-Infrastructure-Levy.aspx>

CIL Neighbourhood Fund Requirements

4. Community Infrastructure Levy Regulations require that 15% of CIL receipts should be reserved to enable the delivery of neighbourhood priorities. These receipts should be passed directly to existing parish and town councils where development has taken place. Where a neighbourhood plan or neighbourhood development order has been made 25% of CIL receipts from development in the plan area is reserved for the delivery of neighbourhood priorities.
5. Where there is no existing parish, town or community council, neighbourhood plan or development order, then the local authority will retain neighbourhood CIL funds, but should engage with communities where development has taken place and agree with them how best to spend the neighbourhood CIL.
6. Within the City of London, there are no existing parish, town or community councils and no adopted neighbourhood plans or neighbourhood development orders. The City Corporation therefore retains the CIL Neighbourhood Fund and should seek community views on how this Fund should be used. In exercising this role, the City Corporation has considered whether specific communities or

neighbourhoods should be identified. However, given that the City is little over one square mile in area, the City Corporation considers that it should be regarded as a single neighbourhood for the purposes of collection and spending of CIL Neighbourhood Funds.

What can CIL Neighbourhood Funds be used for?

7. CIL Regulation 59(F) requires that the Neighbourhood Fund be used to support the development of the neighbourhood. The scope of projects that can be funded by the Neighbourhood Fund is wider than that for general CIL funds and comprises:
 - a. The provision, improvement, replacement, operation or maintenance of infrastructure; or
 - b. Anything else that is concerned with addressing the demands that development places on an area.
8. This definition is deliberately wide and allows the City Corporation to work collaboratively with local communities to determine priorities and how the Fund should be used.

Scale of the City CIL Neighbourhood Fund

9. The City of London CIL was implemented from 1 July 2014.
10. At March 2019, the total amount of CIL monies received and allocated to the CIL Neighbourhood Fund was £4.5 million.

Community Priorities

11. The City Corporation has adopted a Regulation 123 List which identifies the types of infrastructure that it will consider funding using the Community Infrastructure Levy. This Regulation 123 List is kept under review and any proposals for change will be subject to public consultation. The current Regulation 123 List is available on the City Corporation's website at:
<https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-policy/Pages/Community-Infrastructure-Levy.aspx> . The Regulation 123 List is used principally to guide the use of CIL monies outside of the Neighbourhood Fund.
12. In considering how to use the CIL Neighbourhood Fund, Planning Practice Guidance states that where there is no parish, town or community

council, charging authorities should engage with communities where development has taken place on their priorities for funding.

13. The City Corporation consulted on priorities for the use of the City's CIL Neighbourhood Fund during December 2018 and January 2019. This consultation revealed support for the Fund to be used primarily to deliver infrastructure which meets local community identified needs.
14. The City's Neighbourhood Fund has been established to be applied to funding applications from local communities and community groups and to deliver improvements in infrastructure which have the potential to deliver benefit to City residents, workers and visitors. The Fund could be used for:
 - Smaller scale projects, deliverable for under £50,000, in response to locally identified needs.
 - Larger projects of over £50,000 and normally less than 15% of the total available Neighbourhood Fund.

Community Definition

15. The City of London has a resident population of approximately 8,000 and a daily working population of over 500,000 occupying nearly 9 million square metres of office floorspace. The City Corporation's Statement of Community Involvement already recognises that it is not appropriate to regard the 'local community' as just the resident community. For the purposes of the CIL Neighbourhood Fund, 'community' is defined as local residents, City workers and the owners and occupiers of City buildings.

Governance Process

16. The City CIL Neighbourhood Fund will be allocated following consideration of valid applications (i.e. those that meet the adopted assessment criteria for the Neighbourhood Fund) from communities within the City of London or close to the City of London where projects support the development of the City. The determination of these applications will rest with the City Corporation. The City Corporation will publish details of funding applications and its determination of those applications on the City Corporation's website.
17. The City Corporation will prepare an annual report for the CIL Neighbourhood Fund as a separate item within the wider annual CIL

and s106 monitoring report. The Neighbourhood Fund monitoring will include details of:

- Total CIL Neighbourhood Fund receipts for the reporting year;
- Total CIL Neighbourhood Fund expenditure for the reporting year;
- Details of CIL Neighbourhood Fund expenditure for the reporting year, including the amount spent on each individual project;
- Total CIL Neighbourhood Fund monies remaining.

18. City Communities will be consulted on an annual basis on community priorities for the City CIL Neighbourhood Fund. A full review of the Neighbourhood Fund, including priorities and governance, will be undertaken at least every 5 years.

Neighbourhood Fund Application Process

19. The application process will be managed by the City Corporation's Central Grants Unit. Information about the Neighbourhood Fund and how to apply will be posted on the City Corporation's website at: <https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-policy/Pages/Community-Infrastructure-Levy.aspx>
20. Fund applications can be made at any time and should be submitted via an online application form which will be posted on the City Corporation's website.

Organisations eligible to bid for funding

21. Neighbourhood Fund applications will be accepted from the following types of organisation:
- Constituted voluntary organisations and resident associations
 - Constituted business organisations and associations
 - Registered charities
 - Registered community interest companies
 - Charitable companies (incorporated as not for profit)
 - Registered charitable incorporated organisations
 - Exempt or excepted charities

- Registered charitable industrial and provident society or charitable cooperative.
22. Applications should be from City-based organisations or should demonstrate City-based support. Applications cannot be accepted from individuals. Individuals who wish to apply for funding should do so through a City-based constituted organisation or group falling into the above definition. Applications will not be accepted from political parties or organisations involved in political lobbying.
23. Applications from City Corporation service departments will be accepted where they:
- Have the support of a City-based community group, or
 - Can demonstrate that delivery will meet community priorities, either through consultation with communities, or through an adopted City Corporation strategy which can demonstrate community support.
24. Applications for infrastructure funding to mitigate the direct impacts of development will not be accepted. Such mitigation should be delivered as part of the development process and funded through s106 Planning Obligations.

Assistance with Applications

25. The Central Grants Unit can provide assistance to applicants with the completion of application forms. Contact details are available on the City Corporation's website. The Central Grants Unit cannot provide assistance with project management or delivery of schemes funded through the Neighbourhood Fund.

Assessment Criteria

26. Applications should demonstrate that funding will be used to meet the Regulatory requirements for CIL funding set out in Community Infrastructure Levy Regulations, namely to support the development of the area by:
- a. the provision, improvement, replacement, operation or maintenance of infrastructure; or
 - b. anything else that is concerned with addressing the demands that development places on an area.

27. Infrastructure improvements funded through the Neighbourhood Fund should deliver improvements necessary to support development of the City. Normally, such funding will deliver new infrastructure, but funding will also be available to meet reasonable on-going maintenance costs. Applications should, therefore, identify and include an allowance for future maintenance of any infrastructure to be provided.
28. CIL Regulations allow greater flexibility in the use of the Neighbourhood Fund compared with other CIL expenditure. Neighbourhood Funds may therefore be used to fund revenue expenditure. To avoid creating long term commitments on the Neighbourhood Fund, any requests for revenue funding should be clearly justified, showing demonstrable community benefit, and time limited to a maximum of 5 years. The City Corporation will not commit to providing CIL funding beyond the agreed time period and will need to be satisfied that alternative funding is in place if the proposed project is intended to continue beyond 5 years.
29. For larger projects of over £50,000 and up to 15% of the total value of the Neighbourhood Fund at the time of application, applications should also consider whether the project meets the priorities identified in the City Corporation's Regulation 123 List and projects identified in City Corporation strategies that have been subject to public consultation. Funding decisions will not be made solely on the basis of compliance, or otherwise, with the Regulation 123 List.
30. Applications should include evidence of the feasibility, deliverability and sustainability of the project.
31. Where possible, the application should be supported by a delivery plan or business plan, which sets out the timescales for delivery, that any necessary consents have been obtained and the mechanisms in place to ensure that the funds are used appropriately.
32. Projects should be delivered within a 12 month period from the grant of funding unless an alternative timescale has been agreed. If delivery over a longer timescale is anticipated, this should be set out clearly in the application and a justification provided for the extended timescale. The City Corporation will monitor delivery of projects, including taking action to ensure that projects are delivered on time, or seek to recover funds if projects do not proceed within agreed parameters.
33. Applications for funding in excess of £50,000 should demonstrate how the project will deliver value for money, including through the identification of any contributory or match funding. This can include contributions in time or expertise, for example, where a local community

delivers infrastructure improvements themselves, but is not necessary for a successful bid.

34. Applications to fund projects which are already in receipt of other City CIL funding, or s106, s278 funding for site specific mitigation will not normally be accepted.
35. Developers may wish to support an application from a constituted City-based organisation or group, as set out above, where the proposed infrastructure cannot be delivered through other means.

Value of Bids

36. The minimum value for applications for infrastructure funding is £1,000.
37. Individual applications should normally not exceed 15% of the total value of the available CIL Neighbourhood Fund at the time of application. Information on the available funds will be published on the City Corporation's website on a quarterly basis to inform applications.
38. Applications in excess of 15% will only be considered in exceptional circumstances, where there is demonstrable benefit to more than one of the City's communities and where the proposal aligns with other City Corporation ambitions, set out in published strategies.

Awards Process

39. The determination of applications will be made through a combination of officer delegation and Committee approval, depending on the financial value of the application. The adopted thresholds accord with those used by the City Bridge Trust in its consideration of grant applications.
40. Funding applications for under £25,000 will be determined by City Corporation officers under delegated authority. Decisions should normally be made within 12 weeks of the receipt of a valid application.
41. Applications for between £25,000 and £50,000 will be determined by a City Corporation officers under delegated authority and in consultation with the Chairman and Deputy Chairman of the Resource Allocation Sub-Committee. Decisions should normally be made within 16 weeks of the receipt of a valid application.
42. Decisions taken under delegated authority will be reported to the Resource Allocations Sub-Committee.

43. Applications for over £50,000 will be considered by the City Corporation's Resource Allocation Sub-Committee, normally on a quarterly basis. Applications will be considered as items in the public part of the meeting agenda.

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Code of Conduct

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Scope

1. The Code of Conduct (the 'Code') applies to all employees and other workers (including casual workers, agency workers and consultants)¹ and their conduct both within the organisation and when dealing with other organisations as a representative of the City of London Corporation. For ease of reference the term "employees and / or other workers" will be used unless otherwise stated as applying only to employees or specified other workers.
2. Where there are additional requirements in the policy applicable to Chief Officers and senior managers at grades I and J (including any other employees and other workers with the same level of seniority); for ease of reference the term "Senior Management" will be used, unless it is stated as applying only to part of this group.
3. As far as possible, employees must also comply with the Code if they are appointed as a representative of the City Corporation on any organisation, trust or company in addition to the requirements of such bodies.
4. The principles detailed below set common standards for all employees and other workers, but individual Chief Officers may wish to issue further guidance specifically relating to their departmental service requirements, which will supplement but not contradict the principles contained in this Code.
5. The Code does not affect an employee's and other worker's rights and responsibilities under the law. These principles should be taken in conjunction with requirements set down by any employees or other worker's professional bodies obligations.
6. The Code cannot cover every eventuality and if in any doubt or any additional guidance is required, employees and other workers should consult their line manager, who may seek advice as necessary from Corporate HR or their HR contact.

Standards

7. Employees and other workers are expected to give the highest possible standard of service to the public, service users, Members, management and colleagues; and where it is part of their duties, to provide advice to Members, management and colleagues to do so with impartiality and in good faith.
8. This will be achieved in part through the demonstration of effective and appropriate behaviours defined internally, and adherence to the Principles of Public Life i.e. selflessness, objectivity, accountability, openness, leadership, honesty and integrity in which the public, Members, or managers can trust. Employees and other workers are expected to conduct themselves with the reasonably held belief that the City Corporation is not likely to fundamentally undermine the required relationship of trust and confidence between themselves and the organisation.

¹ For relevant parts of the Code that relate to volunteers, see Volunteers Guide.

9. There is an implied duty in employment and casual worker contracts to serve the employer with good faith and fidelity (i.e. the duty: not to disrupt the employer's business, not to compete, not to solicit customers, not to entice employees, not to misuse the employer's property; and the duty: of confidentiality, to account and to disclose wrongdoings); the duty to: obey lawful and reasonable instructions, to be adaptable and to exercise reasonable care and skill. Equivalent provisions will be included in contracts with other workers.
10. Employees and other workers must immediately inform their line manager in writing if, during their City Corporation employment / engagement circumstances arise (during or outside of working hours) that could reasonably be expected to impact on their capability, capacity and/or suitability to carry out the duties and responsibilities of their role.
11. Employees and other workers must not conduct themselves in a way that brings or could bring the City Corporation, Members, service users, partners and colleagues into disrepute or cause reputational damage; so that it is likely to destroy or seriously damage the relationship of trust and confidence between them.
12. All employees and other workers should refer any press or media enquiries directly to the Media Team, without engagement. Any article, publication or interview given on City Corporation policy or activity must be properly authorised by the Director of Communications or Head of Media.
13. To ensure compliance with the Code of Conduct, employees and other workers should periodically familiarise themselves with the latest version and any documents referred to therein. Employees and other workers should also have read and understood the conditions under which they are engaged, including all local policies, which take into account all legislation and any local and national schemes where applicable. This Code and corporate policies are contained within the Employee Handbook.
14. Any substantive contravention of this Code may result in disciplinary proceedings, and those disciplinary proceedings may result in dismissal. For other workers not falling within the scope of disciplinary procedures appropriate action will be taken. In addition, certain cases such as those involving bribery, corruption or fraud may also be referred to the Police and subject to a criminal investigation. Where the offence involves financial irregularities then the City Corporation will aim to recover its assets.
15. Employees and other workers shall not during or at any time after their employment / engagement with the City Corporation ending (except in the proper course of their duties or unless required by law), disclose or otherwise make use of any confidential information relating to the City Corporation's business, strategy, policies or finances, including personal information relating to service users, Members or employees or other workers. (See Disclosure of Information below).
16. Employees and other workers will be expected, through agreed procedures and without fear of recrimination, to bring to the attention of the appropriate level of management potential deficiencies in the provision of service. Employees and other workers must report impropriety or any material breaches of procedure to the appropriate manager. The

Whistleblowing Policy is also available to employees who feel they need to raise an issue outside of the management chain.

17. The Director of Human Resources will be responsible for the interpretation, advice and management of this Code on behalf of the City Corporation.

Conflicts of Interest

18. All City Corporation employees and other workers must remain beyond suspicion and ensure that they are not placed in a position that risks, or appears to risk, conflict between their private interests and their City Corporation duties.
19. The Conflicts of Interests Policy sets out the process to report the type of incidents which may give rise to conflicts of interest including for example: relationships, personal interests, secondary employment or running a business, outside commitments, and the giving or receiving of sponsorship (whether awarded from outside or by the City Corporation), procurement activities, gifts and hospitality. In addition, where employees and other workers self-identify any other type of conflict / potential conflict of interest these should be disclosed as soon as they become aware of them.
20. Senior management are required to make disclosures or confirm a nil return on a wider range of categories than employees and other workers; this is in line with their responsibilities for the activities of the City Corporation, its workforce and for advising Members on the potential implications of political decisions.
21. An employee wishing to undertake additional employment will require permission in advance from their Chief Officer. The City Corporation will not prevent an employee from undertaking additional employment providing it does not conflict with the interests of, or in any way weaken public confidence in the City Corporation and does not in any way affect performance of their duties and responsibilities whilst they are at work; or where their current position could confer advantage to their private interest/personal gain. If there is a conflict the manager can ask an employee to discontinue with conflicting additional work or business interests; noting that the permission given to undertake an additional role does not preclude the City Corporation taking action in response to its impact on their work performance.

Disclosure of Information

22. The law requires that certain types of information must be available to Members, auditors, government departments, service users and the public.
23. Most Committee agendas and most reports and background papers are required by law to be available for public inspection. Detailed guidance is available from the Town Clerk's department. Obstruction of a member of the public who wishes to exercise their lawful rights to access documents may be a criminal offence. If in doubt, refer to the Town Clerk or Comptroller for advice.

24. The public are specifically excluded from certain proceedings of Committees or meetings associated with the business of any Committee. No employee or other worker shall communicate to the public, the confidential content of such proceedings or any document relating to the City Corporation, unless required by law or expressly authorised by the Town Clerk to do so. Equally, no employee or other workers shall disclose confidential information to other employees or other workers who have no reason to know.
25. Employees and other workers have a responsibility to protect and not disclose commercially sensitive information unless required to effectively perform their duties. Guidance should be sought from the appropriate Chief Officer.
26. Employees and other workers have a duty to maintain confidentiality and must not disclose any information obtained in the course of their employment or engagement to any third party for any unauthorised reason.
27. Employees and other workers should not use any information obtained in the course of their employment for personal gain or benefit, nor should they pass it on to others who might use it in such a way.
28. Employees and other workers must not communicate confidential information or documents to others who do not have a legitimate right to know. Furthermore, such information which is stored on computer systems must also only be disclosed in accordance with the requirements of the Data Protection Act. A disclosure which complies with the requirements of the Whistleblowing Policy will be regarded as authorised disclosure.

Political Neutrality

29. Employees and other workers serve the City Corporation as a whole and must not allow their own personal or political opinions to interfere with their work. They must serve all Members and colleagues; and must ensure that the individual rights of all Members and employees are respected. Employees and other workers whether or not politically restricted, must follow every lawfully expressed policy of the City Corporation. Where a City Corporation employee or other worker holds a politically restricted post such restriction is deemed to be incorporated in their contract of employment / engagement. (See Politically Restricted Posts Policy).

Criminal convictions and driving offences

30. Prospective employees and other workers will be asked to disclose convictions on their City Corporation in accordance with the DBS Code of Practice. Employees and other workers must declare actual convictions including driving offences during their employment. The existence of convictions will not preclude the appointment of candidates to the City Corporation unless relevant to the post.

31. During the course of employment or engagement, if required by the City Corporation due to the nature of their role, employees and other workers will be subject to repeat criminal record disclosure checks. (Refer to the Disclosure and Barring Service Policy for detailed guidance).

Relationships

Relatives and close personal relationships

32. Employees and other workers must declare using the Declaration of Interest Form (Officers) any close personal relationships they have with any candidates for appointment to a vacancy (as they become aware of them); a Member; contractor/potential contractor; City Corporation partner organisation; a service user; or as a manager / supervisor with an employee and other worker or vice versa to ensure that potential problems are avoided. Similarly, where a relationship is formed in the workplace and there is potential for conflict to arise, this should be declared. Any such disclosures will be dealt with sensitively.
33. To avoid accusations of impropriety employees and other workers should not be involved in the administration or decision-making in any City Corporation employment or service provision matters for relatives and anyone with whom they have a close personal relationship, including a child. (See Conflicts of Interests, Relationships).

Other employees / workers and managers

34. All employees and other workers have a responsibility to act in a way that ensures dignity and respect for their colleagues. All employees and other workers are expected to adhere to the standards of behaviour as set out in the City Corporation's relevant Policies and Procedures. In particular not to unlawfully discriminate against colleagues, or engage in any form of harassment i.e. sexual, racial.
35. The City Corporation recognises that employees and other workers who work together may have or form close personal relationships. While it does not wish to interfere with these personal relationships, the City Corporation does expect all such employees and other workers to behave in an appropriate and professional manner at work.
36. Employees and other workers with their managers have a mutual responsibility to ensure good working relationships in compliance with the policies and procedures contained in the Employee Handbook. As part of this, employees and other workers should carry out any reasonable and lawful requests that their manager makes and to do so to the best of their ability; and behave courteously, reasonably and fairly in all dealings with their managers. Managers should endeavour to reasonably support employees and other workers in the proper performance of their duties, including assistance, where necessary, in working with others; and behave courteously, reasonably and fairly in all dealings with their teams.

Members

37. Employees and other workers are responsible to the City Corporation as an authority through its Chief Officers and the Town Clerk and Chief Executive as the Head of Paid Service. The role of some employees is to give advice and information to Members and for all employees and other workers to implement the policies determined by the City Corporation.
38. Mutual respect between employees, other workers and Members is essential, and relationships should be conducted on a constructive and professional basis. In this regard, the City Corporation has adopted a Protocol on Member / Officer Relations.
39. Employees and other workers should self-declare any relationship they have with a Member in the interest of transparency and must not lobby Members inappropriately in relation to personal issues affecting either their employment or other matters personal to them. This does not preclude employees who are also residents of the City Corporation, from raising matters in relation to local matters, appropriately in their own time.

Public and Service Users

40. Employees and other workers should always remember their responsibilities to the public and service users they serve and ensure courteous, efficient and impartial service delivery to all groups and individuals as defined by the policy statements of the City Corporation. All stakeholders (e.g. residents, service users and city workers) have a right to be treated with fairness and equality.
41. Where an employee or other worker is either a relative or in a close personal relationship with a member of the public or service user, such relationships must be declared promptly to the line manager or senior manager to determine the appropriate action. (See Relatives and Close Personal Relationships above and Conflicts of Interest Policy).

The Press and the Media

42. Employees and other workers must not deal directly with the press or the media unless they have been expressly authorised by the Director of Communications or the Head of Media. All media enquiries received by officers must be immediately referred to the Media Team, without engaging with the journalist. Any article, publication, or interview given on aspects of City Corporation policy or activity must be properly authorised by the Director of Communications or the Head of Media.

Other Employment Matters

43. Employees and other workers occupying posts which require registration with a statutory body (e.g. the Health and Care Professions Council (HCPC) Register of Social Workers), or

any other mandatory membership, must ensure they maintain the necessary criteria to retain the relevant level of registration and provide evidence to their line manager accordingly. In addition, an employee or other worker must adhere with any duty to report issues with a bearing on their registration or membership and inform their line manager accordingly.

44. Employees and other workers shall dress in line with the appropriate standards set by individual departments. Any special clothing, including personal protective clothing and equipment, or uniform provided by the City Corporation must be worn where required.
45. Employees and other workers should ensure that they are display their corporate identification pass at all times with their photo clearly visible whilst on City Corporation premises and remove it on departure. Passes must be made available for inspection by security personnel and comply with any security requests or instructions whilst on City Corporation premises. (Refer to Security Policy, People).
46. All employees, other workers and volunteers are expected to notify their line manager if they are going to be absent from work; agency workers must inform their agency who will then notify the City Corporation. (See, Sickness Absence Policy).
47. All employees and other workers must be accurate in timekeeping at work, undertaking time recording where this is a requirement.

Equality and Inclusion

48. All City Corporation employees and other workers must ensure that the City Corporation's policies relating to equality and inclusion are complied with in addition to the requirements of the law. Such policies would include the: Equal Opportunity Policy, Lone Working Policy (incorporating the Preventing Violence Policy) and Grievance Procedure, Recruitment and Selection Policy and Managing People Policy. All members of the local community, customers and colleagues have a right to be treated with fairness and equity.

Data Protection, Information Technology and Security

49. The City Corporation encourages the use of appropriate technology to achieve efficient and effective services. Employees and other workers must ensure that they use technology professionally, appropriately and responsibly and follow the City Corporation's procedures in relation to the use of technology and access to / storage of information in relation to the General Data Protection Regulation and the Data Protection Act.
50. This also applies to external facing technology including social media which due to its nature means any comments posted either directly about or that could be associated with the City Corporation should be regarded as public, whether made in a work or private capacity. Comments should not damage the reputation of the organisation, Members, employees, other workers or service users, or contravene the Equal Opportunity Policy. (See, Social Media Policy).

51. The City Corporation processes personal data collected in respect of the processes cited within the Code of Conduct in accordance with its Data Protection Policy (Employees) and Employee Privacy Notice. Data collected is held securely, accessed by and disclosed to individuals only for the purposes of conducting the relevant process (i.e. to ratify declarations, to investigate reported breaches) and related processes (where relevant), and as required by law.
52. Inappropriate access or disclosure of employee data constitutes a data breach and should be reported in accordance with the corporate Data Protection Policy immediately. It may also constitute a disciplinary offence, which will be dealt with under the Disciplinary Procedure.
53. All employees and other workers must undertake such data protection training as required by the Corporation's Data Protection Officer.

Intellectual Property

54. Intellectual property is a generic term that includes inventions and patents, creative writings and drawings, photographs and images. If these are created by an employee or other worker during the course of employment or engagement, then as a general rule the property belongs to the City Corporation. Specific arrangements may exist locally.
55. Any matter or thing capable of being patented under the Patents Act 1977 whether made, developed or discovered by an employee, either alone or with others, whilst in the performance of their duties should be disclosed to the City Corporation through the appropriate Chief Officer, and subject to the provisions of the Patents Act, it will belong to and be the absolute property of the City Corporation.

Bribery, Corruption and Fraud

56. Employees and other workers must be aware that it is a serious criminal offence (and an act of gross misconduct) for them to corruptly receive or give any gift, loan, fee, reward or advantage for doing or not doing anything or showing favour or disfavour to any person in their official capacity. If an allegation is made it is for the employee or other worker to demonstrate that any such rewards have not been corruptly obtained. Such acts may compromise the impartiality of the City Corporation and cause reputational, legal and financial damage.
57. It is important to avoid the perception as well as the fact of bribery or corruption. Employees and other workers must comply with all applicable bribery and corruption laws.
58. Employees and other workers will not offer, promise, give, request, or agree to receive, or accept any bribes:
 - in the course of their employment;
 - when conducting City Corporation business; or
 - when representing the City Corporation in any capacity.

59. A bribe means a financial payment or other forms of reward or advantage, whether direct or indirect, that is intended to induce or influence, or has the effect of inducing or influencing, an individual, company or public body (whether in the UK or abroad) to perform their functions, including business and public duties, improperly. Improper performance includes:
- not acting in good faith;
 - not acting impartially; and
 - not acting in accordance with a position of trust.
60. Employees and other workers must not act fraudulently, whether in relation to finances, resources or other assets. For instance employees and other workers should not directly or indirectly seek to claim entitlement to a government benefit or service (e.g. heating and housing benefits, carer and disability benefits, Blue Badge etc.) from the City Corporation, government department or other local authority by misrepresenting their true circumstances or falsification of records to secure a form of benefit whether financial or otherwise for themselves or others.

Use of Financial Resources and Property

61. Employees and other workers must ensure that they use all City Corporation funds entrusted to them in a responsible and lawful manner. They should strive to ensure value for money and to avoid legal challenge to the City Corporation.
62. All employees and other workers should be aware of and adhere to the City Corporation's Financial Regulations, Procurement Code and the Acceptable Use of IT Policy.
63. Employees and other workers must not steal, misuse, wilfully damage or take off site without permission, anything that belongs to the City Corporation.
64. Employees and other workers must not use City Corporation resources to recognise or reward colleagues without the approval of their Chief Officer.

Health and Safety and Wellbeing

65. The City Corporation as a responsible employer is committed to supporting and encouraging employees to be healthy and resilient individuals. The City Corporation has chosen to adopt a holistic and proactive approach to workplace health, safety and wellbeing, adopting preventative measures; to safeguard the physical health and mental wellbeing of employees and other workers.
66. Employees and other workers are expected to ensure that a safe working environment is maintained and prevent the risk of injury to themselves and others in accordance with the City Corporation's Health and Safety Statement, occupational health and safety policies and guidance including any local arrangements. Employees and other workers are also expected to be proactive in reporting significant hazards or danger. They should inform their line manager in the first instance or other appropriate senior person.

67. The City Corporation has an Alcohol and Drugs Misuse Policy (see Employee Handbook) which is aimed at ensuring that employees and other workers are fit to work to perform their duties.

Safeguarding

68. All employees and other workers have a responsibility to safeguard the welfare of children, young people and adults at risk, whatever the role of the individual, or the City Corporation service or department they work in.
69. Any allegations or concerns that children and adults may be suffering significant harm should be raised promptly with your line manager and the City Corporation's Children and Families Service or Adult Social Care Service (see Safeguarding Policy).

Professional Indemnity

70. If an employee, former employee or volunteer (for the purpose of this paragraph, the term 'employee's refers to the narrow definition of employed staff), is subject to a claim for professional negligence from third parties, in relation to work they carried out as part of their duties for the City Corporation (including voluntary work approved by a Chief Officer carried out in connection with the City Corporation); they will be indemnified in relation to claims for damages and reasonable legal costs (subject as follows) for breaches of professional duty arising from the bona fide execution of their duties in accordance with current policies of the City Corporation. The City Corporation reserves the right to decide whether to defend (or contribute to the costs of defending) a legal action brought against an employee.

Raising Concerns and Whistleblowing

71. The City Corporation is committed to the highest possible standards of probity. In line with that commitment we expect employees, and others that we deal with, who have serious concerns about the conduct of any aspect of the City Corporation's work to come forward and voice those concerns to us. It is recognised that most cases will have to proceed on a confidential basis.
72. Where employees or other workers have concerns around misconduct or the lawfulness of any action or proposed action, they should raise their concerns to the appropriate manager or Chief Officer without delay.
73. The Whistleblowing Policy is also available to employees and other workers who feel they need to raise an issue outside of the management chain. Any suspicion of wrongdoing will be treated seriously and will be reviewed and analysed in accordance with the Whistleblowing or Complaints Policy, considering the Public Interest Disclosure Act, the Human Rights Act and if appropriate the City Corporation's Anti-Fraud and Corruption Strategy.

74. City Corporation employees, agency workers, and contractors should be aware that they have statutory protection against victimisation and dismissal under the Public Interest Disclosure Act 1999 (PIDA)², if they speak out genuinely against corruption and malpractice at work (see, Regulation of Investigatory Powers Policy and Procedure). Further information on how to make a disclosure is contained in the Whistleblowing Policy.

Links / Other resources

- Acceptable Use of IT Policy
- Alcohol and Drugs Misuse Policy
- Anti-Fraud and Corruption Strategy
- Conflicts of Interest Policy
- Data Protection Policy (includes the Employee Privacy Notice)
- Disciplinary Procedure
- Disclosure and Barring Service Policy
- Equal Opportunity Policy
- Financial Regulations
- Gifts and Hospitality Declaration Form
- Grievance Procedure
- Health and Safety Statement
- Physical and Verbal Abuse Policy
- Politically Restricted Posts Policy
- Procurement Code
- Protocol on Member/Officer Relations
- Recruitment and Selection Policy
- Regulation of Investigatory Powers Policy
- Safeguarding Policy
- Security Policy - People
- Sickness Absence Policy
- Social Media Policy
- Whistleblowing Policy

² PIDA was further strengthened by the Enterprise and Regulatory Reform Act 2013.

Conflicts of Interest Policy

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Scope

1. The Conflicts of Interest Policy applies to all employees and other workers i.e. casual workers, agency workers, consultants, prospective employees under conditional offer of employment, service providers and third-party advisors. For ease of reference the term “employees and / or other workers” will be used in the policy unless otherwise stated as applying only to employees or specified other workers.
2. Where there are additional requirements in the policy applicable to Chief Officers and senior managers at grades I and J (including any other employees and other workers with the same level of seniority); for ease of reference the term “Senior Management” will be used, unless it is stated as applying only to part of this group.
3. As far as possible, employees and other workers must also comply with the policy if they are appointed as a representative of the City of London Corporation on any organisation, trust or company in addition to the requirements of such bodies.
4. The principles detailed below set common standards for all employees and other workers, but individual Chief Officers may wish to issue further guidance specifically relating to their departmental service requirements, which will supplement but not contradict the principles contained in this policy.
5. This policy does not affect employees and other workers rights and responsibilities under the law. These principles should be taken in conjunction with requirements set down by any employee and other workers professional bodies obligations and the City Corporation’s Code of Conduct.
6. Whilst the policy tries to cover as many aspects of business conduct as possible, it is recognised that issues will arise which will not fit precisely into the categories described. Where this is the case employees should consult their line manager, who may seek advice as necessary from Corporate HR or their HR contact.

Standards

7. Employees and other workers are expected to give the highest possible standard of service to the public, service users, Members, management and colleagues; and where it is part of their duties to provide advice to Members and colleagues, to do so with impartiality and in good faith.
8. This will be achieved in part through the demonstration of effective and appropriate behaviours defined internally, and adherence to the Principles of Public Life i.e. selflessness, objectivity, accountability, openness, leadership, honesty and integrity in which the public, Members, or managers can trust. Employees and other workers are expected to conduct themselves with the reasonable held belief that the City Corporation is not likely to fundamentally undermine the required relationship of trust and confidence between themselves and the organisation.

9. There is an implied duty in employment and casual worker contracts to serve the employer with good faith and fidelity (i.e. the duty: not to disrupt the employer's business, not to compete, not to solicit customers, not to entice employees, not to misuse the employer's property; and the duty: of confidentiality and to account); the duty to: obey lawful and reasonable instructions, to be adaptable and to exercise reasonable care and skill. Equivalent provisions will be included in contracts with other workers.
10. Employees and other workers must immediately inform their line manager in writing if, during their City Corporation employment / engagement circumstances arise (during or outside of working hours) that could reasonably be expected to impact on their capability, capacity and / or suitability to carry out the duties and responsibilities of their role.
11. Employees and other workers must not conduct themselves in a way that brings or could bring the City Corporation, Members, service users, partners and colleagues into disrepute or cause reputational damage, so that it is likely to destroy or seriously damage the relationship of trust and confidence between them.
12. All employees and other workers should refer any enquiries from journalists directly to the Media Team, without engagement. Any article, publication or interview given on City Corporation policy or activity must be properly authorised by the Director of Communications or Head of Media.
13. In cases of doubt about what constitutes a conflict of interest, employees and other workers should always try to establish in advance the validity of a particular action by consulting their line manager. However, if an employee or other worker initially acted in good faith, then later considered the action to be contrary to the spirit of this policy, they should inform their line manager at the earliest opportunity who may seek advice as necessary from Corporate HR or their HR contact.
14. To ensure compliance with the Conflicts of Interest Policy, employees and other workers should periodically familiarise themselves with the latest version and any documents referred to therein. Any substantive contravention of this policy may result in disciplinary proceedings, and those disciplinary proceedings may result in dismissal. For other workers not falling within the scope of disciplinary procedures appropriate action will be taken. In addition, certain cases such as those involving bribery, corruption or fraud may also be referred to the police and subject to a criminal investigation. Where the offence involves financial irregularities then the City Corporation will aim to recover its assets.
15. Employees and other workers shall not during or at any time after their employment / engagement with the City Corporation ending (except in the proper course of their duties or unless required by law), disclose or otherwise make use of any confidential

information¹ relating to the City Corporation's business, strategy, policies or finances, including personal information relating to service users, Members or employees or other workers. (See Code of Conduct, Disclosure of Information).

16. Employees and other workers will be expected, through agreed procedures and without fear of recrimination, to bring to the attention of the appropriate level of management potential deficiencies in the provision of service. Employees and other workers must report impropriety or any material breaches of procedure to the appropriate manager. The Whistleblowing Policy is also available to employees who feel they need to raise an issue outside of the management chain. (See below, Raising Concerns and Whistleblowing).
17. The Director of Human Resources will be responsible for the interpretation, advice and management of this procedure on behalf of the City Corporation.

Conflicts of Interest

18. A 'conflict of interest' is a set of circumstances by which a reasonable person would consider that an individual's ability to apply judgement or act could be impaired or influenced by another interest they hold. Conflicts can be financial or non-financial and may be:
 - **Insignificant:** trivial and does not create a real risk of conflict of interest;
 - **Perceived or potential:** reasonably perceived or where there is the real possibility of a future material conflict, between one or more interests; or
 - **Actual:** if there is a material conflict between one or more interests.
19. For details of the circumstances to make a disclosure, when and who should make a disclosure; see below at: Circumstances to complete a Declaration of Interest Form; and in addition, for Chief Officers: Circumstances to complete a Register of Interest Form.
20. Detailed below are the most typical areas in which conflicts of interest arise but these are not exhaustive. An employee or other worker should self-declare any other actual or potential conflict, as where there is a risk of improper conduct caution is always advisable.

Relationships

21. Candidates when making an employment application must disclose on the application form whether they are related to a Member and detail any other connection to the City Corporation. Deliberate omission to make such a disclosure will disqualify the

¹ Information obtained in the course of employment / engagement should not be used for personal gain or benefit, nor should it be passed on to others who might use it in such a way.

candidate and if the omission is discovered after appointment, they may be liable to dismissal.

22. Employees and other workers involved in making appointments must ensure that these are made on the basis of merit and must declare to their line manager or senior manager any relationship between the candidate and themselves to avoid any possible accusation of bias. It is unlawful for an employee or other worker to make an appointment based on anything other than the ability of the candidate to undertake the duties of the post. These principles and the City Corporation's procedures are detailed in the Recruitment and Selection Policy.
23. The City Corporation reserves the right, where such a relationship exists between employees or other workers, to ensure that the persons concerned are not employed in a situation where one would be responsible for managing the other. Alternative mitigating measures may be introduced to ensure that appropriate reporting lines are in place.
24. Any close personal relationships employees and other workers have with a Member, a contractor / potential contractor; a worker in a City Corporation partner organisation, a service user, or as a manager / supervisor with an employee and other worker or vice versa should be declared to ensure that potential problems including any perceptions of unfairness are avoided. Any such disclosures will be dealt with sensitively.
25. Employees and other workers should not be involved in decisions relating to employment matters such as discipline, promotion or pay adjustments for any other employee or other worker who is a relative, partner or someone they have a close personal relationship with. Nor, any situation which could potentially involve a conflict of interest in work roles, for example the countersigning of invoices against purchase orders raised by someone with whom they have a close personal relationship.
26. On no account must employees and other workers be directly involved in the administration or decision-making on a matter or application on behalf of the City Corporation involving their close relative (including a child), or any other person with whom they have a close personal relationship. Should such a situation arise, employees and other workers must inform their line manager or senior manager to determine appropriate action.
27. Neither must employees and other workers abuse their position of trust to access records relating to themselves, their close relatives or those with whom they have a close personal relationship (refer to the Code of Conduct section: Data Protection, Information Technology and Security).

Personal Interests

28. Employees and other workers must declare to their Chief Officer, any financial or non-financial interests that could bring about conflict with the City Corporation's interests

using the Declaration of Interest Form (Officers) and submit it to the appropriate Chief Officer. Employees and other workers should be mindful not to place themselves in a situation which could compromise their continuing professional duty to the interests of the City Corporation.

29. Employees and other workers are required to serve the City Corporation and must not allow their personal political opinions to interfere with their work. (Refer to the Code of Conduct section: Political Neutrality and the Politically Restricted Posts Policy).
30. Employees and other workers should self-declare any relationship they have with a Member in the interest of transparency and must not lobby Members inappropriately in relation to personal issues affecting either their employment or other matters personal to them. (Refer to, Protocol on Member/Officer Relations). This does not preclude employees who are also residents of the City Corporation, from raising matters in relation to local matters, appropriately in their own time.
31. Employees and other workers must declare membership of any organisation not open to the public (with formal membership and commitment of allegiance); which has secrecy about rules and / or membership, and / or conduct. For example, the Freemasons, a Society / Trust or an organisation with regular gatherings or meetings not open to members of the public who are not a member of the organisation.
32. In the main employees and other workers do not need to disclose membership of a Livery company, City Company without Livery, Guild or Company seeking Livery Membership, apart from senior management. (See below, Circumstances to Complete a Declaration of Interest Form).

Secondary employment, running a business, or other outside commitments

33. Employees and other workers off-duty hours are their personal concern, but they should not subordinate their duty to private interests so as to put themselves in a position where duty and private interests' conflict.
34. An employee or other worker who wishes to take up secondary employment, running a business or work (paid or unpaid), whether this is external or internal to the City Corporation (e.g. acting as an independent contractor or an independent consultant) requires Chief Officer agreement in advance.
35. An employee or other worker who wishes to take on outside commitments (e.g. becoming a school Governor in their local area, or a board member or trustee of a charity linked to the City Corporation, acting as a volunteer) requires Chief Officer's approval in advance. Refer to: Examples of Conflicts of Interest (appended) and for public duties the Special Leave and Time Off Policy.

36. When making such declarations employees and other workers must indicate the approximate time commitment involved or the relevant timescale; and must also notify of any subsequent change of circumstances.
37. The City Corporation will not automatically preclude the undertaking of additional employment, but any such employment must not, in the view of the City Corporation:
 - conflict with or react detrimentally to the City Corporation's interests, (for example, if their official duties overlap in some way with their proposed work);
 - in any way weaken public confidence in the conduct of the City Corporation's business;
 - interfere with the employee's or other worker's ability to undertake their role, e.g. cause a breach of the Working Time Directive or place demands on the individual such that they cannot perform at their full capacity for the City Corporation;
 - make use of information or material to which the employee or other worker has access by virtue of their position.
38. No outside work of any sort should be undertaken in the office or in Corporation working hours, and use of City Corporation facilities, equipment or materials. The use of telephones, photocopiers or IS systems for outside work is forbidden.
39. If there is a conflict the manager can ask for an employee or other worker to discontinue with conflicting business interests. In the event of a detrimental impact on the employee or other worker's City Corporation duties, the prior approval of a declaration does not preclude any action being taken in response to its impact on their work performance.
40. Any work undertaken on behalf of the City Corporation or which contributes to the work of the City Corporation or is requested / delivered on the basis of being an employee or other worker at the City Corporation and which attracts a fee or is paid e.g. a presentation or lecture, will need Chief Officer approval and the fees will need to be paid to the City Corporation. In the case of a Chief Officer, approval from the Town Clerk is required.
41. In circumstances where the City Corporation grants paid time off work to undertake public duties for up to 12 days maximum in any year, this requires Chief Officer approval (see the Special Leave and Time Off Policy). Where a fee is gained or allowance paid from these duties and City Corporation paid time off has been given, the fee will need to be paid to the City Corporation (e.g. a tribunal panel member day rate fee), or financial loss shown (e.g. in excess of a local councillor's annual allowance) in order to receive paid time off for Special Leave.
42. In addition, senior management are required to make disclosures or confirm a nil return on a range of specified categories, relating to their outside commitments. See below, Circumstances to complete a Declaration of Interest Form.

Sponsorship – Giving and Receiving

43. Where an outside organisation wishes to sponsor or is seeking to sponsor a City Corporation activity, whether by invitation, tender, negotiation or voluntarily, the basic conventions concerning acceptance of gifts or hospitality apply. Particular care must be taken when dealing with contractors or potential contractors.
44. Where the City Corporation wishes to sponsor an event or service: neither an employee or other worker, nor any partner, spouse, relative or other person in a close relationship; must benefit from such sponsorship in a direct way without there being full disclosure to a Chief Officer. Any such disclosure should be made using the Declaration of Interest Form (Officers). Similarly, where the City Corporation through sponsorship, grant aid, financial or other means gives support in the community; employees and other workers should ensure that impartial advice is given and that there is no conflict of interest involved.

Procurement Activities and Contractors / Potential Contractors

45. At the start of each procurement exercise where a conflict arises the relevant Contract Lead/City Procurement has the responsibility to co-ordinate the timely completion of the Contract and Tendering Declaration Form (Officers) by employees and other workers involved in procurement activities i.e. benchmarking activities, specification writing, supplier identification, sourcing, evaluation and selection, decision making and governance forums. (See below, Circumstances to complete a Declaration of Interest Form).
46. Employees and other workers who engage or supervise contractors or have any other official relationship with contractors and have previously had or currently have a direct or indirect pecuniary interest with a contractor who is either engaged or proposed to be engaged by the City Corporation; they should declare that interest using the Contract and Tendering Declaration Form (Officers) at the earliest opportunity and send this to the Commercial Director for City Procurement with a copy to their line manager and Chief Officer.
47. Orders and contracts must be awarded in accordance with the principles of best value as contained in the City Corporation's Procurement Code. All procurement undertaken by the City Corporation must accord equal treatment and consideration to all organisations competing for its contracts. This involves undertaking the procurement in accordance with the rules, procedures and guidance we publish and applying them equally to all participants without favour.
48. Employees and other workers must ensure that no special favour is shown to businesses operated or controlled by, for example current or recent former employees or other workers, their partners, close relatives or associates in awarding contracts whether to businesses run by them or employing them in a senior or relevant managerial capacity.

49. Employees and other workers who are privy to confidential information on tenders or costs for either internal or external contractors must not disclose that information to any unauthorised party or organisation.
50. Where a Chief Officer in conjunction with the Commercial Director for City Procurement feels that any relationship is substantive, the Chief Officer will notify the Town Clerk who will then decide if Members need to be informed. The Chief Officer will determine any appropriate safeguards, including removing the officer in the engagement or supervision of the contractor, taking advice from the Town Clerk as appropriate.
51. Existing consultants, service providers, third party advisors may wish to express interest in contracts that the City Corporation advertises for tender, which may include projects they are already advising on. Alternatively, they may be providing advice or consultancy services to other firms who may wish to tender for the City Corporation's services. These situations naturally give rise to conflicts of interest i.e. advisors to the City Corporation are bidding directly (individually or through their company); or advising outside companies bidding for City Corporation contracts. Any such conflicts should be reported at the earliest opportunity to the Commercial Director for City Procurement, the original appointing manager (i.e. for the consultant, service provider, third party advisor) and the relevant Chief Officer; in order to assess the potential risk and impact of the conflict and determine an appropriate course of action where applicable.
52. It is not acceptable for employees and other workers with buying responsibilities to use their own, relatives or friend's personal loyalty cards while making purchases on behalf of the City Corporation or service users.

Gifts and Hospitality

53. There can be little doubt that the acceptance of gifts or hospitality by employees and other workers from persons who have, or may seek to have, dealings with the City Corporation would be viewed by the public with grave suspicion and would make the employee or other worker concerned and the City Corporation extremely vulnerable to criticism (refer to the Code of Conduct section: Bribery and Corruption).
54. An employee or other worker should tactfully refuse any personal gift which is offered to them or a close relative by, or indirectly attributable to any person or body who has, or may have, dealings of any kind whatsoever with the City Corporation or, who has applied, or may apply, to the City Corporation for any kind of decision.
55. The only exceptions to this rule are:
 - Small gifts of only token value often given by way of trade advertisements to a wide range of people, e.g. calendars, diaries, pens, pencils and similar articles of use in the workplace (up to a maximum value of £20); or

- Small gifts of only token value given on the conclusion of a courtesy visit or visit by / to dignitaries, (up to maximum value of £20).
 - Working meals which are permissible provided the employee or other worker has the approval of the Chief Officer.
 - Chief Officers or appropriate employee or other worker nominated to represent them can attend work related functions as the City Corporation representative.
56. Employees and other workers offered or in receipt of gifts in the course of their work must complete the Gifts and Hospitality Declaration Form (available on the intranet under Tools and Apps). The completed form will need to be sanctioned by the line manager in advance, unless of a tokenistic value as outlined above.
 57. If there is any doubt about whether a gift may be accepted, the gift should be politely and tactfully refused.
 58. In the event of an employee or other worker receiving a gift without warning, which does not fall in any of the exceptions mentioned above, this should immediately be reported to their Chief Officer who will be responsible for deciding whether the gift should be returned.
 59. Employees and other workers should only accept offers of hospitality if there is a genuine need to impart information or represent the City Corporation in the community, establish or maintain good business relationships, and / or improve the image and reputation of the City Corporation.
 60. Acceptance by employees and other workers of hospitality through attendance at relevant conferences and courses is acceptable where it is clear the hospitality is corporate rather than personal, where the City Corporation gives advance consent.
 61. Where visits to inspect equipment or review services by undertaking site visits etc. are required, employees and other workers should ensure that the City Corporation meets the cost of such visits to avoid jeopardising the integrity of subsequent procurement decisions.
 62. Hospitality should only be accepted where it is on a scale appropriate to the circumstances, reasonably incidental to the occasion and not extravagant; and where it is apparent that no cause could reasonably arise for adverse criticism about the acceptance of hospitality.
 63. Offers to attend purely social or sporting functions should be accepted only when these are part of the life of the community or where the City Corporation should be seen to be represented.
 64. An employee and other worker prior to receipt of any hospitality must complete the Gifts and Hospitality Declaration Form (available on the intranet under Tools and Apps). The completed form will need to be sanctioned by the line manager in advance, unless of a tokenistic value as outlined above.

65. When receiving authorised hospitality employees and other workers should be particularly sensitive as to its timing in relation, for example, to decisions which the City Corporation may be taking affecting those providing the hospitality.
66. When hospitality has to be declined the offer should be courteously but firmly declined and it should be explained to the other party the procedures and standards operating within the City Corporation.
67. Any gifts and hospitality offered but declined, unless of a tokenistic value, should be recorded on the Gifts and Hospitality Declaration Form; this ensures transparency and acts as protection for the employee and other worker concerned.

Circumstances to complete a Declaration of Interest Form

68. Employees and other workers must complete a Declaration of Interest Form (Officers), including the approximate time taken per annum or the relevant timescale where applicable, to declare:
 - **Relationships:** Employees and other workers must declare any close relationships they have with any candidates for appointments, a Member, contractor; or as a manager / supervisor with an employee and other worker or vice versa. Where such relationships exist employees and other workers must not be involved in the administration or decision-making on a matter or application on behalf of the City Corporation, nor in the provision of a reference for them to the City Corporation; both in the interest of transparency and to avoid the potential for accusations of impropriety.
 - **Personal interests:** Any financial or non-financial interests that could bring about conflict with the City Corporation's interests; for instance membership of any organisation not open to the public.
 - **Secondary employment, running a business, or other outside commitments (paid / unpaid):** Before they are entered into, together with the approximate time taken per annum or the relevant timescale.
 - **Sponsorship – Giving and Receiving:** Any benefit derived by an employee or other worker, their partners, spouse or relative or anyone else in a close personal relationship where the City Corporation gives support in the community through sponsorship or an event or service, grant aid, financial or other means.
 - **Any conflict / potential conflict of interest:** That employees and other workers self-identify as soon as they become aware of them.
69. In addition to the above, senior management are required to make disclosures or confirm a nil return on a wider range of categories than employees and other workers including the approximate time taken per annum or the relevant timescale where applicable. This is commensurate with their responsibilities for the activities of the City

Corporation, its workforce and for advising councillors on the potential implications of political decisions, these are set out below:

- **Land**², any beneficial interest in land within the area of the City Corporation.
 - **Licenses** (alone or jointly with others) to occupy land in the area of the City Corporation for a month or longer.
 - **Corporate tenancies**, where to their knowledge (a) the landlord is the City Corporation; and (b) the tenant is a body in which the employee or other worker has a beneficial interest.
 - **Securities**³, where (a) the body to their knowledge has a place of business or land in the area of the City Corporation; and (b) either: (i.) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body (whichever is the lower); or (ii.) if the share capital of that body is of more than one class, the total nominal value of the shares in any one class in which the relevant person has a beneficial interest exceeds one hundredth of the total issued share capital of that class.
 - **Membership of:** a Livery company, City Company without Livery, Guild or Company seeking Livery Membership.
 - **Think tank membership**, an organisation one of whose principal purposes include the influence of public opinion or policy and which is likely to seek to affect the policy of the City Corporation, or which may have an impact on its services or stakeholders.
 - **Membership of:** a professional association or body.
 - **Trade association membership**⁴, whether as an individual or company owner.
70. The Contract and Tendering Declaration Form (Officers) should be used to report relationships of a direct or indirect pecuniary nature with external contractors or potential contractors to the Commercial Director for City Procurement and copied to the line manager and relevant departmental Chief Officer. (See above, Procurement Activities and Contractors / Potential Contractors).
71. In the event a declaration is made that impacts on contract and/or tendering processes and outside of such processes, both the Contract and Tendering Declaration Form (Officers) and the Declaration of Interest Form (Officers) will need to be completed; and vice versa.

² 'Land' excludes any interest or right which does not carry with it a right (solely or jointly with another person) for them to occupy it or receive an income).

³ 'Securities' means shares, debentures, debenture stock, loan stock, bonds, units of a collective investment scheme within the meaning of the Financial Services and Markets Act 2000 and other securities of any description, other than money deposited with a building society. A beneficial interest arises where there is a right to the economic benefit of the securities i.e. a right to the income from the securities or a share of it and a right to the proceeds of sale or part of the proceeds.

⁴ Trade association membership as either a sole trader or as a company i.e. company owner.

72. Employees and other workers should note a separate reporting process for declarations regarding the receipt or offer of hospitality and gifts, which are to be recorded using the Gifts and Hospitality Declaration Form (available on the intranet under Tools and Apps).
73. Managers may seek further advice as appropriate from Corporate HR / HR contact, Legal, Audit or Procurement according to the nature of the guidance sought.

When to complete and who should complete a Declaration of Interest Form

74. Employees and other workers should make declarations: as soon as a new matter to declare arises; a change / potential change in circumstances (including notifying their line manager and Chief Officer when there is a cessation regarding a previous declaration); and annually by specified groups of staff as set out below. If in doubt about what to disclose, the general principle should be to disclose.
75. Where an employee or other worker is in doubt as to whether they have an actual or potential conflict, they should seek advice from their line manager or Chief Officer. Employees and other workers are encouraged to err on the side of transparency and openness.
76. **A Declaration of Interest Form (Officers)** must be completed in the following circumstances:

| Self-declaration | Specified staff groups | Chief Officers |
|--|---|--|
| <p>On joining, promotion, change of role (where applicable) and then annual reminders for all employees and other workers working for the City Corporation who must <i>self-declare</i> as soon as they become aware of a perceived, potential or actual conflict; or a change including the cessation of an existing declared conflict.</p> <p>The responsibility for avoiding any conflict of interest lies with the individual, however there will also be an annual Chief Officer reminder. See Circumstances in which a Declaration of Interest must be made above.</p> | <p>On joining, promotion, change of role (where applicable) and then annually thereafter (unless the employee or other worker notifies changes in the interim period).</p> <p>Annually following a Chief Officer communication for the following employees and other workers groups:</p> <ul style="list-style-type: none"> • Senior managers at grades I and J (including any other employees with the same level of seniority) • Sourcing, Category Management and Commercial Contract Management staff within City Procurement • City Surveyors • Internal Audit • Staff with buying responsibilities i.e. responsible for purchasing goods, services or works on behalf of the City Corporation <p>Where the employee and other worker has no declaration to make, they must submit a nil return.</p> | <p>On joining, promotion, change of role (where applicable) and then annually thereafter (unless the Chief Officer notifies changes in the interim period).</p> <p>Annually following a communication by the office of the Director of HR with returns reviewed by the Town Clerk.</p> <p>Where there are no declarations to make, they must submit a nil return.</p> <p>If a Chief Officer has a new declaration or changes to make to an existing declaration, they must self-declare these by advising the Town Clerk at the earliest opportunity. Any new work (paid/unpaid) will need to be approved by the Chief Officer's employing committee and the Establishment Committee.</p> |
| <p>Note: Should a declaration made on the Declaration of Interest Form also have an impact regarding contract and/or tendering processes, then that information should be recorded on both the Declaration of Interest Form (Officers) and the Contract and Tendering Declaration Form (Officers), detailed below.</p> | | |

77. The completed Declaration of Interest Form (Officers) is submitted to the employee or other worker's line manager for comments then referred to the Chief Officer to confirm whether the declaration is acceptable, acceptable subject to specified conditions or not acceptable and ensure the communication of their decision. The Chief Officer will make the final decision on any declarations made, seeking advice where required.
78. Each Chief Officer oversees the annual Declaration of Interest notification reminder process⁵ within their department. Whereas Corporate HR / HR Contact will issue the Declaration and Register of Interest Form for new starters at the conditional offer stage of recruitment or as a result of a promotion or change of role. The returned form will be passed to the appointing manager which is normally the line manager for processing, and then referred on to the Chief Officer as described above.
79. Similarly, each Chief Officer will complete a Declaration of Interest Form to make a new declaration or changes to an existing declaration; to be approved by the Town Clerk. Any new work (paid/unpaid) will need to be approved by the Chief Officer's employing committee and the Establishment Committee.
80. **A Contract and Tendering Declaration Form (Officers)** must be completed as detailed below:
- Annually by Sourcing, Category Management and Commercial Contract Management staff within City Procurement, who must also notify as soon as a conflict of interest arises or changes to line management during the year.
 - Annually by all City Surveyors staff, who must also notify as soon as a conflict of interest arises or changes to line management during the year.
 - At the start of each procurement exercise, declarations of interests by employees and other workers involved should be recorded in the minutes of meetings with City Procurement staff and any external procurement advisors. If a conflict arises, then a declaration form should be completed.
81. Should a declaration made on the Contract and Tendering Declaration Form (Officers) also have an impact outside of contract and/or tendering processes, then that information should also be recorded on the Declaration of Interest Form (Officers), detailed above.
82. **A Contract and Tendering Declaration Form (External)** is required to be completed by existing consultants, service providers and third-party advisors to declare any conflicts of interest at each procurement exercise. For further advice refer to City Procurement.

⁵ The office of the Director of HR co-ordinates Chief Officers' Declarations of Interest process.

Circumstances to complete a Register of Interest Form

83. Chief Officers must also complete a Register of Interest Form to declare the nature of involvement and the approximate time spent on: outside paid work, voluntary work and interests affecting their working life. Where they have no declaration to make, they must submit a nil return.
84. Chief Officers must complete the Register of Interest Form (Chief Officers) annually, the administration for this process is co-ordinated by the office of the Director of HR, and the form is reviewed by the Town Clerk. The Director of HR then reports on the Chief Officers Register of Interests to the Establishment Committee. This information becomes part of the public record, as named individual records are available in open committee papers.
85. However, if there are any new declarations to be made in the intervening time these must be declared at the earliest opportunity and the same principles apply. Any new work (paid/unpaid) will need to be approved by the Chief Officer's employing committee and the Establishment Committee.

Raising Concerns and Whistleblowing

86. The City Corporation is committed to the highest possible standards of probity. In line with that commitment we expect employees, and others that we deal with, who have serious concerns about the conduct of any aspect of the City Corporation's work to come forward and voice those concerns to us. It is recognised that most cases will have to proceed on a confidential basis.
87. Where employees or other workers have concerns around misconduct or the lawfulness of any action or proposed action, they should raise their concerns to the appropriate manager or Chief Officer without delay.
88. The Whistleblowing Policy is also available to employees and other workers who feel they need to raise an issue outside of the management chain. Any suspicion of wrongdoing will be treated seriously and will be reviewed and analysed in accordance with the Whistleblowing or Complaints Policy, considering the Public Interest Disclosure Act, the Human Rights Act and if appropriate the City Corporation's Anti-Fraud and Corruption Strategy.
89. City Corporation employees, agency workers, and contractors should be aware that they have statutory protection against victimisation and dismissal under the Public Interest Disclosure Act 1999 (PIDA)⁶, if they speak out genuinely against corruption and malpractice at work (see, Regulation of Investigatory Powers Policy and Procedure). Further information on how to make a disclosure is contained in the Whistleblowing Policy.

⁶ PIDA was further strengthened by the Enterprise and Regulatory Reform Act 2013.

List of Appendices

Conflicts of Interest, forms and guidance:

- Appendix 1 - Declaration of Interest Form (Officers)
- Appendix 2 - Contract and Tendering Declaration Form (Officers)
- Appendix 3 - Register of Interest Form (Chief Officers)
- Appendix 4 - Declaration and Register of Interests FAQ's
- Appendix 5 - Examples of Conflicts of Interest
- Appendix 6 - Managers Guide, Declaration and Register of Interests

Links / Other resources

- Anti-Fraud and Corruption Strategy
- Code of Conduct
- Data Protection Policy (includes the Employee Privacy Notice)
- Disciplinary Procedure
- Employee Privacy Notice
- Equal Opportunity Policy
- Financial Regulations
- Gifts and Hospitality Declaration Form
- Politically Restricted Posts Policy
- Procurement Code
- Protocol on Member/Officer Relations
- Recruitment and Selection Policy
- Regulation of Investigatory Powers Policy and Procedure
- Special Leave and Time Off Policy
- Whistleblowing Policy

Declaration and Register of Interests

FAQ's

The following Frequently Asked Questions on the Declaration of Interests and Register of Interests process accompany the Conflicts of Interest Policy and cover some common queries. If you require advice on whether something should be declared, then please speak to your line manager in the first instance. Alternatively, you can contact your Human Resources Business Partner (HRBP) / HR contact.

To note that the receipt or offer of a gift or hospitality, apart from some low value exceptions as stated in the Conflicts of Interest Policy, may give rise to a conflict of interest. These must be declared using the Gifts and Hospitality Declaration Form located under Tools and Apps on the Intranet.

Declaration of Interest process

What if I am not sure whether I need to complete a Declaration of Interest Form?

Speak to your line manager. Caution is always advisable, all interests should be declared at the earliest opportunity where there is a risk of perceived or potential conflicts, or what is apparent as an actual conflict. Volunteering such information may avoid the risk of future challenges or misunderstandings.

What should I do if there's a change to a submitted Declaration of Interest Form?

Notify your line manager in writing at the earliest opportunity.

Should I complete a Declaration of Interest Form if I have nothing to declare?

Please refer to the Conflicts of Interest Policy section 'When to complete and who should complete a Declaration of Interest Form' for details of who is required to complete a form annually; noting that if you meet the requirements to make an annual declaration but have nothing to declare you should submit a 'nil' return.

When don't I need to complete a Declaration of Interest Form?

You do not require permission to undertake the exempt activities listed below, either as a one off or as part of the annual Declaration of Interest process:

- Acting as a referee in a personal capacity.
- Membership of a residents' association, unless a representative in an official capacity such as a board member or on a management committee.
- When nominated to be a representative of the City Corporation, for example on an external Committee.

- Professional body membership* i.e. i.e. ACCA, CIPD, Law Society, RICS; unless a representative in an official capacity such as a privy council member, board member or on a management committee due to being nominated by the City Corporation.
- Member of a charity or carrying out unpaid community work*, unless you are a board member, trustee or in a decision-making position including financial management.
- Membership of a Livery company, Livery Company City Company without Livery, Guild or Company seeking Livery Membership*.

** However Chief Officers and Senior Managers at Grades I and J must always make these disclosures, irrespective of their relationship to the third-party organisation.*

Will I be reminded of the need to declare interests?

Yes, there will be an annual communication from your Chief Officer. However, it is your responsibility to declare any interests in advance where you know of them; and as new interests arise or existing one's cease these should be declared at the earliest opportunity.

When my Declaration of Interest Form is being reviewed, what does this mean?

The relevant Chief Officer will review the interest disclosed, whilst it is impossible to give a complete list of factors, they will consider due the range of potential conflicts. Points they could consider include:

- How the interest might impact upon service delivery and the employee's duties i.e. whether work can be re-distributed to avoid an interest becoming prejudicial.
- Any concerns relating to fatigue due to excessive working hours i.e. regarding health and safety at work, or a breach of the Working Time Regulations.

Please note that further information or documentation may be required from you to assist in the review and decision-making process.

What happens if my declared interest is in conflict / potential conflict with my role?

If your Chief Officer considers a risk does exist, in the majority of cases a solution will be reached to mitigate the risk, for example:

- Making a professional judgement to note the declaration, but nevertheless allowing participation in a meeting.
- Putting in place specific work supervision requirements to ensure impartiality.
- Ensuring you do not receive the documentation for the agenda item where an interest has been declared.
- Restricting your involvement in associated discussions or meetings; and excluding you from the decision-making process such as a procurement panel / committee item decision.
- Removing you from an activity altogether.

To note, that if the Chief Officer reviewing the declaration cannot reach a decision following a discussion with the employee, they will seek appropriate advice i.e. HR, legal, audit and / or procurement according to the nature of the guidance sought.

Where there is a significant risk with an actual conflict this could require you to remove the external conflict e.g. resign from an external board. In extreme cases an Officer may be removed from the Corporation following the appropriate procedure/process.

Where a Chief Officer in conjunction with the Commercial Director for City Procurement feels that any relationship to be significantly detrimental with regards to the procurement process, they will determine any appropriate safeguards, including removing the employee in the engagement or supervision of a contractor. Any such substantive concerns will be notified the Town Clerk who will advise if the matter should be referred for information or a decision to the Establishment Committee.

What happens if I fail to disclose an interest?

You are required to provide complete and accurate information on interests to be declared. If you realise you have inadvertently missed an interest out, you must bring this to the attention of your line manager at the earliest opportunity to mitigate any potential conflict arising. Ultimately a deliberate intention to omit i.e. hide relevant information for inclusion in the declaration of interest may constitute misconduct and result in disciplinary action being taken against you by the City Corporation.

Who has access to the Declaration and/or Register of Interest Form?

For employees and Senior Managers at Grade I and J, the Declaration of Interest forms and associated documentation will be held confidentially within Corporate HR as part of the employee's personnel record. However, whilst their Register of Interest Form will be held on the Chief Officer's personnel file, this information additionally becomes part of an open public record as reported in Establishment Committee papers annually.

How long will records of my declarations of interest be kept?

These will be retained for the same duration as the employee's personnel file, which is current financial year plus 6 financial years; unless the employee is in a role working with children / vulnerable adults then 35 years applies, or there is a requirement to retain due to litigation.

If I think there's been a breach of the conflicts of interest rules, what should I do?

There are a number of ways in which a concern can be raised. Employees are urged to consider the nature of the concern, whether it involves their immediate management, the seriousness and sensitivity of the issues involved.

Where employees are reasonably concerned about a matter, they are encouraged to raise this in the first instance with their line manager whenever possible. All managers have a responsibility to act on concerns raised. Alternatively, staff can use the City Corporation's Whistleblowing Policy to raise an issue outside of the management chain. See 'Raising Concerns and Whistleblowing'.

Additionally, employees may wish to make use of the free and confidential employee assistance programme. The helpline is confidential and can provide support on a wide range of work issues.

Register of Interests: Chief Officers

Why do I need to complete a separate Register of Interest Form?

Chief Officers are entrusted with high level decision-making powers in relation to higher risk activities e.g. management of large-scale budgets and investment decisions, placement of contracts and responsibility for procurement; as it is regarded that a greater degree of protection needs to be put in place to protect the City Corporation's interests and reputation.

Chief Officers are therefore required to complete a Register of Interest Form (in addition to completing the Declaration of Interest Form), to declare the nature of involvement and the approximate time spent on: outside paid work, voluntary work and interests affecting their working life. This information is then reported to the Establishment Committee and becomes part of the public record, in open committee papers.

Who reviews the Register of Interest declarations?

The Register of Interest process is co-ordinated by the office of the Director of HR, and the form is reviewed by the Town Clerk who makes an assessment of the potential risk and impact of any declaration. This information becomes part of the employee's personnel record.

The Director of HR submits a report on the Register of Interest declarations by Chief Officers to the Establishment Committee who then review the approximate time spent on outside voluntary and / or paid work, or interests for potential conflicts. This information becomes part of the public record, as named individual records are available in open committee papers.

What if my Register of Interest declaration may put me at personal risk?

Chief Officers can seek to exempt their personal interests from the Register of Interests being in the public domain, if they consider that having this information on record might put them or others at risk. If this is the case, they should discuss the matter in the first instance with their line manager.

Links / Other resources

Policies:

- Code of Conduct
- Conflicts of Interest Policy
- Data Subjects' Rights Policy
- Whistleblowing Policy

Forms:

- Declaration of Interest Form (Officers)
- Register of Interest Form (Chief Officers)
- Contract and Tendering Declaration Form (Officers)