



Planning and Transportation Committee

INFORMATION PACK

N.B: These matters are for information and have been marked * and circulated separately. These will be taken without discussion, unless the Clerk has been informed that a Member has questions or comments prior to the start of the meeting.

Date: THURSDAY, 16 MAY 2024

Time: 9.00 am

Venue: LIVERY HALL - GUILDHALL

4. OUTSTANDING ACTIONS*

For Information
(Pages 3 - 4)

12. DRAFT AIR QUALITY STRATEGY 2025 TO 2030*

For Information
(Pages 5 - 76)

13. PUBLIC LIFT & ESCALATOR REPORT*

For Information
(Pages 77 - 80)

14. TO NOTE THE MINUTES OF THE PLANNING APPLICATIONS SUB-COMMITTEE MEETING HELD ON 13 FEBRUARY 2024*

For Information
(Pages 81 - 106)

15. TO NOTE THE MINUTES OF THE PLANNING APPLICATIONS SUB-COMMITTEE MEETING HELD ON 9 APRIL 2024*

For Information
(Pages 107 - 116)

16. TO NOTE THE MINUTES OF THE PLANNING APPLICATIONS SUB-COMMITTEE MEETING HELD ON 17 APRIL 2024*

For Information
(Pages 117 - 154)

17. **TO NOTE THE MINUTES OF THE STREETS AND WALKWAYS SUB-COMMITTEE MEETING HELD ON 19 MARCH 2024***

For Information
(Pages 155 - 166)

Ian Thomas CBE
Town Clerk and Chief Executive

PLANNING AND TRANSPORTATION COMMITTEE – OUTSTANDING ACTIONS

Item	Date	Action/ Responsible Officer	Progress Update and Date to be progressed/completed
1	17 Nov 2020, 15 Dec 2020, 5 Jan 2021, 26 Jan 2021, 16 Feb 2021, 24 Feb 2021 9 March 2021, 30 March 2021, 22 April 2021, 12 May 2021 8 June 2021, 29 June 2021, 20 July 2021, 7 Sept 2021, 21 Sept 2021, 26 Oct 2021, 16 Nov 2021, 14 Dec 2021, 11 Jan 2022 1 Feb 2022, 22 Feb 2022, 26 April 2022, 17 May 2022, 7 June 2022 1 July 2022, 19 July 2022, 20 Sept 2022 11 Oct 2022, 1 Nov 2022, 10 Jan 2023 7 March 2023, 11 May 2023, 18 July 2023 3 October 2023 21 November 2023 12 December 2023, 31 January 2024, 5 March 2024, 14 May 2024	<p style="text-align: center;"><u>Member Training</u></p> <p style="text-align: center;">Chief Planning Officer and Development Director / Director of the Built Environment</p> <p>A Member questioned whether there would be further training provided on Daylight/Sunlight and other relevant planning matters going forward. She stated that she was aware that other local authorities offered more extensive training and induction for Planning Committee members and also requested that those sitting on the Planning Committee signed dispensations stating that they had received adequate training.</p> <p>The Chair asked that the relevant Chief Officers consider how best to take this forward. He also highlighted that the request from the Town Clerk to all Ward Deputies seeking their nominations on to Ward Committees states that Members of the Planning & Transportation Committee are expected to undertake regular training.</p>	<p>UPDATE: (14 May 2024):</p> <p>New Committee Members are provided with training on key aspects. A programme of wider Member training was implemented in 2023. The first of the recordings (regarding Material Planning Considerations) were sent to members with a Q&A on this topic prior to the 11 May 2023 Planning and Transportation Committee meeting. A Member training session on fire safety took place on 29 February 2024. Heritage training has been arranged for 17 May 2024.</p>

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Agenda Item 12

Committees: Port Health and Environmental Services Health and Wellbeing Board Planning and Transportation	Date: 7 May 2024 3 May 2024 16 May 2024
Subject: Draft Air Quality Strategy 2025 to 2030	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	Leading Sustainable Environment. Providing Excellent Services. Diverse Engaged Communities.
Does this proposal require extra revenue and/or capital spending?	N
Report of: Bob Roberts, Executive Director (Interim), Environment	PHES for decision
Report author: Ruth Calderwood, Air Quality Manager	H&WB and P&T for information

Summary

As part of its statutory duties for Air Quality Management, the City of London Corporation is required to measure air quality and, if concentrations are higher than set standards, develop, and implement an action plan to bring levels of pollution down.

The City Corporation has had an air quality action plan in place since 2002. In 2011, the action plan was incorporated into an Air Quality Strategy. The current strategy is for the period 2019 to 2024. This draft strategy covers 2025 to 2030 and includes new data, new targets, and new responsibilities for helping to reduce emissions of very fine particles (PM_{2.5}). The draft strategy supports the outcomes of the Corporate Plan 2024 to 2029, Climate Action Strategy, Transport Strategy, City Plan and Procurement Strategy.

The current Air Quality Strategy, supported by national and regional action, has delivered around a 40% reduction in the pollutants nitrogen dioxide and fine particles (PM₁₀). The national standards for PM₁₀ are met across the Square Mile, and the annual mean standard for nitrogen dioxide is only exceeded adjacent to the busiest roads. With continued action, it is likely that the national standard for nitrogen dioxide will also be met everywhere in the next 2 to 3 years.

The World Health Organisation (WHO) issues health-based air quality guidelines to help governments manage the impact of air pollution on health. National air quality standards are based on WHO guidelines issued in 2005. Since then, there has been a significant amount of evidence about the adverse health effects of air pollution. This led to new air quality guidelines being published in 2021.

The new guidelines are much tighter than the ones issued in 2005. They have not yet been incorporated into national legislation or adopted by the Mayor of London. It is however recommended that the City Corporation Air Quality Strategy 2025 to 2030 works towards

the achievement of the latest WHO air quality guidelines, rather than the national standards, and thereby continues with its efforts to improve air quality in the Square Mile. By doing so, it will deliver better health outcomes and directly support the new Corporate Plan outcome *Leading Sustainable Environments, Providing Excellent Services and Diverse Engaged Communities*. It will also provide a robust set of data for the Corporate Plan performance measure '*Progress towards World Health Organisation Air Quality Guidelines*'.

Recommendation

Members are asked to:

- Approve the aims of the draft Air Quality Strategy which set a direction of travel towards achievement of the 2021 World Health Organisation Air Quality Guidelines
- Approve the draft Air Quality Strategy 2025 to 2030 for public consultation, subject to comments received at the meeting.

Main Report

Background

1. The City of London Corporation has a statutory duty to assist the Mayor of London and the UK government in taking action to reduce levels of air pollution. This is to ensure that concentrations of pollutants meet health-based standards as soon as possible. The City Corporation also has a responsibility to protect public health.
2. Action taken by the City Corporation is detailed in its Air Quality Strategy. The current Air Quality Strategy 2019 – 2024 includes measures being taken to fulfil statutory responsibilities, and for reducing the health impact of air pollution on residents, workers, and visitors to the Square Mile. Due to statutory requirements, the focus has largely been on the pollutants nitrogen dioxide (NO₂), a product of combustion, and fine particles (PM₁₀), of which there are many sources.
3. Owing to the success of previous strategies, along with national and regional action, air quality in the Square Mile has dramatically improved. In 2022, just 7% of the publicly accessible area breached the national standards for NO₂, down from 70% in 2018. With continued action, it is likely that the national standard for NO₂ will be met everywhere in the next 2 to 3 years. The national standards for PM₁₀ are now met everywhere in the Square Mile, and by a significant margin. For further information on concentrations and origins of air pollution in the Square Mile see Appendix 1.

Air quality standards and guidelines

4. Current national air quality standards for NO₂ and PM₁₀ were originally set in European Directives and transposed into domestic legislation. They are based on guidelines set by the World Health Organisation (WHO) in 2005.
5. As research has advanced, more focus has been placed on the pollutant PM_{2.5} as this has been shown to have the greatest impact on health. The Environment Act 2021

set new national standards for PM_{2.5} to be met by 2040, with interim targets set for 2028. Guidance has been issued which includes new responsibilities for local government to assist with national efforts to reduce emissions of this pollutant. These measures have been incorporated into the draft strategy.

6. Ongoing research has linked air pollution to an increasing number of diseases. This has led to the World Health Organisation issuing new Air Quality Guidelines in 2021. The guidelines are designed to offer quantitative health-based recommendations for managing air quality. They are not legally binding, but they do provide an evidence-based tool to inform legislation and policy in WHO Member States, of which the United Kingdom is one. In addition to new guidelines, interim targets have been set to guide the reduction of air pollution towards the achievement of the guidelines. No target dates have been set by the WHO for achievement of the interim targets or guidelines.
7. Table 1 details the current national standards and WHO Air Quality Guidelines with interim targets. It also includes the aims in the draft Air Quality Strategy. The aims go beyond the current national standards for NO₂ and PM₁₀, whilst also committing to support action to achieve the new national standard for PM_{2.5} ten years early.
8. For nitrogen dioxide, the proposed aim within the strategy timeline is to achieve the second WHO interim target in over 90% of the publicly accessible space by 2030. This demonstrates a direction of travel towards the final WHO guideline. This aim has been set as it takes into account current levels of NO₂, whilst considering the amount of influence the City Corporation has on levels of air pollution in the Square Mile (see Appendix 1). For PM₁₀, the WHO air quality guideline itself is recommended as, despite the City Corporation having little direct influence over levels of this pollutant, much of the Square Mile already meets the guideline.

Table 1

Pollutant (annual mean (µg/m ³))	National Standard (µg/m ³)	2021 WHO Guidelines (µg/m ³)				Draft Air Quality Strategy aims (µg/m ³)	Current levels in the Square Mile (µg/m ³)	
		Interim Target						Final Guideline
		1 st	2 nd	3 rd	4 th			
Nitrogen dioxide (NO ₂)	40	40	30	20	-	10	30**	20 to 52
PM ₁₀	40	70	50	30	20	15	15***	15 to 18
PM _{2.5}	10*	35	25	15	10	5	10***	12

* To be met by 2040

** Over 90% of the Square Mile to meet this target by 2030

*** To support national and regional action to meet these targets by 2030

Draft Air Quality Strategy

9. The draft strategy includes 27 actions to be delivered under the headings: Air Quality Monitoring; Leading by Example; Collaborating with Partners; Reducing Emissions and Public Health and Raising Awareness. Annual reports will be published demonstrating progress with each action.
10. Delivery of the strategy will see the management of emissions of pollutants from construction sites; new developments being low emission; action to tackle unnecessary vehicle engine idling and the best practice of our partners being rewarded. Additional powers will continue to be sought to manage remaining sources of pollution; research into new technologies supported and consideration given to managing pollutants associated with diesel standby generator plant. Attention will also be given to activities that emit relatively high levels of PM_{2.5}, such as commercial cooking.
11. Much of the strategy will be delivered by partnership work with external organisations. This is due to the amount of air pollution measured in the Square Mile that comes from beyond the boundary (see Appendix 1).
12. An important aspect of the work is engagement with communities such as schools, residents, and businesses, raising awareness about the health impacts of air pollution and what steps can be taken to help to deliver the aims of the strategy. The City Corporation is also part of a pan London project to raise awareness about the impact of poor indoor air quality on health.
13. The draft Air Quality Strategy is underpinned by a wealth of monitoring data and a large database of emissions of pollutants. This information is used to shape action, and to provide robust evidence to demonstrate the success of City Corporation action to improve air quality.

Corporate & Strategic Implications

Strategic implications

14. Air quality policy is supported by the Climate Action Strategy, Transport Strategy, Procurement Strategy, and draft City Plan.
15. The work on air quality supports the new Corporate Plan outcomes:
 - Leading sustainable environment
 - Providing excellent services
 - Diverse engaged communities

Financial implications

16. No new funding is being requested to deliver the Air Quality Strategy. Most of the work is delivered by the Air Quality Team of three Officers plus one Manager. External funding is sought for specific projects where available.

Resource implications

17. The strategy will be delivered using existing resources

Legal implications

18. None

Risk implications

19. Air quality is listed as a Corporate risk. The most recent Deep Dive into the risk was presented to Audit and Risk Management Committee in January 2021.

Equalities implications

20. Action to improve air quality has a positive impact on all sections of the population. The benefit is greatest for children and the elderly as they are more susceptible to the health impacts of air pollution. There is also a positive impact on individuals whose lives are affected by asthma and other respiratory and cardiovascular conditions.

Security implications

21. None

Conclusion

22. The City Corporation has produced a draft Air Quality Strategy 2025 to 2030 for consultation. This strategy follows on from the current Air Quality Strategy 2019 to 2024 and includes new data, new targets, and new responsibilities for helping to reduce emissions of PM_{2.5}.

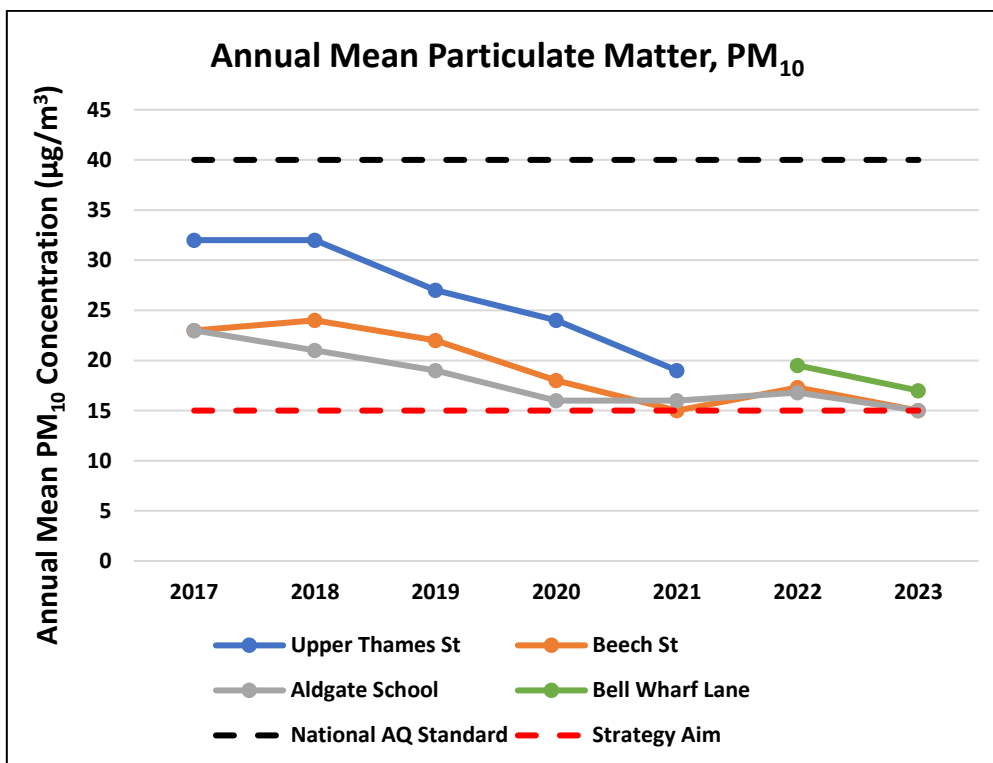
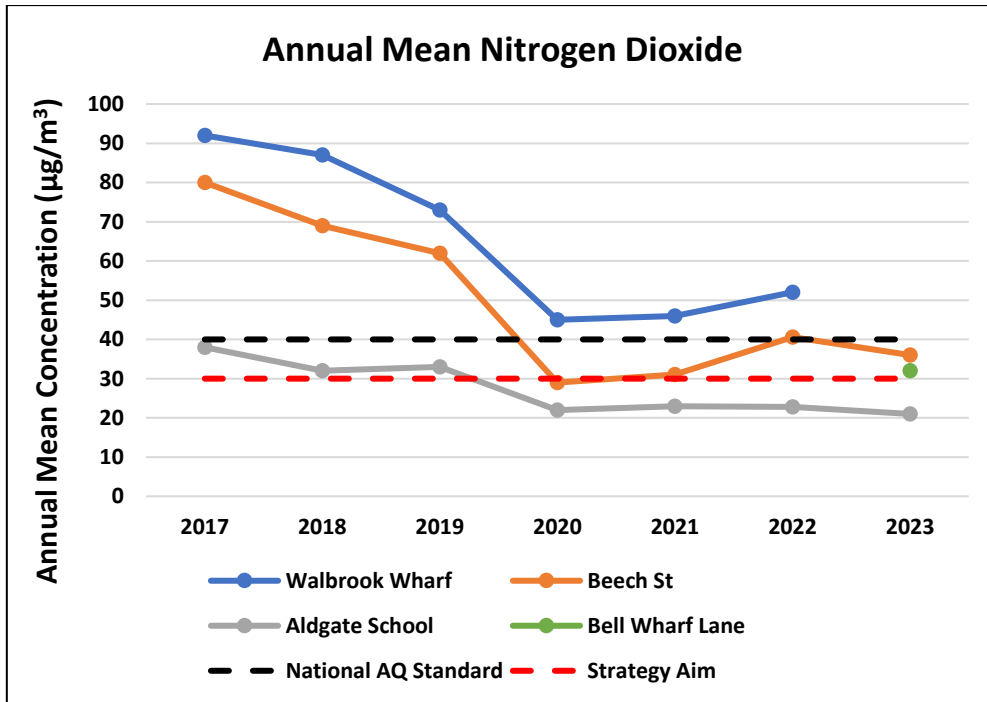
23. Due to the success of previous strategies, along with regional and national action, air quality in the Square Mile has dramatically improved. In 2022 just 7% of the publicly accessible area breached the national standard for the pollutant nitrogen dioxide, down from 70% in 2018. The national standard for fine particles (PM₁₀) is now met everywhere.

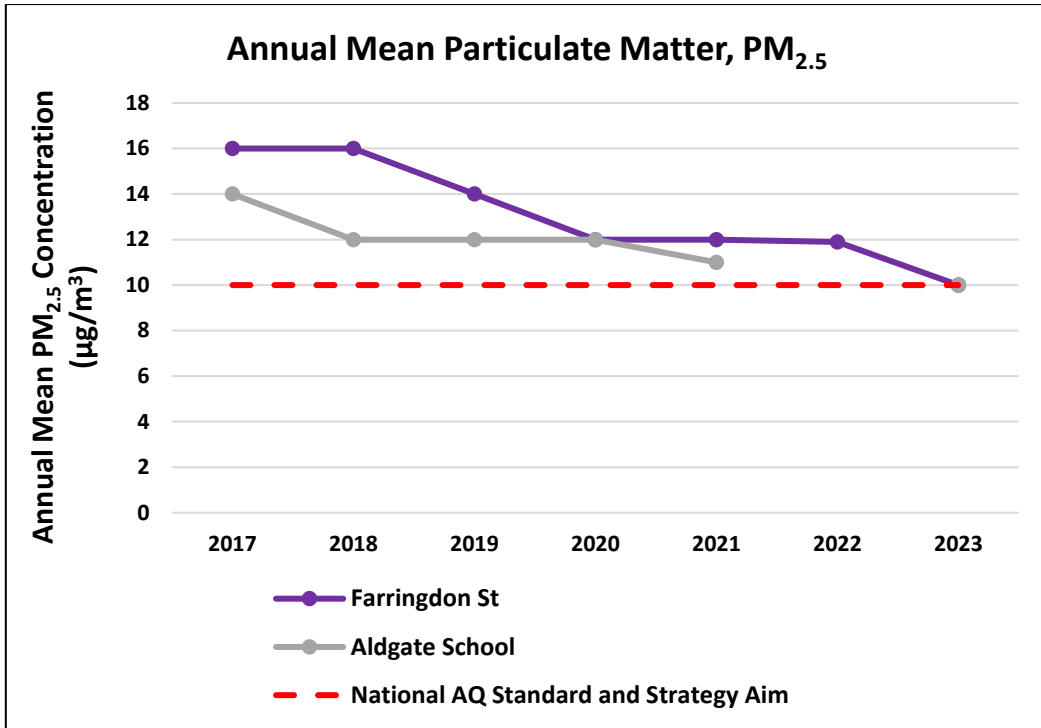
24. It is recommended that the City Corporation Air Quality Strategy 2025 to 2030 aligns itself with the latest WHO air quality guidelines, rather than the national standards, and thereby continues with its efforts to improve air quality in the Square Mile. By doing so, it will deliver better health outcomes and support the Corporate Plan outcomes *Leading Sustainable Environments, Providing Excellent Services and Diverse Engaged Communities*. It will also provide a robust set of data for the Corporate Plan performance measure '*Progress towards World Health Organisation Air Quality Guidelines*'.

Appendices

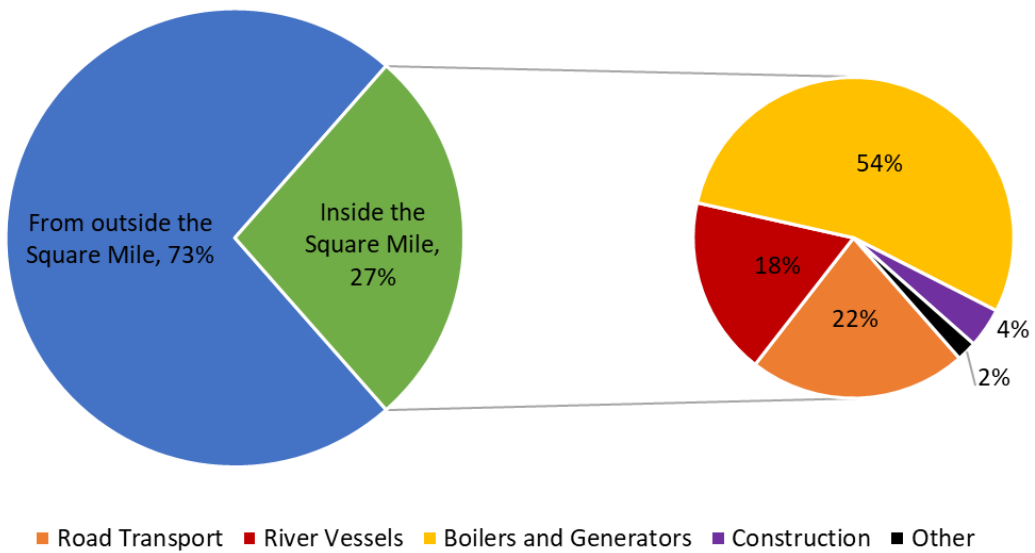
- Appendix 1 – Air quality data
- Appendix 2 – Draft Air Quality Strategy 2025 to 2030

Appendix 1: Air Quality Data

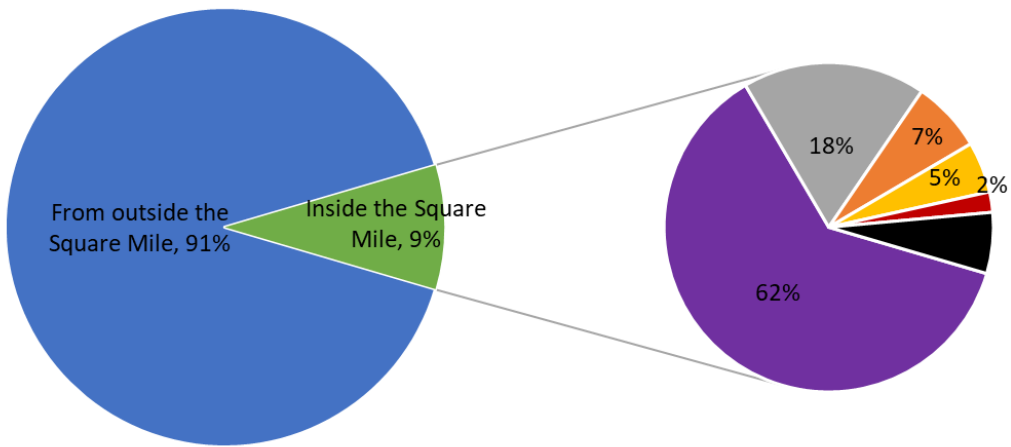




Source of Nitrogen Oxides

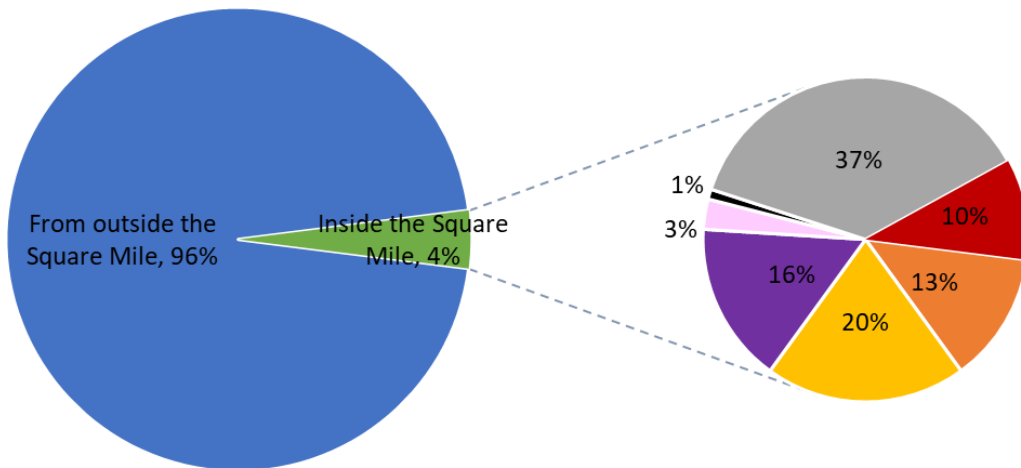


Source of PM₁₀



- Construction Activity
- Restaurants
- Road Transport
- Boilers and Generators
- River Vessels
- Other

Source of PM_{2.5}



- Road transport
- Boilers and Generators
- Construction Plant
- Construction Dust
- Streetworks
- Restaurants
- River Vessels

City of London

Air Quality Strategy

Delivering Healthy Air in the City of London
Draft for Consultation

2025 – 2030



For further information contact:

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This report will be available on the City of London Corporation website.

Foreword

The City of London Corporation has long been at the forefront of tackling air pollution. We have been measuring air quality for over 60 years and in 1954, following the infamous London Smogs, we published our own legislation to ban the production of smoke in the City. This paved the way for the national Clean Air Act of 1956. The form and source of air pollution has changed since the 1950's and, though much improved, remains at a level that impacts on health.

We have been taking more focussed action to improve air quality for over 20 years, and I have great pleasure in presenting our fourth Air Quality Strategy for consultation. It outlines action that we will take to continue to achieve better air quality for our communities. Our last Air Quality Strategy, supported by national and regional action, delivered around a 40% reduction in the pollutants nitrogen dioxide and fine particles (PM₁₀). This was measured using our extensive network of monitoring equipment.

The data we collect is compared to health-based standards. The current national standards for PM₁₀ are achieved across the Square Mile, and the annual mean standard for nitrogen dioxide is only exceeded adjacent to the busiest roads. With continued action, it is likely that the national standard for nitrogen dioxide will also be met everywhere in the next two to three years.

However, we are not complacent. Since the current national air quality standards were set, research has shown that air pollution has an impact on health at lower levels than previously thought. This has been reflected in air quality guidelines issued in 2021 by the World Health Organisation. The aims of the strategy therefore go beyond the national standards and instead take us on a pathway to meet these guidelines. This goes beyond our statutory obligation.

Most of the pollution we breathe in the Square Mile comes from beyond our boundary. The draft strategy therefore is very collaborative in nature, detailing work that we will do with external partners to support and initiate action to improve air quality. We will also continue to demonstrate leadership, for example through the implementation of our ambitious Climate Action Strategy, which aims to achieve net zero across the City's operations by 2027.

We will manage emissions of pollutants from construction sites; ensure new developments are low emission; tackle unnecessary vehicle engine idling and reward the best practice of our partners. We will continue to press for additional powers to manage remaining sources of pollution; support research into new technologies and consider how we can help to manage pollutants associated with diesel standby generator plant. We will also be turning our attention to activities that emit relatively high levels of very fine particles (PM_{2.5}), such as commercial cooking.

An important aspect of our work is engagement with our communities. We will continue to work with our schools, residents, and business communities, raising awareness about the health impacts of air pollution and what steps can be taken to help us to deliver the aims of this strategy.

We look forward to hearing your thoughts on our proposals to achieve our vision of having air quality in the Square Mile that is healthy to breathe.

Mary Durcan CC
Chair, Port Health and Environmental Services Committee

Air Quality Strategy 2025 – 30: Delivering Healthy Air in the City of London

Our definition of healthy air: Concentrations of nitrogen dioxide (NO₂) and particulate matter (PM₁₀ and PM_{2.5}) that meet national health-based standards and are on a pathway to meet the 2021 World Health Organisation (WHO) Air Quality Guidelines.

Why us? The City of London Corporation has a statutory obligation to improve air quality and protect public health. Improving air quality and ensuring good health and wellbeing is supported by our Corporate Plan 2024 to 2029.

Who we will work with: Residents, workers, schools and nurseries, businesses and Business Improvement Districts, North-East London NHS Trust and Barts Health NHS, the Greater London Authority, Transport for London, London Councils, London Boroughs, the UK Government, the Environment Agency, London's Universities, Charities, Port of London Authority, Cross River Partnership, and other stakeholders as they arise.

Our Vision

The Square Mile has air that is healthy to breathe.

Our Aims

- **Over 90% of the Square Mile meets an annual average ⁽¹⁾ of 30µg/m³ for nitrogen dioxide by 2030⁽²⁾.**
- **To support national and regional action that leads to the Square Mile meeting an annual average of 15µg/m³ for PM₁₀ by 2030⁽³⁾.**
- **To support national and regional action that leads to the Square Mile meeting an annual average of 10µg/m³ for PM_{2.5} by 2030⁽⁴⁾.**

Our Key Outcomes (Corporate Plan 2024-2029)

- Leading Sustainable Environment
 - Providing Excellent Services
 - Diverse Engaged Communities

Demonstrating success: Annual reports will be published detailing progress with each action and with the strategy aims.

¹ Measured as the *mean*.

² World Health Organisation 2021 2nd interim target

³ World Health Organisation 2021 Air Quality Guideline

⁴ National air quality standard to be achieved by 2040 and World Health Organisation 2021 4th interim target.

Contents

1	Introduction.....	1
2	Air Quality Monitoring	7
3	Leading by Example	15
4	Collaborating with Partners.....	20
5	Reducing Emissions	23
6	Public Health and Raising Awareness	29
	Appendix 1: Actions to deliver the Air Quality Strategy	32
	Appendix 2: Air Quality Standards and Guidelines.....	41
	Appendix 3: London Atmospheric Emission Inventory	44
	Appendix 4: Monitoring Data, Further Assessment	49
	Appendix 5: Air Quality Partner Commitments	56
	Appendix 6: Air Quality Policies in the Draft City Plan 2040	58
	Technical Glossary.....	59

1 Introduction

The City of London, also known as the Square Mile, is the historic heart of London. It is home to approximately 8,600 permanent residents with a working population of around 614,500 people. In addition to workers and residents, each year the City of London welcomes millions of visitors. The City of London Corporation (City Corporation) is the governing body for the Square Mile. It manages a wide range of functions including 11,000 acres of open space which provide green lungs for the Capital.

Although much improved, air pollution remains at a level where it impacts on health. The pollutants of current concern are nitrogen dioxide (NO₂), a colourless and odourless gas that is a product of fuel combustion, and particulate matter, of which there are a wide range of sources. Particulate matter is referred to as PM₁₀ and PM_{2.5}, which are particles with a diameter of 10 micrometers (µm) or 2.5µm respectively.

The City Corporation is required by statute to monitor these air pollutants through a framework called London Local Air Quality Management (LLAQM). Following detailed air quality monitoring, the whole of the Square Mile was declared an Air Quality Management Area (AQMA) in January 2001 for annual mean concentrations of nitrogen dioxide and PM₁₀, and 1-hour concentrations of nitrogen dioxide. This was due to levels in 2001 being higher than the national standards. Once an AQMA has been designated, there is a requirement to develop and implement an Air Quality Action Plan (AQAP). The national standards were originally set in European Directives and transposed into domestic legislation.

The Environment Act 2021 set new national standards for the pollutant PM_{2.5}. Guidance that followed includes new responsibilities for local government to assist with national efforts to reduce emissions of this pollutant. These requirements are reflected in this strategy.

The City Corporation has had an AQAP in place since 2002. In 2011, the AQAP was incorporated into an Air Quality Strategy. The strategy outlined steps that would be taken to both improve local air quality and reduce the impact of air pollution on public health. The strategy is updated every five years, as a minimum, with updates published in 2015 and 2019. This strategy builds upon previous action and includes new responsibilities for helping to reduce concentrations of PM_{2.5}.

A significant improvement in air quality has been experienced across the Square Mile since the initial AQMA designation in 2001. The current national standards for PM₁₀ are met across the Square Mile, and the annual mean standard for nitrogen dioxide is only exceeded adjacent to the busiest roads. The new national standard for PM_{2.5}, 10µg/m³ as an annual mean to be achieved by 2040, is not currently achieved in the Square Mile.

Since 1987, the World Health Organisation (WHO) has issued air quality guidelines for air pollutants that have a damaging impact on health. As evidence about the adverse health

impacts of air pollution advances, the air quality guidelines are revised. The guidelines are designed to offer quantitative health-based recommendations for managing air quality. They are not legally binding, but they do provide an evidence-based tool to inform legislation and policy in WHO Member States, of which the UK is one.

Table 1.1: World Health Organisation Recommended Air Quality Guidelines and Current National Standards

Pollutant	National Standard (annual mean $\mu\text{g}/\text{m}^3$)	2021 WHO Guidelines (annual mean $\mu\text{g}/\text{m}^3$)				
		Interim Target				Guideline
		1 st	2 nd	3 rd	4 th	
Nitrogen dioxide (NO_2)	40	40	30	20	-	10
PM_{10}	40	70	50	30	20	15
$\text{PM}_{2.5}$	10*	35	25	15	10	5

* To be achieved by 2040

The aims of this strategy are:

- Over 90% of the Square Mile meets an annual mean of $30\mu\text{g}/\text{m}^3$ for nitrogen dioxide by 2030*.
- To support national and regional action that leads to the Square Mile meeting an annual mean of $15\mu\text{g}/\text{m}^3$ for PM_{10} by 2030.
- To support national and regional action that leads to the Square Mile meeting an annual mean of $10\mu\text{g}/\text{m}^3$ for $\text{PM}_{2.5}$ by 2030.

* Where total area includes roads, pavements and public spaces but excludes buildings.

These aims support the Corporate Plan outcome of providing a leading sustainable environment, providing excellent services and diverse engaged communities. The strategy will be delivered across five areas:

- 1. Air quality monitoring**
- 2. Leading by example**
- 3. Collaborating with partners**
- 4. Reducing emissions**
- 5. Public health & raising awareness**

A complete table of actions to deliver the aims of the strategy is presented in Appendix 1, with further information on air quality standards and guidelines outlined in Appendix 2.

1.1 Source of Air Pollution in the Square Mile

The quality of the air in the City of London is influenced by a range of sources, from both inside and outside of the Square Mile.

To assist with the development of targeted measures, the Greater London Authority (GLA) and Transport for London (TfL) have developed a database of emission sources across London. This is called the London Atmospheric Emissions Inventory (LAEI)⁵. The data in the inventory is approximate and should not be viewed as absolute. It has been developed as a guide to assist in decision making for tackling the main sources of air pollution. The City Corporation has also undertaken its own research to look in more detail at emissions of PM_{2.5} in the Square Mile⁶.

Nitrogen oxides (NO_x) refers to nitric oxide (NO) and nitrogen dioxide (NO₂), both of which are formed during the combustion of fuels. Nitric oxide reacts with other gases in the air to form nitrogen dioxide. These reactions take place quickly and are reversible, so the two gases are referred to together as nitrogen oxides.

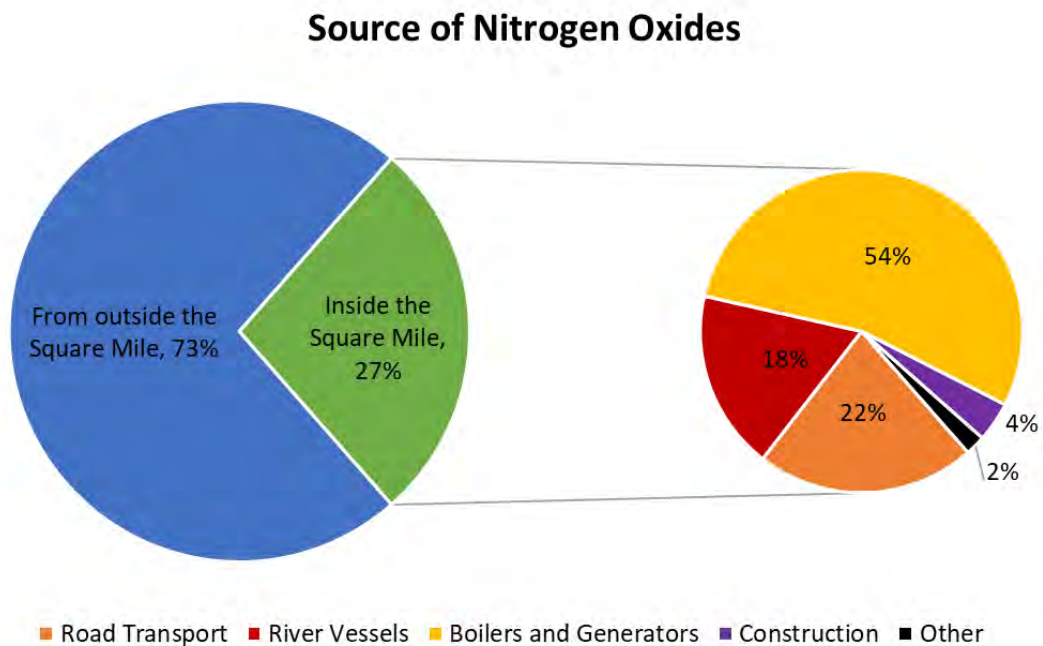
Figure 1.1 presents approximate emissions of NO_x that impact on air pollution measured in the Square Mile⁷. Approximately 75% of the nitrogen oxides in the Square Mile come from outside the boundary. The remaining 25% is made up of emissions from combustion plant such as boilers, generators, combined heat, and power plant (CHP), road transport, river vessels and construction activity. Appendix 3 details how emissions sources in the Square Mile have changed over time.

⁵ Greater London Authority (2021), London Atmospheric Emissions Inventory 2019, London Datastore

⁶ Ricardo Energy & Environment (2022), City of London – PM_{2.5} Emissions Inventory and Source Apportionment, ED16224

⁷ Cambridge Environmental Research Consultants (2024), Determination of the area of the City of London exceeding the NO₂ air quality limit value in 2022 using modelling and measurements, FM1424.

Figure 1.1: Emission Sources, Nitrogen Oxides



Particulate matter can travel large distances, with up to 33% transported to the UK from other European countries. Additionally, around 15%, comes from natural sources such as pollen, sea spray and desert dust. The remaining amount, approximately 50%, comes from anthropogenic sources such as solid fuel burning and road transport⁸.

Figure 1.2 details the approximate origin of PM₁₀ measured in the Square Mile. Over 90% is generated outside the boundary with the largest source within the Square Mile being associated with construction activity.

⁸ Department for Environment Food & Rural Affairs (2024), Emissions of air pollutants in the UK – Particulate matter (PM₁₀ and PM_{2.5})

Figure 1.2: Emission Sources, PM₁₀

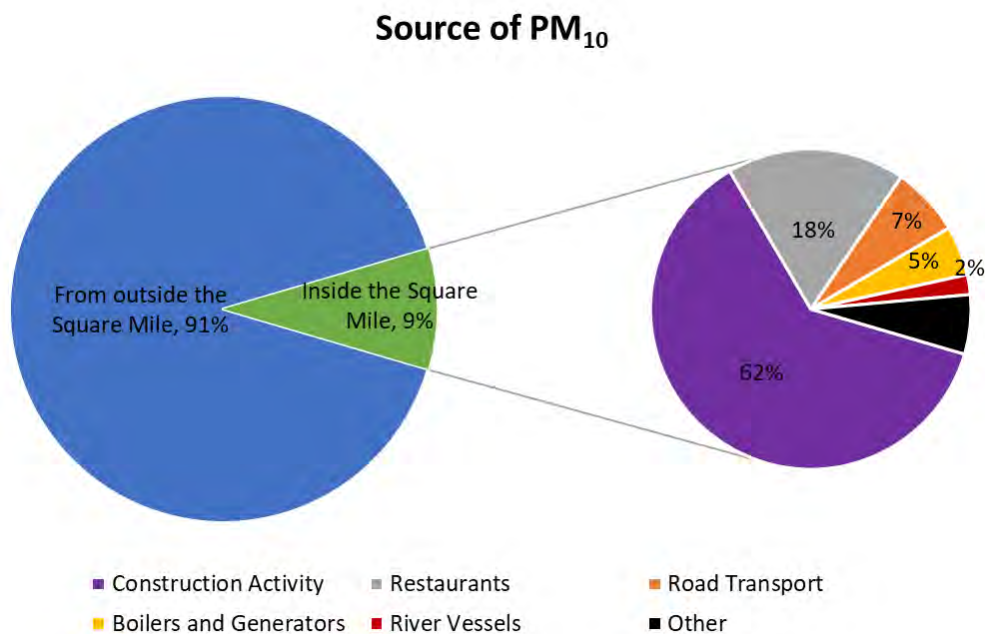
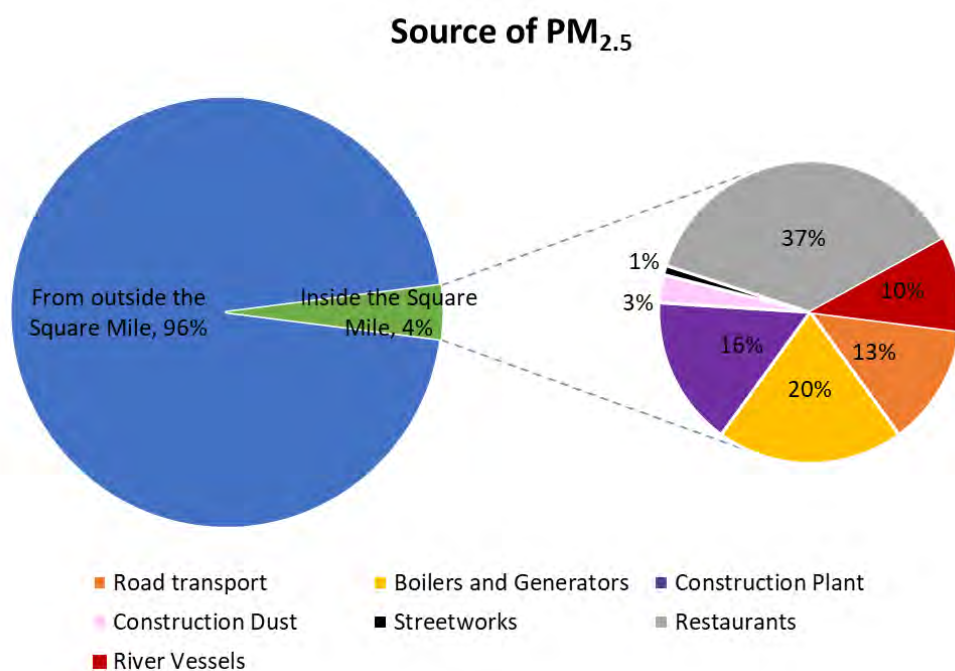


Figure 1.3 shows the approximate origin of PM_{2.5} measured in the Square Mile. 96% of that measured comes from outside the City of London boundary. Of the remaining 4%, the main contributor to local PM_{2.5} is commercial cooking, both from the fuel used and the food itself.

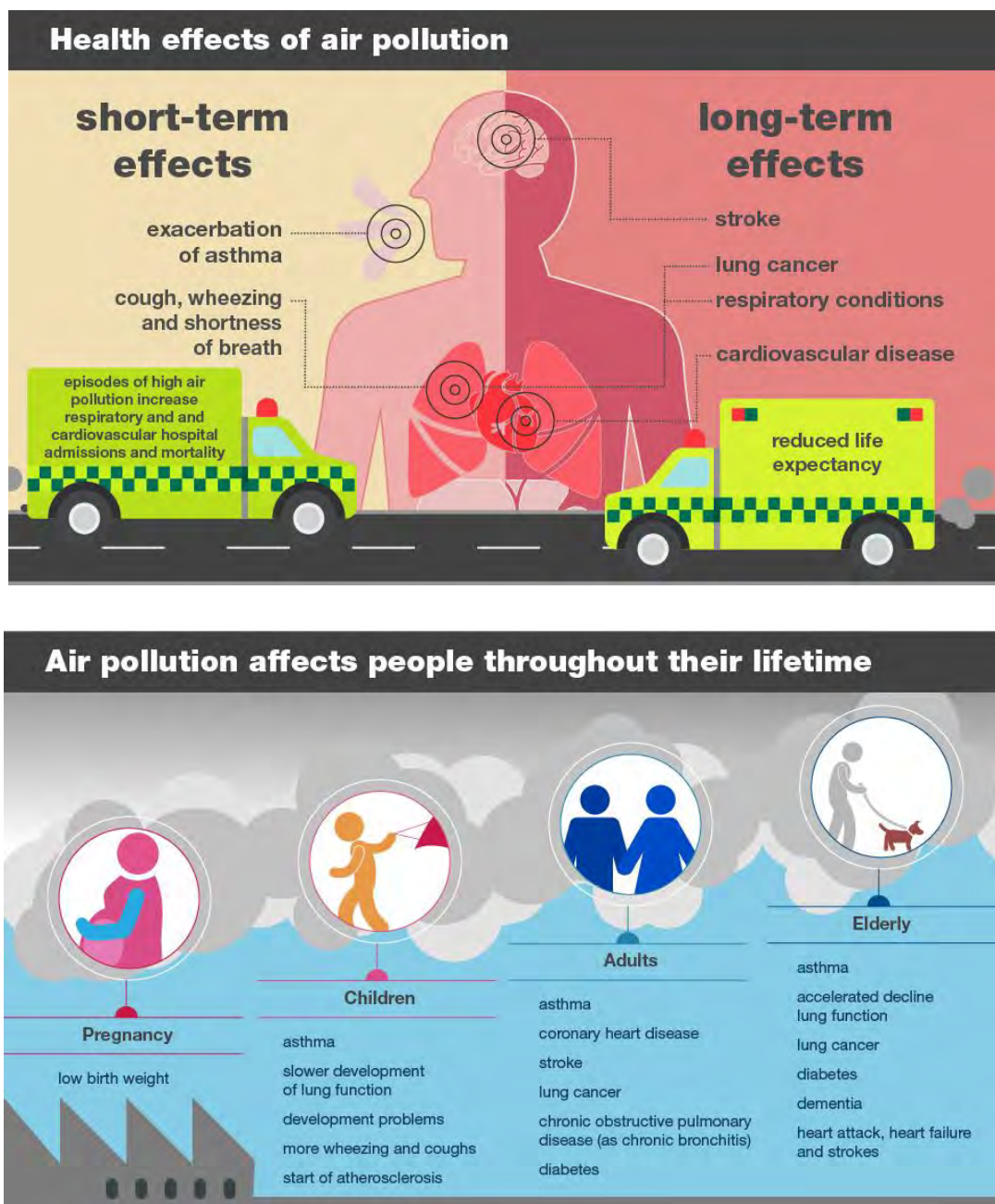
Figure 1.3: Emission Sources, PM_{2.5}



1.2 Health Impacts of Air Pollution

Air pollution is associated with a range of adverse health impacts, with the evidence base strengthening year on year. Elevated concentrations of air pollution particularly affect society's most vulnerable populations; children, the elderly, and those with existing medical conditions. Long-term exposure to air pollution can cause chronic conditions such as cardiovascular and respiratory diseases as well as lung cancer, leading to reduced life expectancy. Short-term acute exposure can impact on lung function, exacerbate asthma, and lead to an increase in respiratory and cardiovascular hospital admissions and mortality.

Figure 1.4: Health Effects of Air Pollution⁹



⁹ Source: UK Health Security Agency (2018), Health matters: air pollution

2 Air Quality Monitoring

Commitment:

The City Corporation will monitor air quality to assess compliance with national air quality standards and internal air quality targets.

The City Corporation has been monitoring air quality for over 60 years. Monitoring is a vital component of air quality management and fulfils the following functions:

- to assess compliance against air quality standards and health guidelines, and consequently the impact on health;
- to assess long term monitoring trends and the effectiveness of policies and interventions to improve air quality;
- to raise public awareness and create alerts when levels of air pollution are high.

Air pollution monitoring is undertaken across the Square Mile using two methods: automatic analysers and passive monitoring. The pollutants nitrogen dioxide, PM₁₀, PM_{2.5} and ozone (O₃) are monitored using automatic analysers. The Aldgate School monitoring site (pictured) houses equipment to measure nitrogen dioxide, PM₁₀, and PM_{2.5}. Full details of the automatic monitoring sites are provided in Appendix 4, and their locations are presented in Figure 2.1.

Passive diffusion tube samplers are devices which are exposed to the air for a month and then analysed in a laboratory later. They are used to measure NO₂ and in 2023 there were over 70 monitoring locations, see Figure 2.2. The locations selected for air quality monitoring are reviewed annually.

Full details of past monitoring locations can be found in the City Corporation Annual Status Reports (ASRs). All City Corporation automatic monitoring data is currently available on the Air Quality in England website, and diffusion tube results are available on the City Corporation website.

All 2023 monitoring data included in this draft strategy is provisional. All data undergoes rigorous checks before it is certified. The certified data for 2023 will be included in the final strategy which will be published in autumn 2024.



Figure 2.1: City Corporation Automatic Monitoring Sites

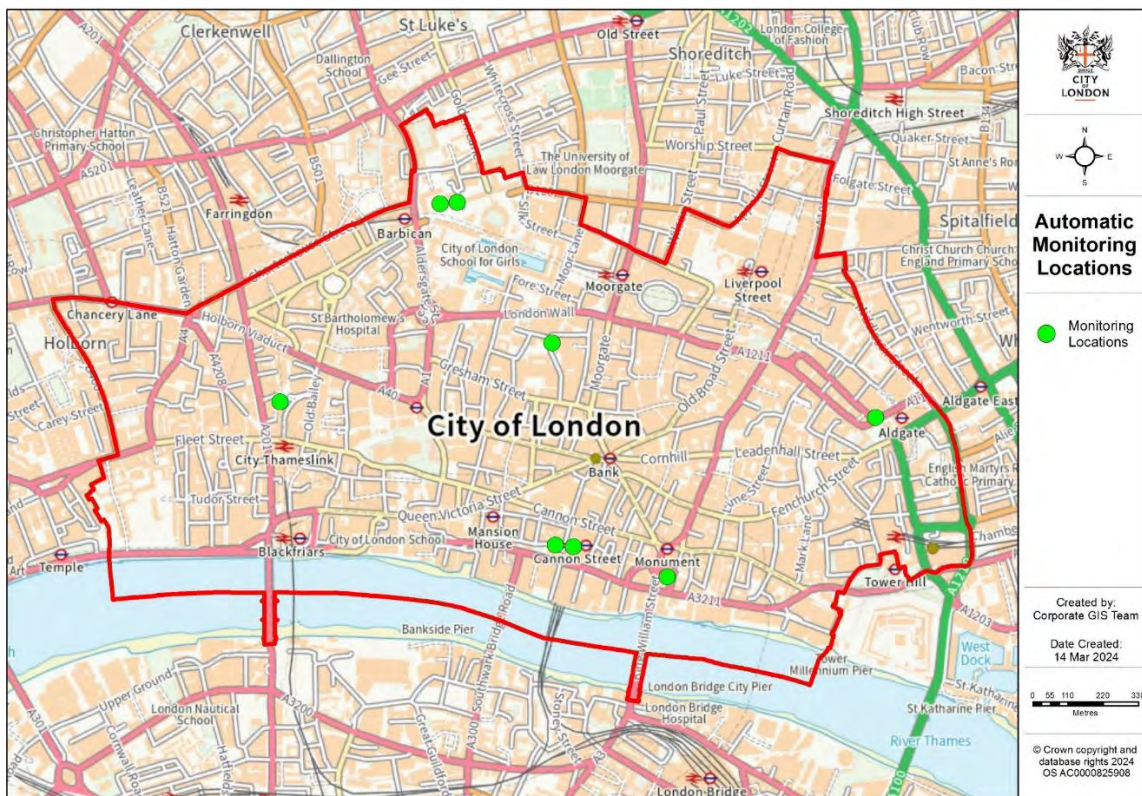
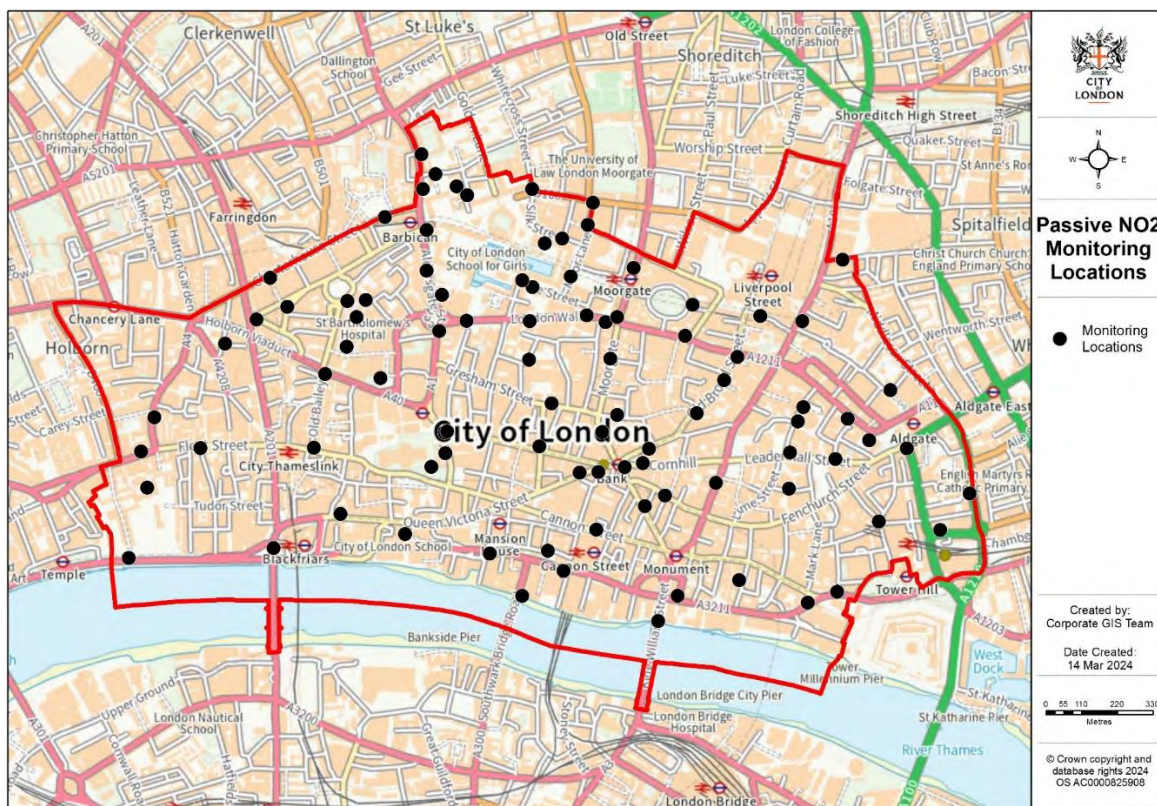


Figure 2.2: City Corporation Passive Nitrogen Dioxide Monitoring Sites



2.1 Nitrogen Dioxide, NO₂

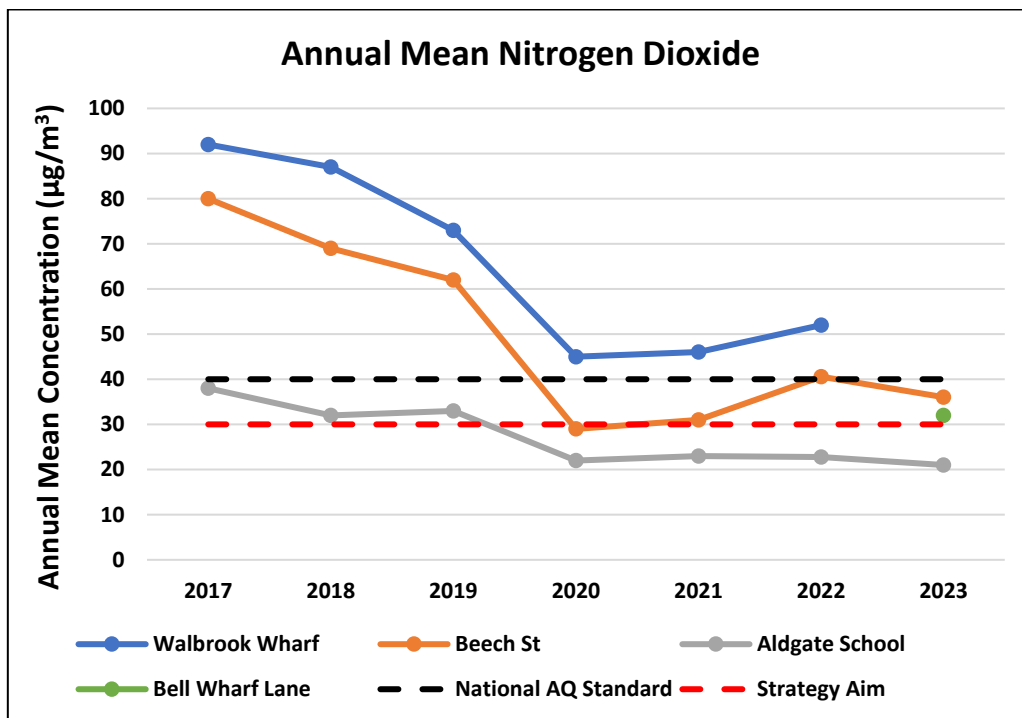
2.1.1 Continuous Monitoring

Figure 2.3 details annual mean nitrogen dioxide concentrations at City Corporation monitoring sites for the past seven years. To see how concentrations have changed over the past 15 years, see Appendix 4.

Concentrations have significantly reduced at all three locations measured. The lowest annual mean concentrations were experienced during the COVID-19 pandemic of 2020. Since 2020 there has been, as expected, a small rebound in roadside concentrations, though concentrations have not returned to pre-pandemic levels.

The final year where monitoring data was collected at the Walbrook Wharf location was 2022. This location has now been decommissioned due to changes in office accommodation, with a new monitoring site established nearby on Bell Wharf Lane.

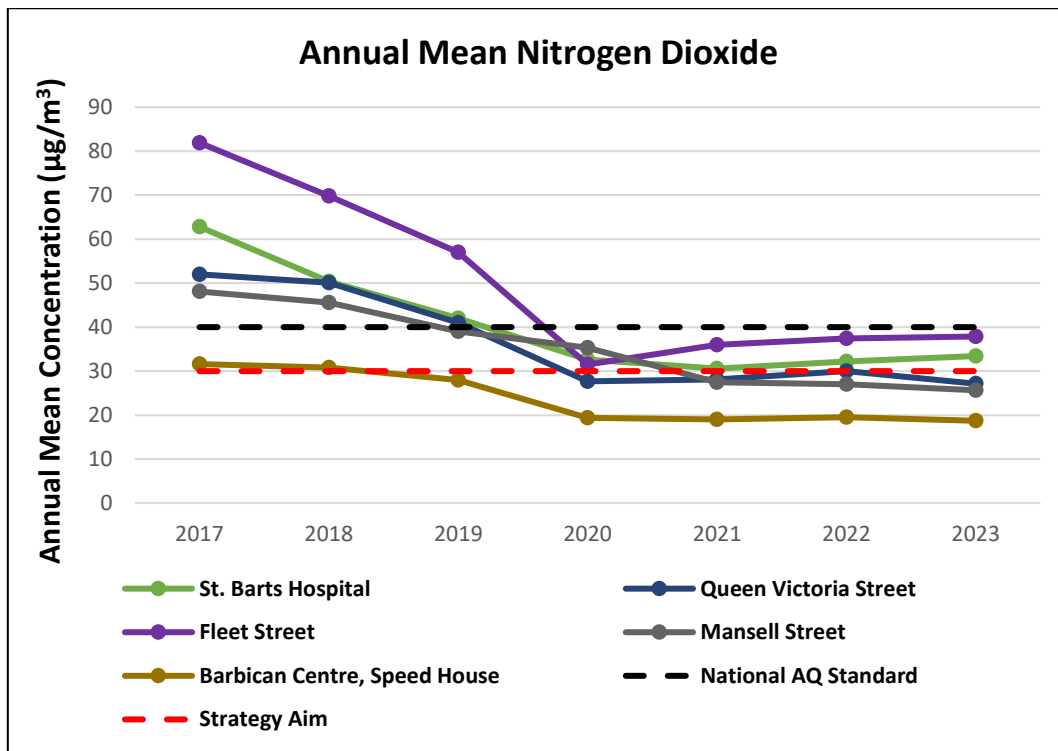
Figure 2.3: Annual Mean Nitrogen Dioxide



2.1.2 Non-continuous (Passive) Nitrogen Dioxide Monitoring

Data for five locations where nitrogen dioxide has been measured long-term using passive diffusion tubes is presented in Figure 2.4. All five sites have been compliant with the national annual mean standard since 2020, with three of the sites meeting the strategy aim for levels below $30\mu\text{g}/\text{m}^3$ in 2023.

Figure 2.4: Annual Mean Nitrogen Dioxide, Passive Monitoring

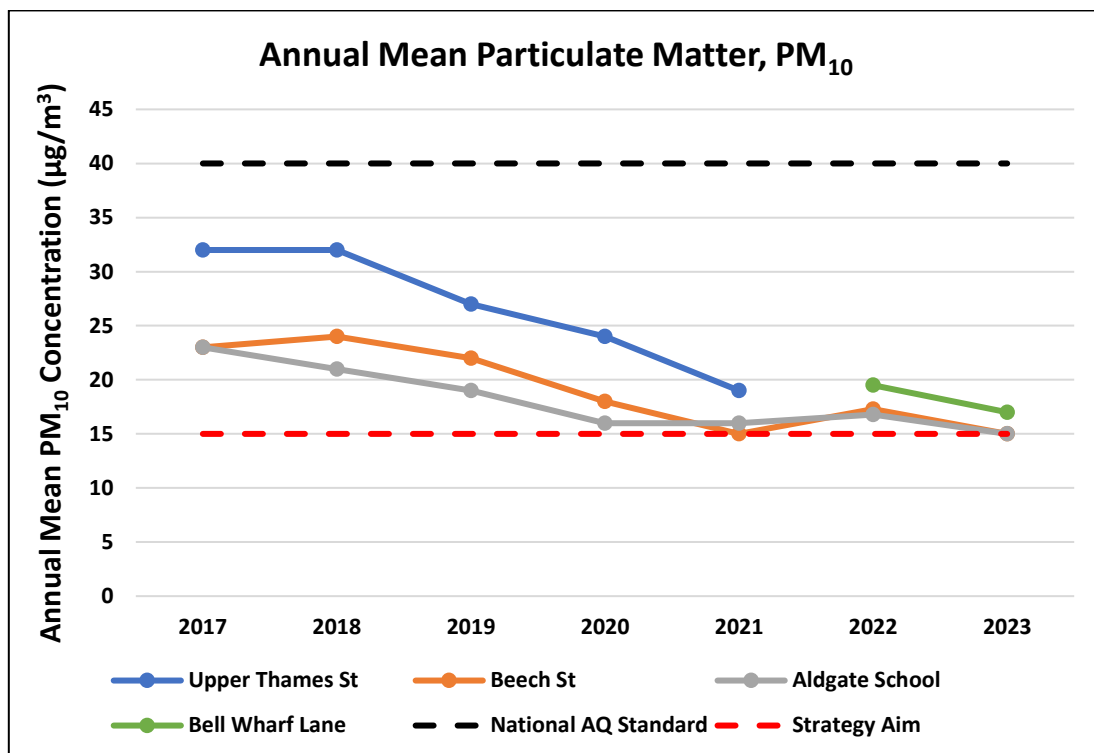


2.2 Particulate Matter, PM₁₀

Annual mean PM₁₀ concentrations have also reduced. Compliance with the national PM₁₀ annual mean standard has been achieved at all sites for the past seven years. The aim to achieve an annual PM₁₀ concentration of 15µg/m³ by 2030 was met at Beech Street in 2021, and at the Aldgate School in 2023.

2021 was the final year where monitoring data was collected at the Upper Thames Street location. This monitoring site has since been decommissioned, with a new monitoring site established nearby on Bell Wharf Lane.

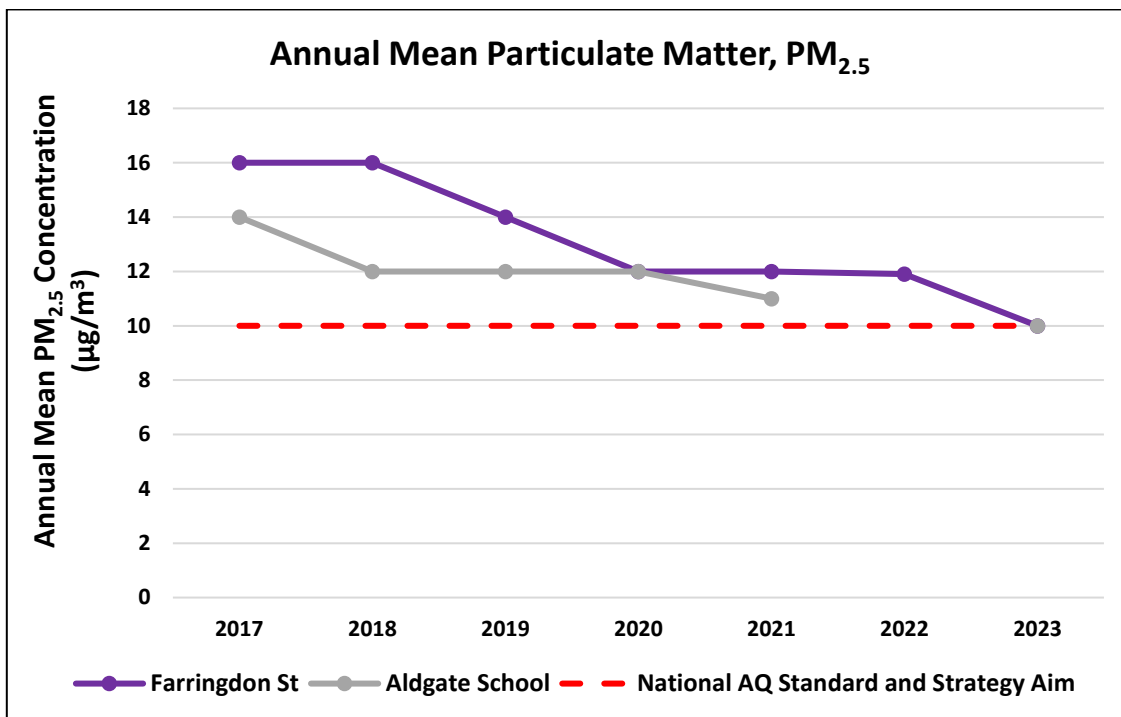
Figure 2.5: Annual Mean PM₁₀



2.3 Particulate Matter, PM_{2.5}

Both monitoring sites breach the new national standard of 10µg/m³ that is to be achieved by 2040. Similar concentrations of PM_{2.5} have been monitored at the two monitoring sites since 2020.

Figure 2.6: Annual Mean PM_{2.5}



Notes:

The 2022 result for The Aldgate School is not available due to poor data capture for the year.

2.4 Dispersion Modelling

Air quality monitoring provides data for specific locations. The monitoring data is supplemented by computer modelling to enable the assessment of a wider geographical area. In addition, modelling is also used to predict future concentrations of air pollution which assists with action planning.

The LAEI estimates both concentrations and emissions for each of the 32 London Boroughs and the City Corporation. Analysis of the current LAEI data for the City Corporation is presented in Appendix 3.

2.4.1 Demonstrating Success

Whilst air quality in the Square Mile is undoubtedly improving, there is further work to be done to ensure that the aims of this strategy are achieved.

One aim of the previous strategy was to ensure that the national air quality standard for annual mean nitrogen dioxide (40µg/m³) was achieved in over 90% of the Square Mile by 2025. An annual assessment has been undertaken since 2018 to track progress. The most recent assessment completed is for 2022. Data for 2023 will be available for the final

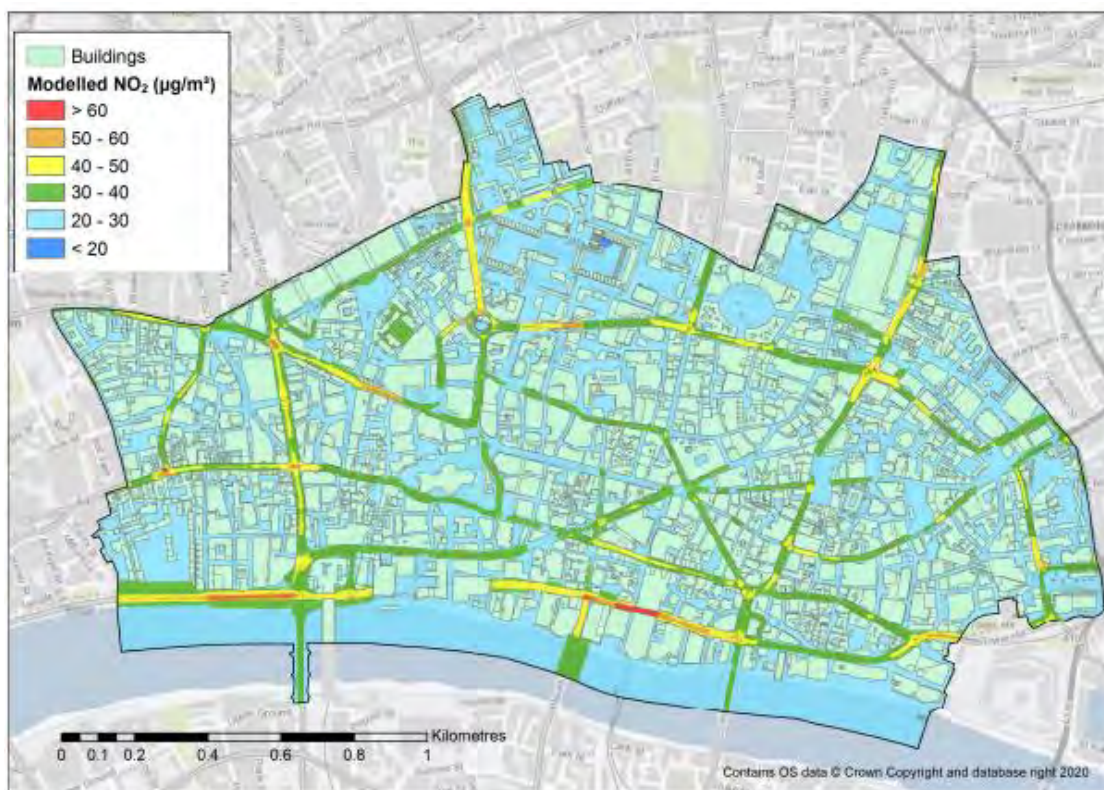
version of the strategy. As can be seen in Table 2.1 the target was met ahead of time in 2020.

Table 2.1: Nitrogen Dioxide Assessment Statistics, 2018-2022

Year	Publicly Accessible Area Meeting the Annual Mean Nitrogen Dioxide Standard, 40µg/m ³
2018	30%
2019	67%
2020	93%
2021	94%
2022	93%

One of the aims of this strategy is for over 90% of publicly accessible areas in the Square Mile to meet a nitrogen dioxide annual mean of 30µg/m³ by the end of 2030. In 2022, 76% of the Square Mile was below 30µg/m³.

Figure 2.7: Modelled Annual Mean Nitrogen Dioxide, 2022



2.5 Air Quality Monitoring on the wider City Corporation Estate

In addition to monitoring air quality in the Square Mile, the City Corporation also undertakes periodic monitoring at the City Markets, Open Spaces (public parks) and in 2024 will commence monitoring on the City Bridges.

Monitoring generally takes place to assess levels of pollution that users of the sites are exposed to. For Open Spaces, it is also done to see how air pollution impacts on

ecosystems. In Epping Forest, nitrogen dioxide and ammonia will be measured for 12 months starting in April 2024. These sites will be located near roads, in the forest itself and in locations that are sensitive to nitrogen pollutants such as heathlands and sites that are home to vulnerable species of moss. The data will be assessed to see whether levels of pollution might be damaging habitats. A similar study was undertaken in 2004.

Air Quality Monitoring

We will

Undertake monitoring of nitrogen dioxide, PM₁₀, PM_{2.5} and ozone using continuous analysers at a minimum of five locations.

Maintain a nitrogen dioxide monitoring network utilising diffusion tubes, ensuring a high degree of spatial coverage.

Review all monitoring locations annually.

Ensure the live data from the continuous monitoring network is made available to the public.

Undertake an annual assessment to demonstrate progress with the aims of this strategy.

3 Leading by Example

Commitment:

The City Corporation will lead by example to improve local air quality and reduce exposure to air pollution.

Improving air quality is a priority for the City Corporation with the development and implementation of air quality policy being overseen by the Port Heath and Environmental Services Committee. The City Corporation Health and Wellbeing Board supports measures for improving local air quality. The City's Joint Strategic Needs Assessment recognises the significance of air pollution on public health.

The City Corporation Corporate Plan 2024 to 2029¹⁰ details the City Corporation's commitment to act as a leader on environmental sustainability. Climate action and resilience, air quality, and sustainability are all aspects of ambitious targets for the entire City to be net zero by 2040.

3.1 City Corporation Fleet

The City Corporation has been reducing emissions from its own fleet for several years. This has been achieved by improved management, a reduction in size of the fleet and the purchase of newer, cleaner vehicles. The City Corporation owns or leases 122 vehicles. The majority of these are not used in the Square Mile. At the time of writing, forty of the vehicles are fully electric or hybrid.

Since January 2016, a policy has been in place that diesel vehicles cannot be purchased or leased if there are low or zero tailpipe emission options available. A fuel hierarchy is in place for new vehicles:

1. Full electric
2. Plug-in hybrid
3. Petrol hybrid (regenerative braking)
4. Petrol
5. (Euro 6/ VI) Diesel Fleet Operator Recognition Scheme Accreditation

The Fleet Operator Recognition Scheme (FORS) is a voluntary accreditation scheme designed to help fleet operators improve standards in their organisation. Bronze, Silver, or Gold accreditation is awarded to organisations based on a range of criteria including emissions and fuel efficiency. The City Corporation has been awarded the Gold FORS accreditation standard for over a decade.

3.2 Procurement Strategy

The City Corporation Procurement Strategy 2020 to 2024 and Responsible Procurement Policy, support the aims of this strategy by:

¹⁰ City Corporation (2024), Our Corporate Plan 2024-2029

- Ensuring that suppliers minimise air and noise pollution associated with contracts;
- Procuring vehicles, plant and equipment with the lowest emissions and pollutants possible.
- Large contracts include a ‘no vehicle engine idling’ policy.

Contracts that use vehicles are required to put additional measures in place to help reduce air pollution. For example, the City Corporation’s waste collection contract uses a fully electric fleet of dustcarts. There is a flexible approach with a menu of options, detailed below, which are periodically reviewed:

- Set ambitious targets for the reduction of nitrogen oxides, PM₁₀ and PM_{2.5} emissions from vehicles over the life of the contract.
- Set an ambitious target for increasing the use of zero tailpipe emission vehicles over the life of the contract.
- Set a target for a reduction in the number of motorised vehicle trips that form part of the services.
- Develop a logistics approach that avoids vehicle movements during peak congestion and pedestrian footfall times, 07:00–10:00, 12:00–14:00, 16:00–19:00.
- Use technology that supports air quality improvement e.g., gear shift indicators, stop-start ignition, software to monitor green driving.
- Green driver training for Contractor Staff used on the Contract, offer safer urban driving courses to drivers.
- Another innovative action to support the Air Quality Strategy that the City would reasonably deem of an equivalent level of ambition.

3.3 Climate Action Strategy

The City Corporation has an ambitious Climate Action Strategy (CAS)¹¹ supported by a £68 million investment. Annual carbon emissions from the City Corporation’s own operations have already been reduced by 66% between 2018/2019 and 2021/2022¹². Since 2018, 100% of the electricity purchased by the City Corporation has been from renewable sources, and in 2020 the City Corporation became the first UK local authority to sign a 15-year Power Purchase Agreement to purchase electricity from a new solar farm of 49.9MW capacity. At the time of writing, more than half of the City Corporation’s electricity comes from this renewable source.

The CAS contains the following commitments which support the aims of this strategy:

- Net zero by 2027 in the City Corporation’s operations
- Net zero by 2040 across the City Corporation’s full value chain
- Support the achievement of net zero by 2040 in the Square Mile

Measures underway to achieve the aims of the CAS include:

- Transforming the energy efficiency of operational buildings through the adoption of best available technologies

¹¹ The City of London Corporation (2020), Climate Action Strategy 2020-2027

¹² The City of London Corporation (2024), Taking Climate Action: Our Progress 2023

- Maximising use of renewable energy
- Accelerating the move to net zero carbon and improving energy efficiency in tenanted buildings
- Developing a Square Mile Local Area Energy Plan

3.4 Transport Strategy

The City Corporation Transport Strategy¹³ has delivered a reduction in the number of motor vehicles in the Square Mile¹⁴:

- The total number of motor vehicles decreased by 26% between 2017 and 2022.
- The number of freight vehicles decreased by 14% between 2017 and 2022.

At the time of writing, the City Corporation 25-year Transport Strategy is undergoing a review. The proposed approach is to continue to improve air quality through traffic reduction and support the transition of the remaining vehicles on City streets to low and zero emission.

The focus of the Transport Strategy is:

1. Prioritising the needs of people walking, making streets more accessible and delivering high quality public realm.
2. Making the most efficient and effective use of street space by reducing motor traffic, including the number of delivery and servicing vehicles.
3. Seeking to ensure that no one is killed or seriously injured while travelling on City streets, including measures to deliver safer streets and reduced speeds.
4. Enabling more people to choose to cycle by making conditions for cycling in the Square Mile safer and more pleasant.
5. Improving air quality and reduce noise, including by encouraging and enabling the switch to zero emission capable vehicles.

3.5 Rewarding Best Practice

The City Corporation runs award schemes to recognise stakeholder best practice.

3.5.1 *The Clean City Awards Scheme*

This scheme has been devised to encourage and reward sustainable business and it celebrated its 30th anniversary in 2024. The awards focus on driving action across the following areas:

- Air quality and climate action
- Communication and engagement
- Resource efficiency and circular economy
- Transitioning towards a Plastic Free City

¹³ The City of London Corporation (2019), City Streets: Transport for a changing Square Mile, City of London Transport Strategy

¹⁴ The City of London Corporation (2023), City Streets 2023 summary report

The 2024 winner of the Air Quality and Climate Action Award was 20 Fenchurch Street Ltd through their work to reduce the environmental impact of light pollution. Project Go Dark reduced energy use by 3,3780kW over a 13-month period by turning office lights off when not needed.

Figure 3.1: 2024 Air Quality and Climate Action Award Winners, 20 Fenchurch Street Ltd¹⁵



3.5.2 Considerate Contractors and Street works Schemes.

The Considerate Contractors and Street works schemes are open to contractors undertaking building and civil engineering, or street works in the Square Mile. Members of both schemes agree to follow a Code of Conduct which exceeds the legal minimum requirement and ensures that general standards of work are improved.

There are annual awards attached to membership of the schemes. The Considerate Contractors Award includes a category for exceptional or innovative environmental practice. The 2023 Environment Award was given to the Mace Group for their work at Stonecutter Court.

3.6 Proposal for New Regulatory Powers

Whilst there is a great deal of action underway to reduce emissions from road traffic, there is currently a lack of effective control to deal with emissions from combustion plant (boilers, generators, non-road mobile machinery [NRMM] and CHP).

Monitoring has revealed that there can be a significant local impact on levels of air pollution from some combustion plant. The City Corporation identified the need for a practical, local authority focused piece of legislation to deal with this form of pollution and put the proposals together in a Private Members Bill. The Emissions Reduction (Local Authorities in London)

¹⁵ 20 Fenchurch Street Ltd, courtesy of Clive Totman

Bill¹⁶ had its first reading in the House of Lords and is used as a basis for pressing for new powers to manage emissions of pollutants from combustion plant.

Leading by Example

We will:

Fulfil the City Corporation's Climate Action Strategy commitments.

Reduce emissions from the City Corporation's fleet.

Deliver the City Corporation Transport Strategy to reduce emissions from vehicles in the Square Mile.

Encourage the use of zero tailpipe emission vehicles through the City Corporation supply chain.

Deliver the Clean City Awards and Considerate Contractors Environment Award Schemes to reward exceptional and innovative practice to improve air quality.

Work with external organisations to promote the proposals in the Emissions Reduction (Local Authorities in London) Bill.

¹⁶ UK Parliament (2019), Emissions Reduction (Local Authorities in London) Bill

4 Collaborating with Partners

Commitment:

The City Corporation will work with a wide range of external partners on air quality policy and action to improve air quality across the Square Mile and Greater London.

As a significant amount of air pollution monitored in the Square Mile is not generated within its boundary, the City Corporation works with a wide range of partners to improve air quality. This collaborative work is an essential component of air quality management.

4.1 Designated Air Quality Partners

The Environment Act 2021 introduced the new concept of designated Air Quality Partners (AQPs) into the Local Air Quality Management (LAQM) framework. An AQP is required to assist a local authority with any reasonable request to work towards reducing air pollution emissions.

The designated AQPs relevant to the strategy are listed in Table 4.1, and the actions being taken by the AQPs to reduce air pollution are detailed in Appendix 5.

Table 4.1: Designated Air Quality Partners

The Mayor of London: The Greater London Authority	The London Environment Strategy was published with an aim for London to have the best air quality of any major city by 2050. The City Corporation works closely with the GLA to knowledge share and develop targeted actions to reduce air pollution.
The Mayor of London: Transport For London	Through the Mayor of London, the City Corporation also works very closely with TfL. TfL is the integrated transport authority responsible for meeting the Mayor's commitments on transport. It runs the day-to-day operation of public transport, including the licencing of taxi cabs and private hire vehicles.
The Environment Agency	The Environment Agency (EA) is a public body with responsibilities for the protection and enhancement of the environment. The EA regulates several operations that have the potential to affect air quality negatively under the Environmental Permitting Regulations. This includes combustion plant that are subject to the requirements of the Medium Combustion Plant (MCP) Directive. All new MCP should now comply with the regulations, and all existing MCP above 1MWth should have a permit in place by 1 January 2029.
The Port of London Authority	The Port of London Authority (PLA) is the custodian of the tidal Thames. The relative proportion of the river's contribution to London's emissions has been increasing as emissions from road vehicles have fallen due to newer cleaner vehicles. Initially published in the 2018, the PLA Air Quality Strategy was the first strategy developed by a port.

4.2

4.3 Additional Partnerships

In addition to the designated AQPs, the City Corporation works very closely with a range of other partners on actions to improve air quality and raise awareness.

Table 4.2: Additional Partnerships

<p>London Boroughs and London Councils</p>	<p>The City Corporation sits within the Central London Air Quality Cluster Group which is comprised of 7 London Boroughs plus the City Corporation. The group meets quarterly to discuss best practice and deliver joint programmes for improving air quality. The City Corporation also chairs the London Air Quality Steering Group. The group aims to direct and influence air policy across London. Members include London Councils, London Boroughs, the EA, the GLA, TfL, the PLA, and the UK Health Security Agency (UKHSA).</p>
<p>Cross River Partnership</p>	<p>Cross River Partnership (CRP) supports public, private, and voluntary organisations to address challenges around air quality, transport, placemaking and wellbeing. The chair of the Port Health and Environmental Services Committee co-chairs the CRP Board, and officers engage with CRP on a range of pan London projects.</p>
<p>Universities and Research Groups</p>	<p>The City Corporation sits on the Air Pollution Research in London (APRIL) steering group. APRIL identifies priority areas for research to improve air quality in London and other major cities, supports the development of new scientific research and communicates the latest research findings. In addition, the City Corporation commissions and supports research that aids understanding and improvement of air quality.</p>
<p>Third Sector</p>	<p>The City Corporation works with a range of non-government and non-profit-making organisations, with particular focus on health messaging and community engagement.</p>
<p>Businesses operating in the Square Mile</p>	<p>The City Corporation works with a range of organisations in the Square Mile to quantify and where possible reduce, air pollution emissions from their activities. This includes, but is not limited to, the construction, restaurant, finance, accounting, and legal sectors.</p>

An example of a collaborative project is *Clean Air Thames* where the City Corporation worked with the PLA and CRP. For the project, a 34-year-old river vessel was retrofitted with pollution emission reduction technology. For the vessel, Driftwood II, this resulted in reductions for all pollutants monitored, including nitrogen dioxide and particulate matter.



Collaborating with Partners

We will:

Work with designated and non-designated Air Quality Partners to collaborate on policies and measures to improve air quality across the Square Mile and Greater London.

Support research into measures to improve air quality and into the health impacts of air pollution.

5 Reducing Emissions

Commitment:

The City Corporation will implement a range of measures to reduce emissions of air pollutants across the Square Mile

5.1 Transport Emissions

The movement of people and goods in and around the Square Mile contributes to air pollution. The road network is used intensively; particularly during the working week as vehicles service City businesses. The Square Mile is located within the London Low Emission Zone, the Congestion Charge Zone, and Ultra Low Emission Zone.

The City of London is very well served by public transport. There are a high number of bus routes passing through the Square Mile, with most buses being hybrid or fully electric. A high number of Hackney Carriages are present. At the time of writing almost 8,500 licensed taxis are zero tailpipe emission capable (ZEC), which accounts for over half of the fleet.

5.1.1 Idling Vehicles Engines

The City Corporation takes a wide range of action to deal with unnecessary vehicle engine idling. This includes:

- Responding to complaints and engaging directly with drivers.
- Issuing Penalty Charge Notices where appropriate. In 2023 11 warning notices and 4 Penalty Charge Notices were issued for unnecessary engine idling in the Square Mile.
- Distributing information leaflets.
- Installing street signs and place signs on lamp posts.
- Writing directly to companies.
- Working with local businesses.
- Enforcement at street works and construction sites.



Since pioneering the volunteer led Idling Action Days in 2015, the City Corporation has overseen pan London Idling Action, and continues to work with other London boroughs on programmes to tackle unnecessary vehicle engine idling across the capital.

5.1.2 Parking Charges

The City Corporation operates an emission based on-street and off-street parking charging system. Older, more polluting vehicles pay a higher charge to park in the Square Mile, see table 5.1.

Table 5.1: Parking Charges as of 2024

Vehicle Type	On Street, Mon-Fri (p/hr)	Off Street (p/hr) *	Off Street Annual Season Ticket (per quarter)	Smithfield Overnight (up to 3-hours)
Electric or hydrogen or hybrid	£5.00	£4.50	£2,500	£1.80
Petrol vehicles registered from 2005	£7.20	£5.00	£2,650	£2.00
Diesel vehicles registered from 2015	£7.20	£5.00	£2,650	£2.00
Other vehicles	£10.00	£7.00	£3,650	£3.50

*City Corporation car parks: Baynard House, London Wall, Minories and Tower Hill

5.2 Non-Transport Emissions

Non-transport sources make a significant contribution to air pollution in the Square Mile. As emissions from road vehicles have declined in recent years, the relative proportion of emissions from non-transport sources had increased.

5.2.1 New developments

The Square Mile is in a constant state of redevelopment with planning policy being an important mechanism for improving air quality. The City Corporation is developing a new Local Plan, the City Plan 2040. This sets out the Corporation’s vision, strategy, and objectives for planning, together with policies that will guide future decisions on planning applications.

The draft City Plan 2040 supports the City Corporation’s drive to improve local air quality. The draft proposals relating to air quality are detailed in Appendix 6.

The City Corporation published an Air Quality Supplementary Planning Document (SPD) in July 2017. The SPD provides developers with information on air quality assessments, and how to mitigate air pollution through appropriate building design, method of construction and choice of heating and energy plant.

The SPD will be updated to align with the City Plan 2040, following its adoption. The update will include the latest best practice guidance and technological advances.



5.2.2 Construction and Demolition

At any given time, there are many active demolition, construction, and refurbishment sites in operation in the Square Mile. There are also many short-term street works. The City Corporation has a Code of Practice (CoP) for construction and demolition¹⁷, detailing environmental standards and operational techniques that it expects all contractors to adhere to.

Construction has been identified by the LAEI as the highest source of PM₁₀ emitted in the Square Mile. Therefore, close management and mitigation of construction emissions is a priority for the City Corporation. The CoP reflects best practice guidance issued by the Mayor of London¹⁸. Regular on-site checks are completed on all large construction sites to ensure compliance with the CoP.



5.2.3 Non-Road Mobile Machinery (NRMM)

NRMM is a broad category which includes mobile machines and equipment, or vehicles not intended for transporting goods or passengers on roads.

The City of London is within the Central Activity Zone (CAZ) of the London NRMM Low Emission Zone. The NRMM Low Emission Zone requires that all engines used on construction sites with a power rating of between 37kW and 560kW must meet a specified emission standard.

Table 5.2 details the dates by which equipment used during construction is required to meet the specified standard. Construction sites across the Square Mile are regularly inspected to ensure compliance.

Table 5.2: NRMM Low Emission Zone Requirements

	NRMM Low Emission Zone Area	
	Greater London	CAZ / Canary Wharf / Opportunity Area
Before January 2025	Stage IIIB	Stage IV
From 1 January 2025	Stage IV	Stage IV
From 1 January 2030	Stage V	Stage V

NRMM is also used in short-term street works. The emission standards used on construction sites don't apply to street works. The City Corporation has been pressing for new powers to deal with this unregulated source of pollution through its Emissions Reduction (Local Authorities in London) Bill.

¹⁷ City of London Corporation (2019), City of London Code of Practice for Deconstruction and Construction Sites, Ninth Edition

¹⁸ Mayor of London (2014), The Control of Dust and Emissions During Construction and Demolition: Supplementary Planning Guidance

5.2.4 Commercial Heat and Power

The largest source of nitrogen oxide emissions in the Square Mile is gas boilers providing heat and hot water to commercial premises. Back-up or standby diesel generators are an additional source which, although only used periodically, do contribute to air pollution in the Square Mile⁶.

The London Plan requires major developments to be net zero-carbon. The 'Be Clean' section of the energy hierarchy process, below, has driven a design shift from gas boilers to air source heat pumps in commercial buildings:

1. Connect to local existing or planned heat networks.
2. Use zero-emission or local secondary heat sources.
3. Use low-emission CHP (only where there is a case for it).
4. Use ultra-low nitrogen oxide gas boilers.

The installation of diesel fuelled backup generators in new developments is assessed through the planning process. Developers are asked to consider alternatives where possible. In 2024, a project to investigate the existing stock of backup generators in the Square Mile commenced. The aim of the project is to gather information, and to ensure any Environmental Permit requirements managed by the Environment Agency are complied with.

5.2.5 Commercial Cooking

Research undertaken by the City Corporation to assess PM_{2.5} emission sources in the Square Mile revealed that commercial cooking is the largest source at 37%⁶. Work is underway to consider how emissions from this sector can be reduced.

5.2.6 Chimneys

Under the Clean Air Act 1993¹⁹, a gas boiler with a rating of 366.4 kilowatts or more is required to have its chimney height approved by the local authority. The City Corporation ensures that chimneys of large boilers are sited and operate in a way that leads to maximum dispersal of pollutants.

5.2.7 Environmental Permitting Regulations

Local authorities regulate a variety of industrial operations to control emissions to air. In the Square Mile, the only operations subject to this are one dry-cleaning operation and the energy centre at Barts Hospital.

Larger combustion plant, boilers, generators, and combined heat and power plant are regulated by the EA. The requirement for a permit depends upon the size of the plant, and in the case of standby generators, how often they are used. All new medium sized plant, put into operation on or after 20th December 2018, will have a permit to operate with conditions designed to minimise pollution. All existing plant between 5MWth and 50MWth

¹⁹ Clean Air Act 1993. (c.11). London: The Stationery Office.

should have a permit in place by 1st January 2024 and all plant above 1MWth by 1st January 2029²⁰.

5.2.8 Smoke Control

The whole of the Square Mile is a Smoke Control Area (SCA) which means it is an offence to emit smoke from the combustion of fuel from any premises. Exemptions are allowed, for example, for a short period during start-up of an engine. The SCA has been in place since 1954²¹. In a SCA, only fuels that are on the list of authorised fuels or ‘smokeless’ fuels, can be burnt, unless an ‘exempt appliance’ is used. Authorised fuels, smokeless fuels and exempt appliances are listed on the Department for Environment, Food and Rural Affairs (Defra) website.

The City Corporation is responsible for enforcing the sale of domestic solid fuels in accordance with domestic solid fuel regulations²². Compliance checks are undertaken regularly in shops to ensure only certified solid fuel with the correct labelling is sold.

²⁰ The Environmental Permitting (England and Wales) (Amendment) Regulations (EPR) 2018 SI 110, the Medium Combustion Plant Directive (MCPD) EU/2015/2193

²¹ City of London (Various Powers) Act 1954. (2 & 3 Eliz. 2. c. xxviii). London: HMSO

²² The Air Quality (Domestic Solid Fuels Standards) (England) Regulations 2020 (SI 2020 No. 1095)

Reducing Emissions

We will:

Develop further action to reduce annual average concentrations of nitrogen dioxide on all City Corporation roads to below 40µg/m³.

Take action to discourage unnecessary vehicle idling and enforce anti-idling policies across the Square Mile.

Ensure City Corporation vehicle parking charges favour low and zero tailpipe emission vehicles.

Assess planning applications for air quality impact.

Revise the City Corporation Supplementary Planning Document for Air Quality to reflect the City Plan 2040 and London Plan Guidance.

Ensure emissions from construction sites are minimised.

Manage and mitigate emissions from non-road mobile machinery.

Reduce emissions associated with standby power generation across the Square Mile.

Develop and implement a plan to mitigate emissions of PM_{2.5} from commercial cooking.

Ensure that where possible chimney stacks terminate above the height of the nearest building.

Ensure that the City Corporation's prescribed processes comply with emission control requirements.

Promote and enforce the requirements of Smoke Control Areas and regulate the sale of solid fuel.

6 Public Health and Raising Awareness

Commitment:

The City Corporation will continue to raise awareness about air pollution and provide information on how to reduce exposure to pollution.

Although air quality is improving in the Square Mile, it remains at a level that has a detrimental impact on health. The City Corporation therefore takes a wide range of action to increase public awareness and understanding about air pollution. With the right information, people can take steps to avoid high levels of air pollution to reduce the impact on their health.

The City of London Joint Health and Wellbeing Strategy²³ has identified improving air quality as a key priority to improve the health and wellbeing of residents and workers.

A Public Health Outcomes Framework has been introduced and consists of a set of indicators compiled by the UK Health Security Agency. One of these indicators is Air Pollution, and this is measured against levels of particles (PM_{2.5}). The City of London Health profile for 2022 shows that the City of London has a proportion of mortality attributable to particulate air pollution of 8.3%. This is higher than both London as a whole (7.1%) and England (5.8%).

6.1 Provision of Information

The City Corporation uses a range of methods to inform businesses, workers, and residents about air pollution. This includes social media, the City Corporation website and providing information at events. In addition, an e-newsletter is produced every month.

The City Corporation has an X account @_CityAir. This helps to raise awareness about air pollution and support campaigns such as anti-vehicle idling and National Clean Air Day.

Overall levels of air pollution in the Square Mile vary from day to day in response to weather conditions. Levels of air pollution each day are defined as either 'low', 'medium', 'high' or 'very high' which reflects banding devised by the Government²⁴. High levels of air pollution occur in the City of London on a small number of days in any year and instances of very high levels of air pollution are now very rare.



The City Corporation's free Smart Phone App 'CityAir' provides advice to users when pollution levels are high or very high. People can sign up and receive tailored messages to help them avoid high levels of air pollution. The App includes a map of current pollution

²³ The City of London Corporation (2017), Joint Health and Wellbeing Strategy: 2017-2020

²⁴ Department for environment, Food and Rural Affairs (2013), Update on Implementation of the Daily Air Quality Index: Information for Data Providers and Publishers

levels and has a function to guide users along low pollution routes. The City Corporation also supports the provision of the AirText messaging service. AirText is promoted to residents and workers who use the service to receive alerts by email, text, and voicemail.

The Mayor of London provides information about levels of pollution through a range of outlets. TfL broadcasts advice whenever air pollution is moderate, high, or very high, and information is sent directly to schools, healthcare professionals, and care homes across London.



As part of a Defra funded project, and in collaboration with the three London boroughs: Hackney; Tower Hamlets and Newham, a web-based information tool ‘Air Aware’ has been developed. Air Aware aims to improve awareness of air quality and highlights ways in which people can reduce their exposure, and their emissions, of air pollution. A group of residents from all participating boroughs helped design the website to ensure it contained information relevant to them and their communities.

6.2 National Clean Air Day

National Clean Air Day is held in June each year. A range of activities are carried out nationally to raise awareness of air pollution and inspire behaviour change. National Clean Air Day is supported by the City Corporation and each year a diverse schedule of events and activities are run by the air quality team.



6.3 Working with Schools and nurseries

Air quality is measured at all schools and nurseries in the Square Mile. Annual reports are produced containing the monitoring data, and all schools and nurseries are offered awareness raising support and information on how to reduce exposure on routes to and from school.

6.4 Working with businesses

Around 614,500 people work in the City of London. Through the CityAir business engagement programme, the City Corporation has been raising awareness of air pollution with workers. This includes supporting events and providing information for internal dissemination.



6.5 Indoor air quality

As concentrations of ambient air pollution improve, attention is turning to indoor air quality. Whilst there is no statutory obligation for local authorities to review and assess indoor air

quality, they are encouraged, through government guidance, to provide information to residents. The City Corporation has produced an information leaflet on the sources and health impacts of indoor air pollution.

The City Corporation is also part of a consortium of 16 London boroughs working on a project to assess indoor air quality and the impact of household behaviour change.

Public Health and Raising Awareness

We will:

Prepare annual air quality briefings for colleagues and for the Director of Public Health.

Disseminate information about air quality.

Run events in support of National Clean Air Day.

Work with schools and nurseries in the Square Mile.

Work with businesses to raise awareness of air pollution amongst workers.

Raise awareness of the health impacts of poor indoor air quality.

Appendix 1: Actions to deliver the Air Quality Strategy

Table Key

Dept. = Department responsible

CHB = Chamberlain's

Env = Environment

IG = Innovation and Growth

Cost = Approximate cost to the organisation per annum:

✓ = <£10,000, ✓✓ = £10,000 - £50,000, ✓✓✓ = >£50,000

Action	Detail	Timeline	Outcome	Dept.	Cost
1	<p>Air quality monitoring.</p> <p>Undertake monitoring of nitrogen dioxide, PM₁₀, PM_{2.5} and ozone using continuous analysers at a minimum of five locations in the Square Mile.</p> <p>Maintain a nitrogen dioxide monitoring network utilising diffusion tubes, ensuring a high degree of spatial coverage across the Square Mile.</p> <p>Review all monitoring locations annually.</p>	Present to 2030	<p>An effective monitoring network providing accurate, trusted, and accessible data.</p> <p>Monitoring data to demonstrate compliance with statutory obligations and assessing the impact of interventions.</p>	Env	✓✓
2	<p>Air quality data dissemination.</p> <p>Ensure live data from the continuous monitoring network is made available to the public.</p>	Present to 2030	<p>Better informed public who can make decisions based on available data.</p>	Env	✓✓
3	<p>Compliance assessment.</p> <p>Undertake an annual assessment to demonstrate progress with the aims of this strategy.</p>	Annually	<p>Meet statutory obligations for reporting.</p> <p>Track progress with meeting the aims of this strategy.</p>	Env	✓✓

		Action	Detail	Timeline	Outcome	Dept.	Cost
Leading by Example	4	Fulfil the City Corporation's Climate Action Strategy commitments.	<p>Improve the energy efficiency of operational buildings.</p> <p>Maximise the use of renewable energy sources across operational buildings.</p> <p>Accelerate the move to net zero carbon and improving energy efficiency in tenanted buildings.</p> <p>Develop a Square Mile Local Area Energy Plan.</p>	Present to 2030	Reduced emissions from the City Corporation's operations.	IG	✓✓✓
	5	Reduce emissions from the City Corporation's fleet.	<p>Increase the proportion of electric, hybrid and other low emission / zero tailpipe emission vehicles in the fleet.</p> <p>Work to reduce the size of the corporate fleet.</p> <p>Maintain the Freight Operator Recognition Scheme Gold accreditation.</p>	<p>Present to 2030</p> <p>Annually</p>	Reduced emissions from the City Corporation's fleet.	Env CHB	✓✓✓
	6	Deliver the City Corporation Transport Strategy.	<p>Prioritising the needs of people walking, making streets more accessible and delivering a high-quality public realm.</p> <p>Making the most efficient and effective use of street space by reducing motor traffic, including the number of delivery and servicing vehicles.</p> <p>Enabling more people to choose to cycle by making conditions for cycling</p>	Present to 2030	Reduced emissions from transport across the Square Mile.	Env	✓✓✓

		in the Square Mile safer and more pleasant.				
		Encouraging and enabling the switch to zero tailpipe emission capable vehicles.				
7	Encourage the use of zero tailpipe emission vehicles through the City Corporation supply chain.	Apply a menu of options for air quality to assist in reducing air pollution from major contracts. Review the menu of options every two years.	Present to 2030 Biannually	Reduced emissions associated with the City Corporation's contracts.	CHB Env	✓
8	Deliver the Clean City Awards and Considerate Contractors Environment Award Schemes.	Reward businesses that take positive action to improve air quality through an annual award. Reward building and civil engineering projects that demonstrate exceptional or innovative practice	Annually	Reduced emissions from City businesses.	Env	✓✓
9	Work with external organisations to promote the proposals in the Emissions Reduction (Local Authorities in London) Bill.	Work with Defra to highlight the need for additional powers for local authorities. Respond to consultations promoting the proposals in the Bill.	Present to 2030	Closed gap in regulatory powers for tackling sources of pollution in the Square Mile.	Env	✓✓

Action		Detail	Timeline	Outcome	Dept.	Cost
10	Work with designated and non-designated Air Quality Partners to collaborate on policies and measures to improve air quality across the Square Mile, and Greater London.	<p>Support the activities of the Mayor of London air quality department.</p> <p>Monitor air pollution along the river and support the delivery of the Port of London Air Quality Strategy.</p> <p>Support the Environment Agency with the implementation of the Medium Combustion Plant Directive.</p> <p>Work with Cross River Partnership on collaborative projects.</p> <p>Work on joint projects with the Central London Air Quality Cluster Group.</p> <p>Chair quarterly meetings of the London Air Quality Steering Group.</p>	Present to 2030	Collaboration and the development and implementation of cross London policies for improving air quality.	Env	✓✓
11	Support research into measures to improve air quality and into the health impacts of air pollution.	<p>Identify priority areas for research to improve air quality and communicate the latest research through membership of APRIL.</p> <p>Investigate the impact of tall buildings on levels of air pollution at street level</p> <p>Subject to funding, commission and support research that aids the understanding and improvement of air quality.</p>	Present to 2030	<p>Improved understanding of how air pollution behaves in a complex urban environment.</p> <p>Increased understanding and support for new technologies and other solutions for reducing air pollution</p>	Env	✓✓

		Action	Detail	Timeline	Outcome	Dept.	Cost
Reducing Emissions	12	Assess options for reducing annual average concentrations of nitrogen dioxide on all City Corporation roads to below 40µg/m ³ .	Identify all roads that breach the national standard for nitrogen dioxide. Assess options for reducing emissions of air pollutants to ensure compliance.	2025 - 2027	All roads in the Square Mile that meet the annual average national standard of 40µg/m ³ .	Env	✓✓✓
	13	Take action to discourage unnecessary vehicle idling and enforce anti-idling policies across the Square Mile.	Issue Penalty Charge Notices for unnecessary vehicle engine idling. Respond to complaints and erect signs in hot spot areas. Provide awareness training to advise drivers to switch off when parked. Work with London boroughs on pan London action to deal with unnecessary engine idling	Present to 2030	Reduced emissions from unnecessary vehicle idling in the Square Mile. Raised awareness amongst drivers and increased support for anti-idling policy.	Env	✓
	14	Ensure City Corporation parking charges favour low and zero tailpipe emission vehicles in the Square Mile.	On-street and off-street parking charges applied based on vehicle emissions.	Present to 2030	Parking policies that favour low and zero emission vehicles.	Env	✓
	15	Assess planning applications for air quality impact.	Review all relevant planning applications for air quality impact. Require air quality assessments for major developments. Encourage the use of non-combustion technology. Apply stringent emission standards for combustion plant where non-combustion plant is not feasible.	Present to 2030	New developments that do not have a negative impact on local air quality.	Env	✓

		<p>Require all new developments to be Air Quality Neutral as a minimum, and Air Quality Positive where relevant.</p> <p>Require developers to consider alternatives to diesel standby generators.</p> <p>Update the Supplementary Planning Document for Air Quality to reflect the latest guidance.</p>	2025			
16	Ensure emissions from construction sites are minimised.	<p>Ensure compliance with the Code of Practice for Deconstruction and Construction Sites.</p> <p>Inspect construction sites and respond to complaints.</p>	Present to 2030	Reduced emissions from construction activities and plant.	Env	✓
17	Manage and mitigate emissions from non-road mobile machinery.	<p>Undertake inspections of all sites to ensure compliance with the NRMM Low Emission Zone.</p> <p>Support the Mayor of London NRMM Beyond Construction project to understand emissions from NRMM used for roadworks and licenced events.</p>	<p>Present to 2030</p> <p>2025 - 2026</p>	Reduced emissions associated with construction and demolition operations.	Env	✓
18	Reduce emissions associated with standby power generation across the Square Mile.	Work with building owners to investigate options for reducing emissions and an alternative means of providing emergency back-up power.	2025 - 2026	Reduced emissions from generators.	Env	✓
19	Develop and implement a plan to mitigate emissions of PM _{2.5} from commercial cooking.	Run an awareness raising campaign for mobile food vendors and commercial cooking establishments.	2025 - 2026	Reduced emissions of particulate pollution associated with commercial cooking.	Env	✓

		Work with neighbouring authorities on proposals to mitigate emissions from commercial cooking operations.				
20	Ensure that where possible chimney stacks terminate above the height of the nearest building.	Where combustion plant is installed, good dispersion of emissions will be required.	Present to 2030	Emissions from chimney stacks have minimal impact on ground level concentrations of air pollution.	Env	✓
21	Ensure that the City Corporation's prescribed processes comply with emission control requirements.	Carry out risk-based inspections of prescribed processes in the Square Mile.	Present to 2030	Regulated operations that comply with the requirements of the legislation.	Env	✓
22	Promote and enforce the requirements of Smoke Control Areas and regulate the sale of solid fuel.	<p>Enforce smoke control provisions and raise awareness of the requirements across the Square Mile.</p> <p>Annual inspections of retail premises that sell solid fuel</p> <p>Engage with food premises to ensure the correct appliances and compliant fuels are used.</p>	Present to 2030	A reduction in the amount of smoke, PM ₁₀ and PM _{2.5} emitted in the Square Mile.	Env	✓

	Action	Detail	Timeline	Outcome	Dept.	Cost	
Public Health and Raising Awareness	23	Prepare annual air quality briefings for colleagues and for the Director of Public Health.	Annual summary report detailing air quality data and action being taken to tackle air pollution.	Annually	Better informed colleagues.	Env	✓
	24	Disseminate information about air quality.	Promote the free CityAir Smart Phone App, the AirText service and Air Aware.	Present to 2030	Better informed public able to take steps to reduce exposure to poor air quality.	Env	✓
			Disseminate an e-newsletter.	Monthly			
			Raise awareness through social media channels.				
			Bi-monthly community engagement at City of London libraries.	2025			
	25	Run events in support of National Clean Air Day.	Run up to three events each year.	Annually	Better informed individuals able to take steps to reduce exposure to poor air quality.	Env	✓
	26	Work with schools and nurseries in the Square Mile.	Monitor air pollution at all schools and nurseries. Provide ongoing advice and support and produce annual information reports for each school and nursery.	Annually	Reduced the impact of air pollution on the health of children in the Square Mile.	Env	✓
27	Work with businesses to raise awareness of air pollution amongst workers.	Engage with business through the CityAir business engagement programme.	Present to 2030	Raised awareness of air pollution amongst workers in the City of London	Env	✓✓	
28	Raise awareness of the health impacts of poor indoor air quality.	Disseminate a leaflet about indoor air quality. Work with a consortium of 16 London boroughs to investigate residential indoor air quality.	Present to 2030 2024-2026	Improved understanding of how to improve indoor air quality. Identify sources of air pollution in residential properties.	Env	✓	

Appendix 2: Air Quality Standards and Guidelines

National Context

In the UK, the responsibility for meeting air quality standards is devolved to the national administrations. The Secretary of State for Environment, Food and Rural Affairs has responsibility for meeting these in England. The Air Quality Standards Regulations 2010²⁵ contains the relevant standards and compliance date for different pollutants.

Table A2.1: UK Air Quality Standards

Pollutant	Standard	Concentration (mean)	Date to be achieved
Nitrogen Dioxide (NO ₂)	200µg/m ³ not to be exceeded more than 18 times per year	1-hour	1 January 2010
	40µg/m ³	Annual	1 January 2010
Particulate Matter, PM ₁₀	50µg/m ³ not to be exceeded more than 35 times per year	24-hour	31 December 2004
	40µg/m ³	Annual	31 December 2004
Particulate Matter, PM _{2.5}	20µg/m ³	Annual	1 January 2020
	20% reduction in concentrations	Annual	Between 2010 and 2020
Ozone	100µg/m ³ not to be exceeded more than 10 times per year	8-hour	31 December 2005

The Environment Act 2021, set additional legally binding targets for PM_{2.5} in England.

Table A2.2: The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023

Pollutant and Metric	Standard	Target Year
PM _{2.5} annual mean concentration	Interim target: 12µg/m ³	2028
PM _{2.5} annual mean concentration	Legally binding target: 10µg/m ³	2040
PM _{2.5} population exposure	Interim target: 22% reduction in exposure compared to 2018	2028
PM _{2.5} population exposure	Legally binding target: 35% reduction in exposure compared to 2018	2040

The Air Quality Standards Regulations²⁵ requires the UK to complete an air quality assessment annually and to report the findings. The annual Air Pollution in the UK report²⁶ provides a high-level summary of compliance, against the pollutants stated above and

²⁵ The Air Quality Standards Regulations 2010 (SI 2010 No. 1001)

²⁶ Department for Environment, Food and Rural Affairs (2023), Air Pollution in the UK 2022

many others, alongside background information on the UK’s legal and policy framework and how air pollution is assessed.

For further information about national air quality legislation please see footnotes²⁷ and ²⁸.

Local Authority Context

The statutory process for action by local authorities is the Local Air Quality Management (LAQM) Framework. The framework sets local limits for air pollution prescribed in the Air Quality (England) Regulations 2000 (as amended in 2002)²⁹. Local authorities are required to assess the quality of ambient air. If it does not comply with the relevant concentrations, an Air Quality Management Area (AQMA) must be declared, and an Air Quality Action Plan (AQAP) published to address the areas of poor air quality. This strategy fulfils the role of an AQAP.

In London, the Greater London Authority (GLA) provides technical and policy context to all London boroughs plus the City Corporation. This London specific guidance is called London Local Air Quality Management (LLAQM) framework.

Table A2.3: LAQM Air Quality Standards in England

Pollutant	Standard	Averaging Period
Nitrogen dioxide (NO ₂)	200µg/m ³ not to be exceeded more than 18 times a year	1-hour mean
	40µg/m ³	Annual mean
Particles (PM ₁₀)	50µg/m ³ not to be exceeded more than 35 times a year	24-hour mean
	40µg/m ³	Annual mean
Particles (PM _{2.5})	Work towards reducing emissions/concentrations of (PM _{2.5})	Annual mean

International Context

The above sets out the national context in terms of air quality legislation. On an international scale, the World Health Organisation (WHO) sets Air Quality Guidelines (AQGs) for ambient air pollutants³⁰. They are designed to offer quantitative health-based recommendations for managing air quality. They are not legally binding, but they do provide an evidence-based tool to inform legislation and policy in WHO Member States, of which the United Kingdom is one. Current air quality targets in the UK are based on the 2005 guidelines.

²⁷ House of Commons (2024), Air Quality: policies, proposals, and concerns

²⁸ Department for Environment, Food and Rural Affairs (2023), Air quality strategy: framework for local authority delivery

²⁹ The Air Quality (England) (Amendment) Regulations 2002 (SI 2002 No. 3043)

³⁰ World Health Organisation (2021), WHO global air quality guidelines: Particulate matter (PM_{2.5} and PM₁₀), ozone, nitrogen dioxide, sulfur dioxide and carbon monoxide

As evidence about the harmful health impacts of air pollution advances, the air quality guidelines are revised. The latest set of guidelines were published in September 2021. The 2021 guidelines are more stringent than those set in 2005 for nitrogen dioxide and particulate matter, PM_{2.5} and PM₁₀. They are presented in Table A2.4 below.

In addition to the guidelines, interim targets have been set to guide the reduction of air pollution towards the achievement of the guidelines. This recognises the difficulty that some countries will face in meeting the new recommendations. The WHO considers there to be no safe limit of exposure to PM_{2.5}, and any reduction in PM_{2.5} leads to positive health outcomes.

Table A2.4: World Health Organisation Recommended Air Quality Guidelines

Pollutant	Averaging Period	2021 Guidelines					2005 Guidelines
		Interim Target ($\mu\text{g}/\text{m}^3$)				AQG ($\mu\text{g}/\text{m}^3$)	AQG ($\mu\text{g}/\text{m}^3$)
		1 st	2 nd	3 rd	4 th		
Nitrogen dioxide (NO ₂)	Annual mean	40	30	20	-	10	40
	24-hour*	120	50	-	-	25	-
PM ₁₀	Annual mean	70	50	30	20	15	20
	24-hour*	150	100	75	50	45	50
PM _{2.5}	Annual mean	35	25	15	10	5	10
	24-hour*	75	50	37.5	25	15	25

* 99th Percentile, equates to 3-4 exceedance days per year.

Appendix 3: London Atmospheric Emission Inventory

The Greater London Authority maintains a database of emission sources across London known as the London Atmospheric Emissions Inventory (LAEI). At the time of writing, the latest release of the LAEI has a baseline of 2019 and forecast years of 2025 and 2030. It should be noted that 2025 and 2030 are predictions from the baseline of 2019 and so the data should not be treated as absolute. The forecasts are based upon Mayor of London and wider national policies.

Pollutant Concentrations

Figures A3.1-A3.3 present computer modelled concentrations of nitrogen dioxide and particulates, PM₁₀ and PM_{2.5}, across the City of London for 2025 and 2030. Both 2025 and 2030 have been presented as they align with the implementation of this strategy. The forecasts do not include the measures detailed in Appendix 1.

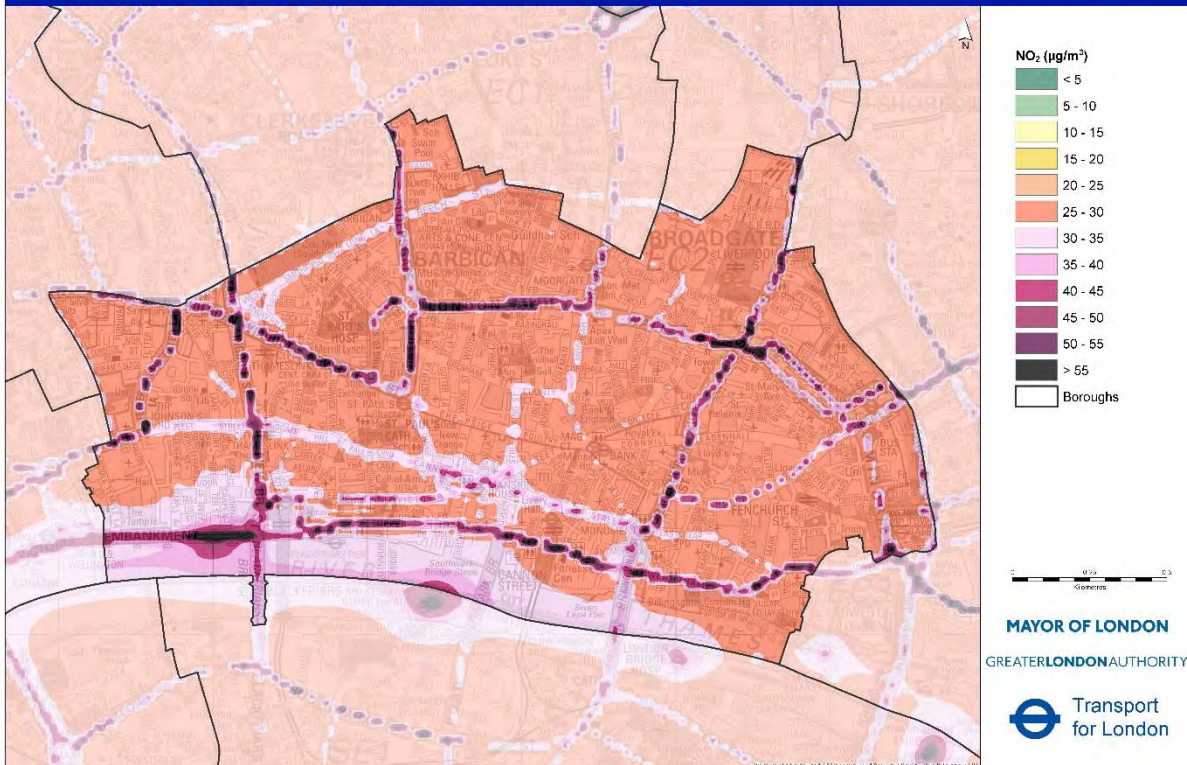
Figure A3.1 shows that the majority of the Square Mile is predicted to be below the nitrogen dioxide annual mean standard of 40µg/m³ in 2025. The areas that remain in exceedance are the main road links. Away from the transport sources concentrations are between 25 and 30µg/m³. This is confirmed by monitoring data.

When compared to nitrogen dioxide, there is less geographical variation in modelled concentrations of particulate matter. Figure A3.2 shows that the majority of the Square Mile will have an annual mean concentration for PM₁₀ in 2025 of between 15 and 20µg/m³. This is significantly below the PM₁₀ annual mean standard of 40µg/m³. Slightly elevated concentrations are predicted in the carriageway of busy road links such as Farringdon Street, Bishopsgate, and Upper/Lower Thames Street.

Figure A3.3 shows that the majority of the Square Mile will have an annual mean concentration for PM_{2.5} in 2025 of between 10 and 12.5µg/m³. Like the PM₁₀ concentration maps, slightly elevated concentrations of PM_{2.5} are expected in the carriageway of the busiest roads.

Figure A3.1: Annual Mean Nitrogen Dioxide Concentrations, 2025 and 2030

London Borough of City of London **LAEI 2019**
Annual Mean NO₂ concentrations 2025



London Borough of City of London **LAEI 2019**
Annual Mean NO₂ concentrations 2030

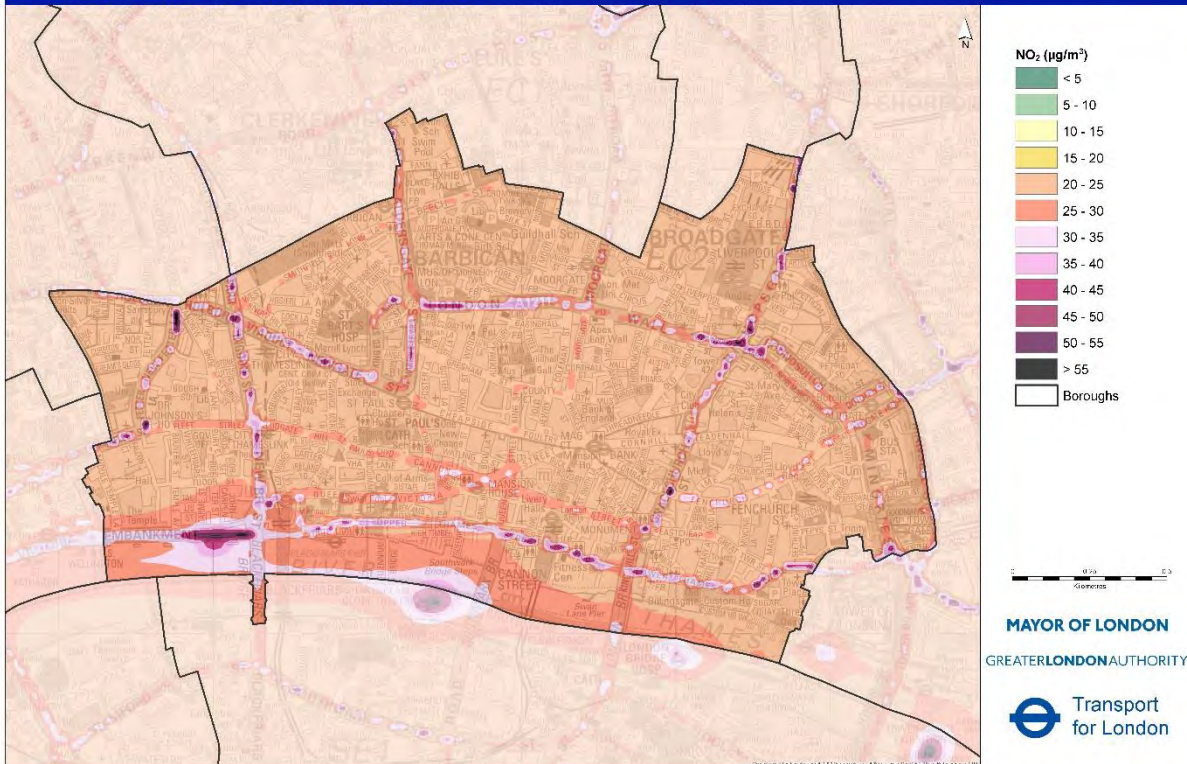


Figure A3.2: Annual Mean PM₁₀ Concentrations, 2025 and 2030

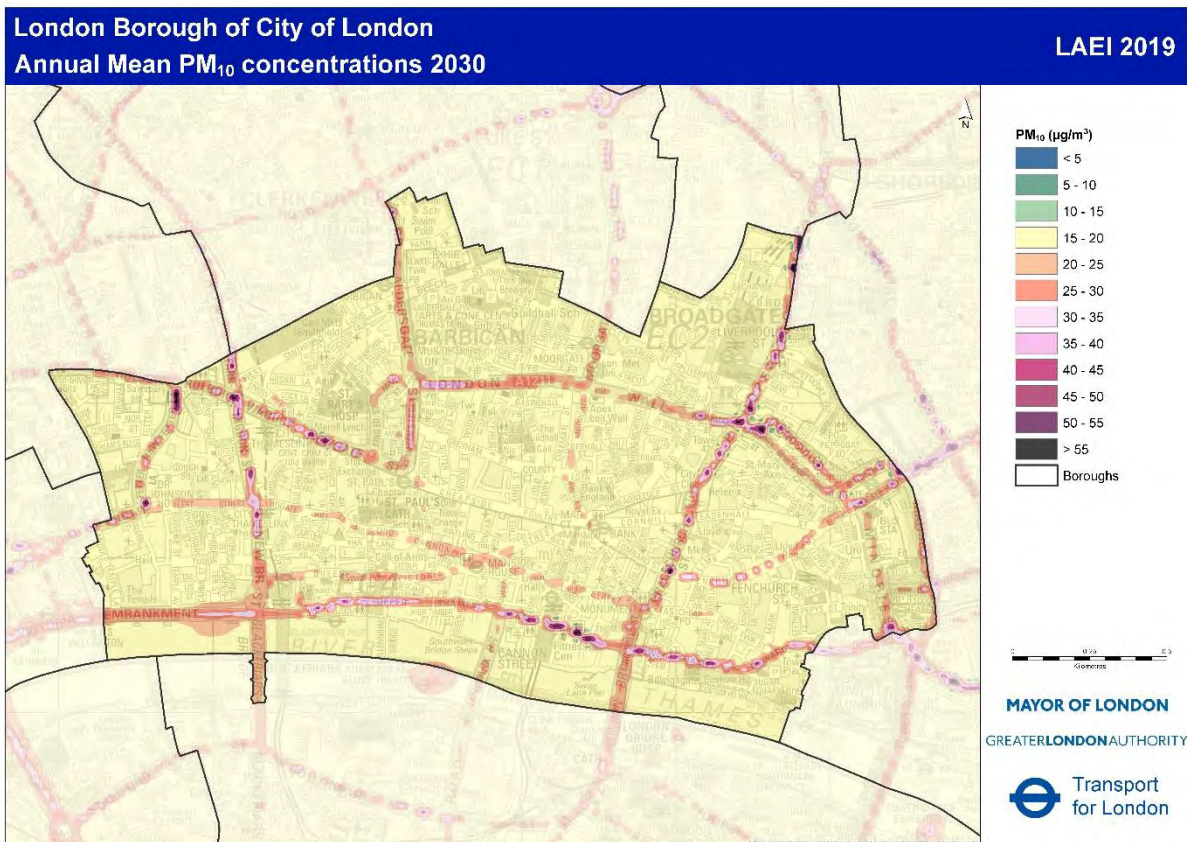
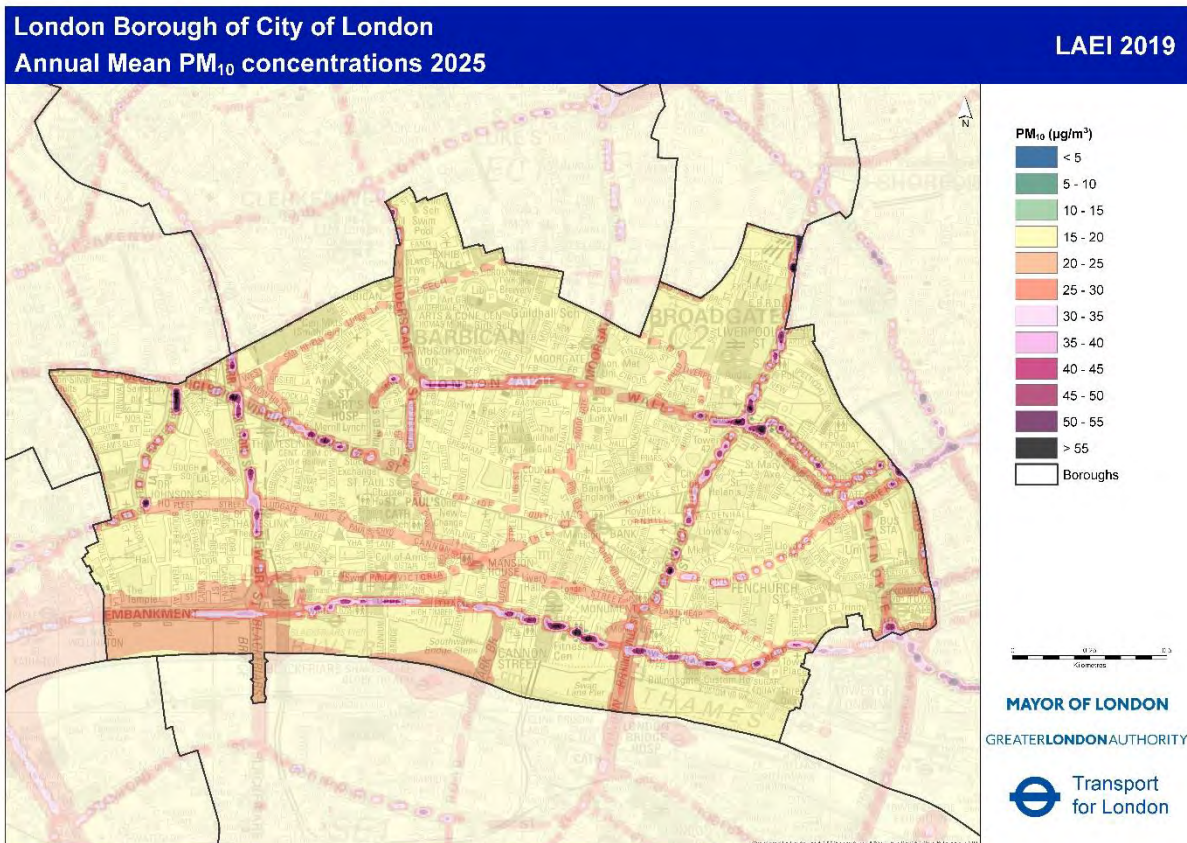
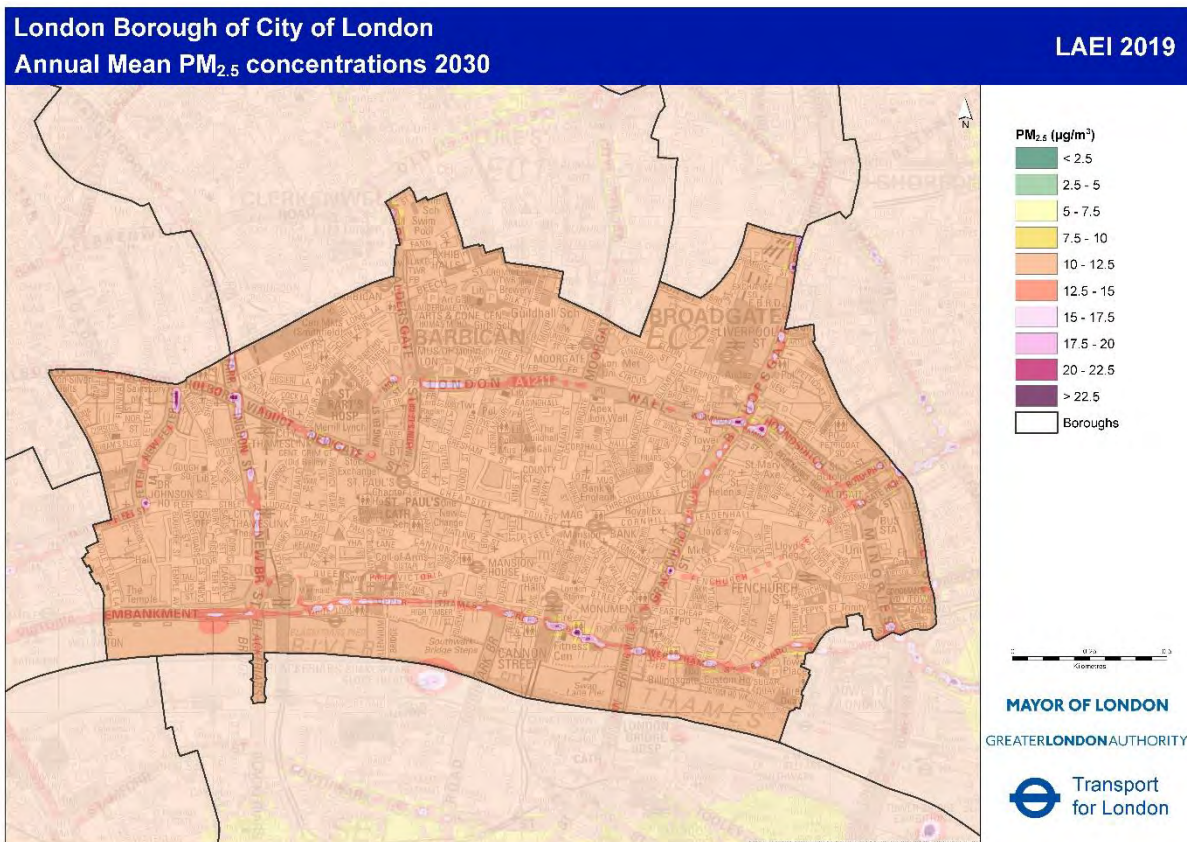
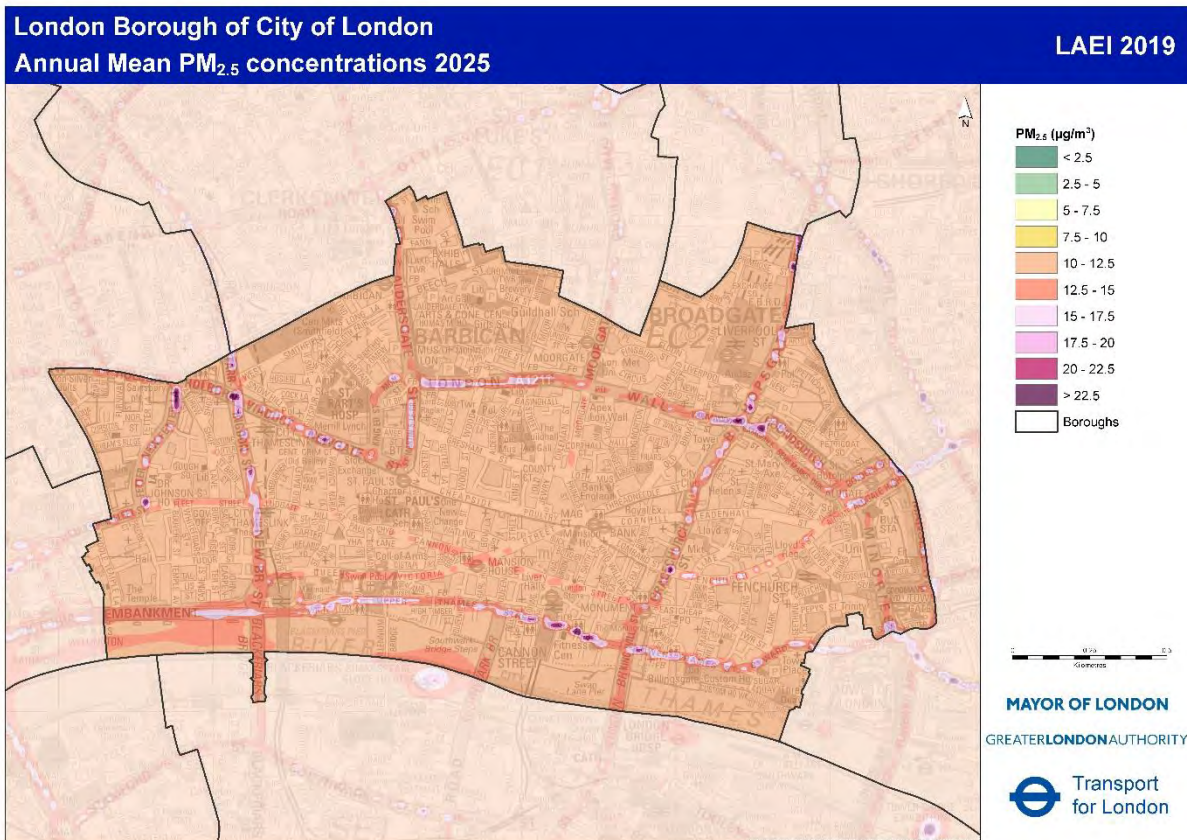


Figure A3.3: Annual Mean PM_{2.5} Concentrations, 2025 and 2030



Pollutant Emissions

Figures A3.4-A3.6 show how emissions of nitrogen oxides and particulates originating in the Square Mile have changed from 2013 to 2019 and are predicted to change by 2030. The data allows identification of areas where targeted improvements can be made and is used as a tool to guide action.

Figure A3.4: LAEI Emissions, Nitrogen Oxides

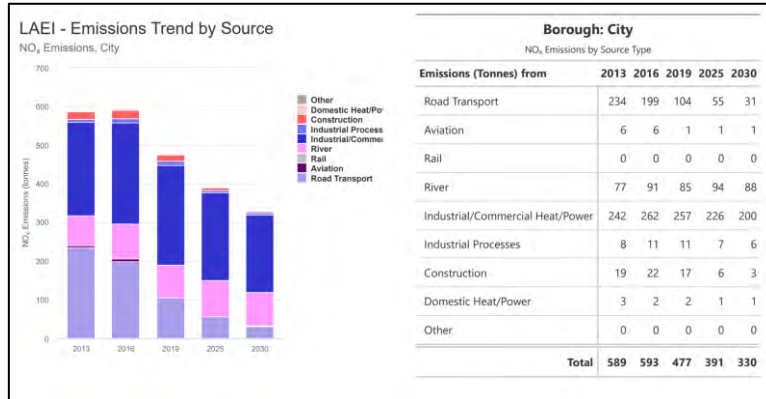


Figure A3.5: LAEI Emissions, Particulates, PM₁₀

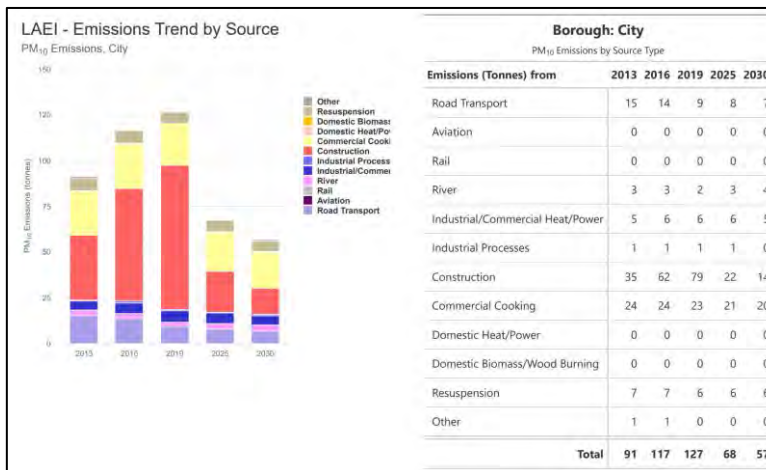
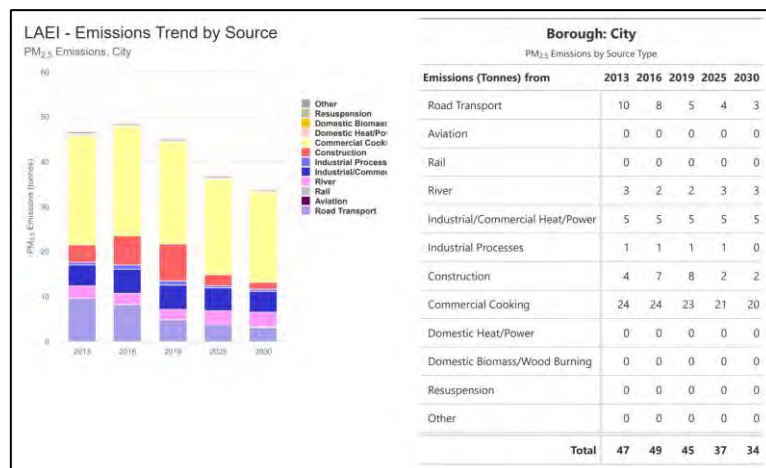


Figure A3.6: LAEI Emissions, Particulates, PM_{2.5}



Appendix 4: Monitoring Data, Further Assessment

The automatic and passive monitoring sites used for assessing long term changes over 15-years, are detailed in Table A4.1 and Table A4.2.

Table A4.1: Automatic Monitoring Sites

Site Name	Site ID	Site Type	Pollutants Monitored
Farringdon Street	CT2	Roadside	PM _{2.5}
The Aldgate School*	CT3	Urban Background	NO ₂ , PM ₁₀ PM _{2.5}
Beech Street	CT4	Roadside	NO ₂ , PM ₁₀
Walbrook Wharf**	CT6	Roadside	NO ₂
Upper Thames Street***	CT8	Roadside	PM ₁₀
Guildhall	CT9	Urban Background	O ₃
Bell Wharf Lane	CTA	Roadside	NO ₂ , PM ₁₀

Notes:

* Previously known as Sir John Cass Foundation Primary School.

** Walbrook Wharf was decommissioned in January 2023 with the NO_x analyser relocated to Bell Wharf Lane.

*** Upper Thames Street was decommissioned in September 2021 with the PM₁₀ analyser relocated to Bell Wharf Lane in May 2022.

Table A4.2: Long-term Passive Nitrogen Dioxide Monitoring Sites

Site Name	Site ID	Site Type
St Bartholomew's Hospital	CL5	Urban Background
Queen Victoria Street	CL38	Roadside
Fleet Street	CL39	Roadside
Mansell Street	CL40	Roadside
Barbican Centre, Speed House	CL55	Urban Background

Nitrogen Dioxide

Annual Mean Standard

A comparison of nitrogen dioxide annual mean concentrations between 2009 and 2023 is detailed in Table A4.3. Over a 15-year period, significant reductions have been experienced at all sites. The greatest reduction in concentrations between 2009 and 2023 was 79µg/m³ at Walbrook Wharf, and in terms of percentage reduction the greatest was 63% at the Aldgate School.

Table A4.3: 15-year Reduction of Nitrogen Dioxide Concentrations

Site ID	Site Type	Annual Mean		Concentration Reduction	
		2009	2023	$\mu\text{g}/\text{m}^3$	%
CL5	Urban Background	42.7	33.4	9.3	22%
CL38	Roadside	66.9	27.1	39.8	59%
CL39	Roadside	102.3	37.9	64.4	63%
CL40	Roadside	66.8	25.6	41.2	62%
CL55	Urban Background	42.6	18.7	23.9	56%
CT3	Urban Background	56	21	35.0	63%
CT4	Roadside	90	36	54.0	60%
CT6	Roadside	131	52 (2022)	79.0	60%
CTA	Roadside	-	32	-	-

Over the 15-year period, the average reduction at roadside sites was $55.7\mu\text{g}/\text{m}^3$, compared to an average reduction of $18.0\mu\text{g}/\text{m}^3$ at urban background locations. This average reduction can be seen in Figure A4.3. When compared against national nitrogen dioxide average concentrations, although concentrations have reduced significantly, average roadside and urban background concentrations have always been higher than national averages.

Figure A4.1: Annual Mean Nitrogen Dioxide, 2009 to 2023: Automatic Monitoring Sites

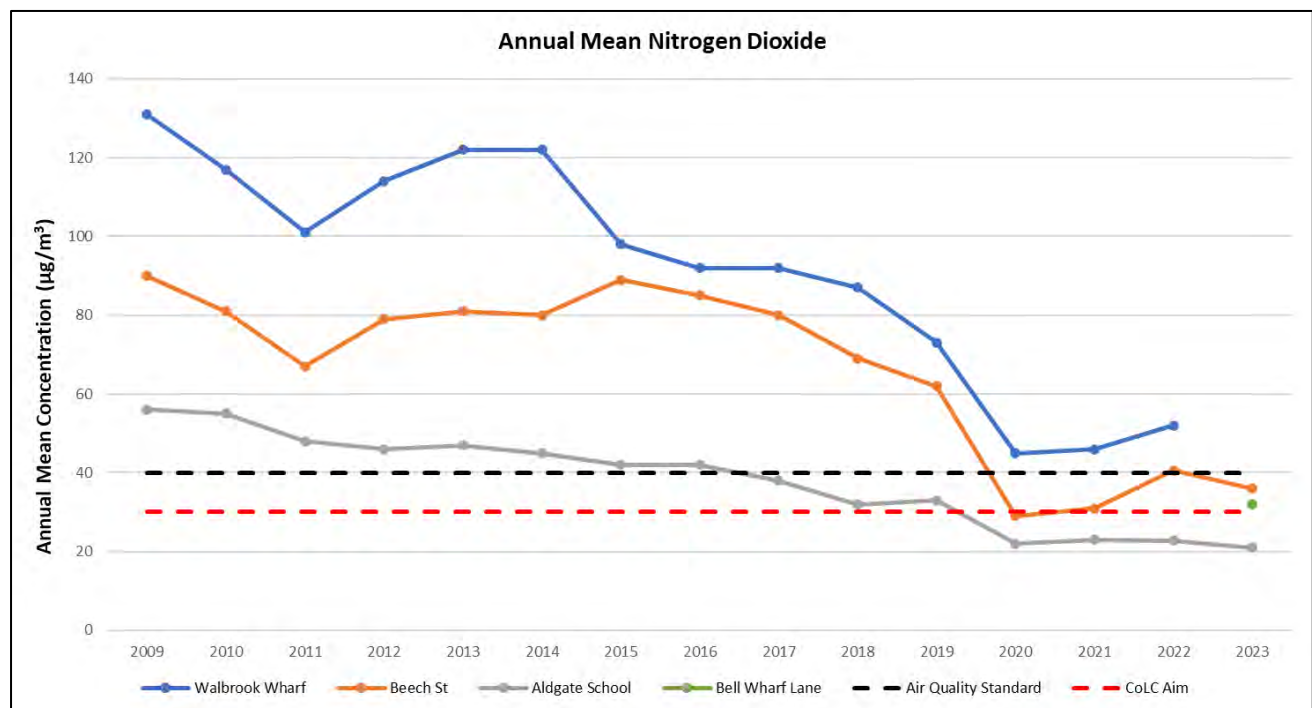


Figure A4.2: Annual Mean Nitrogen Dioxide, 2009 to 2023: Long-term Passive Sites

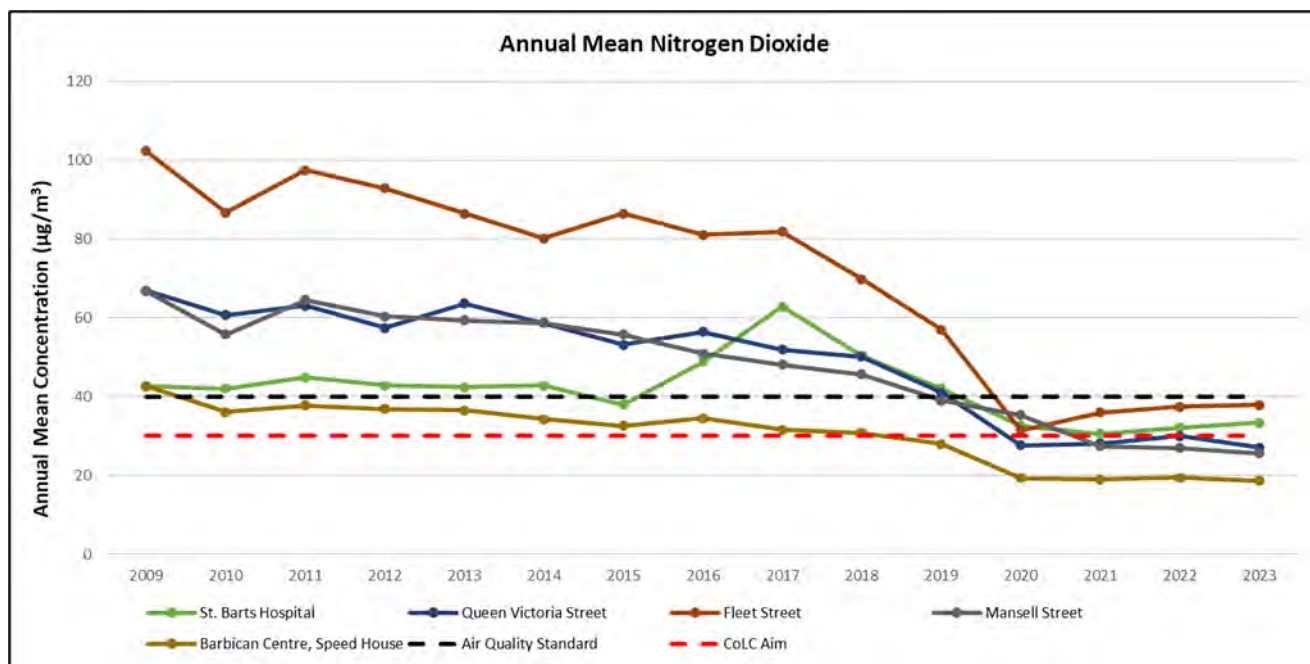
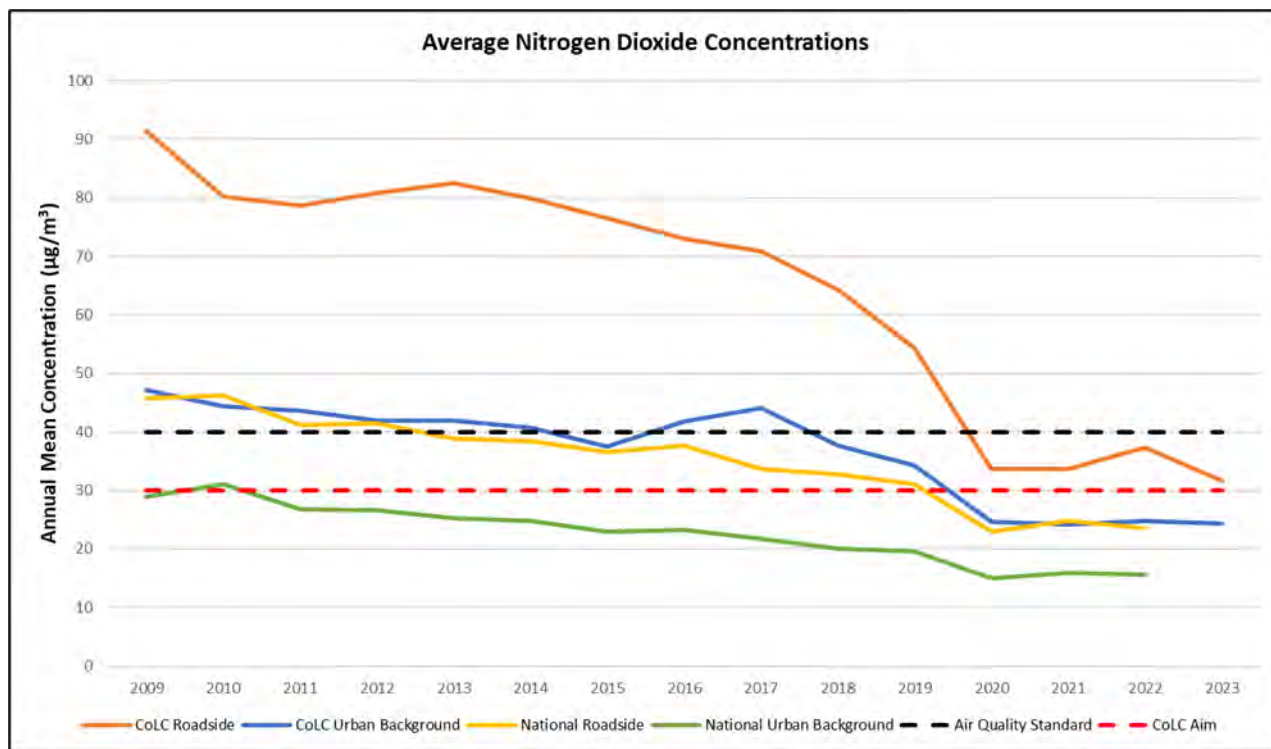


Figure A4.3: Average Annual Mean Nitrogen Dioxide Concentrations, 2009 to 2023: City of London and National Trends

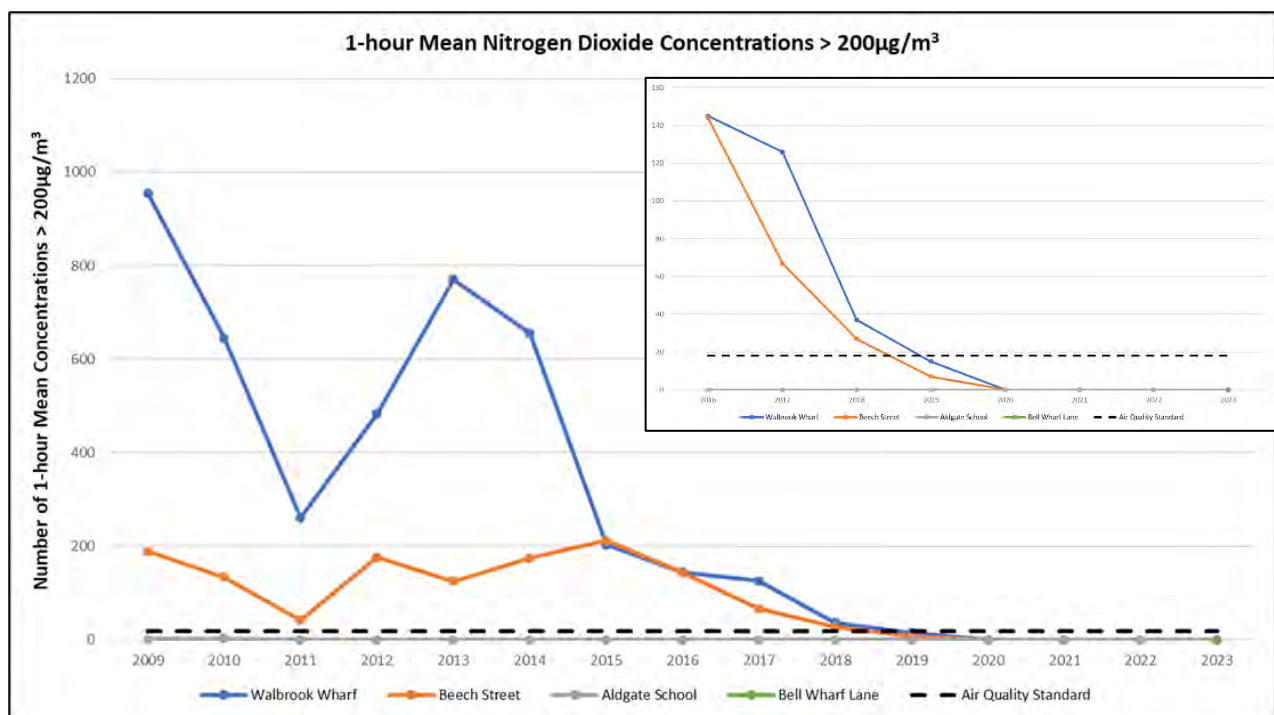


One Hour Standard

In addition to the annual mean standard for nitrogen dioxide, the 1-hour air quality standard of $200\mu\text{g}/\text{m}^3$ is also assessed in the Square Mile. To achieve compliance there must be no more eighteen instances of the 1-hour concentration in a year. To accurately assess compliance against the 1-hour standard, automatic analysers are used to assess hourly monitoring data, but due to their passive nature, diffusion tubes are not. As per LLAQM guidance³¹, a proxy annual mean concentration of $60\mu\text{g}/\text{m}^3$ can be used to predict if there is likely to be an exceedance of the 1-hour standard at a passive nitrogen dioxide monitoring site.

Figure A4.4 details 1-hour mean concentrations greater than $200\mu\text{g}/\text{m}^3$ at the automatic monitoring sites. There has been a significant reduction achieved at both roadside monitoring locations. In 2009 there were almost 1,000 1-hour concentrations greater than $200\mu\text{g}/\text{m}^3$ monitored at Walbrook Wharf, the site achieved compliance in 2019. The Aldgate School has continually reported compliance with the 1-hour standard, and all automatic sites have reported compliance since 2019.

Figure A4.4: 1-hour Mean Nitrogen Dioxide, 2009 to 2023



³¹ Mayor of London (2019), London Local Air Quality Management (LLAQM): Technical Guidance 2019 (LLAQM.TG (19))

Particulate Matter, PM₁₀

Annual Mean Standard

Over a 15-year period, significant reductions in annual mean PM₁₀ concentrations have been experienced at all sites, primarily at roadside monitoring locations. Annual mean concentrations at Upper Thames Street and Beech Street have declined by 17µg/m³ and 13µg/m³ respectively, and experienced similar percentage reductions of 47% and 46%. The Aldgate School, an urban background monitoring location, experienced a smaller overall reduction in terms of concentration and as a percentage over the 15-year monitoring period of 3µg/m³ and 17%.

Over the 15-year period, there was only one exceedance of the 40µg/m³ annual mean air quality standard at Upper Thames Street in 2015. In addition, the aim of achieving an annual mean of 15µg/m³ was met at Beech Street in 2021 and at The Aldgate School in 2023.

24-Hour Standard

In addition to the annual mean standard for PM₁₀, the 24-hour air quality standard of 50µg/m³ applies. To achieve compliance there must be no more thirty-five instances of the 1-hour concentration in a year. Figure A4.6 details instances of 24-hour mean concentrations greater than 50µg/m³. There has been a significant reduction at both roadside locations in the time-period, and there have been no instances of non-compliance since 2016. The Aldgate School has continually reported compliance with the 24-hour standard for the 15-year period.

Figure A4.5: Annual Mean PM₁₀, 2009 to 2023

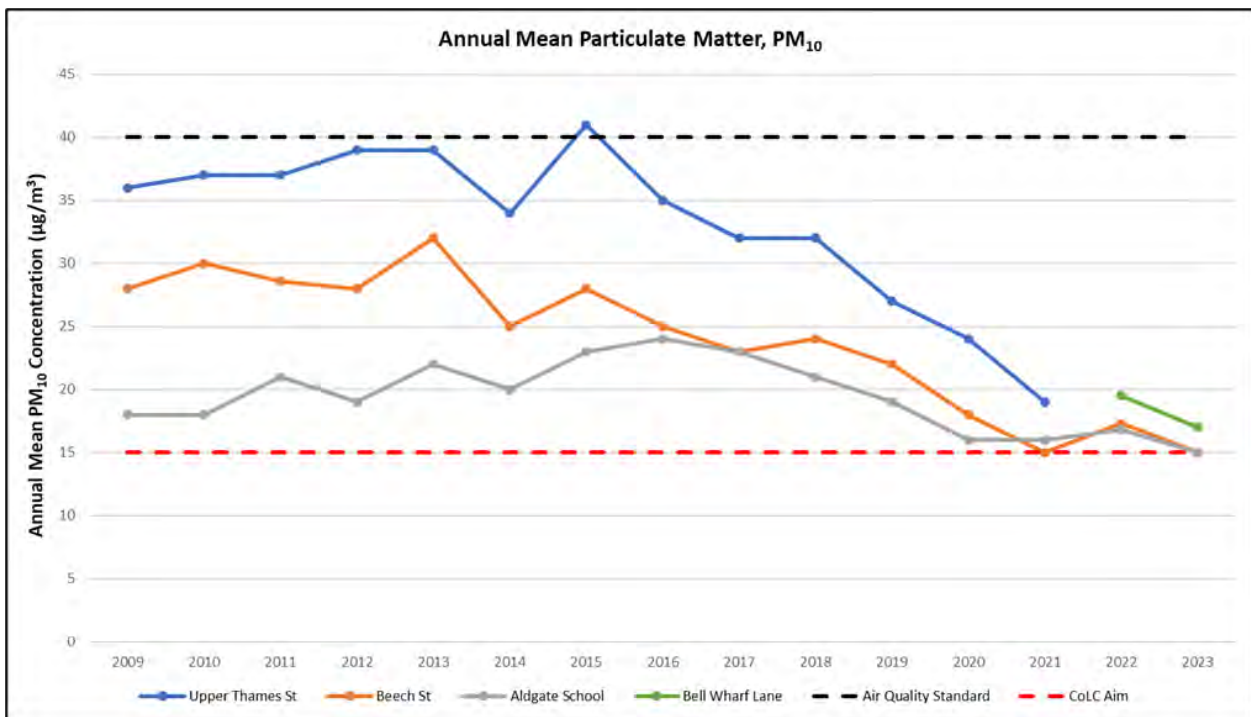
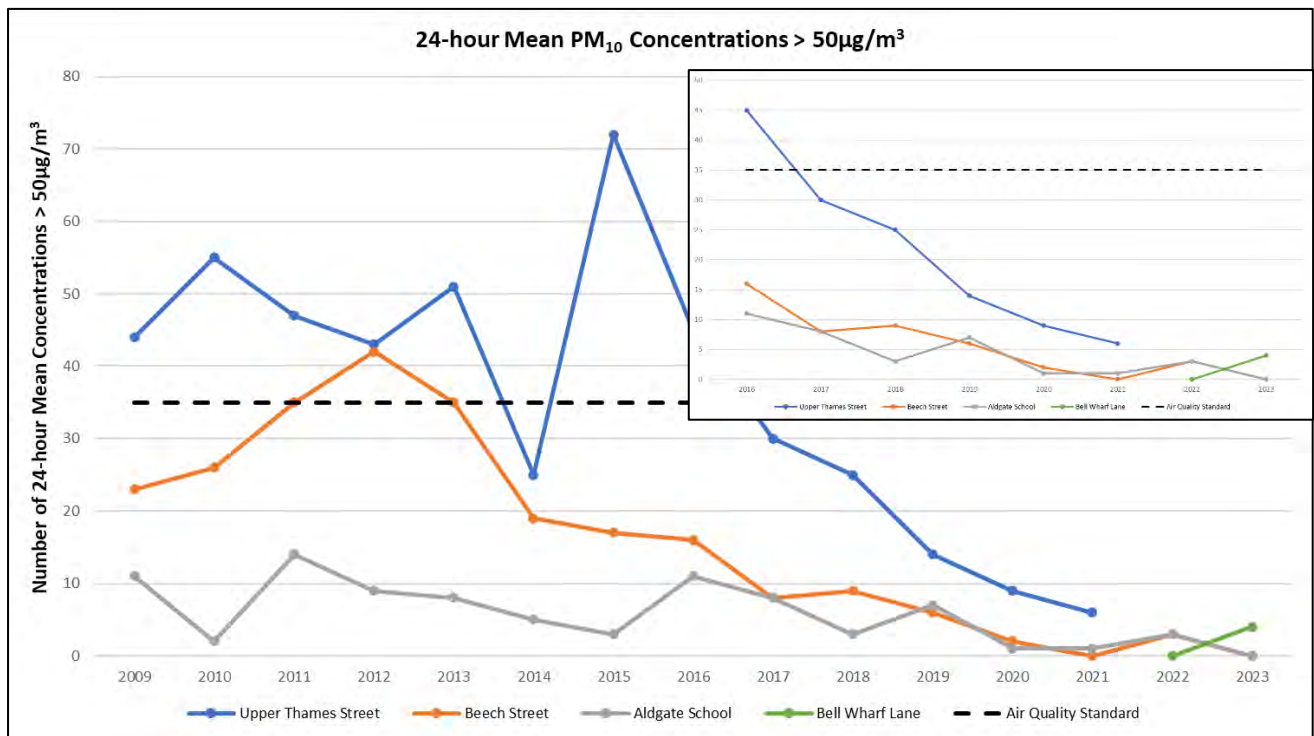


Figure A4.6: 24-hour Mean PM₁₀, 2009 to 2023



Particulate Matter, PM_{2.5}

The PM_{2.5} analysers at both Farringdon Street and the Aldgate School were installed in 2016, therefore all results for the two sites have been presented in Figure 2.6 in the main report. The annual mean concentrations for the two monitoring sites do not vary significantly, with the greatest difference between the two sites being 4µg/m³ in 2018.

Compared to nitrogen dioxide and PM₁₀, PM_{2.5} has a smaller variation between a roadside and urban background site. This is partly due to concentrations of PM_{2.5} being lower than other pollutants, and due to increased dispersion of PM_{2.5} rather than a simple source and concentration relationship.

Ozone

Ozone has been measured at the Guildhall since March 2022. Although this is not a requirement through the LLAQM framework, it is measured as it has an impact on health at high levels.

Ozone is primarily a secondary pollutant, therefore there are no major emission sources in the Square Mile. Most of the ozone is instead formed in the air from reactions between other pollutants. Pollutants photochemically react outdoors in the presence of sunlight to produce ground-level ozone. Similar reactions can occur with nitrogen oxides as a precursor.

In addition to the annual mean, a comparison against the 8-hour air quality standard is presented in Table A2.1.

Table A4.4: Ozone Monitoring Results

	2022	2023
Annual Mean (µg/m ³)	54.1	52.5
100 µg/m ³ not to be exceeded more than 10 times per year	22	22

Appendix 5: Air Quality Partner Commitments

The Environment Act 2021³² introduced the concept of Air Quality Partners (AQPs) into the LAQM framework. AQPs are public bodies that are required to assist local authorities with reasonable requests and contribute to AQAPs.

The City Corporation has identified three AQPs:

1. The Environment Agency;
2. The Port of London Authority;
3. The Mayor of London:
 - a) The Greater London Authority; and
 - b) Transport for London

Engagement with these organisations has taken place to ascertain the actions they are currently taking to reduce pollutant emissions from the operations that they are responsible for. The information received from each AQP is summarised overleaf. Active engagement will continue with each AQP throughout the delivery of the strategy.

³² Environment Act. (c.30). London: The Stationery Office.

Table A5.1: Air Quality Partner Information

The Environment Agency (EA)	The Port of London Authority (PLA)	The Greater London Authority (GLA) and Transport for London (TfL)																														
<ul style="list-style-type: none"> We continue to implement the requirements for the Medium Combustion Plant (MCP) Directive and domestic legislation of Specified Generators (SG). These will apply MCP Directive Annex II Emission Limits; applied to new and existing combustion plant depending on the date they are put into operation and the thermal capacity. Compliance with Emission Limit Values for existing MCP with a rated thermal input greater than 5MWth is the 1 January 2025. For existing MCP with a rated thermal input less than 5MWth, which is more likely to be plant located within the City of London and its surrounding, the compliance date is 1 January 2030. MCP that are also Specified Generators may have stricter Emission Limits than specified in the MCP Directive Annex II or Schedule 25B EPR where they are necessary to ensure Air Quality Standards are met. In the City of London this situation may apply to reciprocating engines providing combined heat and power to residential and commercial premises. We have implemented BAT for new standby back-up generation on Part A (1) Installations and may require the use of abatement (beyond BAT) for large arrays of diesel back-up standby, such as Data Centres, to manage short term peak NO₂ immediately adjacent to these regulated facilities. Implementation of the Waste Incineration BAT conclusions has reduced emissions of NO₂ from existing waste incineration plant by at least 10% by the end of last year, which will reduce the transboundary contribution from incineration plant within the capital and its surroundings. This work will have less reduction on emissions of PM_{2.5} as Waste Incineration Plant are low emitters of particulate matter due to the high capture efficiency of flue gas abatement systems. In terms of plant that are regulated by the EA the following is relevant to the Square Mile: <ul style="list-style-type: none"> There are three issued permits for MCP/SG, all of which are standard rules and have been appropriately consulted on There are no new or current MCP applications in our systems located within the City of London boundary or within 800m of it. There is one Industrial Emissions Directive Environmental Permitting Regulations installation permit of aggregated MCP to >=50MWth (UBS AG Broadgate EPR/ZP3238DK) which was subject to Best Available Techniques and consultation. 	<ul style="list-style-type: none"> The PLA has an Air Quality Strategy (Air Quality Strategy for the Tidal Thames: June 2020) which details an action plan for reducing emissions on the Thames. Since the 2018 and 2020 strategies were published, 14 actions have been completed and 13 are still ongoing, with the aim of raising awareness, knowledge sharing and monitoring emissions on the river. More information on the progress of the previous strategy actions will be detailed in the upcoming 2024 strategy update. The PLA conduct quarterly and annual river-side monitoring of the river from London Gateway to Richmond. This is done via real-time monitoring and passive NO₂ monitoring. Monitoring allows us to track progress against our PM and NO_x emission reduction targets which reflect the objectives of the Clean Maritime Plan, Clean Air Strategy and Climate Change Act 2008: <ul style="list-style-type: none"> 20% reduction by 2026 40% reduction by 2030 50% reduction by 2040 80% reduction by 2050 The updated Air Quality Strategy is to be published in 2024 with updated actions that plan to deliver emission reduction river wide. In 2024 the PLA's Net Zero River Plan will be published, which has been created with the input of river operators on the Thames. It is an action plan to facilitate the achievement of net zero ambitions on the river, working in partnership with stakeholders. The PLA fleet currently consists of 29 vessels which have been involved various trials to demonstrate the effectiveness of certain technologies to reduce emissions to air. <table border="1" data-bbox="1062 1129 1899 1333"> <thead> <tr> <th colspan="2">Recent changes to the PLA fleet include:</th> </tr> </thead> <tbody> <tr> <td>In 2022 a workboat vessel was retrofitted with selective catalytic reduction (SCR) technology to test pre and post emissions. Results showed a reduction in both NO_x and PM emissions.</td> <td>Following a successful trial in 2021, the whole of the PLA fleet transition to hydrotreated vegetable oil (HVO) fuel in 2022 instead of diesel fuel.</td> </tr> </tbody> </table> <table border="1" data-bbox="1062 1360 1899 1543"> <thead> <tr> <th colspan="2">Future changes to the PLA fleet include:</th> </tr> </thead> <tbody> <tr> <td>The Director of Marine Operations is currently conducting a fleet review. This review will consider the sustainability of the current fleet.</td> <td>Funding has been secured to operate an unmanned hydrogen fuelled survey vessel. It is estimated that this will be part of the fleet by 2025.</td> </tr> </tbody> </table> <ul style="list-style-type: none"> Internally, we are exceeding our targets of emission reduction thanks to our transition to biofuel (HVO) in 2022. This transition reduced our scope 1 emissions by 50%, putting us two years ahead of our target schedule. Our river-side monitoring network and newly developed Maritime Emissions Platform by RightShip is allowing us to track against our targets more effectively from 2023. By 2026 we do aim to hit our targets of emission reduction of 20% NO_x and PM port wide. The Net Zero River Plan and Thames Vision are our action plans for achieving our targets outlined for beyond 2026, with the goal of aiding our operators reach their internal net zero targets as well as the overarching government target of net zero by 2050. 	Recent changes to the PLA fleet include:		In 2022 a workboat vessel was retrofitted with selective catalytic reduction (SCR) technology to test pre and post emissions. Results showed a reduction in both NO _x and PM emissions.	Following a successful trial in 2021, the whole of the PLA fleet transition to hydrotreated vegetable oil (HVO) fuel in 2022 instead of diesel fuel.	Future changes to the PLA fleet include:		The Director of Marine Operations is currently conducting a fleet review. This review will consider the sustainability of the current fleet.	Funding has been secured to operate an unmanned hydrogen fuelled survey vessel. It is estimated that this will be part of the fleet by 2025.	<ul style="list-style-type: none"> The Mayor's Transport Strategy sets the ambitious target of 80% of trips made by sustainable modes such as public transport, cycling and walking by 2041. The Mayor and TfL will continue to invest in making it easier and safer to travel by these modes, which will also have air quality benefits. Between 2016 and 2020, TfL replaced older buses and new buses, and retrofitted mid-life buses with new exhaust systems meeting Euro VI emissions. Since January 2021, the entire bus fleet has met or exceeded this standard. Upgrading the fleet to meet the latest Euro VI emissions has significantly reduced the contribution from TfL buses to transport-related NO_x emissions, with the proportion of transport NO_x emissions coming from TfL's buses reducing from 15% to around 4%. TfL has been introducing zero-emission buses from 2016 onwards and there are now over 1,300 zero-emission buses in the fleet that operate across London. TfL has a target of converting the entire bus fleet to zero-emission no later than 2034 or accelerate to 2030 with additional government funding. Most buses operate in London for between 10-14 years. After this time, existing vehicles leave the fleet (once a route contract has ended) and new zero-emission buses will join. There are 35 current bus routes that pass through the Square Mile. Of these routes, 97% operate a mix hybrid and fully electric vehicles and 17% of routes operate solely fully electric vehicles. Additionally, it is planned for the diesel route and three hybrid routes to become fully electric in 2024/25. <table border="1" data-bbox="1929 1081 2279 1264"> <thead> <tr> <th>Vehicle Type</th> <th>Routes</th> </tr> </thead> <tbody> <tr> <td>Diesel</td> <td>1</td> </tr> <tr> <td>Hybrid</td> <td>27</td> </tr> <tr> <td>Electric/Hybrid</td> <td>1</td> </tr> <tr> <td>Electric</td> <td>6</td> </tr> </tbody> </table> <table border="1" data-bbox="2383 1081 2769 1291"> <thead> <tr> <th>Engine Type</th> <th>Routes</th> </tr> </thead> <tbody> <tr> <td>Euro V+SCRT</td> <td>5</td> </tr> <tr> <td>Euro V+SCRT / Euro VI</td> <td>2</td> </tr> <tr> <td>Euro VI</td> <td>21</td> </tr> <tr> <td>Electric / Euro VI</td> <td>1</td> </tr> <tr> <td>Electric</td> <td>6</td> </tr> </tbody> </table> <ul style="list-style-type: none"> TfL contracted bus operators are responsible for maintaining the vehicles they operate. TfL monitors air quality in London but does not monitor individual bus emissions as buses have been type approved by the Vehicle Certification Agency to the latest Euro standards and have On Board Diagnostics (OBD) for monitoring in service by the DVSA. Currently 8,419 licensed taxis are zero emission capable (ZEC), which accounts for over half of the fleet. Since January 2018, all vehicles new to licencing have been required to be ZEC. As a result of the specified age limits for taxi vehicles, which is set out as a maximum of 15 years for Euro 6 vehicles, by January 2033 at the latest the whole fleet will be ZEC. For more information regarding the schemes delivered by the Mayor of London, please visit the GLA Air Quality website, Mayors Transport Strategy and London Environment Strategy. These strategies outline the ambitious work delivered by the Mayor to improve air quality across London. 	Vehicle Type	Routes	Diesel	1	Hybrid	27	Electric/Hybrid	1	Electric	6	Engine Type	Routes	Euro V+SCRT	5	Euro V+SCRT / Euro VI	2	Euro VI	21	Electric / Euro VI	1	Electric	6
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Appendix 6: Air Quality Policies in the Draft City Plan 2040

Draft Policy HL2: Air Quality

1. Developers will be required to effectively manage the impact of their proposals on air quality. Major developments must comply with the requirements of the Air Quality SPD for Air Quality Impact Assessments (AQIAs);
2. Development that would result in a worsening of the City's nitrogen dioxide or PM₁₀ and PM_{2.5} pollution levels will be strongly resisted;
3. All developments must be at least Air Quality Neutral. Developments subject to an EIA should adopt an Air Quality Positive approach. Major developments must maximise credits for the pollution section of the Building Research Establishment Environmental Assessment Method (BREEAM) assessment relating to on-site emissions of oxides of nitrogen (NO_x);
4. Developers will be expected to install non-combustion energy technology where available
5. A detailed AQIA will be required for combustion based low carbon technologies (e.g. biomass, combined heat, and power), and any necessary mitigation must be approved by the City Corporation;
6. Developments that include uses that are more vulnerable to air pollution, such as schools, nurseries, medical facilities, and residential development, will be refused if the occupants would be exposed to poor air quality. Developments will need to ensure acceptable air quality through appropriate design, layout, landscaping, and technological solutions;
7. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to fully minimise air quality impacts possible. Impacts from these activities must be addressed within submitted AQIAs. All developments should comply with the requirements of the London Low Emission Zone for Non-Road Mobile Machinery;
8. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest part of the development to ensure maximum dispersion of pollutants and be at least three metres away from any publicly accessible roof spaces.

Technical Glossary

Annual mean: The average concentration of a pollutant measured over one year.

1-hour mean: The average concentration of a pollutant measured over one hour.

8-hour mean: The average concentration of a pollutant measured over eight hours.

24-hour mean: The average concentration of a pollutant for a single day.

µm: Micrometer, equal to one millionth of a meter.

µg: Microgram, equal to one millionth of a gram.

µg/m³: Microgrammes per cubic metre. A measure of concentration in terms of mass per unit volume. A concentration of 1µg/m³ means that one cubic metre of air contains one microgram of pollutant.

kW: Kilowatts, unit of electric power.

MW: Megawatt, equal to 1,000 kilowatts.

MWth: Megawatt thermal, unit of thermal power.

Emission: The release, direct or indirect, of an air pollutant into the atmosphere.

Concentration: The amount of a particular air pollutant in the air.

Committee(s): Planning and transportation committee – For Information	Dated: 01 May 2024
Subject: Public Lift & Escalator Report	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	Shape outstanding Environments – Our spaces are secure, resilient, and well-maintained
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	n/a
What is the source of Funding?	n/a
Has this Funding Source been agreed with the Chamberlain’s Department?	
Report of: City Surveyor	For Information
Report author: Matt Baker – Head of Facilities Management	

Summary

This report outlines the availability and performance of publicly accessible lifts and escalators monitored and maintained by City Surveyor’s, in the reporting period 16 February 2024 to 01 May 2024. The reporting period is driven by the committee meeting cycle and the associated reporting deadlines.

In this reporting period, publicly accessible lifts and escalators were available for **85%** of the time.

A detailed summary of individual lifts/escalators performance is provided within this report along with the associated actions being undertaken to improve availability where applicable.

Main Report

1. There are 16 public lifts/escalators in the City of London portfolio, which are monitored and maintained by City Surveyor’s. Table 1.0 provides a breakdown of availability during the reporting period and the availability over the previous 12 months.

Table 1.0

Asset Reference	Name	Availability in last reporting period	12 Month Availability	Trend
SC6459146	Speed House Glass/Public Lift	100.00%	99.98%	↑
SC6458959	London Wall Up Escalator	100.00%	72.00%	↑
SC6458958	London Wall Down Escalator	100.00%	75.00%	↑
SC6458962	Tower Place Public Lift	100.00%	98.50%	↑
SC6458963	Tower Place Scenic Lift	100.00%	99.85%	↑
SC6458970	Wood Street Public Lift	100.00%	85.90%	↑
SC6462771	Blackfriars Bridge	97.00%	80.37%	↑
SC6458969	Pilgrim Street Lift	95.00%	96.24%	↑
SC6458968	Moor House	90.00%	95.37%	↓
CL24	Duchess Walk Public Lift	86.00%	93.82%	↓
SC6458965	London Wall West	86.00%	80.32%	↑
SC6458967	Little Britain	68.00%	79.00%	↓
SC6459244	Glass South Tower	59.00%	79.57%	↓
SC6458964	London Wall East	51.00%	74.59%	↓
SC6462850	33 King William Street	45.00%	42.76%	↓

2. Duchess Walk downtime caused by faulty car gate which has been rectified and back in service.
3. London Wall West down time caused by difficulties arranging access to conduct insurance inspection which subsequently expired and had to be removed from service. Insurance inspection booked for 2 May 2024.
4. Glass South Tower is reporting downtime for project work being conducted on the lift car interiors in the evenings in agreement with site.
5. London Wall East downtime caused by damage to equipment caused by flooding/water ingress to the lift pit and delays to conduct insurance inspections.
6. Further to the defective power board reported at 33 King William Street at the last reporting period, during the Annual Insurance Inspection, the lift went into fault. The issue required specialist contractor attendance and requires a part on a 6 week lead time. Part expected 7 May 24.
7. It is worth noting that the industry continues to face significant challenges in the availability of and lead times on parts ordered. Previously “off the shelf” items are now on reasonably long lead times.

8. Table 3.0 categorises the causes of faults/outages in this reporting period.

Table 3.0

Category	No of call outs
External/Environmental factors	0
Equipment faults/failure	10
Planned Insurance Inspections	3
Planned Repairs	0
Resets following emergency button press or safety sensor activation	3
Damage/misuse/vandalism	1
Autodialler faults	0
Total	17

9. Table 4.0 categorises the causes of faults/outages over the last 12 months.

Table 4.0

Category	No of call outs
External/Environmental factors	20
Equipment faults/failure	160
Planned Insurance Inspections	21
Planned Repairs	27
Resets following emergency button press or safety stop equipment activation	18
Damage/misuse/vandalism	26
Autodialler faults	6

10. Projects. Table 5.0 summarises planned projects with approved funding that will support the ongoing improvement in lift & escalator availability.

Table 5.0

Lift/Escalator	Project	Status	Expected Completion
Glass South Tower	Lift Car Upgrade	In Progress	TBC

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PLANNING APPLICATIONS SUB-COMMITTEE

Tuesday, 13 February 2024

Minutes of the meeting of the Planning Applications Sub-Committee held at Livery Hall - Guildhall on Tuesday, 13 February 2024 at 10.30 am

Present

Members:

Deputy Shravan Joshi (Chairman)
Deputy Randall Anderson
Brendan Barns
Ian Bishop-Laggett
Mary Durcan
John Edwards
Deputy John Fletcher
Dawn Frampton
Deputy Marianne Fredericks
Deputy Charles Edward Lord
Antony Manchester
Deputy Brian Mooney
Deputy Alastair Moss
Deborah Oliver
Deputy Henry Pollard
Ian Seaton
Hugh Selka
Shailendra Kumar Kantilal Umradia
Jacqui Webster

Officers:

Zoe Lewis	-	Town Clerk's Department
Fleur Francis	-	Comptroller and City Solicitor's Department
Phillip Carroll	-	Environment Department
Pearl Figueira	-	Environment Department
David Horkan	-	Environment Department
Rob McNicol	-	Environment Department
Tom Nancollas	-	Environment Department
Tony Newman	-	Environment Department
Taluana Patricio	-	Environment Department
Joseph Penn	-	Environment Department
Rachel Pye	-	Environment Department
Gwyn Richards	-	Environment Department
Bob Roberts	-	Environment Department
Peter Wilson	-	Environment Department

1. **APOLOGIES**

Apologies had been received from Jaspreet Hodgson, Deputy Graham Packham, Judith Pleasance, Alderwoman Susan Pearson and William Upton.

2. **MINUTES**

The Sub-Committee considered the public minutes of the last meeting held on 26 January 2024 and approved them as a correct record.

3. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

Deborah Oliver declared that she sat on the Police Authority Board and would recuse herself for Agenda Item 4.

Deputy Anderson declared that he sat on the Police Authority Board. He would remain in the room but not participate in the consideration of Agenda Item 4.

Jacqui Webster and Deputy Fletcher declared interests in Agenda Item 5 and stated that they would recuse themselves for Agenda Item 5.

Deputy Fredericks declared a non-pecuniary interest in that she was a Governor at Aldgate School. She stated that she had not been a governor when the representation was sent in.

4. **MIDDLESEX STREET ESTATE, GRAVEL LANE, LONDON, E1 7AF**

The Sub-Committee considered a report of the Planning and Development Director concerning the change of use of: (i) part basement, part ground and part first floor levels of six retail units and ancillary residential and ancillary commercial areas, to provide a police facility (sui generis) and ancillary residential parking and storage areas and facilities, and (ii) part ground and part first floor levels from gym use to community space (Class F2); and external alterations including: shopfront changes, installation of plant, erection of flue and louvre treatment, works to podium level and associated landscaping including erection of garden room, associated highways works to Gravel Lane and landscaping, installation of security measures; and associated works.

The Town Clerk referred to those papers set out within the main agenda pack as well as the Officer presentation slides and an addendum that had been separately circulated and published.

Officers presented the application, highlighting that the applicant was the City Surveyor's department on behalf of the City of London Police. The City of London Police was the applicant and therefore a handling note had been prepared in accordance with the procedure.

Members were informed that the Middlesex Street Estate comprised 234 residential units, 3,819 square metres of retail space and a library. It also comprised a central podium and garden area for residents, residential blocks and a taller tower in the centre known as Petticoat Tower. There was also an existing police parking facility currently at basement level. An Officer stated that planning permission was sought for the change of use of part of the site from

ancillary residential parking and retail units to a police facility and ancillary community uses. The Officer stated that the police use was referred to as the eastern base.

Members were shown an aerial view of the site looking southwest. Gravel Lane was where the entrance to the police offices was proposed. In the centre of the site there was the podium level, which was the garden for residents. This had to be re-landscaped as part of the proposals.

Members were informed that the applicant had stated that the east of the City contained significant demand for the police with nighttime related offences and had highlighted that future development of the area would increase future demand. The Officer stated that the strategic operational need in the east of the City was reinforced by the planned closure of Bishopsgate police station.

Members were informed that the applicant had submitted an operational management plan which set out how the eastern base would be operated. It confirmed that the base would be occupied by uniformed police officers who would report to the base and then go out on patrol to serve the community. There would be no custodial facilities, no police reception facility and no rapid response vehicles would be based at the site. Also, sirens would not be used when exiting the site except in exceptional circumstances. The applicant had stated this was extremely unlikely and that there would be a lower number of police officers attending the site during the nighttime.

The Officer informed Members that the operational management plan also stated that a dedicated liaison contact would be provided for residents and that the police fully recognised the sensitivity of the eastern base location and the need to avoid causing disturbance to neighbours. Compliance with the operational management plan would be secured by condition if the application was approved.

Members were shown the existing and proposed sections for the proposal including the existing police compound, proposed extended police facility and Gravel Lane frontage. Members were informed that the proposal sought to change the use of six retail units to police offices and one gym to resident facilities, which would include an estate office, a resident gym and storage facilities.

Members were informed that Officers considered there to be some non-compliance with policy due to the loss of retail as a result of the proposals, however due to the operational need for the police and the mitigation proposed to the activation of frontages through a public art proposal, Officers considered this acceptable in this case.

The Sub-Committee were shown the proposed elevation showed the public art proposal in the windows, which would be in the voids of the police offices. They were also shown the proposed works to the highway next to the police offices with new planters, bollards and a widening of the pavement. Members were also shown an image of the proposed public art to be displayed in the

voids of the previous shop fronts and they were informed that the details for this would be secured via condition.

Members were shown photographs from the Artizan Street frontage which showed the proposed entrance for the new ground floor resident cycle facilities, which would include new cycle lifts to basement level. Members were informed the previous ramp to the first floor level of the estate, was now redundant. Members were shown the proposed and existing elevations on Artizan Street.

The Sub-Committee were shown the existing and proposed elevation on Artizan Street. On the proposed elevation, due to the infilling of the previous ramp, this was considered an improvement on the existing condition. Members were shown an image of the Artizan Street elevation, showing the infilling of the ramp void.

Members were shown photographs of Artizan Street comprising the existing vehicle entrances, existing ground floor servicing entrance, existing ramp to the car park at basement level, the basement ramp and the servicing entrance. Members were informed that there would be enhanced security measures, including a barrier. Photographs of the ground floor were also shown, and these showed the informal car parking and servicing. An Officer stated that there was waste storage at this level, and the proposal sought to formalise and improve this.

The Sub-Committee were shown the existing and proposed ground floor plans. The Officer stated that the parking shown on the left of the existing ground floor plan would be formalised in the proposed floor plan and there would be two blue badge parking bays. Members were informed that there would also be new resident cycle parking facility there, waste storage and the new police parking at ground floor level, which would include higher vans and vehicles. This would connect to Gravel Lane, where the police officers would be located.

Members were shown a photo of the existing basement car park which included a metal screened area which contained the existing police compound. The proposed basement plan would switch over the existing resident and police parking. For residents there would be improved and increased cycle parking provision. There would also be the provision of electric vehicle charging and storage.

The Sub-Committee were shown a photograph of the first-floor redundant car park which could no longer be accessed as the ramps had been removed. Members were shown the existing and proposed plans for the first floor which was currently vacant space. In the proposal it would include police facilities that would link to the first floor on Gravel Lane where the offices, storage and other uses were.

Members were shown photographs and the existing and proposed plans for the podium level. They were informed that to enable insulation and waterproofing, the proposal sought to raise this level. However, step free access would be maintained on all sides. The proposal would reinstate landscaping to include

additional greening, biodiversity and flood measures. The proposal would also include a new garden room for residents.

Members were shown a number of images of the landscaping proposal and were informed that the proposal included the inclusion of an air source heat pump system and electric system, and a greening increase in area by 25%, and 30% in terms of biodiversity. There would also be the provision of electric vehicle charging, and more cycle parking, promoting a sustainable means of transport.

In conclusion, Members were informed that Officers considered this to be a finely balanced case. Officers considered that the proposal complied with the Development Plan when considered as a whole and taking into account all material considerations. It was therefore recommended that planning permission be granted, subject to all the relevant conditions being applied and a unilateral undertaking which would include ensuring compliance with the operational management plan in order to secure benefits and minimise the impacts of the proposal.

The Chairman explained that there was one registered objector to address the meeting and he invited the objector to speak.

Mr Roger Way, Chair of the Residents Association stated that in recent years, the City had approved several applications in and around the estate including the relocation of the estate office to an impractical location and discontinue the podium community hall. He raised concern about the approval of plans to install the police parking facility in the basement and stated that incidents of faulty fire alarms and the residents' extractor fans running at emergency levels had disturbed residents for hours at a time, day and night, over a number of years. He raised concern about the approval of external community heating pipe work. Mr Way also stated that in 2014, a scheme was approved to provide Petticoat Tower with a new entrance canopy and improved lighting but residents were still waiting for this. Mr Way raised concern about the approval of landscaping on Artizan Street which had resulted in planting leaking water and creating a flooding hazard in the basement. He also stated that there had been approval of the construction of a new high rise tower block beside the estate that would result in years of disruption and reduced sunlight to the estate.

Mr Way raised concern that if approved, the application for consideration would further reduce residential and public amenities, sterilise an active street and further damage residents' quality of life. He added that this prediction was shared by more than 96% of the individuals who recorded their objections to the application.

Members were informed that residents had welcomed the opportunity to be involved in a community steering group and to influence aspects of the design and implementation. They acknowledged and welcomed that the City intended to continue convening the community steering group until the project's conclusion. Mr Way requested that the applicant and the City's Housing

Officers commit to reviewing the functioning of this hybrid housing, commercial units and police base estate every five years.

Mr Way suggested a lack of foresight to plan a new headquarters off Fleet Street, close the Snow Hill and Wood Street Police Stations, close the Bishopsgate Police Station and then realise that the police would need an operational base in the east of the City. He stated that residents valued the City of London Police as an essential public service, but did not believe this proposal was in the police nor residents best interests. Mr Way stated that in planning to establish an operational base in a purpose-built housing estate, the police had pledged to be good neighbours, but when they had been asked to compromise on these designs in terms of space, proportionality or residential convenience, they had refused to engage.

Mr Way stated that the objections to the planning application had been numerous. He further stated that there remained fundamental disputes between residents and the City about the need for, and the practicality of the proposals. Objections included the creation of a multi-level podium community garden for the police's benefit, not residents, increasing congestion, traffic and pedestrian conflicts, inconvenience, having to relocate residents' vehicle and cycle parking to the basement requiring new and expensive cycle lifts.

Mr Way stated that he considered there to have been a lack of transparency and due process around the application. He stated that residents and elected Members only discovered the design including the raising of the podium three weeks after the decision was made by the Community & Children's Services Committee to declare car park areas and commercial shops surplus to housing requirements. He stated that the change to the podium had still not been formally considered by any elected Members.

Mr Way asked Members, before voting, to consider how this and previous planning decisions would affect the local community, when leaving, returning to and enjoying their homes and gardens. He stated that the residents of the Middlesex Street Estate ranged from infants to the elderly and that they varied greatly in their mobility capabilities. Some made determined but slow progress on level ground avoiding steps and ramps and using Zimmer frames in order to maintain balance. In view of this he requested a further condition requiring the applicant to maintain level access from all entrances to the podium, to the spaces that were currently accessed at that level, rather than constructing a multi-level podium.

The Chairman asked if Members of the Sub-Committee had any questions of the objectors.

A Member asked how many residential units would be affected by the application. Mr Way stated that this was approximately one quarter of the estate. He stated that residents were not objecting but were asking the Sub-Committee to make its own decision on evidence and then add a condition so that the podium did not have multiple levels. He added that every resident used the podium level because it was their garden, and it was a single level and was

currently accessible. All residents would be affected by the change to the podium level.

A Member asked Mr Way to outline the reasons why he considered his proposed additional condition necessary. Mr Way stated that his proposed condition was to retain the existing level of the podium. Raising it and having ramps and step access around meant that, for example, toddlers currently had a track they rode around the podium, but the proposed change meant they would not be able to do a complete circuit of the podium without using steps and therefore parents would be more concerned about the safety of their children. Mr Way stated that residents supported the police and would work constructively with them.

The Chairman invited the supporters of the scheme and the applicant, to speak.

Deputy James Thompson, Chairman of the City of London Police Authority Board stated that the City of London Police Estates Programme had been in operation for 15 years and he had been involved in the project for the last 9 years. He stated that when he had started as a Special Constable in the City of London Police 22 years ago, Bishopsgate and Snow Hill Police Stations were already at the end of their lives. He added that the current police buildings were beyond the end of lives and were not fit for purpose. Deputy Thompson stated that after Salisbury Square, the Middlesex Street site was the next most significant component of the Police Estates programme.

Deputy Thompson stated that the proposal would create the much needed eastern base for the city police close to Liverpool Street and Bishopsgate, one of the busiest parts of the square mile and close to two of the most important residential areas in the east of the city, Middlesex Street and Portsoken. The proposal would help regenerate the Middlesex Street Estate, as well as improve security to the site itself through physical changes, access CCTV and the police presence. It would also provide improved amenity space for residents, podium landscaping, parking, garaging, access and cycle facilities.

Members were informed that the City of London Police wished to be excellent neighbours and part of the community. The site would not be an operational hub of response officers or response vehicles and there would be no vehicles exiting with blue lights and sirens. It would be a base for local policing, ward officers and the cycle squad.

Deputy Thompson stated that nationally people mourned the loss of their local police stations. A few forces were building new ones and increasing the number of police stations in communities and these were welcomed by those communities. The presence of local policing, which this application represented, was seen almost universally as positive. He added that if planning permission was granted, he and the City of London Police senior leadership were committed to ongoing dialogue and partnership with Middlesex Street Estate residents through project delivery and throughout occupation.

Members were informed that if planning permission was not granted, the impact of finding a new site would put significant pressure and extra costs on the City Police and it would significantly damage the morale of officers and staff. Deputy Thompson stated that although he recognised that was not a planning consideration, he hoped it explained why the site was so important to the City of London Police and why they were determined to ensure they had the strongest relationship with their neighbours now and in the future. Deputy Thompson added that work had been undertaken with surveyors to ensure that this was an asset for the community and to address resident concerns. Deputy Thompson stated that he hoped Members would support the application for an important asset for the City of London Police, the City of London Corporation and communities as one that helped protect the square mile, ensuring it remained the safest business district in the world.

Commissioner Pete Doherty stated that it was vital for the City of London Police to have a presence and a base in the eastern part of the city, near Bishopsgate. He stated that the application was not just about having the space needed but also about providing the best possible service to all the residents and businesses in the City of London in one of the most busy, if not the busiest part of the City due to a very vibrant night time economy and busy transportation hubs.

Members were informed that having a presence at this site would improve the response time to the community and help deter and reduce crime in the eastern part of the City. It would also provide a closer connection and a much warmer and better integration between the police and the community in which it served.

The Commissioner stated that the City of London Police were empathetic to the concerns of residents, and had listened closely and genuinely to all of the feedback that had been provided. This had led to a decision to remove police response teams from the site to reduce disruption and noise, meaning no vehicles exiting the site on blue lights unless under exceptional circumstances. He was confident that the City of London Police continued to be a value driven organisation and pledged to be an excellent and respectful neighbour, if the application was approved and thereafter.

Mr Peter Smith from the architect, RSP, stated that he wanted to stress, as head of the design team, that the team had worked constructively with officers and residents throughout the process. The pre-application meeting took place with Planning Officers in April 2022 and resident engagement began in February 2023 with 12 meetings held prior to submission of this application. This had been followed by a further 6 meetings throughout this consultation period.

Members were informed that the submitted design was not just focused on the police accommodation, but also addressed ways to improve facilities for residents, preserve the aesthetics of the estate and provide a sustainable design solution. Consultation with residents had resulted in improvements to the basement car park to make it feel safe, bright and inviting. Increasing the current 34 permit spaces to 43 spaces would accommodate demand for visitor

and carers' parking and the current 54 cycle spaces would be increased by over 400% to 240 with new secure and accessible storage. The current ad hoc service yard arrangements were being replaced with a new managed space where bays could be pre-booked when residents and tenants were expecting a delivery. Residents also helped define the requirements for Unit 20 with the new gym facility and relocated estate management office being their preferred solution, along with adding a new community room on the podium. Mr Smith stated that working closely with residents, the designs for the podium incorporated their requests for a mix of spaces where people could meet and gather and there would be improved play facilities for children and wildlife would be encouraged.

Mr Smith stated that consultations with the Accessibility Officer had ensured that the design team had responded to the concerns about the raised area of the podium and the number of shallow gradient ramps had been increased. All four corners of the site from the stair cores were accessed by ramps, as was Petticoat Tower. The number of steps was greatly reduced.

The Sub-Committee were informed that on Gravel Lane consultations with Officers and residents had helped to introduce the concept of the new display spaces in the shop fronts for art work, local history or other community information. The development of the Artizan Street works had been progressed with Officers and residents, and would be further refined as part of any section 278 agreement if consent was given.

Mr Smith stated that residents had expressed their pride in the appearance of the estate, so the new cladding enclosures on Artizan Street had been developed with them and their preferred choice of materials was incorporated. Initial proposals for enclosing an existing refuge chute was omitted following residents' concerns and a new solution was found for concealing the route of the proposed generator flue.

Members were informed that to make the proposals more sustainable, the existing structure and fabric would be retained and reused, giving significant savings on embedded carbon, upgrading thermal performances of the proposed spaces and installing new electric heating, cooling and hot water for the police facility. This would mean it was energy efficient and would reduce operational energy and carbon. Infrastructure was being provided to encourage more sustainable modes of transport through increased cycle parking and EV charging facilities. There would be increased biodiversity using local climate resilient planting to increase urban greening and provide residents with an improved amenity space to enhance their health and wellbeing.

In his summary, Mr Smith stated that the submitted proposals responded to the concerns and feedback raised by residents and Officers and would provide major improvements to the Middlesex Street Estate, whilst also integrating an essential facility for the City of London Police to serve the local community.

The Chairman asked Members if they had any questions of the applicants.

A Member asked for clarification on who could use the podium. Mr Smith stated that it would remain entirely for use by residents. He added that as part of the works to replace the waterproofing of the roof of the police facility, the current slab of the podium would have to be taken up and as part of that the facilities for residents were being enhanced. The podium would not be used by the police.

A Member asked for clarification on whether there would be full accessibility to the podium. Mr Smith stated that it would be fully accessible and that the central section of the podium would be raised. There would be access onto it from every corner of the site via ramps that were at least 1 in 21 gradient, so they were very shallow to the point where they were not actually classed as ramps under the building regulation, they were just slopes. From whichever side of the estate residents approached the podium, there would be ramp access. From Petticoat Tower there was also ramped access. Accessibility had been reviewed with the Accessibility Officer for the City of London Corporation and the feedback was that a very slight adjustment was required to the ramps in the northwest corner. This had been implemented.

A Member asked if the applicants had addressed the specific concerns of objectors. Deputy Thompson confirmed that through the consultation, every concern had been considered and they had responded to every concern raised. He stated that the points made in the condition suggested by the objector had been resolved, that the ramped access at the lowest grade was barely noticeable. In addition, the podium height increase had been minimised to the lowest level that would achieve water tightness. The Commissioner added that noise and disruption were the main issues raised by residents. The ideal situation for the City of London Police would have been to have the base as a response base with vehicles using blue lights regularly throughout the day and evening but the police had compromised on this position and there would now not be Officers responding to emergency blue light situations from the site. Personnel and other vehicles would use the space. He stated that in this regard, the police had not only listened, but acted proactively on the feedback given and change the requirement that was initially put forward.

Mr Smith stated that any development on this site, even if not a police facility, would require insulation to meet sustainability requirements and modern building regulations. The space was designed in the 1960s as a car park and there was no insulation. The structure and ceiling height below was not suitable to insulate from below so insulation would be required on top of the slab and a change in level of the podium would be necessary. Mr Smith stated that the change in level was about 370 millimetres with gentle ramping to that over lengths of about 8 metres. He also stated that the podium was not currently level as there was a sunken garden.

A Member stated that the police had been occupying the basement car park for many years and there had been incidences of police activity disturbing residents. He gave an example of police vehicles being picked up by tow vehicles, and blocking the exits to the car park for residents with the issue not being resolved quickly. He asked what measures were in place to ensure that

when there was such an incident, that it would be dealt with far more quickly than it had been done in the past. The Commissioner stated that he was sorry to hear this and acknowledged that this must have been frustrating for residents. He stated that there were high levels of vehicle movement when the police seized vehicles from criminal endeavours and also when vehicles used to pursue and respond to emergencies, required maintenance. He added that this site would not be used to store vehicles that had been seized from criminal endeavours. Vehicles parked at the site would not be used for frequent emergency response scenarios and therefore would not require maintenance in the same way. In addition, it was hoped that by being closer to residents, if there were any issues these would be discussed and the police would endeavour to address them quickly. He reiterated that the site would not be used for the purposes that previously caused concern. The applicant confirmed a point of contact would be put in place for residents to contact with issues and these would be logged and dealt with at the highest levels.

A Member asked for more information on the public art and historical display including plans for the ongoing management to ensure it stayed fresh and vibrant.

The applicant stated that the display spaces were conceived as a location. Work had taken place with the City of London surveyors and the Destination City team. A company was being approached to effectively manage and curate that space so that it would be regularly changed. Access into the spaces was being designed to enable maintenance. The applicant explained that this was an emerging proposal and the details were required by condition and would be submitted once further work had taken place with the curators.

In response to a Member's question as to why there would be no public reception in the area, the Commissioner stated that the model being developed was in line with the different and more modern ways for the public to interact with the police i.e. digitally, through engagement, cluster meetings, pop-up spaces in the local community and making sure police were more visible locally. The building was designed as an operational base without the increased footfall that having a reception area within the building would bring.

Deputy Thompson stated that under the Police Estates Programme it was recognised that it would be desirable to have some form of counter access in the Bishopsgate area, given how busy it was. Middlesex Street Estate was not considered to be the right place for it, so further work was taking place to identify a suitable location for a police front counter space.

A Member asked about the provision of extra security on Gravel Lane to deter antisocial behaviour. The applicants stated that CCTV around the building would be significantly enhanced and the police presence should act as a deterrent. Access for police officers would be separate from any of the residential entrances, so of the six shops that were being taken for the eastern base on Gravel Lane, two of them would have live entrances for use by police personnel. Throughout the day, bearing in mind shift changes, there would be a constant police presence. There would also be CCTV coverage of the entrances and street frontage.

A Member stated that a police hub was welcomed in the eastern side of the City. She stated that an access counter would make the police more visible and enable residents to raise issues and have them resolved quickly. She stated a management plan should be drawn up in consultation with residents and Officers. The Member added that the enhancements were welcomed by residents but they were concerned about ongoing maintenance and who would be responsible for this as well as who would be responsible for the costs of servicing the new facilities. She also raised concern about vehicles leaving the building using blue lights and sirens. She asked applicants to confirm that the police facility would not impact on residents' amenities and quiet time. The applicants stated that a management plan would be in place as part of conditions and that the site would be an operational base so blue lights and sirens would only be used by exception. In addition, the Commissioner stated the importance of visibility and ease of contact and stated a formal plan was required to ensure residents could contact the police. He added that the City of London Police were in the process of publishing a new neighbourhood policing strategy to make sure they were more visible and accessible to all residents and businesses in the City. There would be more policing from the site than there had been before in this part of the City, and this was one of the benefits in having the site in one of the busiest parts of the City.

A Member commented on the significant leaking from the podium into the car park and asked if the redesign did not take place, whether the leaking would be addressed and who would pay for it. The Member also asked if the applicant could ensure the resourcing of the community gym, beyond refurbishment to cover costs such as insurance, maintenance, and cleaning.

The Interim Assistant Director for Housing and the Barbican stated that Housing Officers would work from a housing perspective with the police to put in place a comprehensive management plan and this would include maintenance. Housing would manage the residential part of the car park and the police would manage the police side. She stated that there were significant issues with the podium and water coming from it. The proposal would address 75-80% of the issues. Housing would look to fix the remaining leakage issues at the same time. The maintenance of the gym would also be included in the management plan. There was a charge each year for the maintenance of the podium and it was possible that once the works were complete and the water issues had been addressed, it could be cheaper to maintain. The Officer stated that from a housing perspective, she was supportive of the application. A Member stated that a management plan should be worked up with the department but also with leaseholders to split the cost fairly. She stated that there were some shared areas and the police would have to access the car park the same way as the residents so costs would have to be considered. The Member stated that the residents should not have to cover all of these costs. The Officer stated that there was a need in the management plan to be clear about how the costings should be split for the shared spaces and how they would be managed.

A Member asked if there would be space in the new podium garden for Members to continue the allotment style gardening currently in place. The applicant stated that they had been working with both residents and the gardening club. A visit was planned to walk around the site with residents and identify any planting that they wanted to try and retain. The gardening club used one of the garages in the basement and one of those storage areas would be retained for the gardening club. Discussions had taken place with the gardening club about adding outside taps at different locations around the podium as part of the work so that they could water and maintain the garden as currently they did not have hose coverage across the whole area.

A Member raised concerns about the lack of a police front counter for vulnerable women and girls. Deputy Thompson stated that the City of London Police were working to tackle violence against women and girls, including through a Safe Havens project, which was seeing safe havens rolled out to numerous locations across the City. A Member suggested that the public should be asked if they wanted a front counter. Deputy Thompson stated that there would be a front counter in the area but it would be in a location where there was greater footfall.

The Chairman suggested that the Sub-Committee now move to any questions that they might have of Officers at this stage.

The Chairman asked Officers whether they considered that the operational management plan would mitigate against some of the concerns that had been raised e.g. community contact and liaison and ongoing maintenance of the landscaping. An Officer stated that following consultation with residents, Officers had asked the applicant to submit an operational management plan. The applicant had confirmed that there would be no response vehicles based on the site and the plan included details about police not exiting with sirens on. There would be a dedicated contact provided for community liaison for both the operational and construction phase and this liaison was to ensure that any issues were dealt with and residents were able to report these. Officers had recommended that the scheme of protective works, which was recommended as a condition, should provide for a respite area during the construction phase and that the community steering group should continue meeting throughout the project. There was also a condition to require the applicant to comply with the operational management plan. The Officer stated that with the requirement for the applicant to comply with the operational management plan, residents' concerns would be addressed.

In response to a Member's question as to whether the operational management plan included a requirement for the ongoing liaison group set up with residents to continue, an Officer stated that a robust communications protocol would be implemented during the construction works. Post-construction, the community liaison group would continue to meet regularly with residents. The Officer stated that the applicant had shared a dedicated e-mail and telephone number for residents to raise any concerns and that the plan stated that the force would regularly undertake local meetings with residents, including cluster meetings

with the Middlesex Street State, engagement with community policing officers via local patrols and other meetings.

A Member asked whether the applicant could be encouraged not to undertake noisy work on Saturdays or if possible, not undertake any works on Saturdays due to the amount of disruption the work would cause to residents. An Officer stated that the approval of the scheme of protective works sat with the pollution control team, which fell under environmental health. She stated that it would not be possible to give that guarantee as there were many works that were required to be undertaken on a Saturday, in terms of unusual vehicle movements and large loads coming in e.g. crane lifts. She added that Officers would work with the applicant to ensure that all mitigations were put in place and it would need to be over and above the existing code of practice, given the proximity of residents.

In response to a Member's question, the Officer stated that in the current code of practice, the issue of respite areas was not explicitly addressed. Due to the proximity of the residents, quiet respite areas would be provided away from the noise.

A Member raised concerns about construction noise and stated that there was a heavy concentration of residents in the area including school children and elderly people. She asked if a condition could be added stating that there could be no Saturday or weekend working and stated that a construction programme could be built around not working at weekends. An Officer stated that there were a number of safety and engineering reasons why weekend working was sometimes required. Applying a condition requiring no weekend working would severely hamper the build and make it almost impossible to do. Officers could though ensure any works undertaken at weekends had to be completed then.

A Member asked if there was a waiting list of applications for the residents' parking bays. An Officer stated that she was not aware of any waiting lists for car parking at the estate. She clarified that there would be a reduction of 24 car parking spaces for residents of this site. There were currently 34 parking permits issued. 43 car parking spaces including blue badge were proposed as part of the application which was in excess of the permits that were issued at present. The maximum number of vehicles parking during the survey was 43.

Seeing no further questions, the Chairman asked that Members now move to debate the application.

A Member stated that the podium being raised by 300mm and the installation of air source heat pumps under acoustic shrouds so they would not be heard, represented a good example of complying with the climate change policy and a retrofit first policy. He stated that the designers had found an elegant way of raising the podium, putting in insulation and installing a ramp system. In relation to concerns raised by residents, he stated that more should be done to explain to the public that in order to help address climate change and reuse buildings, compromises such as the risen podium were necessary. He suggested that the public should be invited to a demonstration of an air source heat pump working

under an acoustic shroud to reassure them that they would not be able to hear it. He stated that more work should be done to outline what the City of London Corporation was trying to achieve in its Climate change and retrofit first policies.

The Chairman requested that Officers should provide Members data and information on emerging technologies to help inform Members' debate at Planning Application Sub-Committee meetings.

The Chairman thanked Helen Fentimen for the work she had done to bring the community together on this project over the past few months. He stated that this gave him confidence that community engagement would continue. He stated that it also provided an opportunity to learn from this example and require this level of community engagement and involvement in applications going forward.

A Member stated that this application was in his ward and he had been involved in discussions about how to use the empty space in the Middlesex Street Estate for over a decade. He stated the proposal would provide an estate office, a gym, a repaired and refurbished podium, more CCTV, secure cycle parking, a refurbished Artizan Street frontage, new car park gates, better car park lighting and painting, electric vehicle charging points, a garden room and an enhanced police presence in the area. He stated that although there were drawbacks and the proposal would need to be well-managed, the benefits far outweighed the drawbacks.

Having fully debated the application, the Committee proceeded to vote on the recommendation before them.

Votes were cast as follows: IN FAVOUR – 15 votes
OPPOSED – None
There was 1 abstention.

The recommendations were therefore carried.

Deputy Pollard who had left the meeting, Deborah Oliver who had recused herself and Deputy Anderson who had declared an interest, did not vote.

RESOLVED -

1. That the Planning and Development Director be authorised to issue a decision notice granting planning permission for the above proposal in accordance with the details set out in the attached schedule, as amended by the addendum, subject to:
 - a. the City Corporation as landowner giving a commitment (through a resolution or delegated decision) that it will comply with the planning obligations in connection with the development; and
 - b. a unilateral undertaking being executed in respect of those matters set out in the report, the decision notice not to be issued until the commitment/resolution has been given and a unilateral undertaking has been completed.

2. That Officers be instructed to negotiate the unilateral undertaking.

5. **PORTSOKEN PAVILION 1 ALDGATE SQUARE LONDON EC3N 1AF**

The Sub-Committee considered a report of the Planning and Development Director concerning the retention of a change of use of the premises from the lawful permitted use as Class E(b) (restaurant) to Sui Generis (drinking establishment) use.

The Town Clerk referred to those papers set out within the main agenda pack as well as the Officer presentation slides.

Officers presented the application and stated that planning permission was being sought for the change of use of the Portsoken Pavilion located in Aldgate Square from the Class E Cafe restaurant to a drinking establishment with a substantive food offer. There were no physical works to be carried out or under consideration and the use was already in place. As such, the permission was being sought retrospectively.

The Officers highlighted that the site was located to the north of Aldgate Square, within the existing pavilion building, which was constructed as part of the wider gyratory remodelling granted planning permission by the Planning and Transportation Committee at the beginning of 2015.

Members were informed that the western edge of the square was Aldgate School and to the east was St. Botolph without Aldgate Church. Representations had been received from both the church and 15 members of the public raising concerns including the loss of the previous use, anti-social behaviour, public safety and impacts upon the community. Officers had taken the comments received into account and in response to the representations received, restrictive conditions had been agreed with the applicant to limit the hours customers would be able to spill out into the wider area. Objectors were further notified following these agreements with the applicant. Three responses were received and were detailed in the Officer report. Further responses were received from two members of the public and one from the neighbouring church.

Members were shown a ground floor plan which included the bar and seating area and accessible toilet. Members were informed that the external seating area was provided through the grant of a pavement licence. Members were shown a basement level plan which included the kitchen, cellar and additional publicly accessible toilets. Members were informed that the applicant had agreed by way of condition that the toilets were part of the city's community toilets scheme and publicly accessible without charge or the need to purchase, during operating hours.

Members were shown a photograph of the pavilion from the northeast with the school behind it and the church to the left of the image, and an image from the southwest in which the square could be seen as being fully open to the public with pre-existing seating and bin provision.

Members were shown a photograph of the pavilion taken in January 2024, with the existing outside seating as consented through the associated licence. They were also shown a photograph of the entrance to the bar and the toilets, which was located in the west of the building.

The Sub-Committee were shown a photograph from within the square and the fountain area, which would continue to be unhindered by the seating area. They were shown a similar photograph taken from the west. Members were shown a further image showing the use as of May 2023 taken at about 5:30pm from the west of the square.

The Officer informed Members that a management plan had been submitted following the initial objections that were received and the applicant had advised that this was already being implemented throughout the square. The plan included the applicant and the operator of the bar regularly collecting customer glasses as well as general cleaning and the collection of bottles and cans brought into the square by other users of the public space. Staffing levels had been increased during busier times.

Members were shown a photograph provided to Officers by Reverend Laura Jorgenson, an objector to the application, showing activity within the square in late June 2023. The Officer stated that whilst it was recognised that the overall use of the square had increased with the introduction of the bar, footfall in the City had also increased over this time. The Officer added that to mitigate concerns, conditions were proposed that would limit spilling out from the premises other than to the areas specifically licenced for such purposes, namely the seating shown, before 5.30pm Monday to Friday during the school's term time.

The Sub-Committee were informed that following complaints about large crowds within the square, colleagues from the licencing team had inspected the site on 7 occasions in June and July 2023, when the use of the square was at its busiest, and they did not find anything of note with regards to antisocial behaviour or obstruction. They had advised that, following the provision of guidance to the premises management on how best to manage outside drinkers, no further complaints had been received by them.

Members were shown a map of nearby areas within an approximate 200m radius of the site and a further map, showing bars, pubs and also other premises licenced to sell alcohol within the same radius.

In summary, the Officer stated that the site was in a busy and lively area of the City and contributed to the vibrant and dynamic area. He stated there were many retail outlets in the immediate area, including five drinking establishments within 130 metres of the proposed site and 7 within 200 metres. He added that this would increase to 8 when The Ship pub was reinstated after redevelopment. As such the proposed use was not considered to be out of character with the location. The proposed change of use to a drinking

establishment was considered acceptable and it was recommended that the Sub-Committee grant planning permission subject to the conditions proposed.

The Officer stated that in particular; Condition 1, that would prohibit outside drinking before 5:30pm Monday to Friday during term time, and then only within the area approved under the associated pavement licence; Condition 2 that this activity should cease and all tables and chairs be removed, should the licence be revoked at some point in the future; Condition 3 that the premises would only operate under the approved management plan that was subject to a first anniversary review by the Planning Officers and subsequent revisions as required as may be seen fit by the Corporation; and Condition 4 to have membership of the community toilet scheme within three months of planning permission being granted. Other conditions had been imposed with regards to noise and disturbance and environmental health requirements as set out in the Officer report. The Officer stated that on this basis, Officers recommended that planning permission be granted by Members of the Sub-Committee.

The Chairman explained that there was one registered objector to address the meeting and he invited the objector to speak. Reverend Laura Jorgensen stated that she was attending as Rector of St Botolph's on behalf of her congregation, as a school governor on behalf of Aldgate School, as a parent of children at Aldgate School and on behalf of Wynn Lawrence, another parent. Reverend Jorgensen stated that from the inception of the public realm project to create Aldgate Square, its first objective had been to create attractive, inviting and comfortable spaces that were destinations in their own right, and stated that account must be taken of the needs of the variety of users from the community, including children and parents, workers, residents and visitors using the spaces at different times of the day. Members were informed that the opening of Aldgate Square in 2018 was transformative. The square was enjoyed at different points of the day and evening by a broad cross-section of people, including Aldgate school, residents of Middlesex Street, Mansell Street Estate, office workers, construction workers and tourists. Reverend Jorgensen stated that as the largest public square in the City, it quickly became a place for the community to gather, for children to play in the fountains and had the only grass many children, including her own, ever played on freely during weekday evenings.

Reverend Jorgensen stated that since the opening of the Portsoken Pavilion as a bar, there had been a different feel to the square. She raised concerns about the diminution of Aldgate Square as a community space, a loss of amenity of public toilets, noise from loud music, antisocial behaviour and particular concerns about the interface between children and drinkers and stated that the square was no longer a family friendly space. She raised concern about drinkers being prioritised over providing space for families, elderly residents and tourists to enjoy.

Reverend Jorgensen raised concern about who would manage the sharp interface at the eastern and western points of the pavilion, where drinkers, children and others stood or passed by in close proximity and when the barriers narrowed the path by a considerable margin for buggies and wheelchairs.

Reverend Jorgensen suggested that there might be a different outcome to the discussion about change of use if it had been taken place before the lease was awarded to the current operator in 2022.

Reverend Jorgensen raised concern that the public toilets deemed necessary to the original scheme were now closed at weekends and every morning. She stated that many people including children and people whose faith meant they did not drink, were reluctant to use them. She added that in addition, children could now not play freely in the previously very popular play fountains when surrounded by adults drinking.

Concerns were raised about the costs to build the pavilion and the public realm project as a whole and just one business taking the majority of the enjoyment of the square in warm weather, with vertical drinking taking place and no space for others after 5:30pm. It was also stated that there were other bars with outdoor spaces in very close proximity to the square.

Reverend Jorgensen stated that the change of use did not take into account a variety of users. There were many people who lived and worked and passed through this vibrant and diverse area. She stated that by granting this change of use, Aldgate Square would never reach its potential as an open space for all.

The Chairman asked if Members of the Sub-Committee had any questions of the objectors.

A Member thanked the objector for providing up to date photographs. She asked if the objector considered that the bar was managing itself proactively. She also asked whether the objector considered the situation would improve or deteriorate if the premises remained as a pub. Reverend Jorgensen stated that all through the summer the square was full of people and children could not play freely. She stated that she had had several conversations with the bar owner and they had put in place measures which were appreciated, but they were not going to turn away people from their business in the summer. She stated that many of the issues related to the sheer numbers of people using the space.

In response to a Member's question referring to the lack of complaints since the measures had been put in place, Reverend Jorgensen stated that people did not know how to make formal complaints and many people had spoken to her or complained on parents' Whatsapp groups. She raised concern that she was not written to about the proposed change of use and only happened to see a poster after the consultation date had expired.

A Member stated he understood the concerns raised but expressed concern that the lack of formal complaints meant there were no formal numbers to consider. He stated that the City was evolving and as part of Destination City, changes were being made and working together was important. Reverend Jorgensen stated that she spoke to her ward councillor and other Members. She had not considered that she would be asked to provide numbers but she had observed that children no longer played in that square and she wanted people to enjoy the space as they used to. She stated that she was not saying

that objectors wanted to exclude certain people, but they were asking not to include just one group.

A Member stated that he understood that a condition would be put on the licence such that the patrons of the drinking establishment would be excluded from the use of the park until 5:30pm and would only be allowed in a confined space so there would not be an interface between children and drinkers, unless the children were playing after 5:30pm. He asked to see a plan of the space. On the plan shown, Reverend Jorgensen highlighted the school entrance and stated that patrons did not currently stay in the small area. The Member stated that if the condition was applied, they would be obliged to. He asked if this addressed concerns. Reverend Jorgensen stated that many children wanted to play beyond 5.30pm, especially in warm weather and that people drinking came out into the space near the play fountains and did not just use the area where the tables and chairs were positioned.

The Chairman invited the applicant to speak but the applicant was not in attendance.

The Chairman suggested that the Sub-Committee now move to any questions that they might have of Officers at this stage.

The Chairman asked Officers to outline the previous licence conditions on the premises that closed in 2020, the licence conditions on the proposed premises and the situation regarding people drinking in public in the City. An Officer stated that the planning and the licencing regimes were separate regimes. The licencing regime was specifically about promoting the four licencing objectives of public safety, public nuisance, protecting children from harm and crime and disorder. The licencing regime was set up to be permissive, so unless there was an objection to an application which would then be determined by a sub-committee, the licence application was granted. The licence for the previous premises was first granted in 2018. It operated as a coffee and cake shop with alcohol ancillary to that. They closed down in 2020 and that licence was then transferred in late 2022, almost as it was, so the conditions on the licence were the mandatory conditions, including having a designated premises supervisor available at the premises. There was one additional condition which related to CCTV, but because it did not go to a sub-committee, there were no additional conditions attached to the licence.

The Officer stated that in relation to drinking in the City, there were no prohibitions on drinking in the square mile. Some boroughs were dry boroughs and had public space protection orders preventing alcohol being consumed but the City had none, so there were no restrictions on buying alcohol, opening it and drinking it.

A Member commented that the report stated that conditions were proposed that would prevent spilling out from the premises other than to an area specifically licenced for such purposes before 5:30pm Monday to Friday. He asked Officers to clarify where this area was on the plan and asked how this condition would work in view of there being no way to stop people from drinking in the square

mile. The Officer confirmed that the area was approximately the area where the tables and chairs were located. The Officer confirmed that people could visit the square and drink under the existing regime. The Officer added that it had been agreed with the applicant to prohibit drinking beyond the delineation approximately before 5:30pm Monday to Friday. The Officer stated she did not have an image with the red line marking the outline of the licensed premises but stated the structure of the building was under the premises licence and the pavement licence ran up until September 2024.

A Member commented that the original planning application was for a café/restaurant which would provide amenities including toilets for people in the area and enhance the use of the public space. The use would also be enhanced by the use of the area adjoining the pavilion with ancillary external seating. The Member stated that Aldgate Square was intended to be a community facility for mainly the school and the residents in Middlesex Street and Mansfield Street and it was clearly set out that it would be a café/restaurant and this was granted by the Committee. She added that there had been an obvious change of use and asked why enforcement action had not been taken against the change of use. The Officer stated that the sequence of events was regrettable and that the Planning Department became aware of the change of use at the end of 2022. An enforcement investigation was undertaken and that had resulted in the current planning application being submitted. Local Planning Authorities were obliged to give applicants the opportunity to apply retrospectively for planning permission. He added that if the decision was overturned, this could reopen enforcement action.

A Member asked for clarification on the definition of substantial food. The Officer stated that there was not a specific definition but a food offer would be required and this was not just a drinking establishment. The Officer stated that the previous cafe /restaurant did have alcohol consumption on the premises and the licence did allow for offsite sales of alcohol to take place. The current business was operating on the same licence.

Officers were asked to what extent they considered that the antisocial behaviour outlined by the objector was a consequence of people drinking at the establishment as opposed to people bringing drinks from elsewhere into the square or having arrived at the square inebriated from another venue. The Officer stated that several visits were undertaken in the Summer of 2023 at different times of the day and night, with many visits being at the busiest times. No anti-social behaviour was observed. Members were informed that if there was evidence that customers were undertaking anti-social behaviour, there were strong powers under the licencing regime to review the licence. Members were informed that there was a good management plan in place, there was active glass collection and monitoring and management of the spaces being used.

A Member asked what the pavilion would be used for if planning permission was not granted. An Officer stated that the lawful use of the premises was that granted by the committee in 2015, which was a café/restaurant. He added that

if planning permission was refused, the use would revert to that lawful use, notwithstanding any opportunity for the applicant to appeal that decision.

A Member asked how the 5.30pm restriction would be enforced. An Officer stated that this would be secured by a planning condition. If the planning division received complaints that this was being undertaken before 5:30pm, investigation and possible enforcement action would be taken.

A Member asked why the premises would have 3 months to join the community toilet scheme as opposed to being required to join immediately. The Officer stated that the wording could be revised to require them to join immediately.

A Member asked for further details on the policies in relation to the protection of the open space and how that interacted with the proposed use. This Officer referred to the local plan and development plan as outlined in the Officer report. He stated the space was utilised for drinking and gathering and this had been well established.

A Member commented on the references to the licensing regime and stated that there should be clarity on the plans about the area licensed. He stated that the Sub-Committee should make a decision in its own right and not by reference to the licensing regime. He also stated that there appeared to be some off-licensing provision and that if there was just an on-licence, there was control over where people drank and took their drinks. He asked if it was possible to mark out the line where people could go and could not go. An Officer stated that this application had been considered within planning terms but with due regard to an existing licence and the pavement licence for the tables and chairs. He stated that the wording of the conditions recognised that there was a delineation and a containment of those tables and chairs, and they should be contained within that area.

In response to a Member's query about the rationale for the time restriction for spilling out, the Officer stated that before 5:30pm Monday to Friday, there were sensitive neighbouring receptors in terms of amenity and users, including the school and it would not be appropriate for the bar to spill out beyond the agreed seating area into the public space. Beyond that, there was a transition to a nighttime economy. Officers considered 5:30pm to be the time that the amenity impact would no longer be to the same extent.

Members agreed to extend the meeting in line with Standing Order 40.

In response to a Member's question about on-sales and off-sales, the Officer stated that the licence permitted on-sales and off-sales and there were no further conditions on the licence to limit where off-sales could be consumed. The Officer stated that if a review was undertaken, additional conditions could be applied to prevent people taking drinks away and drinking them in that locality, but these could only be applied through a subcommittee review hearing. Members were informed that the City of London was not a dry borough and did not have a public space protection order for any day other than

marathon day and so there were currently no restrictions on people buying alcohol and drinking it in the park.

An Officer stated that a management plan was secured through the planning process. This went beyond the licencing regime and gave due regard through the planning system and the amenity and protection of the wider space. He stated that there was an imposition upon the applicant with their agreement and Officers understood that it had been successful since its implementation in the summer of 2023.

A Member raised concern that that conditions would be unenforceable, especially as people could buy and drink alcohol in the square. She added that many children would still be playing after 5.30pm.

A Member raised concern that this premises was essentially a pub which was operating close to the school entrance and asked if this would be considered by the Licensing Committee. An Officer stated that the matter under consideration was planning permission for the change of use of the building. He stated that conditions had been agreed in terms of hours of operation for the outside seating and activity and the management plan had been secured. He added that planning permission was not being sought for the wider square and the licencing regime was a separate regime. It had been discussed at the meeting so that Members were aware of the background of the matter and the restrictions and allowances that were in place. The Officer added that Members were being asked to grant planning permission subject to the conditions set out for the change of use of the pavilion itself.

Members were informed that Officers were content that the conditions had been applied, responded positively to the comments that had been received and concerns raised by the local and wider community. The Officer stated that the management plan would improve the situation in terms of the management and functionality of the square and the hours restriction would protect the amenities of local communities, residents and stakeholders, in particular the school. The Officer stated that the licencing regime was an entirely separate matter. Members were informed that the proposed change of use was considered to comply with the development plan as set out and subject to the conditions that had been set out in the report, the proposal should not have an undue impact on the amenity of those concerned.

Seeing no further questions of Officers, the Chairman asked that Members now move to debate the application.

The Chairman stated that the debate should focus on planning and not licensing matters but it was useful to have received information on the licensing regime in order to have a holistic picture. The Chairman commented that both planning and licensing conditions were enforceable. He stated that there had not been any police complaints or other complaints raised from a planning perspective. He also stated that if there were licensing concerns in the future, they could be addressed through the licensing regime.

A Member stated that the pavilion scheme was a £20 million scheme which removed the gyratory and brought the school and the church together in a community space. The square provided a space for the residents and a key part of the offering was a community café/restaurant, which was a social enterprise that would employ local people and give back to the community. The space was designed with much consultation to ensure the children from the school and the local area could play. The Member stated that play water fountains were included as part of the design and the grass was sloped so children could roll down the space. The Member stated that unfortunately the social enterprise failed during the pandemic. The Member also stated that when the unit was remarketed there were a number of people who put in for cafe use and that the operator and may not have understood planning requirements of a café/restaurant. The Member raised concern that people spilled out of the premises and that drinkers stood in the area the fountains were in so the fountains could not be turned on for children to play in them. She stated that this was not what was intended when the scheme was implemented, and the atmosphere of the open space had changed. She stated that it was not right that children would not be able to play after 5.30pm when the premises could spill out. She stated that there were not many places in the City of London where children could play and this space was designed for them. The Member stated that the pavilion would not fail if the premises closed down as there were others willing to open a café in the space.

A number of Members stated that they were not in support of a pub in an area where children played and which was close to the entrance of a school. A Member stated that there were other premises nearby where people could drink, but there were no other local spaces for the community.

A Member stated that there were lots of local families in the area without outside spaces or balconies and they should not have to leave the park at 5.30pm.

A Member stated that many people would not feel comfortable entering the pavilion to use the toilets which would be part of the community toilet scheme.

A Member raised concern that the food being provided was not a substantial offering. Another Member stated a pizza menu had only recently been uploaded to the website and he had been unable to book a table for a meal when he had tried.

A Member stated that whilst he acknowledged that Officers had worked to mitigate impacts e.g. through the management plan, he did not agree with the principle of granting permission.

A Member stated that there were issues with how the City of London Corporation, as landlord, wished to sculpt the public space. There were also issues in relation to the planning authority and what should be done from a planning perspective. There were also issues from a licensing perspective. The Member stated that from a planning perspective, he did not consider there to be a reason people could not enjoy a drink with friends in the park. He stated that

from a licensing perspective, it appeared that most of the concerns were with the specific operator and with specific instances e.g. of anti-social behaviour and he considered that these could be dealt with through enforcement and planning and licensing conditions.

The Chairman stated that the site was not in isolation in Aldgate; there were many licensed premises close to the school and the church that existed and operated in a well-enforced manner and the area was renowned for its vibrancy,

A Member raised concerns about people with pushchairs or in wheelchairs being able to get past people drinking in the space.

A Member suggested that in the future, consideration could be given to putting public space protection orders in place.

A Member stated that the square was specifically designed as an open space and suggested that if an application had been submitted for a pub in the consultation phase, it would not have been passed. She stated that consultees had been listened to and the scheme had been designed accordingly. The Member stated that if this planning permission was now granted, it would change the space.

In response to a Member's question, an Officer stated that the planning application sought planning permission for a change of use to a sui generis drinking establishment, and therefore it would cease to be a café/restaurant if the planning permission was granted.

Having fully debated the application, the Committee proceeded to vote on the recommendation before them.

Votes were cast as follows: IN FAVOUR – 2 votes
OPPOSED – 11 votes
There was 1 abstention.

Deputy John Fletcher and Jacqui Webster did not vote as they had recused themselves. Deputy Brian Mooney, Deborah Oliver and Deputy Henry Pollard did not vote as they were not present for this item.

The Chairman reported that, with the majority having refused the application, it was now important for the Sub-Committee to register their reasons for this. The Director of Planning and Development stated that Officers had been following the debate and it was clear there were concerns in relation to the use and the character of Aldgate Square, especially due to the proximity to the school, and the impact on amenity. He recommended that Officers prepare a report detailing reasons for refusal reflecting the Committee's discussion, for approval at the next meeting. A Member stated there were other reasons in policy including the improvement of the Aldgate area given the challenges, improving the open spaces, biodiversity and activity which could also be included.

RESOLVED – That the application be refused, and that Officers be instructed to prepare a report detailing reasons for refusal reflecting the Sub-Committee’s discussion for submission to the next meeting of this Sub-Committee for formal approval.

6. **VALID PLANNING APPLICATIONS RECEIVED BY DEPARTMENT OF THE BUILT ENVIRONMENT**

The Committee received a report of the Chief Planning Officer and Development Director detailing development applications received by the Department of the Built Environment since the report to the last meeting.

RESOLVED – That the report be noted.

7. **DELEGATED DECISIONS OF THE CHIEF PLANNING OFFICER AND DEVELOPMENT DIRECTOR**

The Sub-Committee received a report of the Chief Planning Officer and Development Director detailing development and advertisement applications determined by the Chief Planning Officer and Development Director or those so authorised under their delegated powers since the report to the last meeting.

RESOLVED – That the report be noted.

8. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**

There were no questions.

9. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

There were no additional, urgent items of business for consideration.

The meeting ended at 12.50 pm

Chairman

Contact Officer: Zoe Lewis
zoe.lewis@cityoflondon.gov.uk

PLANNING APPLICATIONS SUB-COMMITTEE

Tuesday, 9 April 2024

Minutes of the meeting of the Planning Applications Sub-Committee held at Livery Hall - Guildhall on Tuesday, 9 April 2024 at 10.30 am

Present

Members:

Graham Packham (Deputy Chairman)
Deputy Randall Anderson
Brendan Barns
Ian Bishop-Laggett
Mary Durcan
Deputy John Edwards
Deputy John Fletcher
Dawn Frampton
Deputy Marianne Fredericks
Alderman Robert Hughes-Penney
Antony Manchester
Deputy Alastair Moss
Deborah Oliver
Alderswoman Susan Pearson
Deputy Henry Pollard
Hugh Selka

Officers:

Bob Roberts	- Interim Executive Director of Environment
Gwyn Richards	- Chief Planning Officer and Development Director
Pearl Figueira	- Environment Department
David Horkan	- Environment Department
Kerstin Kane	- Environment Department
Tom Nancollas	- Environment Department
Baljit Bhandal	- Comptroller & City Solicitor's Department
Peter Wilson	- Environment Department
Joseph Anstee	- Town Clerk's Department

The Deputy Chairman, in the Chair, opened the meeting and welcomed those in attendance, before welcoming Natasha Lloyd-Owen back to the Sub-Committee following a period of leave.

1. APOLOGIES

Apologies for absence were received from Deputy Shravan Joshi (Chairman), Deputy Michael Cassidy, Jaspreet Hodgson, Deputy Brian Mooney, Alderman Simon Pryke, Ian Seaton, and William Upton.

2. **MEMBERS DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

Deputy John Fletcher declared an interest in Item 5 by virtue of being a School Governor at The Aldgate School, which neighboured the site, and advised that he would not speak or vote on this item.

3. **MINUTES**

RESOLVED – That the public minutes of the meeting held on 13 February 2024 be agreed as a correct record.

4. **HILL HOUSE, 1 LITTLE NEW STREET, LONDON EC4A 3JR**

The Sub-Committee considered a report of the Chief Planning Officer and Development Director regarding Hill House, 1 Little New Street, London EC4A 3JR, specifically the demolition of existing building above ground with retention of existing basement and piles/ foundations and erection of a mixed use office building comprising two basement levels, lower ground, upper ground and upper ground mezzanine plus 18 upper storeys for the provision of office space (Use Class E), gym/auditorium (Use Class E), flexible office, café/retail (Use Class E), reprovision of existing library (Use Class F1), flexible library/office (Use Class F1/E) and restaurant (Use Class E), discontinuance of the City Walkway (Little New Street To Wine Office Court), enhanced and enlarged public realm, hard and soft landscaping, highway works, and associated enabling works.

The Town Clerk advised the officer's presentation, as well as two addenda containing late representations and advising of corrections to errors within the planning officer's report, amended conditions and planning obligations had been circulated to Members in advance. The Chief Planning Officer and Development Director then introduced the application to Members and presented the officer's report, informing the Committee about the details of the scheme and its wider implications. The officer's recommendation was that planning permission be granted, subject to all the relevant conditions being applied and Section 106 obligations being entered into.

There were no speakers registered to address the Sub-Committee in objection to the recommendations.

Oliver Hunt, on behalf of Landsec, then addressed the Sub-Committee in support of the recommendations. The Sub-Committee heard that Landsec had a successful track record of development in the City of London, which supported strategic ambitions such as Destination City and the Climate Action Strategy. Landsec sought to realise place potential, support the driving of footfall and future-proof City of London office stock. The Hill House proposals followed wide consultation and engagement and would provide a rich multi-use destination including a sustainable workplace, outdoor terrace, modernised library and restaurant. The site would be revitalised at ground level with green space, contributing to generational change in the area alongside the Fleet Street Quarter. The scheme would seek to safeguard the environment and meet the needs of the community, and provide an important local resource in

the Shoe Lane Library, which would be secured as a key community hub for the long-term.

Ross Pirie, on behalf of Apt, also addressed the Sub-Committee in support of the recommendations, advising that the scheme's shape and form had been sculpted to enhance views and contribute to the immediate environment. The proposals were cognisant and respectful of the Conservation Area and sought to connect with local heritage. This was a significant opportunity to create a sustainable building, with existing material to be reused wherever possible, innovative ventilation and air conditioning, reduced concrete usage and ambitious environmental and urban greening targets, plus high-quality public realm.

The Chairman then invited questions from Members to those speaking in support of the application. In response to questions from Members, it was clarified that there would be two public lifts within the library, with a separate goods lift, and that it was intended for the incidental play features referenced to be part of the renewed Gunpowder Square. The Sub-Committee was also advised that the scheme had been designed considering views from Cannon Street, Southbank and Westminster, in conjunction with consultants, with it concluded that the proposals were of an appropriate scale. The Sub-Committee was further advised that an area had been designated for visitor cycles, and storage space for e-cycles could be considered as part of this. It was also confirmed that the changing places toilet would be located on the ground floor of the library and would be fully accessible during opening hours. The bleachers area would be multi-functional and usable as a work area, with power sockets available for use in that space.

In response to a question regarding the design carbon options, the Sub-Committee heard that option B2+ would have resulted in lower quality provisions on the ground floor and reduced floor to ceiling height, as well as restricted daylight into the office space. The Sub-Committee was also advised that CFD and wind tunnel testing had been undertaken across all spaces, with the results indicating some positive impact at ground level.

The Chairman then invited the Sub-Committee to ask questions of officers. In response to questions, the Chief Planning Officer and Development Director advised that alterations or amendments to the public benefits referenced within the proposals would result in the application being returned to the Sub-Committee. The Deputy Chairman, in the Chair, commented that the provision of the library and related facilities, as well as conditions to mitigate against overlooking from the terraces, should be considered as red lines, with any relaxation not acceptable and amendments expected to be brought back to Members.

The Chief Planning Officer and Development Director further advised that condition 28 required the incorporation of Hostile Vehicle Mitigation (HVM) measures to resist structural damage, with details of these measures to be submitted and approved by officers, and the Section 278 agreement to include the removal of redundant bollards. The Sub-Committee heard that a number of

targets for the scheme set within conditions could only be confirmed following the detailed design phase, but that detailed justification was sought where these targets were not met. There were also appropriate triggers that needed to be met throughout the development pipeline, with a number of them pre-commencement.

The Chief Planning Officer and Development Director confirmed that the height of the scheme exceeded the threshold advocated within the Local Plan, but had been subject to qualitative assessment and was considered to be within the margin of error. The Chief Planning Officer and Development Director clarified that the applicant was targeting a BREEAM rating of Outstanding, exceeding the policy target of Excellent. In response to a question on operational carbon, the Chief Planning Officer and Development Director advised that the calculated 13% carbon emission saving for the scheme was around the average for commercial schemes approved by the Sub-Committee since last year, with significantly higher targets difficult to achieve and requiring extensive focus on energy efficiency.

The Sub-Committee was the advised that the library would have access to the outdoor terrace on Friday mornings and fortnightly for the Dragon Café, with a further 4 uses per year Friday to Sunday and availability for 22 weekends each year for use by community groups.

The Sub-Committee noted that the height of the scheme had been revised over time in response to objections and concern, particularly from Historic England, regarding the harm to views of St Mary-le-Strand. The Sub-Committee was advised that as per usual practice, representations from residents had been appended to the report, with representations from statutory bodies summarised and responded to within the main body of the report. The Chief Planning Officer and Development Director further advised that officers were conscious of the emerging issue of duplicate representations that may have been mass-produced. Noting feedback from Members that these representations should be made more readily available to the Sub-Committee, the Deputy Chairman, in the Chair, asked that officers take this on board for future meetings. The Comptroller & City Solicitor advised that the summary reporting of representations and references to the full representations within the background papers was sufficient with regards to the requirement for Members to consider all representations in respect of an application.

In response to a question from a Member regarding the cumulative effect of daylight/sunlight levels and impact on residences, the Chief Planning Officer and Development Director acknowledged the potential impact of relative change and that small absolute reductions in light levels could have a more significant impact, but added that a third-party review of this aspect of the proposals had been undertaken, which had found the impact of the proposals was not unacceptable.

The Chief Planning Officer and Development Director further advised that the servicing management strategy for the scheme would be refined during the design process and submitted to officers for approval. The loading bay would

be located at the south-eastern part of the site and away from residences. The Deputy Chairman, in the Chair, suggested that officers explore freight consolidation for the whole area with Landsec, noting the large buildings which Landsec owned nearby. The Sub-Committee also heard that landscaping would provide cover for residential windows, and that mitigations against noise would be considered further through the detailed design phase.

The Chairman then invited Members to debate the application. A Member, opening the debate, commented that they felt the application could have been excellent and that option B2+ represented an ideal proposal for the site and a welcome opportunity to update and increase use of the site without the issues of excess height and breaches of NPPF requirements. The Member added that the proposals were overoptimised and did not make sufficient compromises in favour of lower carbon, and in their view should not be approved, on the basis of environmental impact, excessive height and impact on sightlines. Noting the strong objection submitted by Historic England, the Member stressed the importance of thinking about localities, especially Conservation Areas, and that aspects of Historic England's representation had not been reflected in the summary provided.

A Member commented that they agreed with concerns regarding the height and bulk of the scheme and its impact on local heritage assets. However, having seen the potential for the Shoe Lane Library, the Member felt this would be transformational for the community and advised that on balance, they supported the scheme.

Another Member said that the scheme could have been fantastic, but for the excessive height and encroachment on historic views, which could have been mitigated without detriment to the developer. The Member added that they would not be supporting the recommendations, as the developer could improve significantly improve the scheme and increase its policy compliance and performance against targets. The Member added their agreement that the Sub-Committee should be readily provided with all representations in full, without reducing some to summaries.

The Deputy Chairman, in the Chair, commented that having considered the view from The Strand, their personal view was that the impact of the scheme on the views was minimal and was outweighed by the public benefits of the scheme, and on this basis they would support the recommendations.

Another Member commented that they struggled to see the issues reported with regards to the views. Whilst they did not approve of the height exceeding the limit advocated in the Local Plan, the Member added that they did not feel the building would be out of place, particularly with the site's proximity to nearby developments such as 120 Fleet Street. The Member noted that the existing library needed improvement, adding that the new library proposed within the scheme looked excellent.

A Member argued that the new library alone was enough to make the scheme attractive, adding that there was a lack of awareness of the current library. The

Member commented that they also did not find the objections regarding the impact on views compelling and advised that they supported the scheme.

At this point, the Deputy Chairman, in the Chair, adjourned the meeting for a period of fifteen minutes between 12:02 and 12:17 to facilitate a comfort break for Members.

Arising from the discussion, the Deputy Chairman, in the Chair, moved the Sub-Committee to a vote. The Sub-Committee then proceeded to vote on the recommendations as amended, with 9 Members voting in favour and 6 Members voting against. The recommendations were therefore agreed. Anthony Manchester and Deputy Henry Pollard were not eligible to vote, having not been present for the entirety of the item.

RESOLVED – That the Planning Applications Sub-Committee agree:

1. That, subject to the execution of a planning obligation or obligations in respect of the matters set out under the heading 'Planning Obligations' the Planning and Development Director be authorised to issue a decision notice **granting** planning permission for the above proposal in accordance with the details set out in the attached schedule;
 2. That Officers be instructed to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106 of the Town and Country Planning Act 1990 and any necessary agreements under Sections 278 and 38 of the Highway Act 1980 in respect of those matters set out in the report; and
 3. That Officers be authorised to provide the information required by regulations 29 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, and to inform the public and the Secretary of State as required by regulation 30 of those regulations.
5. **PORTSOKEN PAVILION, 1 ALDGATE SQUARE – REASONS FOR REFUSAL**

The Sub-Committee considered a report of the Chief Planning Officer and Development Director and the Comptroller and City Solicitor recommending reasons for refusal to reflect the views of the Sub-Committee in resolving, at the meeting of 13 February 2024, that it would refuse the application for planning permission under application ref: 23/00255/FULL for Portsoken Pavilion, 1 Aldgate Square London EC3N 1AF. The Sub-Committee was advised that only Members that were present at the Sub-Committee meeting on 13 February, at which the application was considered, could consider and agree the recommendation proposed (reasons for refusal). The Deputy Chairman, in the Chair, introduced the item and invited comment from Members.

In response to questions from Members, the Chief Planning Officer and Development Director, highlighted references within the reasons for refusal to the change of use for the proposed drinking establishment, which diverged from the original application, and the site's proximity to The Aldgate School and

other local impact. The Deputy Chairman, in the Chair, then drew the Sub-Committee's attention to the recommendations, which were agreed.

RESOLVED – That the Planning Applications Sub-Committee agree that the Decision Letter includes the reasons for refusal as follows:

1. By reason of its location within the public open space of Aldgate Square, adjacent to the east entrance of the Aldgate School and west side of St. Botolph's Church Aldgate, the operation of the proposed drinking establishment (Sui generis) use, and the associated spilling out of customers, has a detrimental impact on the amenity and character of the public open space, contrary to Local Plan Policy DM3.5 (Night-time entertainment) and Draft Local Plan Policy CV4 (Evening and Night-Time Economy).

6. *** VALID PLANNING APPLICATIONS RECEIVED BY THE DEPARTMENT OF THE BUILT ENVIRONMENT**

The Sub-Committee received a report of the Chief Planning Officer and Development Director providing a list detailing development applications received by the Department of the Built Environment since the last meeting.

In response to a question from a Member, the Chief Planning Officer and Development Director confirmed that the applications in respect of Cromwell Tower would be consulted upon with residents in accordance with usual procedure, with notification by post and all objections properly accounted. Noting that the application was validated on 7 March 2024, the Chief Planning Officer and Development Director advised that there may have been an administrative delay in progressing the consultation.

RESOLVED – That the report be noted.

7. *** DELEGATED DECISIONS OF THE CHIEF PLANNING OFFICER AND DEVELOPMENT DIRECTOR**

The Sub-Committee received a report of the Chief Planning Officer and Development Director providing a list detailing development and advertisement applications determined by the Chief Planning Officer and Development Director or those so authorised under their delegated powers since the last meeting.

At this point, the Deputy Chairman, in the Chair, sought approval from the Sub-Committee to continue the meeting beyond two hours from the appointed time for the start of the meeting, in accordance with Standing Order 40, and this was agreed.

In response to questions from Members, the Chief Planning Officer and Development Director advised that the application in respect of 81 Newgate Street was originally approved by the Planning & Transportation Committee in June 2020 and outlined amendments and approvals for the scheme, which had been permissible under delegated authority.

RESOLVED – That the report be noted.

8. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**

A Member noted the application in respect of 65 Gresham Street, and, referencing an online article on the subject, sought confirmation as to why this had been determined under delegated authority rather than being brought to committee, given the suggestions that the scheme failed to accord with planning policy and the application was of public interest. Before a response was provided by the Chief Planning Officer and Development Director, the Interim Executive Director of Environment and a Member condemned abusive language used in the online article referenced.

The Chief Planning Officer and Development Director advised that the delegated officer's report had not identified policy non-compliance issues with the scheme, and that the number of objections received was below the threshold at which applications are referred to Members. With regards to the level of public interest, the Chief Planning Officer and Development Director added that this had been a matter of judgement which he had exercised having considered the application. The Chief Planning Officer and Development Director further advised that he took full ownership for the decision to determine the application under delegated authority, and had not referred the matter to the Chairman and Deputy Chairman. In response to a question from another Member, the Chief Planning Officer and Development Director advised that the road closure included in the application was likely to be a managed and timed closure secured as part of the Section 278 agreement.

The Deputy Chairman, in the Chair, responded that delegated authority was an important part of the planning process and was required to keep the system moving, adding that where proposals had little or no objections and had been appropriately scrutinised by officers, they should be agreeable under delegation without management by the Sub-Committee.

A Member, referencing earlier discussion in respect of representations, asked that clarity on the approach taken in presenting applications, as well as a proposed approach for taking forward be provided by officers. The Chief Planning Officer and Development Director advised that officers could commit to including all representations in full if it were the will of Members. The Deputy Chairman, in the Chair, noting varying opinions on the appropriate approach, suggested that the issue be raised as a matter of policy at a meeting of the Grand Committee.

The Member further queried whether the scope of items that could be discussed under Questions and AOB needed clarification, as Members ought to be able to raise items causing concern with a degree of urgency, even if they related to consultations or the Local Plan rather than exclusively to planning applications. The Deputy Chairman, in the Chair, responded that he understood this view and asked that it be noted for following up.

9. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

There was no other business.

The Deputy Chairman, in the Chair, then thanked all those in attendance for their contributions before closing the meeting.

The meeting ended at 12.47 pm

Chairman

Contact Officer: Zoe Lewis
zoe.lewis@cityoflondon.gov.uk

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PLANNING APPLICATIONS SUB-COMMITTEE

Wednesday, 17 April 2024

Minutes of the meeting of the Planning Applications Sub-Committee held at Livery Hall - Guildhall on Wednesday, 17 April 2024 at 9.00 am

Present

Members:

Deputy Shravan Joshi MBE (Chairman)
Graham Packham (Deputy Chairman)
Ian Bishop-Laggett
Deputy Anne Corbett
Deputy Simon Duckworth OBE DL
Deputy John Edwards
Deputy John Fletcher
Dawn Frampton
Deputy Marianne Fredericks
Steve Goodman OBE
Jaspreet Hodgson
Amy Horscroft
Alderman Robert Hughes-Penney
Deputy Charles Edward Lord
Antony Manchester
Deputy Brian Mooney BEM
Deputy Alastair Moss
Alderwoman Jennette Newman
Deborah Oliver
Alderwoman Susan Pearson
Deputy Henry Pollard
Alderman Simon Pryke
Hugh Selka
Luis Felipe Tilleria
William Upton KC
Deputy Dawn Wright

Also In Attendance:

Deputy Ann Holmes, Chief Commoner

Officers:

Zoe Lewis	-	Town Clerk's Department
Fleur Francis	-	Comptroller and City Solicitor's Department
Gemma Delves	-	Environment Department
David Horkan	-	Environment Department
Kerstin Kane	-	Environment Department
Rob McNicol	-	Environment Department
Tom Nancollas	-	Environment Department
Joanna Parker	-	Environment Department
Gwyn Richards	-	Environment Department
Bob Roberts	-	Environment Department
Amy Williams	-	Environment Department

1. **APOLOGIES**

Apologies were received from Brendan Barns, Mary Durcan, Judith Pleasance, Ian Seaton and Shailendra Umradia.

At Mary Durcan's request the following statement was read out by the Town Clerk.

"I participated in a meeting of Policy and Resources in 2022 where an item about the London Wall development was on the agenda. I was not at that time a member of the Planning & Transportation Committee. Therefore, there was no reason to recuse myself because at that stage there was no conflict of interest. It was only on the resignation of a Member of my Ward from the Court of Common Council that I took the Ward place on the Planning & Transportation Committee. Since becoming a Member of this Committee I have correctly recused myself from all discussion about the London Wall site and the planning application at Policy and Resources and all other committees. However, to avoid any misunderstanding I have decided not to participate in today's Planning Applications Sub-Committee meeting and the decision on London Wall following advice from the City Solicitor."

The Town Clerk stated that the membership of the Sub-Committee had changed since the agenda was published, with Deputy Brian Mooney being reappointed in place of Alderman Alastair King. She also stated that there were a number of new Members on the Sub-Committee since it last met, namely Deputy Anne Corbett, Steve Goodman and Deputy Dawn Wright. The Town Clerk confirmed that they had all received the necessary training to enable them to take part in the consideration of planning applications.

The Town Clerk stated that the Chief Commoner was in attendance.

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

Jaspreet Hodgson stated she had a non-pecuniary interest as a resident on the Barbican Estate but was not affected by this application.

Deborah Oliver and Steve Goodman stated they were Barbican residents and the aspect of their flats was away from the site under consideration. They had received dispensations to speak on the London Wall West item.

3. **DEMOLITION OF 140 AND 150 LONDON WALL**

The Sub-Committee considered a report of the Planning and Development Director concerning:

- 23/01304/FULEIA:
Demolition of 140 & 150 London Wall to provide a phased development comprising: the construction of new buildings for a mix of office (Class E(g)), cultural uses (Sui Generis) and food and beverage/cafe (Class E(b)), access, car parking, cycle parking and highway works including reconfiguration of the Rotunda roundabout, part demolition and reconfiguring of the Ironmongers Hall (Sui Generis), creation of a new

scheduled monument viewing area, public realm alterations to Plaisterers Highwalk, John Wesley Highwalk, Bastion Highwalk and Mountjoy Close; removal of two highwalks known as Falcon Highwalk and Nettleton Court; alterations to the void, lifts and stairs at 200 Aldersgate Street and One London Wall, introduction of new City Walkway.

- 23/01277/LBC:
External alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of new highwalks, hard and soft landscaping, and works associated with the construction of new buildings with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftsbury Place, and London Wall Car Park, London, EC2Y).
- 23/01276/LBC:
Demolition of Ferroners' House alongside external alterations to the facade and roof level of Ironmongers' Hall, internal reconfiguring to cores and back of house areas and associated works in association with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftsbury Place, and London Wall Car Park, London, EC2Y).

The Chairman stated that a late representation had been received shortly prior to the start of the meeting. The meeting would therefore be paused until Members had received it.

At this point, at 9.05am, the Chairman adjourned the meeting. The meeting briefly resumed at 9.07am.

The Chairman stated that the addendum had now been sent electronically to Members and hard copies would be printed and circulated.

At this point, at 9.08am, the Chairman adjourned the meeting to facilitate this. The meeting resumed at 9.17am.

The Chairman stated that the legal officer had advised that the officer presentation could continue and there would be a further pause in proceedings to enable the hard copies to be read once they were provided.

The Chairman stated that Agenda Items 3 and 4 would be considered together.

As a point of order, a Member asked for clarification on the background to the second addendum which had been received the previous afternoon, and how this affected the Sub-Committee's decision. The Chairman asked Officers to clarify this matter. An Officer stated that the addendum report set out that Article 31 was a standard procedure by the Secretary of State to prevent a local authority from issuing a planning permission. He added that the Sub-Committee could determine the application and resolve to grant or refuse but planning permission could not be issued until the London elections had passed in early May. The Officer stated that this was a procedural matter and was

commonplace. It did not preclude the sub-committee considering the application.

The Chairman asked Officers to present the application. An Officer stated that prior to the meeting Members were provided with a copy of the presentation. The presentation being shown was a summary of that provided. The Officer stated that the existing site was located at the western end of London Wall with the Barbican Estate to the north, Monkwell Square to the east, commercial development along London Wall to the south and commercial and residential development along Aldersgate Street to the west.

Members were shown an aerial view of the site looking east and were informed that Bastion House could be seen in relation to the lower scale Museum of London development, the Barbican Estate and the commercial buildings along London Wall. An Officer stated that the existing site was made up of the Museum of London, the highwalk connections to the museum, the 1970's office block Bastion House, Barber-Surgeons' Gardens, the western end of the London wall car park and its associated access ramp, the Mountjoy House truncated highwalk connection, the 1970's extension to Ironmongers' Hall, known as Ferroners' House (the extension was not part of the listing) and the Thomas More car park ramp.

The Officer outlined the designations that were relevant to the site. She stated that the northern portion of the site and Barber-Surgeons' Gardens were within the Barbican and Golden Lane Conservation Area. Postman's Park and Foster Lane Conservation Areas were to the South. The listed buildings were outlined. Members were informed that the northern portion of the site was part of the Grade II listed Barbican Estate and the site surrounded the Grade II listed Ironmongers' Hall. The Officer stated that a full assessment of the impact of the scheme on the listed buildings and the conservation areas was set out in the report. She also stated that the northern portion of the site and Barber-Surgeons' Gardens were part of the Grade II registered Historic Park and Garden and part of the Jewish cemetery boundary overlapped the site, as set out in the report. Members were informed that special consideration had been given to this area and it would be ensured that there would be no digging in the area that was within the cemetery domain.

Members were shown a number of existing images including an image looking north along St Martin's Le Grand towards the museum and were informed that this was a key arrival point to the site from the south and the Museum of London could be seen with the Barbican Tower in the background. Members were shown the existing view looking west along London Wall towards the museum and Bastion House. The Officer stated that the ground level of the existing site was considered to be poor with limited active frontage and dominated by the London Wall carriageway. She added that opportunities for formal crossing were limited. Members were shown a view of the Rotunda roundabout from Aldersgate Street which included a covered walkway which was a particularly poor pedestrian route. Members were shown a view of the Rotunda Garden which the Officer stated was not accessible to members of the public. She added that this was mainly used by the museum. This view also

showed some of the highwalk areas. Members were shown an existing view of Ironmongers' Hall which was surrounded by the Museum of London development. Members were also shown an image of the existing Thomas More car park and the truncated Mountjoy House highwalk plus images of Bastion House, the scheduled ancient monument and the access ramp to the London Wall car park. The Officer stated that the scheme involved the demolition of Bastion House and the Museum of London. She added that a full optioneering exercise had been undertaken in respect of the demolition.

Members were shown a slide of 10 scenarios which were considered, ranging from refurbishment to full development and were informed that six of these scenarios were taken forward for whole life carbon analysis. The Officer stated that the full details of the exercise were set out in the Officer's report and that the exercise was undertaken in accordance with the City of London guidance. It had been independently assessed and was considered to be a sound basis for the decision making.

The Officer outlined the proposal in more detail. Members were shown the ground floor layout and were informed that three new buildings were proposed; a new Bastion House on the site of the former Bastion House, the Rotunda building with its associated cultural development to the southwest, and the North building to the north of the site. The Ferroners' House extension would be demolished and the buildings would be set amid extensive public realm.

Members were shown the proposed ground floor uses and were informed that it was considered that the layout made the best use of the site through the provision of an uplift in office space with complementary retail and cultural space. Active uses would be located to the south with more tranquil public realm areas located to the north, closer to residents. The Officer stated that the proposal would transform the site and as part of this transformation, fundamental changes were required to the highway network. The existing Rotunda roundabout would be removed and a new peninsula layout would be formed that would allow the creation of improved pedestrian crossing arrangements and the formation of new cycle lanes. The pedestrian comfort of the proposed footways had been analysed and was considered to be acceptable and policy compliant. These highway works would align with the St Paul's Gyratory project. As part of the highway changes, some stopping up would be required and some new areas of highway would need to be dedicated as set out in the Officer's report.

Members were shown an image of the site layout at lower ground floor. They were informed that new loading bay areas would be provided along with further cultural space. The cultural space would connect to the London Wall car park where remains of the Roman Fort Gate would be opened up to be publicly accessible. The remains were currently located within a locked room within the car park and therefore the opening up of this area was considered to be a considerable heritage benefit of the scheme. Enhancements would be made to Barber-Surgeons' Gardens and the setting of the new scheduled monument through new landscaping. The removal of the access ramp would allow more pedestrian-friendly access to the gardens. The car parking at the western end

of the London Wall car park would be removed which was favourable in sustainability transport terms and the western end of the car park would be transformed into a cycle hub accommodating 250 publicly accessible parking spaces and five accessible parking spaces. Following the removal of the existing access ramp, changes would be required to the entry and exit of the car park. The impacts of this change had been assessed and were considered to be acceptable in highway terms.

Members were shown an image of the lower ground floor plan which showed the cultural spaces and the connection with the Roman Fort Gate. Members were also shown a CGI of the Roman Fort Gate viewing area.

Members were informed that the lower ground floor level loading bays that would be created for the servicing of the proposed buildings, would be accessed via the Thomas More car park ramp. At present the ramp was used by residents to access the car park and also for the egress of servicing vehicles for Bastion House and the Museum of London. Members were informed that as part of the proposal, servicing vehicles would enter and exit the ramp. The impact of this on the ramp and the use of residents using the car park had been carefully considered.

The Officer stated that there would be consolidation of delivery vehicles and caps on the number of deliveries from servicing vehicles. Members were informed that the existing servicing vehicle movements were not capped. Servicing would be limited to off-peak hours and entry and exit controls would be put in place with stringent controls secured through a delivery and servicing management plan. It was considered that the servicing arrangements would be acceptable.

Members were shown an image of the new basement areas which would be created as part of the proposal. They would accommodate cycle parking, shower facilities and back of house areas. The provision of cycle parking on the site in terms of long and short stay spaces was in excess of policy compliance and an additional basement area and new heat network expansion area would be provided in the basement of the Rotunda building.

Members were shown a plan which showed the site layout at highwalk level. Two existing highwalk bridges would be removed completely. New highwalk connections would be made through the development. There would be a connection into the truncated highwalk beneath Mountjoy House. Members were informed that at pre-application stage, the proposal showed that all the highwalk bridges would be removed and in response to consultation and feedback from Officers, one of the highwalk bridges would be retained. It would be demolished and rebuilt in a slightly higher position in order to enable the changes to the highwalk level and some recession of City walkway would be required. Members were shown an image of this and the new areas of City walkway that would be provided.

Members were also shown an image of the proposed use mix at highwalk level. There would be cultural space and office space. Members were informed that

there was an error on this plan. At highwalk level in the Bastion building, maker space would be provided, as part of the cultural offer, but on the slide it was shown as office space.

Members were shown a plan of the proposed second floor level and typical office floors and were informed that the buildings across the upper levels, much needed Grade A office space, was proposed. The Officer stated that the site was an appropriate location for office use and the scheme would contribute towards the 1.2 million square metres of new office space that the draft City Plan sought to deliver. The Officer stated that spaces were designed with flexibility in mind and would support a range of occupiers. An element of affordable workspace would be provided and details would be secured by condition.

Members were shown a proposed plan of the 11th floor level which showed the cultural space that would be provided within the Rotunda building and the 12th floor level which showed a new publicly accessible viewing gallery in the Rotunda building giving people access to new views of St Paul's Cathedral. Members were also shown a plan of the proposed roof level. Photovoltaic panels were proposed.

The Sub-Committee were shown a section which showed the use mix across the site. There were cultural uses across the lower levels of the site and the upper levels of the Rotunda building, along with the office use.

Members were shown images of the proposed south, north and elevations. The Officer stated that given the height of the buildings, they were considered to be tall buildings. In policy terms, the implications of this had been fully assessed in the Officer's report, particularly in respect of the Barbican and Golden Lane Conservation Area and it was considered that the impacts were acceptable and that the buildings would sit comfortably within the context of the surrounding development.

Members were shown an image of the design of the new buildings and the facades. They were informed that the Rotunda and Bastion buildings would form a dynamic pair with aluminium fins on the husk facades that would then transition to the interior facades where terrace areas and greening would be provided.

Members were shown an image of the North building which was designed to mediate between the larger scale development to the south of the site with the low scale buildings to the north. The design of this building drew on cues from the Barbican Estate and the Barbican Turret.

The Officer informed Members that the scheme would provide a significant amount of new public realm. Members were shown an axonometric showing the new public realm areas with the Central Plaza of London Wall, a new Rotunda Arcade linking onto Aldersgate Street, the Glade at podium level, the Roman Gate viewing area with connection to Barber-Surgeon's Gardens, a new area of public realm at the north of the site formed from the decking over part of the Barbican car park and a new plaza area formed to the front of

Ironmongers' Hall. Members were informed that the uplift would result in 4,539 square metres of new public realm being provided which equated to a 49.9% increase. The new public realm combined with the greening of the buildings would result in the scheme delivering an urban greening factor of 0.41 which would be in excess of policy requirements.

Plans were shown of the existing and proposed public realm. The Officer highlighted the new public realm off London Wall at ground floor level and then at podium level where there was new public realm to the north of the site. The Officer stated that along with the enhancements in public realm, there would be the provision of new routes. The Officer stated that the City's Access Officer had assessed the scheme and considered that the public realm that would be delivered was positive and that the new routes provided would help with the transition between the different levels of the site. Four new lifts would be provided and a new step-free east-west route would be provided to the north of the site.

Members were informed of the sustainability credentials of the scheme which were considered to be excellent. Buildings were designed to be highly energy efficient. They would contribute to the development of a heat network in the City. In accordance with the Local Area Energy Plan, BREEAM outstanding would be targeted and the scheme contributed significantly to biodiversity and greening.

The Officer advised that as set out in the Officer's report and presentation, there would be some impacts on daylight and sunlight to surrounding residential units but these impacts were considered to be acceptable.

Members were shown CGIs of the proposal including the view looking north along St Martin Le Grand to the Rotunda building and they were advised that the cultural offer was clearly defined at the top of the building and at ground floor, level access to the cultural office would be provided enlivening this area.

Members were shown an aerial view of the Glade and Plaza off London Wall. The thermal comfort conditions for the proposed public realm were considered to be positive and the scheme removed the safety exceedance in wind terms on St Martin Le Grand.

A CGI of the Central Plaza showed the staircase and lift from ground floor to podium level. Members were also shown an image looking south from the Barbican Estate and were informed that the scheme would change the outlook from the Barbican Estate and from residents' flats. The protection of views was not a material consideration. Measures had been taken through the design of the building e.g. through the positioning of the fins, some access restrictions to some of the terraces and fritting on the glass in order to prevent any undue overlooking and limit light spill.

Members were shown a CGI of the northern garden showing the step-free access and extensive greening and the Barber-Surgeons' Gardens where the enhancements to the setting of the scheduled ancient monument and improvements to planting and access improvements could be seen.

Members were also shown the view along St Martin Le Grand towards the site where the proposed Rotunda building could be seen. Members were also shown an image of Aldersgate Street near the junction with Little Britain and were informed that the positioning of the buildings with a separation between them would create a gate way through the site and would give views to the Barbican Estate.

The Sub-Committee were shown the existing and proposed view from Postman's Park within the Postman's Park Conservation Area. The Officer stated that the Officer's report acknowledged that the scheme would result in a degree of less than substantial harm to the church and the conservation area as a result of this view.

Members were shown the existing and proposed view of the London Wall south pavement between Alban Gate and 88 Wood Street which showed the scale of the development in conjunction with the scale of development along London Wall. They were also shown the existing and proposed view along Aldersgate Street and were informed the North building could be seen mediating between the higher commercial development to the south of the site.

Members were shown the view from Aldersgate Street to Ironmongers' Hall. The Officer highlighted that at present, only part of Ironmongers' Hall could be glimpsed in this view and as part of the proposal, views of Ironmongers' Hall would be opened up. This was considered to be positive in heritage terms.

Members were shown the view from the Andrewes Highwalk showing the existing and proposed view of Bastion House in conjunction with the church. They were also shown the existing and proposed view from the Thomas More Highwalk terrace towards the site and the existing and proposed view from Monkwell Square looking west. The Officer stated that the scale of the development could be seen in conjunction with the scale of the surrounding development.

Members were shown the proposed and existing views from Wallside. They were also shown an image from Golden Jubilee/Hungerford Footbridges with a view of St Bride's Tower. Members were also shown the cumulative impact showing there would already be some impact on this view from the Salisbury Square development. It was acknowledged in the Officer's report that there would be some less than substantial harm to the setting of St Bride's as a result of the scheme.

Members were shown images of the views of St Paul's Cathedral and were informed that it was not considered that the scheme would impact on the setting of St Paul's Cathedral in wider views. Members were shown an image from Bankside opposite the Tate Modern and the top of the existing Bastion House could be seen. The Officer stated that given that the proposed Bastion House was the same height as the existing one, it was considered that the impact was negligible, although the proposed building would be slightly wider.

Members were shown an image from Millenium Bridge. The Officer stated that the existing Bastion House was set below the Barbican towers. As part of the proposal the relationship would continue, although the proposed building would be slightly wider.

In conclusion, the Officer stated that the scheme represented a high-quality transformation and regeneration of the western end of London Wall. The scheme was acceptable in height and massing. The site already had a tall building with a tall building in the immediate vicinity. The scheme was appropriate in height and scale to its townscape with negligible impacts on wider strategic views. The Officer stated that the high-quality scheme would deliver over 67,000 square metres of much needed Grade A office space accommodating an estimated 3,000 jobs in a well-connected area which was proving very popular. The site already had part office use. The scheme included substantial cultural benefits with generous scaled flexible cultural space including an elevated cultural space offering exceptional public views over London Wall and St Paul's Cathedral. It would deliver on the aspirations of the City's Destination City initiative. The proposed provision of accessible public realm was exemplary resulting in a 49% increase on the site with a new south-facing public square bordered by cultural and retail uses with good microclimatic conditions. As part of the enhancements to the public realm, new prominent, clear and accessible routes would be provided across the site with significantly enhanced public access to the highwalk, better integrating the highwalk into the City's public realm network for all the public to enjoy. The new green spaces had exceptional urban greening with 100 new trees being planted and a focus on biodiversity. The proposal had been rigorously assessed in terms of whole life carbon and there had been a third-party review in line with the City's adopted carbon options planning advice note. The scheme had been subject to a rigorous transport assessment including emergency vehicle and car park access and the removal of a traffic underpass. The scheme incorporated consolidation and off-peak deliveries. Cycle parking provision exceeded the London Plan targets. The scheme would deliver significant heritage benefits through the opening up of the Roman Fort Gate as a public destination enhancement, enhancement to the setting of Ironmongers' Hall, enhancement to the setting of the scheduled ancient monument in Barber-Surgeons' Gardens and the provision of new views to St Paul's Cathedral. The amenity impacts of the scheme on local residents had been rigorously assessed and subject to the recommended conditions were acceptable. The Officer stated that as set out in the Officer's report, the scheme would result in some degree of minor harm to heritage assets but the setting of other heritage assets would be substantially enhanced. The scheme was considered to be high-quality, well considered and very substantially compliant with local plan policies and in some cases exceeding policy aspirations. The Officer stated that the proposal was recommended for approval.

As a point of order, a Member asked for Officers to provide more detail on servicing, the new road layout and floor plans. The Chairman stated that this could be covered during questions to Officers.

As a point of order, a Member raised concern about a second addendum being sent to Members the previous afternoon and Members now being informed there was a third and fourth addenda to be considered with Members to be sent these during the meeting. He asked for clarification on what the Sub-Committee should take into account. He also commented that in the second addendum there was an Officer comment about alternative schemes and he asked whether there was a cut off time for representations. The Chairman asked the legal officer to comment. She stated that whilst some planning protocols at other local planning authorities operated a strict cut off for submissions e.g. 24 or 48 hours before the committee meeting, this was not in the City's planning protocol. It had always operated more flexibly based on advice given historically about risk and last-minute submissions could include material planning considerations so if the local planning authority was not flexible, these could be missed. The legal officer stated that if Members were amenable, it would be best to put the last-minute submissions before the Sub-Committee and give Members the opportunity to consider them. She stated that there had been three rounds of consultation, a robust report had been prepared and it was unlikely that the new submissions gave rise to material planning considerations that had not already been taken into account, but it had not been possible to consider this level of detail. The legal officer advised that the Sub-Committee could take a decision on how they wanted to proceed.

The Chairman thanked the legal officer for her advice and stated that the Sub-Committee would now continue to hear the application.

The Town Clerk explained that there were two registered objectors to address the meeting and she invited the objectors to speak.

Ms Estelle Dehon stated that she was speaking on behalf of Barbican Quarter Action (BQA). She stated that the scheme was proposed in 2021 as a regeneration opportunity to help achieve the Corporation's most exciting aspirations including the challenge of climate change. She raised concerns that the scheme did not focus on climate change and had become an office-led overdevelopment, more than tripling the square metres of office floorspace in the north of the City, an area where the local plan did not envisage such distribution.

Ms Dehon stated that the Officer's report had found the scheme would cause heritage harm to two Grade I listed churches and a conservation area, triggering the presumption against permission which must be overcome by the benefits of the scheme. Ms Dehon added that the Officer's view differed from Historic England's assessment, which was a higher level of harm to the churches and the conservation area and additional harm to the significance of assets it emphasised were of the highest heritage significance: the Barbican Estate, its Grade II* Registered Landscape, St Giles and St Paul's. She added that the 20th Century Society and the independent heritage report found an even higher level of harm to more heritage assets. Ms Dehon stated that the Officer's report played down the level of heritage harm, both to individual assets and the cumulative harm. She encouraged the Sub-Committee to take a

conservative, prudent approach and rely on Historic England's assessment, resulting in a strong presumption against the granting of planning permission.

Ms Dehon raised concern that no design review had been carried out when the GLA strongly encouraged the use of the London Review Panel service. She added that none of the prevailing qualities of good design of replacement buildings in other parts of London Wall could be seen in the scheme. She stated that the position, proximity and imposing bulk and massing of the three blocks did not respect the local built environment. Ms Dehon stated that the BQA commissioned Anstey Horne to review of the assessment submitted in relation to daylight, sunlight, overshadowing and solar glare. They concluded that there would be a significant impact to a number of rooms with a living element.

Ms Dehon stated that Local Plan Policy CS15 applied a presumption against demolition, but this had been ignored. She stated that the first whole life carbon assessment, dated May 2022, only considered two options; part demolition and full demolition. She added that by then the applicant had been working closely with architects and designers since 2021 which suggested that a retrofit scheme had been ruled out early on, long before the carbon options and impacts were assessed. Concern was raised that the carbon optioneering study was dated just three days before the application was made. Peer reviews by leading carbon expert Simon Sturgis showed the study and the WLC assessment were flawed by failing to assess retrofit alternatives. She added that the peer review the Corporation obtained from Arcadis did not have the benefit of seeing Simon Sturgis's reports, despite them being available.

Ms Dehon stated that the applicant's own figures showed the scheme would result in the overall whole life-cycle carbon emissions of 98,674,620kg CO₂ being emitted over a 60-year period and that the scheme would release 40% of its total 60-year carbon within the first six years, the time of demolition and construction.

Ms Dehon stated that the optioneering study described the proposal as a carbon investment that would unlock the greatest amount of strategic and public benefits. She stated this was incorrect and pollution was not an investment, neither was a large and immediate carbon hit. She stated the proposal would cause harm, the force of which would be felt in this crucial decade when rapid decarbonisation was needed. The harm would be environmental harm, harm to people, economic harm from the high cost of climate impact and reputational harm.

Ms Dehon stated that the option favoured by the soft market test was major refurbishment, but this had not been assessed. She added that major refurbishment was viable from an engineering perspective and that this was addressed by structural engineers Conisbee & Associates and then abandoned by the applicant who considered it would be prudent to reinforce if there were alterations or extensions. Ms Dehon stated that Option 2, Major Refurbishment, performed far better than any other option in relative (per square metre) and overall terms. She stated that it would produce around 60 million kg CO₂, so

38.6 million kg CO₂ less than the scheme and the scheme did not overcome the presumption against demolition.

Ms Dehon stated that the scheme lacked compliance with a large number of development plans policies, referred to in the letter from BQA's planning consultants, Carney Sweeney. She commented that the claimed benefits of the scheme were overstated, particularly the office, cultural and public realm benefits, and did not overcome the presumption against grant arising from heritage harm or the presumption against for overall lack of compliance with the development plan.

In conclusion, Ms Dehon stated that on the correct planning analysis, the application stood to be refused, for robust reasons and would re-establish the City of London Corporation as a responsible steward of world-famous heritage assets and an international leader in preventing climate change.

Mr David Rees stated that he was a long-leaseholder of a flat in Thomas More House and he was speaking for leaseholders, residents and families from the Barbican and the wider community whose properties and homes would be adversely affected by the development.

Mr Rees stated that the development was ill-considered and the Officer's report did not properly address the effect of the application on residential amenity. He stated that there was not adequate engagement on the numerous objections on this point. He added that the proposals would extend the height and footprint of Bastion House, and would introduce a new high-rise tower on the Rotunda site, taller than the surrounding parts of the Barbican Estate. Mr Rees commented that this would reduce the open sky visible from Thomas More and Mountjoy Houses with a corresponding reduction in sunlight. He raised concern that this would lead to flats being overlooked by offices and the 11th floor restaurant proposed for the Rotunda Tower facing directly into the living rooms of Thomas More House.

Mr Rees commented that the use of the Thomas More car park ramp and service yard to provide access for construction traffic was dangerous. He stated that the proposed alternative access route for residents was impractical and too small and narrow to be used by delivery vans or emergency vehicles. He stated that there was no other vehicle route into this part of the estate. Mr Rees raised concern that in practice, residents and visitors would be required to share the existing ramp with construction traffic. He stated that the applicants should be required to provide a viable and safe alternative route for construction access away from the existing ramp.

Mr Rees stated that the proposal to base the site offices during the construction period, close to flats in Mountjoy House, would affect residential amenity in this part of the estate and residents would be required to endure six years of construction noise and disruption.

Mr Rees raised concern about the proposals for access after the completion of the development. He stated that the Thomas More car park ramp and service yard was currently a shared space used by vehicles, cyclists and pedestrians.

The car park attendant was the concierge and therefore residents collected packages from their cabin. He added that the ramp provided convenient step-free access to the flats and was regularly used by those with children and buggies. Concern was raised that the applicant had not properly studied the existing use of these spaces and yet was proposing that they should be the sole means of service vehicle access to the completed development. Mr Rees commented that limiting the servicing hours, as suggested in the Officer's report, would prove unenforceable in practice and did not adequately address the dangers inherent in the proposed arrangements.

Mr Rees stated that the removal of the roundabout would make access to the Barbican Estate significantly more difficult, increasing congestion and pollution. He stated that westbound vehicles on London Wall wishing to gain access to Wood Street and Andrewes House car park would not be able to do so without a significant diversion and similar issues would arise for vehicles leaving Thomas More House car park heading north.

Mr Rees raised concern about misinterpretation of impact. He stated that the Officer's report stated that the images in the Design and Access Statement were for illustrative purposes and were not accurate visual representations. He stated that carefully selected viewpoints made spaces look bigger and could minimise the impact of the scheme on the existing built environment and on wider views of the Barbican and St Paul's Cathedral. Mr Rees commented that the proposed planting would not thrive on northbound walls or at higher levels and the reality of the proposed development would be that its north faces would be unsoftened by any viable planting above ground level.

Mr Rees stated that the application contravened the vision set out in the existing Local Plan. He commented that his written objection identified a number of policies which were contravened by the application including CS5, CS12 and DM12. He stated that the application did not meet residents' needs, did not protect residential amenity and did not respect the significance, character, scale and amenities of the surrounding heritage assets.

Mr Rees stated that the application focussed exclusively on extracting maximum profit from the site and failed to give proper consideration to its best use or the Corporation's own planning policies. He suggested that the public benefits of the scheme had been overstated and could equally be secured within a less harmful retrofit scheme. He stated that the conditions of access to, and the use of, much of the proposed cultural space was left vague, while elements of this space would negatively affect the amenity of neighbouring flats. Mr Rees stated that there had been a failure to undertake a sequential assessment in relation to cultural floorspace and the Officer's report recognised that the National Planning Policy Framework stated that where an application failed to satisfy this sequential test it should be refused.

In conclusion, Mr Rees stated that the proposals would turn a meaningful public and cultural space into another high-rise private office development which would result in heritage harm, as recognised in the Officer's report, and a significant loss of residential amenity. He stated that great vision had been

shown in the commissioning of the Barbican Estate and the cluster of Powell and Moya buildings whose demolition was now sought. He asked that Members think critically about the development of the special site and reject the application.

The Chairman explained that Deputy Elizabeth King and Naresh Sonpar would address the meeting as Ward Members.

Deputy King informed the meeting that she had a disclosable pecuniary interest as she overlooked the site and she had consulted the City Solicitors and received a dispensation to speak as a Ward Member.

Deputy King stated that finding extra sources of income to fund operations was not a valid consideration in planning decisions and that the scheme should be considered on its own merits. She stated that the scheme would take 6-10 years to complete. It was at the heart of the cultural quarter and would in no way enhance, but would instead blight, the aspirations for Destination City for many years. Deputy King stated that the proposal failed to offer the option to retain some of the site and retrofit even though retrofit first was a key policy. Deputy King raised concern about the implications for carbon emissions of demolishing and rebuilding. She raised concern that alternatives had not been presented and added that retrofitting the site would save carbon, time, resources, risk and reputation.

Members were informed that the scheme aimed to create more than triple the office space target in the City Plan 2015. Deputy King stated that this was not a priority zone for tall office buildings. The application fell outside the Eastern Cluster and the proposed Holborn and Fleet Valley Cluster in the emerging City Plan and therefore Members should not be being asked to approve tall buildings here.

Deputy King raised concern that there had been no independent peer review contrary to London Plan Policy D4 and good practice in other London Boroughs. Deputy King referred Members to the comments of Professor Frampton CBE and stated that he was a renowned architectural historian for a peer critique of the design quality of this scheme. She stated that the Officer's report claimed that the application process had adhered to the intentions of the London Plan design policy however it also stated that there was non-compliance with the policy requirement to have an independent carbon review. Deputy King added that the applicant had admitted that a demolition and new build option would frontload in the next four years the release of almost 40,000 of the total of 56,000 tonnes of CO2 emissions. This was not consistent with local, London or national policy which all prioritised retention and retrofitting.

Deputy King stated that it was claimed that the structure of the building was not sound, however this was not the case and in the brief soft market test, several credible offers for retrofitting the existing buildings had been received. Deputy King considered that retrofitting could have saved significant disruption, carbon and money. She added that Simon Sturgis, leading advisor to the government, demonstrated that major refurbishment performed better than any other option

in relative and overall terms with only a small amount of embodied carbon released by a major refurbishment, there would be a radical reduction in operational carbon emissions.

Deputy King stated that demolition and construction would impact workers and residents over a minimum of a six-year period. She stated that demolition was estimated to take 19 months and piling a further 17 months that would make living and working nearby intolerable. Construction was then estimated to continue for a further 36 months until August 2033 with noise and a large increase in vehicle movements. Deputy King asked Members to reject the application.

Naresh Sonpar stated that he was a resident of Lauderdale Tower and his flat did not directly overlook the site. Mr Sonpar stated that this was a complex and contested application. He stated that the Officer's report acknowledged the application would cause harm and this was reinforced by the St Paul's objection. Historic England had stated that this harm would need to be weighed against the public benefits of the proposal as part of the decision-making process. He added that the benefits were overstated and the application was caveated by over 100 conditions, and that many of these matters should have been resolved before the application was brought to the Sub-Committee.

Mr Sonpar stated that the public realm offer was weak and uncertain and could easily be value engineered out of the scheme at a later date, even with conditions. He stated that the scheme would cause significant harm to a number of the City's most important heritage assets including St Paul's Cathedral, St Giles and St Botolph's churches, Postman's Park and the Barbican and Golden Lane Conservation Area. Members were informed that the surveyor of the fabric of St Paul's stated the applicant's rebuttal of these concerns appeared to be unduly dismissive. He stated that these changes would cause a material degree of harm in the significance of the Grade I listed heritage asset. He also stated that there had to be a clear and evidenced demonstration that a no harm option had been drawn and evaluated. Mr Sonpar stated that there was no public benefit delivered as part of the scheme that could justify the damage to the heritage assets and he added that given the removal of the public benefit elements of the 81 Newgate Street development there was little guarantee that any public benefit conditions would remain.

Mr Sonpar stated that Bastion House and the Museum of London were on the 20th Century Society's top 10 at risk register. He stated that Bastion House would be more than 2.5-3 times the volume of the current Bastion House and the applicant stated that it was only slightly larger. Mr Sonpar also stated that the proposed Rotunda building would be more than twice the size.

Mr Sonpar stated that the scheme was not sympathetic to the surrounding area. He added that examples such as London Wall Place demonstrated that volume could be added to a site whilst remaining sympathetic. Mr Sonpar raised concern about the impact on local transport and traffic with neither the modelling nor the scheme agreed by TfL or the London Fire Brigade with the

Officer's report stating that at the time of writing, discussions were ongoing with the TfL modelling team.

Mr Sonpar stated that there were over 300 homes located within 15 minutes of the boundary of the London Wall West site plus Liveries, a nursery and the City of London School for Girls. He stated that the massing, height and vehicle access to the proposed new buildings would result in serious and permanent loss of amenity of these residents.

Mr Sonpar stated that all servicing to the proposed new buildings, which were 230% larger than the current buildings, would be via a single in-out route using the ramp from Aldersgate Street. He stated that this would lead to vehicles backing up on to Aldersgate Street, with an increase in noise, air pollution and danger to pedestrians and vehicles. In addition, this access route was used by the emergency services so emergency access would be impeded. Mr Sonpar stated that this could cause a danger to life and added that the fire brigade and ambulance service had not approved the proposed access to all residential areas. Mr Sonpar stated that no meetings had taken place between the applicant and the London Ambulance Service and questioned how the nearby school would be safeguarded. He stated that prior to building the school, the school did not consider safeguarding to be an issue but it subsequently revised its view and was aware of the issues the design had caused. Mr Sonpar asked Members to reject the application.

The Chairman asked if Members of the Sub-Committee had any questions of the objectors.

In response to a Member's question as to why concerns, apart from the embodied carbon concerns, could not be resolved by conditions, an objector stated that heritage, sunlight, daylight and glare were all impacts that could not be resolved by conditions. Another objector stated that overlooking could not be addressed by condition and highlighted overlooking issues with the building next to the Tate Modern where there had been overlooking from the viewing gallery. Also, currently the Thomas More House ramp was currently not used by the current occupiers of Bastion House or the Museum of London site. In the proposal, this would become shared and would be used by service vehicles and construction traffic as there was no other suitable vehicle access. The objector added that unless there was an entirely different means of access, associated dangers could not be addressed by condition.

A Member asked objectors to outline the reasons for justifying refusal. An objector stated that she had set out the potential reasons for refusal to Members drawn up in conjunction with the BQA and planning specialists Carney Sweeney. The first reason related to just the heritage assets that Historic England identified as harmed. The second reason dealt with the non-heritage assets of Bastion House and the Museum of London which the Officer's report stated were non-designated heritage assets but the 20th Century Society and the heritage expert for the BQA took a different view. The third reason was based on the design points, the scale and massing and the domination of the forms of the surrounding area and the tall buildings issue.

The fourth reason was the solar glare issue and the fifth reason was the whole carbon life cycle emissions issue. The objector stated that all of the reasons were within the context of their policy ramifications and the policies that were considered to be breached by the relevant harms.

In relation to a Member's question about scale and grain and context, an architect for the BQA stated that the area was bombed in World War II and an evolving master plan for the central Barbican area and South Barbican area was applied to the whole area with new buildings on a perpendicular grid. Four of the six original buildings had been replaced with newer office blocks of a much larger scale in density. One London Place continued on the perpendicular grid and the building was comparable in size to the Barbican building with the actual mass broken down into smaller segments which all related to the smaller scale and the finer grain proportion of the immediate neighbours. None of the elements were any larger than one of the six original towers so they all fitted into the context. 88 Wood Street was comparable to Bastion House in size however it was also broken down into smaller segments and it was tiered down towards the neighbour on Wood Street. The new buildings would not mediate and would not fit within the grain. They did not step down to the neighbours and were not specific to the site. He stated that this should be a main consideration being next to two conservation areas and so many heritage assets.

The Chairman stated that that the hard copies of the third and fourth addenda were currently being circulated to Members.

A Member referred to the second addendum and stated that he was not aware whether the objectors had seen this. He asked whether the objectors considered that the alternative schemes should be taken into account. In response, the objector stated that the short timescale made it difficult for Members to take the information into account. She also stated that unlike in other planning applications where planning policy did not require the consideration of alternatives, there was a combination of policies in the local plan with the carbon policy and the planning advice note which made it clear that in planning terms, when considering whether the presumption against demolition had been overcome, alternatives became relevant as a planning consideration. There was therefore a planning link between viable alternatives of major retrofit or major refurbishment and the planning policy that required the applicants to demonstrate that they had overcome the presumption against demolition and that they had properly addressed the whole life carbon impacts of the scheme and therefore there was a carbon optioneering process before the Sub-Committee. The objector stated that a significant difficulty for this scheme, as raised in her submissions, was that the main retrofit and Option 2 - Major Refurbishment that was indicated to be a market viable option, was not taken forward for full carbon assessment. The objector stated that she had not seen the second addendum.

The Chairman asked the Town Clerk to confirm that all the addenda had been uploaded to the public website. The Town Clerk stated she would check and report back.

A Member noted the large amount of documentation for this application. She asked for the objector to provide insight into why they considered the Officer's view differed from the views of Historic England, the 20th Century Society and other independent heritage experts.

An objector stated that Officers had fairly pointed out that it was possible for professionals to disagree in their judgement in relation to heritage harm. She stated that although the report covered in detail the various heritage assets, the difficulty was that it did not necessarily engage in a clear way with why the professional assessment differed in particular from that of Historic England. She added that with Historic England being the statutory body consulted with the greatest experience in relation to heritage harm, this was relevant. She also stated that it was unusual for there to be such a degree of difference in professional terms between the Officer's assessment and that of Historic England without a third-party peer review. She stated that there was a difference on many of the heritage assets and in particular, on some of the highest protected heritage assets that were relevant and in these circumstances, it seemed prudent to take into account Historic England's assessment. The objector also stated that there was cumulative harm and less than substantial harm covered the majority of heritage harm. Historic England had not stated it objected in principle to the idea of this type of development. She stated that she considered that Historic England and others would take the view that there were ways the site could be capable of redevelopment for an office use that might not cause the extent of heritage harm and stated that objectors would say that part of that, would be a proper assessment of a retrofit analysis.

A Member referred to an objector's points that the applicant and the application focused exclusively on extracting maximum profit for the site but failed to give the proper consideration to its best use in terms of planning policies and that the public benefits had been overstated. She asked the objector to expand on this and provide more detail and examples and their view on this in terms of grounds for refusal.

In relation to maximising value, an objector stated that the Corporation on a number of occasions throughout the process had emphasised that it was considered it was bound statutorily to achieve best consideration or best value. She stated that this applied if there was going to be a sale of land to obtain best value for the land. It was not a legal obligation to maximise financial return from a planning scheme and there was no analysis before the Sub-Committee about the extent to which major refurbishment would increase the land value in a way that was different from a scheme e.g. that would retain and majorly retrofit. She added that best value or best consideration was not a material planning consideration.

The Chairman stated that the Town Clerk had confirmed that all the addenda were online and he thanked Officers for circulating and uploading the papers.

Another objector stated that it was clear from the scale and massing of the buildings that were proposed and the size of the site, the amount of office

space that could be contained within the site was driving the proposal. He stated that in terms of the public benefits and the cultural space, there were areas that might or might not be galleries or studios and the proposals were vague as to the conditions of use or the access that would be granted in due course. He raised concern that if permission was granted and the development progressed, they might not remain in the plan. The objector also stated that the viewing gallery with free but limited access only for those with tickets would retain the views that everybody could currently see from Thomas More House highwalk. The objector stated that the restaurant in the Rotunda was stated to be a public benefit and was part of the cultural offering. He raised concern that this would overlook directly into the flats on Thomas More. He added that the City was not short of restaurants and therefore this was not a public benefit.

A Member referred to objectors' concern about access for emergency vehicles via the Thomas More access road and asked objectors to explain why they considered the proposal to be dangerous. An objector stated that what was currently proposed was that the Thomas More car park ramp should be used solely for construction purposes and that effectively, all other access should be down another side ramp into the Lauderdale car park from Aldersgate Street which went through a small roll up gate. An Objector stated that delivery vehicles, ambulances and fire engines would not be able to use it and if a fire engine did get down it, there was then a hair pin bend to get towards Thomas More or Mountjoy Houses. The objector stated this was impractical and even the Officer's report accepted this. The Officer's report suggested as a condition that there should be further engagement with Barbican residents as to how access during construction should be promoted but there was only one way in to Thomas More, Mountjoy and Seddon Houses and that was down the existing ramp and fire engines and ambulances would need to go down this ramp. In addition, it was stated that there were 73,000 tonnes of demolition to come up the same ramp by lorry at the same time as residents were going to school and work and with six years of substantial construction traffic there would be very real safety issues for residents. Members were informed that there had been no real study of the current use of Barbican residents of the service yard and the views and needs of residents had not been taken into account at any stage.

A Member stated that he had listened with sympathy and interest to the objections. He asked if the objectors were not fundamentally opposing the scheme because they lived in the crowded environment of the City. He stated that the City had always been crowded and in reference to objections about the six year construction period, he stated that nothing would have been built in the post war period if there had not been long and lengthy construction periods. He stated that there had been objections to views but there were no rights to a view, and on certain occasions views were lost or there were view degradations of historical and special sites and people had lived with this since the beginning of the major construction in the northeast of the City. He stated that these types of discussions were often a result of people feeling that development should not be taking place near them and added that this was inevitable in a crowded City.

An objector stated that the City forefathers built the Barbican as a residential area . He stated that it was therefore a special part of the City and residential amenity was a matter the Sub-Committee needed to consider. He added that his submission on residential amenity had not mentioned views, they had related to the disruption to residents' lives during the construction period and in the period thereafter. He accepted there had to be construction within the City but stated that these buildings could be retrofitted with the existing buildings being left on the site. He stated that the proposal sought to put new buildings on sites where tall buildings did not currently exist and these tall buildings would affect residential amenity.

A Member asked an objector for her professional opinion and clarification on Article 31 and whether the recent high court judgement on Marks and Spencer, Oxford Street had any bearing on this application.

The Objector stated that the Article 31 direction did not prevent the Sub-Committee from considering the application and indicating a view either opposing or granting permission, she stated that this was a holding position so the Secretary of State could consider whether to call in the application. The recent Marks and Spencer decision was not only based on embodied carbon. The refusal was recently quashed by the high court. The objector outlined the case and stated that the application being considered was very different as there was a local plan that in policy terms had a presumption against demolition and a planning advice note which required the applicant to undertake optioneering analysis and consider alternatives.

The Chairman stated that there would be a 20-minute break during which the third and fourth addenda could be read.

There was a 20 minute pause in proceedings between 10.40am and 11.00am.

When the meeting resumed, the Chairman invited the applicants to speak.

Paul Wilkinson, City Surveyor and Executive Director of Property at the City of London Corporation, stated he was representing the applicant team behind the London Wall West project. He stated that the Museum of London moving to a new home in West Smithfield and Bastion House being vacant, created an opportunity to consider the future of both purpose-built buildings, neither of which met the needs of modern occupiers. The Surveyors Department had therefore been set the objective to find a long-term solution for this site that would bring maximum benefit to the City of London, its businesses, residents and visitors. Mr Wilkinson added that the proposed scheme would deliver the required regenerative and transformational benefits that would positively respond to this objective and importantly the City Corporation's strategies and policies.

Members were informed that the planning application had been developed over five years by lead designers Diller Scofidio and Renfro and collaborating architects Sheppard Robson. During this time, feedback from the considerable pre-application process and formal public consultations had been listened to

and responded to where possible. Mr Wilkinson added that following continued dialogue with the Ironmongers' Company through presentations and discussions on the design and merits of these scheme, they were now able to support the scheme. Mr Wilkinson stated that the result was a scheme that was capable of delivering a world class destination for business and one that was rich in public and cultural benefits.

Mr Wilkinson stated that there were no other commercially led schemes coming forward in the City of London that had as much floorspace dedicated to culture and offer to improve public access to historic assets, such as the Roman Gate. Members were informed that the planning application would deliver approximately 12,500 square metres of public realm. Those who lived, worked and visited the area would enjoy a softer and greener environment, better connected to its surroundings.

In addition, Mr Wilkinson stated that the proposal would help with the ongoing demand for high quality offices by delivering approximately 56,000 square metres of office space, which would provide nearly 3,100 new jobs. He stated that these world class architectural buildings were designed to perform to the highest environmental standards and were the most efficient option in whole life carbon terms per square metre.

In conclusion, Mr Wilkinson stated that it was strongly believed that the application scheme would meet and deliver on the City's strategies and policies and would give the City Corporation a viable option, presenting a fantastic opportunity for this important site.

At this point, the Chairman sought approval from the Sub-Committee to continue the meeting beyond two hours from the appointed time for the start of the meeting, in accordance with Standing Order 40, and this was agreed.

Ben Gilmartin, stated that he was a partner at Diller Scofidio and Renfro, the London Wall West lead designers, who collaborated with Sheppard Robson. He informed Members that Diller Scofidio and Renfro brought deep experience creating transformational public realm and cultural projects such the Highline elevated park and the redevelopment of Lincoln Centre for the Performing Arts, while Sheppard Robson had a proven track record of mixed-use and office projects in the City.

Mr Gilmartin stated that the team knew the site's complex conditions and tremendous assets very well e.g. its history, the highwalks, nature, and proximity to the Barbican and stated that it also exhibited a legacy of 1960's vehicle-centric design that was hostile, inaccessible and disorienting for pedestrians.

Mr Gilmartin stated that the team acknowledged there were strong calls for the re-use of the existing buildings and that the whole-life cycle carbon optioneering study would be discussed separately. He stated that the applicant team believed that, through a redevelopment approach, there was a huge opportunity

to transform the site into a welcoming, inclusive environment with generous gardens and public spaces accessible for all.

Mr Gilmartin advised that the design had evolved considerably over five years through many dozens of meetings with Planning Officers, consultees and stakeholders. In particular, the massing was reduced through sculpting bulk and height relative to townscape views and consultation feedback. Mr Gilmartin stated that all inputs had improved the proposal. He commented that at the north end of the St Paul's gyratory project, the revised highway layout would create a safer pedestrian junction and allow for movements along desire lines, connecting key cultural institutions and public destinations. To ascend to the Highwalk, there would be multiple intuitive new stairs and lifts, plus a gently sloped garden route, while retaining a pedestrian bridge over London Wall. These would provide easy flowing vertical access while negotiating the transitional character of the site between the London Wall commercial corridor and the Barbican's quieter green courtyards. The unrealised Highwalk link to Mountjoy Close would be made good.

Mr Gilmartin stated that the design focused on the spaces buildings could make around them with the architecture creating a green valley and public spaces being at the heart of the scheme. He stated that the masterplan imagined a rich network of landscape, heritage, cultural and open spaces and that the active central plaza was bordered and animated by cultural and food offers. In addition, new and improved gardens provided quiet moments on the north and east edges of the site, expanding green space and biodiversity. Mr Gilmartin stated that the proposal would provide enhanced access and views to the historic City Wall, revealing the currently forgotten Roman Gate. He added that the setting of Grade II listed Ironmongers' Hall, currently hemmed in behind the museum, would be granted breathing room, with increased visibility from Aldersgate Street as would befit its importance. Mr Gilmartin stated that the scheme's prominent cultural offer at street level, would provide flexible and ample space, supplemented by the cultural cap and public rooftop terrace with new public vantages of St Paul's.

Mr Gilmartin stated that the architecture was developed around the public and cultural spaces. Flanking the plaza would be green terraced facades with the planting extending up the sides of the two main buildings and these facades had a deliberate residential scale and feel. He stated that, in contrast, the outer facades of the main buildings were calmer with a more vertical expression, related to the scale and character of London Wall. Mr Gilmartin stated that the material of the solid cladding elements and fins recalled the bush-hammered concrete and details of the Barbican Estate. He added that the smaller North building had a contrasting approach formally and materially, reinterpreting the brick arches present in Ironmongers' Hall and the Barbican Estate south-west turret.

In conclusion, Mr Gilmartin stated that the applicant team were very confident that the design solution would deliver the optimal transformation of the site and public realm, capitalising on the heritage and landscape assets, while offering flexible, grade A office space and amenity to meet the demands of modern

occupiers. He added that this was all a vibrant, rich and varied mix of uses that would bring together culture, public realm, workplace and historic fabric.

Ms Anna Woodeson, Director at Buro Happold outlined the optioneering process to look at whole life carbon. She stated that initially two options were analysed: 1) a refurbishment and extension; and 2) full demolition and new build. After the publication of the Planning Advice Note in 2023, the optioneering process was extended to include 11 options in agreement with officers and Arcadis who had independently reviewed the work and compliance with the Planning Advice Note and from the 11 options, 6 were chosen to be developed in more detail. One option was a minor refurbishment which incorporated a major refurbishment after 15 years, Options 3a, 3b, 5 and 6 were major refurbishment options with extensions, and Option 9 was a complete redevelopment proposal. The embodied carbon of each option was measured in detail alongside operational energy.

Ms Woodeson stated that the overall conclusions were that the full redevelopment option maximised the site potential and delivered in the region of double the floor area of the existing buildings so, as expected it would have a higher upfront carbon spend. However, over the 60-year evaluation period as prescribed by planning policy, the cumulative carbon emissions per metre squared were the lowest in Option 9 as overall, the redevelopment option provided superior operational performance. It was concluded that the carbon investment in the full redevelopment would unlock the greatest amount of strategic and public benefits from the site and broader opportunities for sustainability across the site.

Ms Woodeson stated that the application scheme, developed from Option 9, was designed to deliver an exemplar development, adopting industry leading embodied carbon and operational energy targets, which were all locked in through the robust planning conditions proposed by Officers. It supported a connection to the Citigen district energy network, which allowed it to actively contribute to the decarbonisation of the local network through its onsite energy centre. Ms Woodeson also stated that the development would be industry leading and planning policy compliant in terms of its approach to sustainability and circularity within the design aiming for BREEAM Outstanding and WELL platinum for its offices. Ms Woodeson stated that wider sustainability benefits included improved biodiversity, with new habitat types proposed including extensive green roofs, a rain garden, a new pond and 100 trees to be planted across the site.

Ms Woodeson stated the public realm would be increased by nearly 50% opening up the area, improving accessibility, removing roads and prioritising pedestrians and cycles. She added that the evaluation of urban thermal comfort concluded that the proposed development significantly improved the urban environment, mitigating discomfort and enriching the public experience.

The Chairman asked Members if they had any questions of the applicants.

The Chief Commoner asked why a third-party review had not been undertaken. The applicant asked for clarification on whether this was in respect of the carbon optioneering or the design. The Chief Commoner stated it was in respect of the entire scheme. The Chairman suggested that this question be asked of Officers during the questioning of Officers.

A Member asked for clarification on how the conclusion that the overall carbon intensity of Option 9 - Redevelopment was less than that of the refurbishment options over the lifetime of the building. The applicant stated there were a number of components to establishing the cumulative carbon intensity. There was an analysis of the upfront carbon emissions of all the options as outlined in the carbon optioneering report. In this, Option 1 was the lowest and Option 9 was the highest per square metre. Then, as the 60 years progressed, the operational energy of the building and the maintenance and replacement cycles had to be added in. New build options often ended up reducing in intensity as they were more efficient. Option 9 reduced in intensity over the 60 years and was overtaken by the other options which concentrated more on refurbishment and retrofit.

In response to a Member's question about the level of interest in the soft market test, the Chairman stated this was not a planning consideration.

A Member referred to the spatial distribution policy of the north of the city and the local plan which did not permit tall buildings in the proposed area unless they were suitable and had regard to the character and amenity of the surroundings, including the significance of heritage assets and their settings and the effect of historic skyline features. She asked the applicant how the proposals met these policies. The applicant stated that the buildings were carefully studied in relation to distant views and regulated views, monuments and townscape considerations. New Bastion House was the same height as the existing Bastion House, although larger in bulk and the Rotunda was three storeys shorter and was placed at the southern end of the site where its impact on the surroundings was minimised. The placement of views was intended to preserve a sense of openness through the heart of the site and for views to St Paul's Cathedral to be preserved to the maximum extent. In terms of the context and character of the buildings, the design took a significant amount of its architectural character and expression in thinking about a contemporary reinterpretation of elements and qualities that existed on the site at the Barbican Estate so that it picked up and was contextually sympathetic in a contemporary fashion.

A Member stated there appeared to be no public toilets and no changing places and asked if the applicant could provide these. The applicant stated that public toilets had been identified throughout the lower parts of the buildings and they would principally be associated with the cultural elements and the office receptions. A planning condition related to the identification of a changing places toilet. The precise location had not been identified but this would be delivered under condition. The Member stated that if toilets were only open during office hours, they would not be a public benefit outside of office hours. The applicant stated that the cultural provision was expected to operate beyond

traditional office hours and this was also where the applicant was looking to locate the changing places toilet so it was expected that both would be available into the evening.

A Member asked for the applicant to comment on how the Ironmongers' Livery who had written a strongly objection on 30 January 2024, had changed their mind. The applicant stated that the Ironmongers and the applicants had continued dialogue throughout the process and a conclusion had been reached.

The Chairman asked for more detail on the service arrangements in the car park and how these would interact with users of the car park on a regular basis. The applicant stated that a traffic light system would be introduced and would be operated to give priority to users of the car park as opposed to servicing access. The servicing vehicles were being reduced by using an offsite consolidation facility. There would also be a condition restricting when servicing could take place to limit it to daylight, normal hours. The service yards were designed to have extra capacity in case there was a need to hold vehicles in the service yards to avoid queues on the ramps. It would be a very managed facility when it was developed in the future.

The Chairman asked applicants to outline the discussions with TfL on the gyratory and their views on the new road layouts and the impacts on traffic. The applicant stated that the team had been liaising with TfL throughout the project. A highway design had been developed to accommodate the existing traffic flows through the site without undue delay or excessive queuing and provide significant improvements to pedestrian crossings, particularly for vulnerable pedestrians. The applicants were not aware of any objections from TfL in terms of their strategic road network.

A Member asked about the details around the provision of a banksman at the Thomas More ramp. The applicant stated this would be covered by condition but it was anticipated that there would be a person present there 24 hours a day and they would also have access to cameras and be operating the traffic light control system within the service yards so there would not be a need for a banksman.

A Member asked how the conclusion to have a tall building on the museum site had been reached if maximising profit had not been the driving force. She stated that if it was a lower building, it would not have impinged so much on views and residential amenity. The applicant's representative from the townscape heritage and visual impacts consultants for the scheme, stated they had been working with the applicant and had been in close dialogue with Officers throughout pre-application discussions. A detailed and thorough assessment of heritage assets within the surrounding area had been undertaken. This included those which were closest to the site such as the Barbican and the associated heritage designations which covered the area, St Paul's Cathedral and other key Grade I listed buildings. The height, massing and design had changed throughout the pre-application process to respond to those heritage assets e.g. the key views of St Paul's Cathedral from bridges

and the south bank of the river were a significant driver in maintaining the height of Bastion House and ensuring the roof line where visible would just be a small sliver and would not cause undue harm. The Cathedral had raised comments in relation to St Paul's and the views from the south bank but not an objection in terms of the Barbican. The height and scale of the new Bastion House and the Rotunda building were comparable with the established setting of tall commercial buildings to the south of the estate and amendments were made to the height and massing of both of these to mitigate impacts on the Barbican. The materiality drew on reference to the Barbican buildings such as the bush hammered concrete. The greening and staggered design of the elevations drew upon the balconies which were present in the Barbican. There were also heritage benefits of the scheme for the Barbican, in particular, repairing the highwalk connection with the truncated area of Mountjoy House which was never realised as part of the original master plan for the Barbican, as well as the opening up of the Fort Gate, the scheduled monument in the car park. There would be significant public realm enhancements to the settings of the listed buildings and scheduled monument. In terms of strategic policy, the London Plan policy required the maximisation of the potential of sites. This was undertaken having regard to the full suite of policies set out in the London Plan and the local plan, having regard to environmental, social and economic considerations.

In response to a Member's question about consultation and issues raised in consultation that had not been responded to, the applicant stated that developers' guidance that was published in May 2023 was followed and was exceeded throughout the consultation process. There had been an informative consultative and collaborative engagement process and the applicant took on board the feedback that was received and responded to this where possible. Consultation took place over a 31-month period. Prior to the application being submitted, there was a phase of understanding priorities and aspirations for the area and then there were two phases of consultation where plans were presented to the public. Feedback was invited throughout the period. Six public meetings were attended by 503 members of the public, 190 feedback forms were completed and 116 meetings were held across the scheme with local stakeholders and members of the community. A public consultation website was visited over 14,000 times and statistics were captured in the statement of community involvement document submitted as part of the application. This document stated the feedback that was received and how it had been taken on board.

A Member asked the applicant to state what would happen in relation to operational carbon savings if the district heating network was not decarbonised. The applicant stated that the energy strategy incorporated a Citygen plant room within the development which would help decarbonise the network by 4.2%. It was acknowledged that the district heat network would not be fully decarbonised for many years, however a fully electrified strategy would require much more plant to be installed within the development which would result in much more embodied carbon. By connecting the district heat network as outlined, less plant was required within the development and it would be used

more efficiently than it would be if designed to meet the peak demand of the building.

A Member asked if TfL had approved the traffic and access plans. The applicant stated they had been consulted and provided some initial feedback but they had not provided formal approval. The proposal had not yet been through the TfL model audit process which was undertaken in the detailed stage so TfL could understand the modelling.

A Member commented on the duration of the project being six years and lifetime of the proposal being 60 years. He asked how long refurbishment and renovation would take to reach a good outcome and how long it would last. The applicant stated they had not looked at this so were unable to comment. They had instead focussed on the construction and operational arrangements for the development scheme.

A Member asked for more detail on the servicing of the building and detail of the building in terms of capacity on each floor. She raised concerns that consolidation would not be enough, that traffic could back up and she also raised concerns about number of crossings being reduced with more concentrated crossing points. She asked what would happen if TfL did not agree to the traffic and access plans and the impacts on residential amenity.

The applicant stated that consolidation and possible land uses had been taken into account in terms of servicing vehicles and numbers and those had all be used in the analysis. Priority would be given to people accessing via the service ramp and therefore it was not anticipated that there would be a queue back onto Aldersgate Street. If a queue did start to build, leaving vehicles would be held back. Consolidation would allow controlled times for vehicles so they would have to book a time to arrive and peak times would be avoided. Robust conditions would limit the service vehicle movements to 60 in any 24-hour period restricted to a 5-hour window. The existing position provided for in the region of 83 service vehicle movements so it was expected that there would be a betterment over the existing situation.

Following a question from a Member, the applicant confirmed that the service vehicle movements would be 120 as the ramp would be two-way but there would be resilience in the service bays as they had space for vehicles to be held to allow the free flow of traffic.

The Chairman suggested that the Sub-Committee now move to any questions that they might have of Officers at this stage.

A Member, following on from the Chief Commoner's earlier question asked if the proposed design had been reviewed by an independent body. An Officer stated that there was a Mayor's design review panel for the GLA for any referable cases. This case was not a referable case. The GLA stated that it was of no strategic interest. Part of the site was within a conservation area and Officers considered this item could be considered by the Conservation Area Advisory Committee (CAAC). This was an independent body set up by the City,

made up of architects, planners and conservation specialists. They reviewed the proposals on 7 March 2024 and concluded that there was a significant improvement in their view on the existing situation and they raised no objections. The scheme had therefore been reviewed by an independent body.

The Chief Commoner asked that, in consideration of the City of London Corporation being both the applicant and local planning authority, if there had been the type of independent review that objectors had requested. The Officer reassured Members that the CAAC was an independent body. He also stated the intense scrutiny that this application had been subject to from statutory stakeholders. He reminded Members that Historic England had not raised an objection to the scheme and neither had St Paul's Cathedral and added that the proposal had been subject to rigorous and comprehensive external scrutiny.

A Member asked Officers for clarification on the public toilets and changing places toilet and how this would be embedded into conditions and whether they would be 24 hour toilets. An Officer stated that as part of the condition, plans would be provided along with details of the changing places and accessible toilet and details on the hours of opening. Officers could look to secure 24-hour access for an accessible toilet through the condition and details would have to be approved in writing.

A Member asked Officers to outline how they came to recommend for approval a non-refurbishment scheme given the retrofit first policy. An Officer stated that the emerging City Plan had a retrofit first approach but did not include a presumption against demolition. It did require development to minimise whole life cycle carbon, to robustly explore retention and to seek the most suitable and sustainable approach. The City Plan 2040 was a material consideration but was not part of the adopted development plan. It was clear in the local plan that there was a need for robust consideration of sustainability matters in all development. Core Strategy Policy CS15 was about avoiding demolition but this had to be understood in the wider context of the policy and the plan as a whole which included detail on redevelopment proposals and the need for meeting the quality and quantity of new development, particularly office floor space. There was also the carbon options guidance which was adopted in 2023 and set out a process for considering different options for any scheme. This scheme had been through that process. Another Officer stated that six options had been assessed robustly and had also been third-party reviewed by an independent reviewer. The outcome was that there would be potential to retain Bastion House especially if there was a change of use e.g. to a hotel, due to the constraints of the building but the redevelopment option would have wider benefits. It was not just the building sustainability that had to be considered but also the wider context and the way the site would be accessible and connected to the rest of the City, support sustainable transport modes and support short distances so it was future-proofed as a sustainable location in the City. In the wider context of the region all these elements had to be considered. The redevelopment option provided the most benefits.

A Member asked for clarification on the carbon impact of the scheme. An Officer stated that the square metre figure for redevelopment was the lowest of

all the options and was used to assess compliance with GLA policies. It would achieve the aspirational benchmark of the GLA.

In relation to Members' questions about highways, an Officer stated that they considered the highway design to be a betterment to road users. The existing highways arrangements were considered unsafe when accident data was checked. TfL had not highlighted any concerns with the proposals. The detail of the highways work would be part of the Section 278 works. As part of this highways work, detail design work would be undertaken and there would be liaison with TfL regarding the final arrangements and the modelling.

A Member stated that there were early concerns that retrofit might not be viable due to the Bastion House structure but she understood these concerns had been clarified and a reuse or retrofit approach would be possible. The Member stated she did not understand there to be safety concerns for the former Museum of London site. The Member asked if any remaining safety concerns could be addressed and put into context. An Officer stated that as part of the carbon optioneering, structural problems were not part of the second optioneering exercise so no option had been discounted for that reason. The applicant had applied a carbon contingency to any works that would be required to adapt Bastion House or to remodel the buildings if they were reused and this had been reviewed by a third-party. Works could include new lifts, extensions and strengthening works. The Officer confirmed that none of the options presented structural safety concerns.

A Member also asked if Option 3 was classed as a major refurbishment and stated that in the case of 81 Newgate Street, public amenities such as retail space and public roof garden had been removed without this being considered by Committee. She asked for assurances this would not happen on this site. An Officer stated that Option 3A was a major refurbishment but it did replace the Museum of London buildings with a rotunda building that was smaller and also replaced the northern building but Bastion House would be retained along with a large part of the podium structure. The Officer stated that 81 Newgate House had two objections which was fewer than the threshold of nine the scheme of delegation required for an application to be considered by the Sub-Committee. There were also no policy non-compliance issues to that application and it was not considered there was broader interest in that case. The Officer added that in the application currently being considered, there were a significant number of objections which indicated very wide broad interest and even though the scheme was very substantially compliant with policy, there were policy non-compliance issues. For these reasons, any diminishment in the public benefit of any significant would be returned to the Sub-Committee.

A Member asked for clarification of the operating hours and maintenance of the new lifts. An Officer stated that there was an existing lift on the highwalk over London Wall which would be remodelled. There would be a new lift down to the scheduled monument and Barber-Surgeons' Gardens, improving access significantly. There would also be a lift adjacent to Ironmongers' Hall and there was a further lift at the base of the new Bastion House. Condition 94 would look

at the public realm including the lifts and accessibility regarding management and operations and this would include opening times.

A Member asked if the reports from Simon Sturgis were considered when the different options around carbon were considered. An Officer stated that although there were many graphs and tables about the refurbishment option, it was not known what the underlying assumptions were. She stated that the major refurbishment option outlined in the Officer's report was an amalgamation of scenarios one and two and that had been calculated and reviewed and although similar to the option from Simon Sturgis, the assumptions underlying these options were declared.

A Member stated that Bastion House was an example of important historical architecture and he asked Officers to outline the efforts made to try and retain the building and why Officers considered on balance that the wider benefits of the scheme meant that the proposal was appropriate. An Officer stated that in relation to aesthetic or architectural qualities of the existing Bastion House, the Officer report set out in detail why it was not concluded to be a non-designated heritage asset, chiefly on account of its simple elevation, simple cuboid form and underwhelming detail. From this basis it was deemed acceptable in principle to move to a new design aesthetic and one which took different design cues and employed different materials to arrive at a different kind of character and identity for this scheme.

A Member asked a number of questions and the Chairman asked Officers to address the material planning considerations. In relation to the suitability of the site for an office, the Officer stated that paragraph 111 of the Officer report detailed the adopted local plan and the emerging City Plan and the London Plan all supporting the delivery of new office floor space in the City. Paragraph 122 of the Officer report summarised the key policies. Strategic Objective 1 of the Local Plan was to maintain the City's position as a world leading financial and business centre. Policy CS1 of the Local Plan aimed to increase the amount of City's office floor space during the period of the plan. Local Plan Policy DM 1.2 promoted the assembly and development of sites for large office schemes in appropriate locations. The Officer stated that the local plan was not prescriptive about the specific uses that should come forward on this site. The plan identified at the north of the City area in which this site was located, there would be significant office growth of 10%-20% of the total office growth envisaged in the City Plan. There was an expectation set out that offices in the local plan would be acceptable development across the City. The Officer also stated it was important to note that the site was an existing office location alongside its current cultural use and the wider area that had a mixed character, parts of which were the large-scale office buildings that sat nearby. The Officer added that Point 2 of the emerging City Plan stated that office growth would be encouraged in all parts of the square mile.

In relation to a question about the level of debate amongst Officers, Members were informed that Officers considered that this was a very good planning scheme in all respects, it was very substantially policy compliant and Officers were completely behind the recommendations.

In response to a Member's question about the number of objections received, an Officer stated that the number received was not typical of many major applications in the City but it was not unprecedented. The Officer stated that the current Liverpool Street Station application and the previous Bury House scheme had comparable numbers of objections. Officers took into account all representations received. They set out the details in the consultation section of the Officer report with individual Officer responses to each and also addressed these through the main body of the report.

In response to a Member's question about the scheme being changed, an Officer stated that when schemes were granted permission, there was a general expectation that the scheme would be implemented as approved but there was scope to submit further amendments to any scheme. All subsequent applications were fully assessed on their merits and were subject to consultation. It was not known whether there would be any amendments to this scheme but if there was, they would be fully assessed and any material changes would be brought back to the Sub-Committee.

In relation to a Member's question about carbon release and what would happen in the next decade, an Officer stated that the development, if approved, would go through an extensive detailed design process during which all the details to satisfy the conditions would be worked up. This would take a number of years so it was not expected there would be significant carbon impact before the end of this decade. The main impact was likely to be in the 2030s.

In terms of a Member's concern about the climate, an Officer stated that the major refurbishment options would also result in two-thirds of the carbon emissions of the redevelopment scheme. In relation to policies including the National Planning Policy Framework approach, all environmental, social and economic sustainability issues had to be weighed and balanced against each other for each planning application. The Officer stated that this application had done this and this was the reason why Option 9 - the redevelopment option was proposed. This was important to deliver wider sustainability benefits. Sustainability could not just be reduced to carbon; biodiversity, greening and climate resilience all had to be considered and the City had to be future-proofed as a whole.

An Officer stated that the words climate emergency had been mentioned and he reminded Members that this was not the position of the City of London.

A Member stated she had a question relating to cyclists and the public realm. She stated that with the removal of the highwalk level and access points to the southern end, it would be necessary for pedestrians to use the street level. She asked who would be policing the dismount and conduct of cyclists and stated that this was already a problem on Aldersgate Street and across the City, especially in relation to dockless electric bikes and scooters being abandoned in the public realm. An Officer stated that dockless bikes would be considered during the detailed design. There was wider debate about the management of dockless bikes.

In relation to a Member's question about the figure of 3,000 jobs stated in the Officer report, an Officer stated that the figure was based on the floor space delivered on the site. There was substantial demand for new office floor space within the square mile. Evidence commissioned independently from Arup and Knight Frank last year, stated that a minimum of 1.2 million additional square metres of office floor space was required in the City to accommodate substantial job growth of upwards of 60,000 new jobs up to 2040 within the square mile so there was substantial demand for jobs. These job projections were taken from the GLA's figures which were long-term job projections based on robust assessment of the future long-term growth of the UK's economy so rather than being based on short-term economic cycles, they were based on the long-term projections. A site such as this one would take years to develop. Another aspect to the economic benefits were the cultural aspects and retail which would help with the seven day a week economic life of the City and contribute to Destination City.

In relation to a Member's question about traffic modelling and concern about u-turn movements, an Officer stated that this would be part of a thorough highways design which would take into consideration all road users. There was currently an outline design which had been verified and there were very few u-turn movements so this was not anticipated to be a problem. Members were informed that the removal of the roundabout would be a benefit to many road users. The project would address accidents and provide better routes for pedestrians. Surveys would be undertaken as part of the detailed design.

In response to a question about the Jewish cemetery, an Officer stated that the precise boundaries of the cemetery were subject to debate but had been rigorously looked at by scholars. Over the course of the application, several amendments were made to the design to remove any impacts from the zone of the Jewish cemetery. Conditions were secured to monitor work around the area to ensure that no further disturbance would be caused. The Officer confirmed that there would be no changes to the size or shape of the building.

A Member asked if it would be possible for Conditions 10, 12, 18 and 57 to be amended to state that details had to be provided prior to demolition and Conditions 14, 16, 22, 59 and 73 should trigger demolition after they had been approved. In addition, the Member asked that Conditions 88 and 89 should clearly state that no demolition would be undertaken before details were provided. She stated that it was important for Destination City that there were not years of having a demolished site. The Member also asked that there be further consultation with the residents on Condition 12. The Chairman asked Officers if it would be possible to amend these conditions. An Officer stated that any pre-commencement conditions should be discussed and agreed with the applicant. He also stated that in relation to the Jewish Cemetery proposed amendment to the conditions, the intention with the existing conditions was that no work would be carried out until those safeguards were in place.

A Member referred to Paragraph 822 of the Officer's report and asked for confirmation that there was a condition in place to the effect that no demolition

would take place before the London Wall West site had been marketed, a legally binding contract had been entered into with a successful developer and the developer had appointed a principal contractor. She stated that if not, she would like a condition on this to be included.

A Member asked for clarification on the peer review had been carried out by the City of London Conservation Area Advisory Committee (CAAC) and the members present at the meeting where this item was discussed, including whether the Chairman and Deputy Chairman of the Planning and Transportation as ex-officio Member were present.

A Member raised concern about the second addendum, circulated the afternoon before the meeting, with the amendment to a condition which extended the time limit for the development to begin from three years to five years and asked Officers for clarification on this.

A Member stated that the car park would be truncated as one of the entrances would be taken away. She raised concern about the difficulty of getting into and out of the car park and asked if this would mean it would be sacrificed as an income generator or would become infeasible.

MOTION: - A Member stated that the Sub-Committee had heard from the developers, the objectors and Officers and had had ample opportunity to ask them a series of searching questions. Whilst he recognised this would be advancing proceedings, he proposed that the Sub-Committee now move to vote on the recommendations.

As a point of order, another Member stated that as this was a City of London Corporation application and the Sub-Committee was the City of London's Planning Applications Sub-Committee, it had a duty to ensure that every Member had the ability to ask questions of Officers.

The Chairman asked if there was a seconder and a Member seconded the proposal to move to the vote.

The Chairman ruled the motion to be premature at this juncture and stated that the Sub-Committee would finish questioning Officers as there were still new points emerging, and then might reconsider this course of action should it be put again after this section.

The Officer stated that in relation to the question about CAAC membership, this was a mixture of ward club members, architects, planners, heritage specialists and other organisations by invitation. The Chairman and Deputy Chairman were ex-officio members but did not vote. The Chairman and Deputy Chairman stated they were not present at the meeting where this item was considered.

An Officer stated that the government advice was that written agreement of the developer must be secured in relation to pre-commencement conditions and he suggested that the Sub-Committee leave this with Officers to discuss with the applicant, if the planning permission was granted. In respect of the change to

the five-year time limit, the Officer stated that this was requested by the applicant following sight of the conditions. Officers considered this was reasonable in this instance, given the scale of the scheme and the number of details that would need to be given careful consideration prior to implementation. In respect of the details on the transport matters in Paragraph 822, there were conditions covering construction and deconstruction logistics and there was a scheme of protective works condition for the construction and demolition phases of the development.

A Member asked Officers for the proportion of applications within the City of London that received Article 31 holding directions. The Officer stated they were very common-place on high profile schemes. They were triggered by a third-party or other request to call-in and they normally enabled the Secretary of State some time to consider the request. The Officer stated that the advice given by the Department of Levelling Up, Housing and Communities was not to issue a decision until after the political sensitives of the London Mayoral Elections.

In reference to a point made by an objector about the Tate modern viewing platform, a Member asked what implications this case would have for the viewing platform in this application. The Officer stated that the viewing gallery in the proposal was directed away from residents and looked southward so there would not be issues of overlooking. The design mitigated and avoided any sense of overlooking.

The Chief Commoner asked why the GLA recommended Mayoral Review Panel had not been used for this application. An Officer stated that this was not considered to be a referable case by the GLA as it was not considered to be of strategic interest, it did not impact on views of Londonwide significance and as such was considered to be a local issue. The panel was used in instances where the application was so substantial that it was referred to the Mayor and it then went to the Mayoral Design Review Panel but this was not triggered in this instance.

Seeing no further questions, the Chairman asked that Members now move to debate the application.

MOTION: - The Member who had earlier proposed that the Sub-Committee move to vote on the recommendation, proposed the motion again. This was seconded and the Sub-Committee therefore proceeded to vote on the motion.

Votes were cast as follows: IN FAVOUR – 15 votes
OPPOSED – 9 votes
There was 1 abstention.

The motion to move to the vote was therefore carried.

[Deputy Dawn Wright who had left the meeting, did not vote.]

** In accordance with Standing Order No. 38, Ian Bishop-Laggett, Deputy Anne Corbett, Deputy Marianne Fredericks, Dawn Frampton, Steve Goodman,*

Jaspreet Hodgson, Deborah Oliver, Alderwoman Susan Pearson, having voted against the motion, asked that this be recorded in the minutes.

A Member raised a point of order. She asked for clarification on whether the holding notice affected Members voting on the application. The Officer stated that the holding notice did not preclude Members for making a resolution. The legal officer stated that often the Secretary of State would not make a decision on whether or not to call the item in until they were aware of the decision reached by the Local Planning Authority so the Secretary of State would be informed of the decision taken by the Sub-Committee and this would be taken into account.

The Sub-Committee proceeded to vote on the recommendations before them.

Votes were cast as follows: IN FAVOUR – 16 votes
OPPOSED – 8 votes
There was 1 abstention.

The recommendations were therefore carried.

[Deputy Dawn Wright who had left the meeting, did not vote.]

** In accordance with Standing Order No. 38, Ian Bishop-Laggett, Deputy Anne Corbett, Deputy Marianne Fredericks, Dawn Frampton, Steve Goodman, Jaspreet Hodgson, Deborah Oliver, Alderwoman Susan Pearson, having voted against the recommendations, asked that this be recorded in the minutes.*

RESOLVED -

1. That the Planning and Development Director be authorised to issue a decision notice granting planning permission for the above proposal in accordance with the details set out in the attached schedule, as amended by the addenda, subject to:
 - (a) The City as landowner giving a commitment (through a resolution or delegated decision) that it will comply with the planning obligations in connection with the development if it implements the planning permission (and that it will ensure that the obligations are binding on any future purchaser or development partner) and a Unilateral Undertaking being signed in respect of those matters set out in the report, the decision notice not to be issued until the commitment/resolution has been given and a Unilateral Undertaking has been signed.
2. That it is noted in principle that land affected by the building which is currently public highway and highway over which the public have a right of access, including Shaftsbury Place may be stopped up to enable the development to proceed and, upon receipt of the formal application, officers may proceed under delegated authority with arrangements for advertising and making of a stopping-up order for the various areas, to the extent that such stopping-up order is unopposed. If there were to be any unresolved objections to the stopping-up order, a report would be taken to the Planning and Transportation Committee for decision;

3. That your Officers be authorised to provide the information required by regulation 29 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (information to be provided to the developer post determination of the application), and to inform the public and the Secretary of State as required by regulation 30 of those regulations.

4. **LISTED BUILDING CONSENT REQUESTS**

The Sub-Committee considered a report of the Director of Planning and Development concerning the demolition of Ferroners' House alongside external alterations to the facade and roof level of Ironmongers' Hall, internal reconfiguring to cores and back of house areas and associated works in association with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y).

The Sub-Committee also considered a report of the Director of Planning and Development concerning external alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of new highwalks, hard and soft landscaping, and works associated with the construction of new buildings with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y).

The Sub-Committee voted on these recommendations alongside those set out under Agenda Item 3.

The Sub-Committee proceeded to vote on the recommendations before them.

Votes were cast as follows: IN FAVOUR – 16 votes
OPPOSED – 8 votes
There was 1 abstention.

The recommendations were therefore carried.

[Deputy Dawn Wright who had left the meeting, did not vote.]

** In accordance with Standing Order No. 38, Ian Bishop-Laggett, Deputy Anne Corbett, Deputy Marianne Fredericks, Dawn Frampton, Steve Goodman, Jaspreet Hodgson, Deborah Oliver, Alderwoman Susan Pearson, having voted against the recommendations, asked that this be recorded in the minutes.*

RESOLVED -

That Listed Building Consent be granted for the above proposals in accordance with the details set out in the attached schedule as amended by the addenda.

5. **VALID PLANNING APPLICATIONS RECEIVED BY DEPARTMENT OF THE ENVIRONMENT**

The Sub-Committee received a report of the Chief Planning Officer and Development Director detailing development applications received by the Department of the Environment since the report to the last meeting.

RESOLVED – That the report be noted.

6. **DELEGATED DECISIONS OF THE CHIEF PLANNING OFFICER AND DEVELOPMENT DIRECTOR**

The Sub-Committee received a report of the Chief Planning Officer and Development Director detailing development and advertisement applications determined by the Chief Planning Officer and Development Director or those so authorised under their delegated powers since the report to the last meeting.

RESOLVED – That the report be noted.

7. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**

There were no questions.

8. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

There were no additional, urgent items of business for consideration.

The meeting ended at 12.37 pm

Chairman

Contact Officer: Zoe Lewis
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STREETS AND WALKWAYS SUB (PLANNING AND TRANSPORTATION) COMMITTEE

Tuesday, 19 March 2024

Minutes of the meeting of the Streets and Walkways Sub (Planning and Transportation) Committee held at Committee Room 2 - 2nd Floor West Wing, Guildhall on Tuesday, 19 March 2024 at 1.45 pm

Present

Members:

Graham Packham (Chairman)
Deputy Randall Anderson
Deputy Shravan Joshi MBE
Deputy Charles Edward Lord
Alderswoman Susan Pearson
Ian Seaton
Deputy Paul Martinelli (Ex-Officio Member)

Officers:

Zoe Lewis	- Town Clerk's Department
Melanie Charalambous	- Environment Department
Gillian Howard	- Environment Department
Ian Hughes	- Environment Department
Daniel Laybourn	- Environment Department
Bruce McVean	- Environment Department
David Morris	- Environment Department
Tom Noble	- Environment Department
Giles Radford	- Environment Department
Clarissee Tavin	- Environment Department
Giacomo Vecia	- Environment Department
Clive Whittle	- Environment Department

1. APOLOGIES FOR ABSENCE

Apologies were received from John Edwards, Deputy Marianne Fredericks and Deputy Alastair Moss.

2. MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA

In relation to Agenda Item 14, Ian Seaton declared that he was church warden at St Lawrence Jewry and Deputy Edward Lord declared that they were on the Guild Church Council of St Lawrence Jewry.

3. **MINUTES**

RESOLVED, That the public minutes of the meeting of 30 January 2024 be approved as an accurate record of the proceedings.

Matters Arising

Barbican and Golden Lane Healthy Streets Plan

The Chairman stated that he had met with Councillor Rowena Champion, who held the Transport Portfolio at Islington Council and he advised that work was progressing well.

King William Street bus stop at the top of the steps under London Bridge

An Officer stated that TfL had replied to the request to relocate the bus stop and they had advised that it would not be possible to move it further south as it would be closer to the bridge and would interfere with the lanes. They had stated that buses could potentially get stuck behind each other when they were using the bus stop and this could lead to delays and congestion on the bus network. A Member stated that there was currently significant crowding by the bus stop and the steps by King William Street which made it very difficult for pedestrians to pass. They requested that TfL be asked to relocate the bus stop to the north where the pavement was wide and the bus stop would not interfere with lanes. The Officer stated he would request TfL to move the bus stop northwards and would also follow up with TfL on the bridge repairs request at the last meeting as he had not yet received a response.

4. **PEDESTRIAN PRIORITY STREETS PROGRAMME - PHASE 1 (KING WILLIAM STREET TRANSFORMATION AND PROGRAMME UPDATES)**

Members considered a report of the Interim Executive Director, Environment concerning the King William Street Transformation and Programme Updates as part of the Pedestrian Priority Streets.

Members were informed that scheme would include wider footways, a narrowed carriageway to 6.4m, the minimum for two-way buses, greening and substantial tree planting, new side entry treatments where they were not already in place to help people walking and wheeling, raised carriageway tables at King William Street at the junction with Lombard Street and Nicholas Lane junctions to complement the London Underground step-free accesses, two purpose built inset loading bays. The scheme accounted for TfL's plans at Monument Junction so less work would be required on the City Network as part of that. It was proposed to start work in Summer 2024 and for work to last for 18 months.

In response to the Chairman's question about the local Members consulted and their responses, the Officer stated that there had been minor comments about design elements e.g. street furniture but there was support from all the Members consulted. Following a Member's question about specific feedback given, the Officer stated that there had been comments about the Lombard Street Corner and the number of people using the London Underground entrance. Officers had responded to the feedback and they would continue with design work on this corner. There were also comments on the cycle stands and

trees. In response to a Member's question, the Officer confirmed that black taxis at Bank Junction had not been raised.

In response to Members' questions, the Officer confirmed that surveys had been undertaken and trees could be planted and the bicycle racks would be Sheffield stands. Also, the inset loading bay loading restrictions mirrored others in the area. Due to the bays being located on the footway, the restrictions sought to avoid peak hours when the footways were busiest.

A Member asked how the Bank Junction decision due to be made by the Court of Common Council in June 2024 would impact upon this scheme. The Officer stated that the design of this scheme would not change regardless of the Bank Junction decision.

A Member asked for confirmation that, if a decision was taken to reopen Bank Junction to black taxis, this would not impact on the design of this scheme. An Officer stated that it would not. He added that Bank Junction did not have 24 hours restrictions in place and therefore vehicle movement was allowed through the junction.

The Chairman asked if there would be any changes to the vehicle restrictions and the Officer responded that in this scheme, there would be no changes to the Traffic Management Order (TMO) that was previously approved. There would be changes to the waiting and loading restrictions.

A Member asked for details on the improved drainage system. The Officer stated that current King William Street was serviced by four drain covers along its 400m length. A more contemporary drainage system would be installed. There would not be an increase in the highways drainage as there would still be the same amount of water, but the extended footways would be accommodated. The Officer confirmed that the high-level drainage would be replaced, but the actual drainage system this would go into, would not change.

The Chairman asked if there would be a pedestrian controlled crossing at the Monument junction end of the street. Members were informed that Officers had worked with TfL and their Safer Junctions team who were designing Monument junction. They planned to consult after the mayoral elections. Officers had designed a scheme that was ready for that project. The Officer stated that the crossing would be improved and moved back so a dropped kerb could be accommodated. It would be an informal crossing with a temporary traffic island until the Monument Junction work was completed and then pedestrian controlled lights would be installed. The Officer stated that the phasing of Monument Junction did not currently allow for a full green man crossing. The system being built would enable TfL to put signals in as part of their scheme.

In response to the Chairman's questions about the phasing of the scheme, an Officer stated that work would start at the southern end and move towards the northern end, working on roughly a third of the street at a time. There would be some full closures of the street to allow for resurfacing and this would be undertaken at the least disruptive times. The Officer stated that there would be

no southbound traffic on King William for 18 months to allow for the working space. Northbound access for motor vehicles, pedestrian access and accessibility access would be retained as best as possible at all times throughout the scheme apart from during resurfacing work. Work was taking place with TfL on the diversion route for buses. Work was also taking place on diversions and phasing plans for cycles and motor vehicles. An Officer stated that there would be publicity and a briefing note on the details of the works and Members of the Sub-Committee would be provided with this in advance.

RESOLVED – That Members of the Sub-Committee

1. Approve the final highway and public realm design for King William Street (shown in Appendices 2, 3 and 4 of the Officer report) which widens the pavements on both sides of the street, allows for the planting of a number of street trees, the provision of some seating and reconstruction of the carriageway;
2. Approve the requested overall budget of £5,756,690 (an increase of £3,572,261, excluding costed risk and maintenance, funded by previously approved funding) to implement the King William Street Transformation and continue work on the rest of the programme;
3. Approve the Costed Risk Register in Appendix 5 and the requested increase of the Costed Risk Provision from £417,200 to £518,000 (an increase of £100,800) for the entire programme, and that the Executive Director Environment is delegated to authorise the drawdown of funds from this register;
4. Approve the commuted maintenance budget of £87,000 for the trees on King William Street. This is to be funded by the Cool Streets & Greening Programme funding which is included in this overall budget; and
5. Agree that the Corporate Programme Management Office, in consultation with the Chairman of the Streets & Walkways Sub Committee and Chief Officer as necessary, is to decide whether any project issues or decisions that falls within the remit of paragraph 45 of the 'City of London Project Procedure – Oct 2023' (Changes to Projects: General), as prescribed in Appendix 6 of this report, is to be delegated to Chief Officer or escalated to committee(s).

5. OLD JEWRY AND IRONMONGER LANE

Members considered a report of the Interim Executive Director, Environment concerning details of the potential improvements to Ironmonger Lane as requested by Members at the last meeting.

An Officer stated that there had been discussion at the last sub-committee meeting around the options for potentially opening Old Jewry in a southbound direction and Members indicated support for Option 2 - the southbound reopening of Old Jewry at all times and then pausing any work on potential improvements whilst conducting an experimental traffic order around the reopening. The Officer stated that there had also been discussion at the meeting about the potential for Ironmonger Lane. Officers were asked to consider how the two schemes might link and whether there was merit in looking at them together. The Officer stated that Officers had concluded that

Ironmonger Lane was unlikely to be an alternative route to most of the people currently using Old Jewry as they were not on the same desire lines. Whilst this could change due to routes available to people walking in the area when the new route through a development on Frederick's Place, Officers did not consider the projects to be linked and suggested that if Members chose to proceed with Option 2A, this scheme would be taken forward separately to any improvements to Ironmonger Lane. Members were informed that some of these improvements would come forward as part of a Section 278.

In response to a Member's question, an Officer stated that the timeframes for the scheme were as outlined in the Officer report to the previous sub-committee meeting and Officers would provide these to the Member.

A Member commented that Ironmonger Lane was scheduled to reopen in July 2024 and asked whether it was appropriate to open it at this point if it would then be substantially closed shortly afterwards. An Officer stated that it was currently closed for construction activity and it was possible it might be needed for longer for fit out works. The Officer stated that he considered it appropriate to allow the street to open up first before the consideration of time restrictions. He added that this could be dealt with separately from Old Jewry. The Officer added that the number of vehicles that previously used the street was minimal so there would be a minimal impact if there was a closure to implement in due course a scheme to improve and enhance the street.

A Member commented that the pavements on Ironmonger Lane were very narrow. She stated that any project should make it more pedestrian friendly. An Officer stated that Officers proposed to extend the scope of the Section 278 project to raise the carriageway and potentially introduce pedestrian zone restrictions and there would be a report on this to a future meeting of the sub-committee. He added that there would need to be a bid for funding as it was not a funded project and funding would need to be secured before a project could proceed.

RESOLVED – That Members of the Sub-Committee

1. Confirm the decision to proceed with Option 2a, as indicated at the January meeting of this Sub Committee, to initiate a traffic experiment to reopen Old Jewry to all traffic in a southbound direction, at all times; and pause any work on potential improvements until the conclusion of the experiment; and
 2. Note that, subject to a successful funding bid, the scope of the project to deliver the s278 for Dauntsey House will be expanded to incorporate improvements along the length of Ironmonger Lane, including a potential pedestrian zone.
6. **PAN-LONDON RENTAL E-SCOOTER TRIAL EXTENSION UNTIL MAY 2026**
Members considered a report of the Interim Executive Director, Environment concerning the extension of the Pan-London rental scooter e-trial until May 2026.

The Officer stated that e-scooters were a form of dockless vehicle. They were managed very differently to dockless bikes as they were regulated in a way that dockless bikes were not. The e-scooter trial had been helpful in informing the forthcoming London wide contract and this could also improve dockless bike management.

The Chairman queried whether, if the City of London Corporation declined to participate, it would free up space for more dockless bikes. An Officer confirmed this would be the case, but the amount of increased space would not be sufficient to resolve the space issues. He added that Officers were looking to identify additional parking spaces for e-scooters and bikes. Officers had explored with TfL and London Councils the option of leaving the trial and having more spaces available and they were keen for the Corporation to stay in the trial. They found having a destination like the City of London as part of the trial was useful in understanding how people used e-scooters. The wider learnings for the trial were helpful in terms of informing the broader policy approach to the management of both bikes and scooters in the future.

A Member commented that the behavioural pattern between cyclists and e-scooters was different. He stated that there was a need to find more space for e-bikes rather than leaving the trial to gain more space.

A Member asked why delegated authority was being sought. An Officer stated that another extension was not anticipated but if there was one, it would be of a similar nature and it was considered that it would be appropriate to work with the Chairmen and Deputy Chairmen to process any necessary extensions should this matter arise.

A Member raised concern that if the City was not part of trial, it could increase the number of scooters being left at the periphery of the City. She asked for statistics of the numbers using e-scooters. An Officers stated that statistics showed there had been a year-on-year increase in the number of e-scooter trips on the trial. There had been enforcement against private e-scooter use and anecdotally it seemed the number of private e-scooter users had declined following the rise in the number of private rental e-scooters. The number of rental dockless bikes had also increased significantly.

A Member asked how the safety statistics in the Officer report compared to other forms of transport. An Officer stated that this information had been requested from TfL who had stated that analysis was ongoing and it would take additional time to provide like-for-like figures. He also added that it was difficult to fully capture the rate of safety incidents on e-scooters because Stats 19, the Department for Transport regulated collision and accident reporting guidance and guidelines, did not list e-scooters as a mode of transport.

In response to a question from the Chairman as to why e-scooters were less problematic than e-bikes, an Officer stated that there were less well used than e-bikes and were more tightly controlled through a contract with TfL. They were not legal for use on the public highway and were only permitted to operate as part of these trials. There were also legal controls around the use of e-scooters

and rental e-scooters, in particular where they were permitted to end journeys and park. Officers considered that the contractual regulatory environment as well as the legal regulatory environment led to higher rates of compliance and officers would continue to advocate for legislation that would provide additional powers to manage dockless bikes.

RESOLVED – That Members of the Sub-Committee

1. Approve the City of London Corporation's participation in the extension of the pan-London rental e-scooter trial until May 2026; and
2. Delegate authority to approve participation in any further rental e-scooter trials or extensions beyond May 2026 to the Executive Director Environment, in consultation with the Chairs and Deputy Chairs of Planning & Transportation Committee and Streets & Walkways Sub Committee.

7. **ST PAUL'S CATHEDRAL EXTERNAL RE-LIGHTING**

Members considered a report of the Interim Executive Director, Environment which provided an update on the works completed to date.

An Officer stated that the cathedral lighting was over 30 years old and was out of date in terms of technology and energy use. The Corporation had historically managed the lighting and once of the outcomes of this process was to hand control over to the cathedral. The Officer stated that the lighting trial was intended to prove the concepts and demonstrate the control that could be applied over the lighting of the cathedral. The ambition was to better reveal the architecture of the building at night, to improve the quality of the lit environment and to look at how technology could better deliver a low energy solution with approximately a 75% reduction in energy. There were considerable heritage considerations. The Officer reported that the trial was a success with a significant amount of positive feedback. Detailed design would now take place. He added there was considerable work needed to be undertaken around the consent process particularly with the cathedral itself and in relation to the buildings adjacent to the cathedral. The Officer stated the complexity of having to deliver the lighting on such an important building.

Members were shown a number of photographs from the lighting trial which focussed on the west elevation. Members were shown comparisons between the current lighting and the lighting trial with the concept of light coming from within the building to show that it was a live building and a place of worship. The new lighting would reveal the architecture of the building, showing depth and architectural details and features that were currently in shadow. The colour of the lighting would make the building stand out in the local and wider environment. The trials provided a good opportunity to test different levels of lighting with the gradual dimming of lighting throughout the night.

Members were also shown photographs from key points across London. Members were informed that the new lighting would be warmer than that of many other buildings so the Cathedral dome would be more visible.

In response to a Member's question about costs, an Officer stated that this would be part of the next stage with the detailed design work as part of the quantity surveyor process. Officers had worked to secure funding from a number of external sources. The Corporation would also contribute and would continue to look at funding as the programme evolved.

The Chairman asked Officers to outline the operational costs once the lighting was completed. An Officer stated that the cost would transfer to St Paul's Cathedral. The energy and maintenance costs would reduce and would be affordable for the cathedral to take on.

A Member asked if it was possible to shorten the timeframe. An Officer stated that the timeframe was realistic given the required permissions and consents which were outside the Corporation's control. He added that the cathedral was fully engaged with the process. After this time, there could be ways to accelerate the process. Officers would keep Members informed.

In response to a Member's questions, an Officer stated that the delivery phase was not just the time on site but also included fixtures and fittings being made. The procurement process would be followed for the supply of these. The Officer added that challenges in delivering the lighting scheme would include the heritage nature of the building and services taking place which meant there would have to be phased working hours.

In response to a Member's question about funding sources, an Officer stated these were included on page 151 of the agenda pack.

In response to a Member's question, an Officer stated that the project aligned with the Climate Action Strategy objectives and moving the City towards net zero.

The Chairman asked about engagement with Historic England. An Officer stated that the individuals involved had been positive and consultation would be taking place.

The Chairman asked for further details on who was on the joint project board. An Officer confirmed it comprised Officers, external experts and representatives from St Paul's Cathedral. The Officer also confirmed that there was currently one project manager who was an Officer.

RESOLVED – That Members of the Sub-Committee

1. Approve the procurement and appointment of services required to reach the next Gateway;
2. Approve the additional budget of £705,000 funded from the S106 contributions allocated to the project (£640,000) and the previously approved £1.16M capital bid (£65,000) as detailed in Finance Tables in Appendix 2; and
3. Note the revised budget of 1,380,000 (excluding risk).

8. **STONECUTTER COURT S278**

Members considered a Gateway 3/4/5 options appraisal and authority to start work report of the Interim Executive Director, Environment concerning Stonecutter Court S278.

RESOLVED – That Members of the Sub-Committee

1. Approve a budget of £631,400 is approved to reach the next Gateway;
2. Note the revised total estimated project budget is £696,400 (excluding risk);
3. Approve a Costed Risk Provision of £100,000 (to be drawn down via delegation to Chief Officer) as set out in the risk register in Appendix 4 of the Officer report;
4. Note the Commuted Maintenance sum of £45,100, is included in the budget and will cover any additional future maintenance costs for a period of 20 years;
5. Approve the design option shown in Appendix 2;
6. Note that the making of the necessary Traffic Orders, subject to no objections, or the resolution and consideration of any objections, is delegated to the Director of City Operations under the scheme of delegation;
7. Delegate to the Executive Director Environment authority to approve budget adjustments, above the existing authority within the project procedures and in consultation with the Chamberlain, between budget lines within the approved total project budget; and
8. Delegate to the Executive Director Environment authority to further increase or amend the project budgets in the future (above the level of the existing delegated authority) provided any increase be fully funded by the Developer.

9. **65 GRESHAM STREET S278**

Members considered a Gateway 2: project proposal report of the Interim Executive Director, Environment concerning 65 Gresham Street S278.

A Member asked if St Lawrence Jewry would be involved in discussions and an Officer confirmed that they would be approached as a local stakeholder.

In response to a Member's questions, an Officer stated that this proposal had come out of the 278 negotiation as part of the planning process. He added that this was a gateway report stating that there was a potential project in this space that the developer was happy to fund the first piece of work which was to investigate the possibility. He added that there would be transparency about what would be delivered. Any possible road closures would require the sub-committee's approval and a public statutory consultation. Although there was a delegation for projects under £1million, given the traffic order requirement and the interest of members, this would come to the sub-committee.

A Member who was on the Guild Church Council of St Lawrence Jewry, raised concern that the church had not been consulted on the planning application and

stated that under Section 106 there could have been greater engagement with St Lawrence Jewry.

RESOLVED – That Members of the Sub-Committee

1. Approve a budget of £100,000 to reach the next Gateway as set out in Section 2;
2. Authorise officers to instruct the Comptroller & City Solicitor's department to negotiate and enter into a Section 278 agreement;
3. Agree that the Corporate Programme Manager, in consultation with the Chairman of the Projects & Procurement Sub Committee and Chief Officer as necessary, is to decide whether any project issues or decisions that fall within the remit of paragraph 45 of the 'City of London Project Procedure – November 2023' (Changes to Projects: General) is to be delegated to Chief Officer or escalated to committee(s); and
4. Delegate authority to the Executive Director Environment to approve budget procedures in consultation with the Chamberlain, between budget lines if this is within the total project budget amounts.

10. **FENCHURCH STREET AREA HEALTHY STREETS PLAN**

Members considered a Gateway 2: project proposal report of the Interim Executive Director, Environment concerning the Fenchurch Street Area Healthy Streets Plan.

RESOLVED – That Members of the Sub-Committee

1. Approve a budget of £100,000 to reach the next Gateway;
2. Note the total estimated cost of the project to develop the plan is £240,000 (excluding risk); and
3. Approve the boundary of the Fenchurch Street Area Healthy Streets Plan as set out in Appendix 3 of the Officer report.

11. **BEVIS MARKS SUSTAINABLE URBAN DRAINAGE SYSTEM (SUDS)**

Members considered a Gateway 6: outcome report of the Interim Executive Director, Environment concerning the Bevis Marks Sustainable Urban Drainage System (SUDS).

In response to a question from the Chairman, an Officer confirmed that engineers had stated the square meterage of paving that now flowed into the SUDS beds and the planting and permeable paving was 200 square metres. Officers would undertake a data review on the combined SUDS projects in terms of the amount of water saved from the drainage system and would also look to collate statistics of typical figures from summer storms and the impact of the schemes.

RESOLVED – That Members of the Sub-Committee

1. Approve the content of this outcome report;
2. Approve the budget adjustment summarised in section 13 and Table 2 of the Officer report;

3. Agree to close this project once the budget adjustment to cover an increase in staff costs has been completed (refer to section 13 of the Officer report); and
 4. Agree for the unspent funds from this project to be re-allocated to the Climate Action Strategy programme – Phase 3.
12. *** ANTI-TERRORISM TRAFFIC REGULATION ORDER**
Members considered a report of the Interim Executive Director, Environment concerning an update on the Anti-Terrorism Traffic Regulation Order.
- RESOLVED** – That Members of the Sub-Committee note the usage of the ATTRO during 2023, and that it will remain in place until the next review in two years' time.
13. *** OUTSTANDING REFERENCES RECEIVED.**
14. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**
A Member stated that the Moorfields Highwalk had recently come into operation but the lifts and escalators were not working at weekends and evenings. She added that the highwalk was one of the main links to the Barbican Centre and was also used by residents so it was important it was accessible at all times. The Member asked about the planning requirements. An Officer stated that it appeared the developer was switching off the lifts and escalators out of hours. Officers were investigating the requirements of the planning consent. He also advised that from the point of adoption, the Corporation would have more ability to control the timing of the facilities.
15. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
There was no urgent business to be considered.
16. **EXCLUSION OF THE PUBLIC**
The Committee agreed to exclude the public from the Non-Public part of the meeting in line with Section 100A(4) of the Local Government Act 1972.
17. **NON-PUBLIC MINUTES**
RESOLVED – That the non-public minutes of the meeting on 30 January 2024 be approved as an accurate record of the proceedings.
18. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**
There were no non-public questions.
19. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE SUB COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**
There was no urgent business to be considered in the non-public session.

The meeting ended at 3.00 pm

Chairman

**Contact Officer: Zoe Lewis
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