



## Planning and Transportation Committee

**Date:** TUESDAY, 25 JULY 2017  
**Time:** 10.00 am  
**Venue:** LIVERY HALL - GUILDHALL

**Members:**

Christopher Hayward (Chairman)	Alderman Vincent Keaveny
Deputy Alastair Moss (Deputy Chairman)	Oliver Lodge
Rehana Ameer	Paul Martinelli
Randall Anderson	Andrew Mayer
Alderman Sir Michael Bear	Deputy Brian Mooney
Sir Mark Boleat	Sylvia Moys
Mark Bostock	Barbara Newman
Deputy Keith Bottomley	Graham Packham
Henry Colthurst	Susan Pearson
Peter Dunphy	Judith Pleasance
Emma Edhem	Deputy Henry Pollard
Sophie Anne Fernandes	Jason Pritchard
Marianne Fredericks	James de Sausmarez
Graeme Harrower	Oliver Sells QC
Christopher Hill	Graeme Smith
Alderman Robert Howard	Deputy James Thomson
Deputy Jamie Ingham Clark	William Upton
Alderman Gregory Jones QC	

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Lunch will be served in Guildhall Club at 1PM  
**NB: Part of this meeting could be the subject of audio or video recording**

John Barradell  
Town Clerk and Chief Executive

# AGENDA

## Part 1 - Public Agenda

1. **APOLOGIES**
2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
3. **MINUTES**  
To agree the public minutes and summary of the meeting held on 4 July 2017.  

**For Decision**  
(Pages 1 - 12)
4. **DELEGATED DECISIONS OF THE CHIEF PLANNING OFFICER AND DEVELOPMENT DIRECTOR.**  
Report of the Chief Planning Officer and Development Director.  

**For Information**  
(Pages 13 - 26)
5. **VALID APPLICATIONS LIST FOR COMMITTEE**  
Report of the Chief Planning Officer and Development Director.  

**For Information**  
(Pages 27 - 30)
6. **PUBLIC LIFT UPDATE**  
Report of the City Surveyor.  

**For Information**  
(Pages 31 - 32)
7. **REPORTS RELATIVE TO PLANNING APPLICATIONS**
  - a) Emperor House 35 Vine Street London EC3N 2PX (Pages 33 - 136)  

**For Decision**
  - b) Wood Street Police Station 37 Wood Street London EC2P 2NQ (Pages 137 - 244)  

**For Decision**
  - c) Wood Street Police Station - Listed Building Consent (Pages 245 - 252)  

**For Decision**
  - d) Public Comments in Planning Reports (Pages 253 - 258)  

**For Decision**
  - e) Imposition of planning conditions on planning permissions (Pages 259 - 280)  

**For Information**

8. **REPORTS OF THE DIRECTOR OF THE BUILT ENVIRONMENT**

- a) Cultural Hub North/South Programme: St Paul's Area Strategy (Pages 281 - 292)  
**For Decision**
- b) Eastern Cluster Area Enhancement Strategy - Update (Pages 293 - 304)  
*Appendices 1,2 and 3 will be circulated separately electronically and colour copies will available at the meeting.*  
**For Decision**
- c) Strategic Transportation - Freight Strategy Update (Pages 305 - 348)  
**For Decision**
- d) Freight and Servicing Supplementary Planning Document - Draft for Consultation (Pages 349 - 482)  
**For Decision**
- e) Thames Court Footbridge (Pages 483 - 488)  
**For Decision**
- f) City Corporation response to consultation on the Mayoral Community Infrastructure Levy 2 Preliminary Draft Charging Schedule (Pages 489 - 512)  
**For Decision**
- g) Viability Appraisals (Pages 513 - 518)  
**For Decision**
- h) Microclimate Advice Notes 2017 (Pages 519 - 560)  
**For Decision**

9. **PUBLICATION OF THE CITY OF LONDON CORPORATION'S AIR QUALITY SUPPLEMENTARY PLANNING DOCUMENT**  
Report of the Director of Markets and Consumer Protection.  
**For Information**

**For Decision**  
(Pages 561 - 640)

10. **REVENUE OUTTURN 2016/17**  
Report of the Chamberlain, the Director of the Built Environment, the Director of Open Spaces and the City Surveyor.

**For Decision**  
(Pages 641 - 658)

11. **REVIEW OF DESIGNATION OF THE STILL & STAR PUBLIC HOUSE AS AN ASSET OF COMMUNITY VALUE**  
Report of the Chamberlain.

**For Decision**  
(Pages 659 - 660)

12. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

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

14. **EXCLUSION OF THE PUBLIC**

MOTION – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.

**For Decision**

**Part 2 - Non-public Agenda**

15. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 4 July 2017.

**For Decision**  
(Pages 661 - 662)

16. **DEBT ARREARS - BUILT ENVIRONMENT**

Report of the Director of the Built Environment.

**For Decision**  
(Pages 663 - 670)

17. **LONDON BRIDGE STAIRCASE**

Report of the Director of the Built Environment.

**For Decision**  
(Pages 671 - 676)

18. **EASTERN CITY CLUSTER SECURITY PROJECT**

Report of the Director of the Built Environment.

**For Decision**  
(Pages 677 - 678)

19. **RISK REGISTER FOR BRIDGE HOUSE ESTATES**

Report of the Chamberlain and City Surveyor.

**For Decision**  
(Pages 679 - 686)

20. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

21. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

**Any drawings and details of materials submitted for approval will be available for inspection by Members in the Livery Hall from Approximately 9:30 a.m.**

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## PLANNING AND TRANSPORTATION COMMITTEE

Tuesday, 4 July 2017

Minutes of the meeting of the Planning and Transportation Committee held at the Guildhall EC2 at 10.30 am

### Present

#### Members:

Christopher Hayward (Chairman)	Alderman Vincent Keaveny
Deputy Alastair Moss (Deputy Chairman)	Oliver Lodge
Rehana Ameer	Paul Martinelli
Randall Anderson	Andrew Mayer
Alderman Sir Michael Bear	Deputy Brian Mooney
Sir Mark Boleat	Barbara Newman
Mark Bostock	Graham Packham
Deputy Keith Bottomley	Deputy Henry Pollard
Henry Colthurst	Jason Pritchard
Peter Dunphy	James de Sausmarez
Emma Edhem	Oliver Sells QC
Marianne Fredericks	Graeme Smith
Graeme Harrower	Deputy James Thomson
Alderman Robert Howard	William Upton
Alderman Gregory Jones QC	

#### Officers:

Simon Murrells	-	Assistant Town Clerk
Amanda Thompson	-	Town Clerk's Department
Jennifer Ogunleye	-	Town Clerk's Department
Deborah Cluett	-	Comptrollers & City Solicitor
Simon Owen	-	Department of the Built Environment
Carolyn Dwyer	-	Director of the Built Environment
Annie Hampson	-	Department of the Built Environment
Paul Monaghan	-	Department of the Built Environment
Iain Simmons	-	Department of the Built Environment
Peter Young	-	City Surveyor's Department

#### 1. APOLOGIES

Apologies for absence were received from Christopher Hill, Deputy Jamie Ingham Clark, Sylvia Moys and Susan Pearson.

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

Oliver Sells declared a personal interest in agenda item 6 a) – Inner Temples Treasury Building which was also stated on his Register of Interests and

advised that he would remain in the meeting but take no part in the discussion or voting.

Alderman Gregory Jones declared a personal interest in agenda item 6 a) – Inner Temples Treasury Building which was also stated on his Register of Interests and advised that he would remain in the meeting and take part in consideration of the application as his interest was not pecuniary.

William Upton declared a personal interest in agenda item 6 a) – Inner Temples Treasury Building which was also stated on his Register of Interests and advised that he would remain in the meeting and take part in consideration of the application as his interest was not pecuniary.

Emma Edhem declared a personal interest in agenda item 6 a) – Inner Temples Treasury Building and advised that she would remain in the meeting and take part in consideration of the application as her interest was not pecuniary.

Deputy Alastair Moss declared a personal interest in agenda item 6 a) – Inner Temples Treasury Building and advised that he would remain in the meeting and take part in consideration of the application as his interest was not pecuniary.

### 3. **MINUTES**

**RESOLVED** – That the minutes of the meeting held on 13 June be approved as a correct record subject to the addition of the following:

#### 'Wind Modelling' – Eastern Cluster

The Committee requested that the issue be looked into and a report be brought to a future meeting.

#### **Matters Arising**

##### Thames Court Footbridge

A Member expressed concern that nothing had happened yet and reported that there was a degree of impatience building in the Ward as the footbridge had been closed since October 2016.

Officers advised that a report would be coming to the next meeting on 25 July 2017.

##### Sensitive Material

A Member asked if any work had been undertaken on what was being done to resolve the issue about access by members to sensitive information in relation to viability submitted by applicants.



Officers advised that a report would be coming to the next meeting on 25 July 2017.

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

The Committee received a report of the Chief Planning Officer and Development Director in respect of development and advertisement applications dealt with under delegated authority.

**RESOLVED** – That the report be noted.

5. **VALID APPLICATIONS LIST FOR COMMITTEE**

The Committee received a report of the Chief Planning Officer and Development Director which provided details of valid planning applications received by the department since the last meeting.

**RESOLVED** – That the report be noted

6. **REPORTS RELATIVE TO PLANNING APPLICATIONS**

6.1 **17/00077/FULMAJ - Inner Temples Treasury Building, The Terrace, Crown Office Row, London, EC4Y 7HL.**

The Committee received a report of the CPO in relation to an application for the extension and refurbishment of the Inner Temple Treasury Building to provide a new barristers' Education and Training Centre, primarily at third floor level within adapted library space and a new roof level extension above the Library and the Hall. The CPO informed the committee of late representations including one from Richard Humphries QC, which had been previously circulated. The CPO also advised of corrections to the report at paragraphs 80, 85 and 101 to state that the roof ridge height would be 400mm higher than the current ridge height (not the same, as stated in the report in error).

The CPO presented the report including by reference to photographs, drawings and plans shown on screen and advised that the development comprised a new mansard roof extension featuring dormer windows and chimney stacks. Two extensions were proposed on the north elevation to accommodate a new lift shaft and stairs and internal alterations included the insertion of a new ceiling above second floor level within the library.

The Committee noted that a total of 77 (plus 8 supplementary) representations had been received across two rounds of consultations. The issues raised included the harm to the library space, the impact of the proposed extension on heritage assets and the Temples Conservation Area, the need for education facilities and the impact on the Inner Temple Garden of potential temporary structures during construction.

The CPO advised that the proposals would result in less than substantial harm to the significance of the Temples Conservation Area and the setting and significance of Temple Church. The proposals would result in some harm to the Treasury Building as a non designated heritage asset, however the harm was outweighed by the public benefits of the proposal which comprised the completion of the original design for the building, and the creation of a barrister's' training centre which would reinforce the legal character of the Inner Temple and sustain the building's long-term use.

It was considered that the development complied with the NPPF and the Development Plan as a whole and was appropriate subject to conditions, and a Section 106/Section 278 Agreement being entered into and complied with.

Robert McCracken QC, Desiree AA Artesi and Marcus Binney (of Save Britain's Heritage) spoke in objection to the application including on the grounds that the harm to the library interior was highly material, amounted to substantial harm and had been under-estimated by the officers, and irreplaceable damage would be caused to the Inner Temple Library which was one of the finest law libraries in the world and one of the Inn's most precious assets. It was in the great tradition of fine libraries and an example of the important post-war reconstruction period. The library provided comprehensive and up to date research facilities and contributed to the education and training of students and pupils, and the loss of open access shelving would adversely impact legal practise. It would be a loss to future generations and the claimed benefits were highly questionable.

The Chairman advised Mr McCracken that he had received his request for his 'reasons for refusal' to be circulated to Members in advance of the meeting, but advised that should the Committee decide to refuse the application, it would be appropriate for the reasons to be drafted by officers based on the Committee's views.

Members asked the objectors a number of questions in relation to the significance of the loss of shelf space, how often the library was used and whether it was open to Members of the public, alternative options, and the relevance of the business case .

Guy Featherstonhaugh QC and Michael Spencer QC spoke in support of the application which they felt would improve the external appearance of the Treasury Building and enhance its standing within the conservation area. The Inner Temples needed to provide a high quality training and teaching facility to meet the needs of students, pupils and its members so that the primary purpose of providing education and training for the Bar could be maintained.

Members asked a number of questions including in relation to the scale of the education provision, the availability of facilities at other Inns, the scope of proposed Condition 17 in restricting use of Inner Temple Gardens, and

the ordinary functioning of the Inn during the construction period, why the option of going underground wasn't pursued, and why it was essential that training staff were accommodated on site.

Debate ensued and several Members spoke in support of the application as they felt the applicants had made a credible case regarding the need for facilities that would address current and future demand for a barrister's training centre. Some Members felt that some concerns raised by the objectors were 'operational' issues and questioned whether they were material planning considerations. The historic role of the Inns and their contribution to sustaining the country's justice system was also referred to.

Other Members spoke against the proposal, including concerns about the importance of the library as a heritage asset, and the scale of harm to the library which some members felt would be substantial. They also felt that there was no requirement for a tiered lecture room or for training staff to be based on site and the harm was therefore unnecessary. Alternative options were also raised.

A Member asked for clarification of Condition 17 which prohibited the use of the Inner Temple Garden as a works compound or for temporary structures during construction. The CPO clarified that it was not intended to prohibit temporary structures unrelated to construction of the library proposals, such as event marquees currently used on a few occasions a year. The Condition was intended to withdraw permitted development rights for structures in connection with construction works under Part 4A of the GPDO and possible minor clarification had been discussed. Buildings required for temporary relocation of Treasury Building facilities during the course of the works would require a separate grant of planning permission.

Arising from the discussion, the application was put to the vote, the result of which was as follows:

14 votes in favour of the CPO recommendation  
12 votes against

RESOLVED – That Planning permission be granted for the above proposal in accordance with details set out in the proposed schedule, subject to:

- a) Planning obligations and other agreements being entered into under Section 106 of the Town & Country Planning Act 1990 in respect of those matters set out in the report, the decision notice not to be issued until the Section 106 obligations have been executed; and
- b) Officers being instructed to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106 and any necessary agreements under Section 278 of the Highway Act 1980.

## **6.2 Leadenhall Market Draft Supplementary Planning Document - Adoption**

Members considered a report of the CPO in relation to the Supplementary Planning Document (SPD) for Leadenhall Market which was issued for public consultation during April and May 2017.

Members were advised that in response to comments received one minor amendment was proposed.

### **RESOLVED - That**

- 1) The amendment to the Leadenhall Market SPD listed in Appendix B of the report be agreed, and
- 2) Members resolve to adopt the amended Leadenhall Market SPD.

## **7. REPORTS OF THE DIRECTOR OF THE BUILT ENVIRONMENT**

### **7.1 Historic Environment Strategy: adoption after public consultation**

The Committee considered a report concerning the Historic Environment Strategy which brought together City of London Corporation guidance on the historic environment. The Strategy was an interlinked series of documents that could be read independently. Between October and December 2016 three of these documents were issued for public consultation, arising from which some minor amendments were proposed.

### **RESOLVED - That**

- a) The amendments to the Introduction, Archaeology and Development Guidance SPD and Churchyard Statements listed in appendix 2 be agreed.
- b) Members resolve to adopt the amended Archaeology and Development Guidance as an SPD.
- c) Members agree the publication of the Introduction and City of London Churchyards evidence base.

### **7.2 Pipe Subways of Holborn Viaduct and Snow Hill over Thameslink: GW3 Internal Consultation**

The Committee considered a report proposing the combining of two projects to progress to Gateway 4a, and in order to select the best option in terms of whole-life costings, sought to appoint a Quantity Surveyor and a Contractor for just early contractor involvement.

**RESOLVED - That**

- a) Approval be given to the Director of the Built Environment to proceed to the next gateway by combining the above listed two projects and close them as two separate projects.
- b) Approval for an increase of the budget by £280,000 to allow a consultant to be appointed, undertake any further exploratory works and for staff costs funded from the On-Street Parking Reserve, bringing the project overall budget to £313,000 (i.e. £280k + £33k already approved).

**7.3 City Transportation Network Performance 2017/18 Work Programme**

The Committee considered a report previously considered by the Streets and Walkways Sub-Committee concerning the transportation network performance work programme.

At the Streets and Walkways Sub-Committee Members had discussed workload pressures and requested that they be made aware of current workload issues and, given the pressure on staffing resources, be given the opportunity to agree work programme priorities.

The report set out those significant work items that either directly or indirectly impacted upon the workload of the City Transportation's 'Network Performance' team, and provided a proposed work plan.

Members were advised that the 'Network Performance' team within the City Transportation section was experiencing significant service demands and a workload that even if staffed to current full establishment it would not be possible to meet. It had therefore been necessary to recommend a review of service priorities.

**RESOLVED - to**

- a) Agree the proposed highest priority programme (Appendix 1: table 1) which based on current staffing resource can be progressed within 2017/18.
- b) Agree the proposed additional programme (Appendix 1: table 2) which could be progressed in 2017/18 if the network performance team is fully resourced.
- c) Agree the proposed reserve programme (Appendix 1: table 3) which could commence in 2018/19 or sooner if resources permit.
- d) Agree those projects proposed as 'low priorities' (Appendix 1: table 4) which it is proposed are indefinitely deferred but that this decision be reviewed in quarter four 2017/18.

**After consideration of this item, and in respect of Standing Order No. 40, the Chairman sought the Committee's consent to extend the meeting to allow the item to be considered and this was agreed.**

**8. MIPIM PROPERTY CONFERENCE 2017**

The Committee received a report detailing the CoL Corporation's activities at the MIPIM property exhibition in March 2017, and seeking approval for City attendance at MIPIM 2018. This report also identified potential areas to develop to maximise the benefit of the City Corporation's attendance at MIPIM 2018.

Members welcomed the report and commented that MIPIM provided an opportunity to engage with local and international representatives of the property industry together with high level representatives of other London Boroughs and UK cities. It provided a unique opportunity to engage in the debate relating to key issues and demonstrate how the City Corporation would provide leadership in taking forward matters of local and international importance. The programme of activities was extremely well received by those who attended.

A member commented that appointing a PR consultancy to support the visit had really helped and urged that this be allowed to continue.

**RESOLVED - That**

- a) The report on MIPIM 2017 be noted.
- b) Approval be given in principle for the City of London Corporation to attend MIPIM 2018, and
- c) A further report outlining a detailed programme of activities and costings for MIPIM 2018 be submitted for consideration in October 2017

**9. CITY FUND HIGHWAY DECLARATION - LEADENHALL STREET, EC3**

The Committee received a report of the City Surveyor seeking to declare a volume of airspace situated above 365 ft<sup>2</sup> of City Fund highway land at Leadenhall Street, EC3 to be surplus to highway requirements to allow its disposal in conjunction with the development known as 'The Scalpel'.

The development scheme was approved by the Committee on the 15 May 2014 and was designed with projecting glazed canopies along its two principal elevations part of which was intended to project into City Corporation property above the highway.

Before third party interests could be granted in City Fund highway land the affected areas first needed to be declared surplus to highway requirements.

**RESOLVED** to declare a volume of City Fund highway land above an area of highway measuring 365 ft<sup>2</sup> (33.91m<sup>2</sup>) situated in Leadenhall Street EC3 to be surplus to highway requirements to enable its disposal upon terms to be approved by the Corporate Asset Sub Committee and subject to the City Corporation retaining ownership of the highway and the continuing highway functions.

10. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

Question from Sir Mark Boleat

Following lengthy discussion on three recent planning applications and in anticipation of another lengthy discussion on one item today can I ask the Chairman if he agrees that the time is right for the Committee to have a fundamental review of how it considers major planning applications. Today, members are being asked to consider 567 pages on a single application. For most members this is the first they know about this application. We were invited for a site visit but at notice that was so short as to be impossible for most members.

I have been looking at practice in other London authorities as part of the research I am doing for a paper I am writing on the housing problem. We are an outlier in respect of how we consider planning applications. Best practice seems to be that decisions are taken by a panel, typically of around ten members, and that those members are involved in pre-application discussions with the developer. As I understand it until recently in the City such discussions involved only officers; it is welcome that the Chairman is now involved but in my view that is not enough.

Could I ask the Chairman what is currently the process for advising developers informally of what is or is not likely to be acceptable to the Committee, and who is involved in this process. And would the Chairman establish a small working group of members to consider whether there is a better way of considering major planning applications, for example by involving a smaller group of members (I should add not the same members in every case) in major applications from a very early stage.

RESPONSE

The Chairman replied that he was very open to improving processes although he would be nervous about having smaller groups of members considering applications and running the risk of pre-determination. He added that it was important for Members of the Committee to be available to applicants and developers and attend site visits, although only in the presence of officers. The Chairman also reminded Members that the Committee's terms of reference were set by the Court of Common Council so any changes would require the Court's approval.

Members of the Committee expressed concern at the suggestion that the current process needed reviewing as the strength of the Committee lay in the knowledge of its Members and the practice of holding a full debate. Also the CoL was a unique area and very different to other local authorities.

A Member commented that it was obvious to the public how much effort went into the decisions made by the Committee, which also enabled a totally transparent process.

Another member suggested that a review would be helpful only if undertaken properly, although caution would need to be taken in relation to site visits and meetings.

Arising from the discussion, the proposal was put to the vote, the result of which was as follows:

11 votes in favour of a review of the existing process  
6 votes against

The Chairman stated that while Members had agreed that a full review was unnecessary, there was always scope for improvement which officers should bring to Committee.

11. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**  
**Cultural Hub Public Realm Temporary Artistic Projects: Look and Feel**  
**'Quick Wins'**

This Committee was asked to consider an urgent report updating Members on the Artistic installations for the public realm: the programme of events, temporary art installations, new street furniture, and greening for the Cultural Hub area of the City that had been termed the Look and Feel 'Quick Wins'.

The Committee was advised that the Cultural Hub Working Party and its Chairman had expressed a strong desire to see a series of 'Quick Wins' across the Cultural Hub ahead of the proposed major capital interventions, and an indicative programme was endorsed by the Working Party on 1 February 2017.

A Gateway 1/2/3/4 report was thereafter approved by Members in March 2017 to initiate the programme and since that date a creative producer had been appointed to put the programme together; artists had been appointed to do some pre-evaluation work; designs had been drawn up and costs clarified ready for approval at Gateway 5.

**RESOLVED** that the outlined 'Phase 1' of the Quick Wins project, comprising events, installations and greening in the public realm in support of the Cultural Hub, be approved in principle.

12. **EXCLUSION OF THE PUBLIC**

**RESOLVED** - That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds



that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

**13. TOWER BRIDGE - REPLACEMENT OF HEATING SYSTEM SERVING THE HIGH LEVEL WALKWAYS AND TOWERS**

The Sub-Committee considered a report of the Director of Open Spaces regarding the project to replace the heating system serving the high level walkways and towers at Tower Bridge.

**14. FINSBURY CIRCUS - CROSSRAIL ISSUE REPORT**

The Committee considered a joint report of the Director of Open Spaces, the City Surveyor and the Comptroller and City Solicitor in relation to the reinstatement of Finsbury Circus Garden upon completion of Crossrail tunnelling works.

**15. NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

There were no non-public questions.

**16. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

There were no items.

**The meeting closed at 1.00 pm**

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Chairman

**Contact Officer: Amanda Thompson**  
**tel. no.: 020 7332 3414**  
**amanda.thompson@cityoflondon.gov.uk**

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<b>Committee(s)</b>	<b>Dated:</b>
Planning and Transportation	25 <sup>th</sup> July 2017
<b>Subject:</b> Delegated decisions of the Chief Planning Officer and Development Director	<b>Public</b>
<b>Report of:</b> Chief Planning Officer and Development Director	<b>For Information</b>

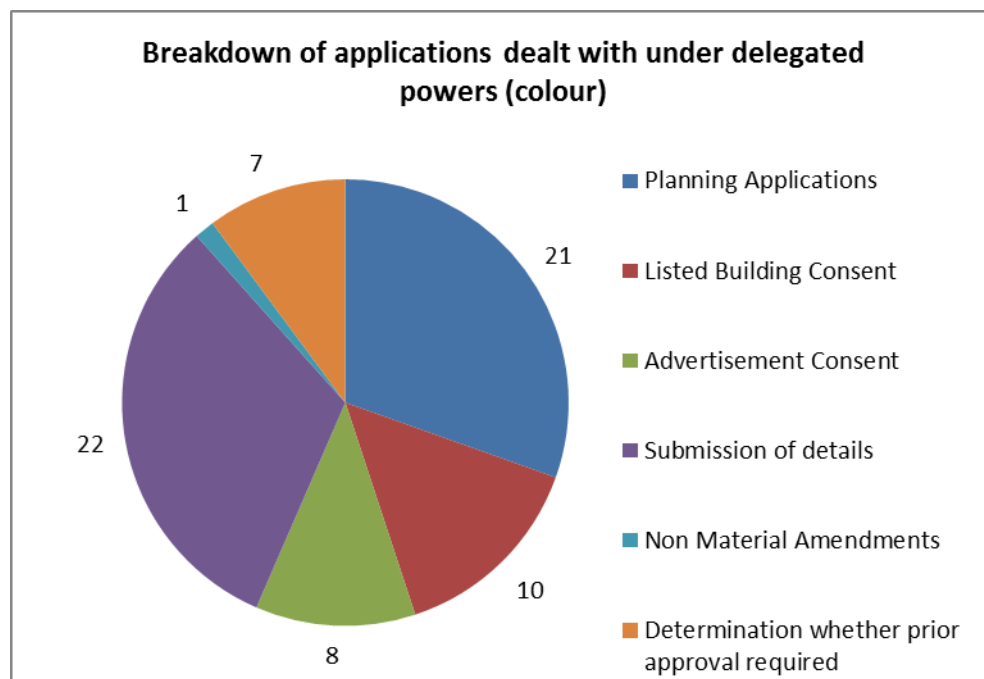
## Summary

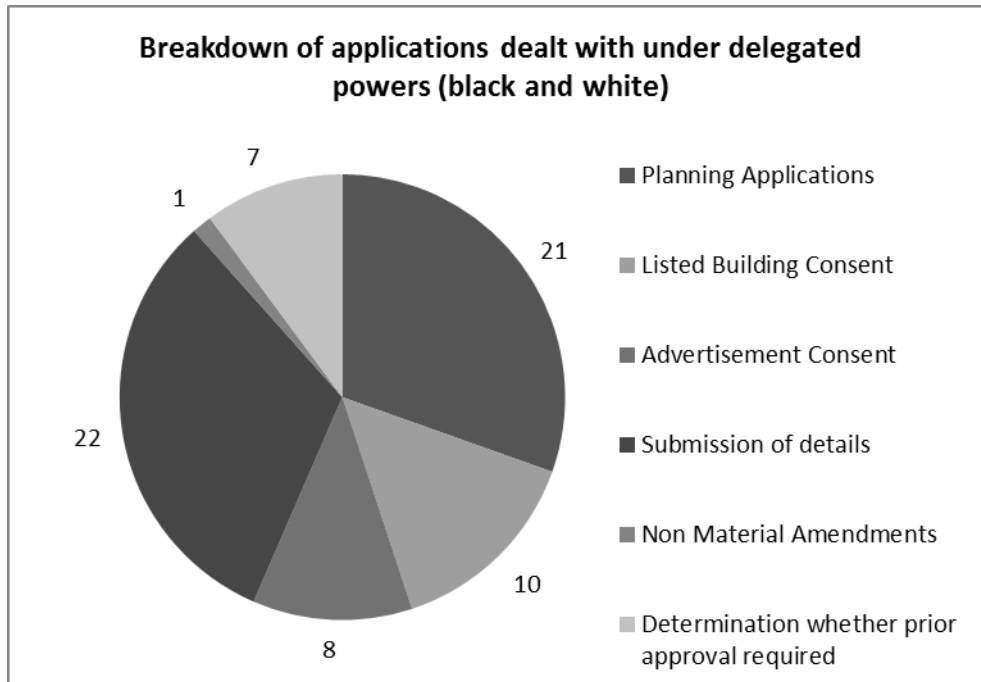
Pursuant to the instructions of your Committee, I attach for your information a list detailing development and advertisement applications determined by the Chief Planning Officer and Development Director or those so authorised under their delegated powers since my report to the last meeting.

In the time since the last report to Planning & Transportation Committee 69 (sixty-nine) matters have been dealt with under delegated powers.

22 (twenty-two) relate to submission of details of previously approved schemes. 1 (one) Non-material amendment relating to a previous planning permission. 8 (eight) express consent to display advertisements. 7 (seven) relate to applications for determination as to whether prior approval is required for the installation of telephone kiosks, all of which were refused. 10 (ten) Listed Building Consents.

21 (twenty-one) applications for development have been approved including 4 (four) change of use, 2 (two) sculpture in the city applications.





Any questions of detail arising from these reports can be sent to [plans@cityoflondon.gov.uk](mailto:plans@cityoflondon.gov.uk).

### Details of Decisions

Registered Plan Number & Ward	Address	Proposal	Decision & Date of Decision
17/00473/FULLR3 Aldgate	Lamp Column On Lime Street Eastern Footway O/s Willis Building 51 Lime Street London	Temporary installation of a sculpture 'Support for a cloud' by Mhairi Vari for a period of up to one year, to be taken down on or before 01.06.2018.	Approved 22.06.2017
17/00324/FULL Aldgate	20 Bury Street London EC3A 5AX	Change of use of part of the ground floor from offices (Class B1) to a mixed use for restaurant/drinking establishment (Sui Generis) with associated external alterations and provision of external tables and chairs on the south elevation (36.6sq.m).	Approved 29.06.2017

17/00328/FULL Broad Street	1 Angel Court London EC2	Use of private land for the placing of 6 tables and 24 chairs ancillary to the adjoining Class A1/A3 use (88 sq.m)	Approved 20.06.2017
17/00449/MDC Broad Street	60 London Wall London EC2M 5TQ	Submission of a Buried Utilities Infrastructure report pursuant to Condition 15 of planning permission 16/00776/FULMAJ dated 27.04.17.	Approved 20.06.2017
17/00255/FULL Broad Street	27 Throgmorton Street London EC2N 2AQ	Installation of exterior lighting; removal of existing lift motor room at roof level, and installation of new accessible lift within light well; addition of new services riser within light well; new plant at roof level; infill to existing light well at second floor level with glazed 'winter garden' over at third floor level.	Approved 29.06.2017
17/00256/LBC Broad Street	27 Throgmorton Street London EC2N 2AQ	Refurbishment, addition of exterior lighting; creation of step free access and addition of accessible sanitary facilities at ground floor level; removal of existing lift and motor room at the roof level, and installation of new accessible lift within existing light well area; upgrade to existing services, addition of new services riser within light well; upgrade to services plant at roof level; infill to existing light well at second floor level with glazed 'winter garden' over at third floor level.	Approved 29.06.2017
17/00540/MDC Broad Street	60 London Wall London EC2M 5TQ	Submission of details of Sustainable Urban Drainage pursuant to Condition 16 of planning permission Ref. 16/00776/FULMAJ dated 27.04.2017	Approved 29.06.2017
17/00329/ADVT Broad Street	100 Old Broad Street London EC2N 1BG	Installation and display of: (i) three sets of halo illuminated letters and logo measuring 0.3m high by 2.48m wide at heights above ground of	Approved 05.07.2017

		2.79m, 2.79m and 2.91m; (ii) two internally illuminated projecting signs measuring 0.65m by 0.65m at heights above ground of 2.68m and 2.86m; and (iii) one non-illuminated panel measuring 0.4m high by 0.3m wide at a height above ground of 1.29m.	
17/00601/MDC Broad Street	60 London Wall London EC2M 5TQ	Details of a programme of archaeological work and foundation and piling configuration relating to a proposed crane base pursuant to conditions 10 and 11 (in part) of planning permission dated 27 April 2017 (application number 16/00776/FULMAJ)	Approved  07.07.2017
16/01306/LDC Bridge And Bridge Without	7 - 8 Philpot Lane London EC3M 8AA	Details of works to the staircase and associated partitions at ground floor level and details of panelling modification adjacent to the chimney breasts pursuant to condition 4 of planning permission dated 25th August 2016 (reference 16/00515/LBC).	Approved  22.06.2017
17/00260/FULL Bridge And Bridge Without	17-21 Eastcheap London EC3M 1BU	Installation of sprung-wire pigeon deterrent to the cornices, ledges and pediments of the building on the facades overlooking Eastcheap and Philpot Lane.	Approved  22.06.2017
16/01021/FULL Bridge And Bridge Without	23 - 39 Eastcheap London EC3M 1DE	Installation of external lighting on the front elevation to illuminate the upper storey's of buildings.	Approved  07.07.2017
16/01022/LBC Bridge And Bridge Without	23 - 39 Eastcheap London EC3M 1DE	Installation of external lighting on the front elevation to illuminate the upper storey's of buildings.	Approved  07.07.2017
17/00195/ADVT Bishopsgate	Sunshine House 5 - 7 Cutler Street	Installation and display of: (i) One set of illuminated lettering measuring 0.16 metres high,	Approved  29.06.2017

	London E1 7DJ	1.54 metres wide displayed at a height of 2.87 metres above ground level; (ii) two sets of non illuminated lettering measuring 0.7 metres high, 1.25 metres and 0.44 metres wide, displayed at a height of 2.87 metres above ground level.	
17/00607/ADVT Bishopsgate	61 St Mary Axe, 80-86 Bishopsgate, 12-20 Camomile Street, 15-16 St Helen's Place, And 33-35 St Mary Axe (North Elevation Only) London EC2N 4AG	Temporary installation and display of a ground floor shroud/hoarding displayed at heights of between 1m and 8.5m around the perimeter of the development site, facing Bishopsgate, Camomile Street and St Mary Axe, displayed at ground floor level, incorporating 36 non-illuminated adverts.	Approved 04.07.2017
17/00599/PODC Bishopsgate	Site Bounded By Stone House And Staple Hall Bishopsgate Devonshire Row London EC2	Submission of details of the Local Training, Skills and Job Brokerage Strategy pursuant to schedule 3 clause 3.1 of the section 106 agreement dated 01 February 2017 for the planning application reference 14/01151/FULL.	Approved 07.07.2017
17/00496/MDC Bassishaw	Land Bounded By London Wall, Wood Street, St. Alphage Gardens, Fore Street, Fore Street Avenue, Bassishaw Highwalk, Alban Gate Rotunda, Alban Highwalk, Moorfields Highwalk And Willoughby Highwalk, London, EC2	Details of archaeological recording, conservation proposals and removal of vegetation on the City Wall pursuant to conditions 41 (in part) and 53(D) of planning permission dated 30.06.2014 (application number 14/00259/FULL).	Approved 22.06.2017
17/00559/PODC	Land At St Alphage House	Submission of a Interim Travel Plan and Travel Plan pursuant	Approved

Bassishaw	And St Alphage Garden Fore Street London EC2	to clauses 16.1 and 16.3 of the S106 Agreement dated 26th August 2011 of planning permission 14/00259/FULL (dated 26.06.14).	27.06.2017
17/00395/DPAR Billingsgate	Pavement Outside 35 Fenchurch Street London EC3M 3BD	Application for determination under part 16 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) whether prior approval is required for the installation of a telephone kiosk.	Prior approval refused  29.06.2017
17/00396/DPAR Billingsgate	Pavement Outside 30 Fenchurch Street London EC3M 3BD	Application for determination under part 16 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) whether prior approval is required for the installation of a telephone kiosk.	Prior approval refused  29.06.2017
17/00367/FULL Castle Baynard	St Paul's Cathedral St Paul's Churchyard London EC4M 8AD	Replacement of two existing shelters located to the north and south of the Cathedral's Stone Gallery, alteration of two exterior metal access staircases, and associated works.	Approved  21.06.2017
17/00248/FULL Cripplegate	Golden Lane Community Centre Golden Lane Estate London EC1Y 0RJ	Installation of new covering and photovoltaic panels to the roof.	Approved  29.06.2017
17/00249/LBC Cripplegate	Golden Lane Community Centre Golden Lane Estate London EC1Y 0RJ	Installation of new covering and Photovoltaic panels to the roof.	Approved  29.06.2017
17/00464/LDC Cripplegate	Barbican Arts And Conference Centre Silk Street London	Discharge of Condition 3 of Listed Building Consent Ref 15/01268/LBC dated 18th March 2016; comprising details of replacement urinals	Approved  07.07.2017



	EC2Y 8DS	and urinal dividers in male toilets at level -1.	
17/00450/MDC Cornhill	15 Bishopsgate London EC2R 8AY	Submission of an acoustic report for all new plant pursuant to condition 19 of planning permission dated 4th January 2016 (App No14/01251/FULMAJ).	Approved  20.06.2017
17/00440/LBC Cornhill	4-6 Royal Exchange Buildings London EC3V 3NL	Creation of a new entrance within existing window reveal to provide access to retail unit.	Approved  27.06.2017
17/00466/FULL Cornhill	4 Royal Exchange Buildings London EC3V 3NL	Creation of a new entrance within existing window reveal to provide access to retail unit.	Approved  27.06.2017
17/00002/FULL Candlewick	Capital House 85 King William Street London EC4N 7BL	Removal of existing entrance canopy and replacement with a new entrance canopy plus entrance alterations.	Approved  22.06.2017
17/00427/LBC Candlewick	37 Lombard Street London EC3V 9BQ	Repairs and reinstatement of stonework on west elevation.	Approved  04.07.2017
17/00515/MDC Candlewick	32 Lombard Street London EC3V 9BQ	Particulars and samples of materials (glazing spandrels) pursuant to condition 9 (a) (in part) of planning permission dated 21st July 2013 (14/01103/FULL).	Approved  04.07.2017
17/00456/LDC Candlewick	The Olde Wine Shades Public House 6 Martin Lane London EC4R 0DJ	Discharge of conditions 2, 3 and 4 of application 16/007856/LBC detailing treatment of basement walls (condition 2), a scheme for repainting at basement and ground floor level (condition 3) and details for the relocation of the ground floor snug mirror.	Approved  07.07.2017

16/01287/FULL Coleman Street	Cycle Hire Docking Station On Fore Street At The Junction With Moor Lane London EC2	Installation on the footway of a Santander Cycles docking station, containing a maximum of 25 docking points for scheme cycles plus a terminal.	Approved 20.06.2017
17/00297/MDC Coleman Street	56-60 Moorgate, 62-64 Moorgate & 41-42 London Wall London EC2	Details of an Environmental Protection Scheme (demolition) and Environmental Protection Scheme (construction) pursuant to conditions 2 and 3 of planning permission 15/01312/FULMAJ dated 14 February 2017.	Approved 20.06.2017
17/00361/ADVT Coleman Street	City Point 1 Ropemaker Street London EC2Y 9AW	Installation and display of: An externally illuminated building entrance sign measuring 0.5m high by 8m wide, situated at a height of 4.7m above ground floor level.	Approved 20.06.2017
17/00302/ADVT Coleman Street	115 London Wall London EC2M 5QA	Retention of i) one halo illuminated fascia sign measuring 0.46m high by 1.23m wide at a height above ground of 2.37m, ii) one externally illuminated projecting sign measuring 0.6m high by 0.6m wide at a height above ground of 2.4m; and iii) one internally illuminated light box measuring 0.85m high by 4.24m wide at a height of 3.67m above ground level.	Approved 22.06.2017
17/00428/PODC Coleman Street	41- 42 London Wall, London EC2M 5TB	Submission of Highways Condition Survey pursuant to Schedule 3 Paragraph 7.1 of Section 106 Agreement dated 13 February 2017. Associated Planning Application Reference 15/01312/FULMAJ	Approved 04.07.2017
17/00429/PODC Coleman Street	41- 42 London Wall, London EC2M 5TB	Pursuant to Schedule 3 Paragraph 11 of Section 106 Agreement dated 13 February 2017, submission of Draft	Approved 04.07.2017

		Utility Programme dated 20 April 2017 and a Statutory Authority Update Schedule dated April 2017, including Utility Connections (Drawing Ref: S-100, Rev T3) and Electrical Services Containment - Basement Level (Drawing Ref: 2099, Rev T3) Planning Application Reference 15/01312/FULMAJ	
17/00527/PODC Coleman Street	56-60 Moorgate, 62-64 Moorgate & 41-42 London Wall London EC2	Submission of the draft Local Procurement Strategy dated 05 May 2017, pursuant to Schedule 3 Paragraph 2 of Section 106 Agreement dated 13 February 2017. Planning Application Reference 15/01312/FULMAJ	Approved 04.07.2017
17/00217/LBC Cheap	6 Frederick's Place London EC2R 8AB	Application under Section 19 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to vary condition 3 of listed building consent (application no. 15/01302/LBC) dated 9th June 2016 to refer to a revised list of drawings amended to reflect minor alterations to the detailed design of the internal layout.	Approved 22.06.2017
17/00218/NMA Cheap	6 Frederick's Place London EC2R 8AB	Non-Material Amendment under Section 96A of the Town and Country Planning Act 1990 to planning permission 15/01301/FULL dated 9th June 2016 to allow minor internal and external revisions.	Approved 22.06.2017
17/00412/DPAR Cheap	Pavement Outside 86 Cheapside London EC2V 6EB	Application for determination under part 16 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) whether prior approval is required for the installation of a telephone kiosk.	Prior approval refused 29.06.2017
17/00366/FULL	36 - 37 Old	Relocation of the main	Approved

Cheap	Jewry London EC2R 8DD	entrance; alterations to the secondary entrance to create a fully accessible entrance; introduction of a level cycle user entrance; and installation of a new projecting canopy with signage.	07.07.2017
16/00841/FULL Cordwainer	1 Poultry London EC2R 8EJ	Change of use of part of the ground and concourse levels from shop (class A1) use, restaurant and cafe (class A3) use and drinking establishment (class A4) use to create a single unit for a flexible use for either a shop, restaurant and cafe, drinking establishment and assembly and leisure uses (classes A1, A3, A4 and D2) (1,625sq.m) and associated external works.	Approved 20.06.2017
17/00090/LBC Cordwainer	1 Poultry London EC2R 8EJ	Alterations at ground and concourse level to create a single unit at concourse level. Includes the installation of a glazed infill over the rotunda space; creation of new entrance points; and associated works.	Approved 20.06.2017
17/00319/ADVT Dowgate	Cannon Bridge House 1 Cousin Lane London EC4R 3XX	Installation and display of one projecting sign with internally illuminated lettering measuring 0.7 metres wide by 2.2 metres high, displayed at a height of 2.75 metres above ground level.	Approved 22.06.2017
17/00086/FULL Dowgate	Statue O/s Dowgate Hill House 14 - 16 Dowgate Hill London EC4R 2SU	Installation of the 'LIFFE Trader' statue on Dowgate Hill.	Approved 04.07.2017
17/00388/DPAR Farringdon Within	Pavement Outside 50 Farringdon Street London EC1A 2FD	Application for determination under part 16 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) whether prior approval is required for the	Prior approval refused 29.06.2017

		installation of a telephone kiosk.	
17/00493/MDC Farringdon Within	Site Bounded By 34-38, 39-41, 45-47 & 57B Little Britain & 20, 25, 47, 48- 50, 51-53, 59, 60, 61, 61A & 62 Bartholomew Close, London EC1	Details of sewer vents for Phase 3 of the development pursuant to condition 21 of planning permission dated 16 March 2017 (ref: 16/00165/FULMAJ).	Approved  29.06.2017
17/00486/PODC Farringdon Within	Site Bounded By 34-38, 39-41, 45-47 & 57B Little Britain & 20, 25, 47, 48- 50, 51-53, 59, 60, 61, 61A & 62 Bartholomew Close, London EC1	Details of utility connections to the development pursuant to clause 12.1.1 of Schedule 2 of the section 106 agreement, dated 24th July 2015 (App ref: 16/00165/FULMAJ).	Approved  07.07.2017
17/00504/PODC Farringdon Within	160 Aldersgate Street London EC1A 4DD	Submission of an Occupiers Management Plan pursuant to schedule 3 paragraph 12.1 of the section 106 agreement dated 30 April 2015 (planning application reference 15/00086/FULMAJ).	Approved  07.07.2017
17/00433/ADVT Farringdon Without	53 Fleet Street London EC4Y 1BE	Installation and display of: (i) one internally illuminated fascia sign measuring 4.1m(wide) by 0.8m (high) displayed at a height of 3.1m above ground floor level; (ii) one internally illuminated projecting sign measuring 0.91m(wide) by 0.61(high) displayed at a height of 3.07m above ground floor level.	Approved  27.06.2017
17/00384/DPAR Farringdon Without	Pavement Outside 20 - 23 Holborn London	Application for determination under part 16 of Schedule 2 of the Town and Country Planning (General Permitted	Prior approval refused  29.06.2017

	EC1N 2JD	Development) Order 2015 (as amended) whether prior approval is required for the installation of a telephone kiosk.	
17/00385/DPAR Farringdon Without	Pavement Outside 14 - 18 Holborn London EC1N 2LE	Application for determination under part 16 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) whether prior approval is required for the installation of a telephone kiosk.	Prior approval refused  29.06.2017
17/00387/DPAR Farringdon Without	Pavement Outside of 326 - 328 High Holborn London WC1V 7PE	Application for determination under part 16 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) whether prior approval is required for the installation of a telephone kiosk.	Prior approval refused  29.06.2017
17/00468/LBC Farringdon Without	37 Fleet Street London EC4Y 1BT	Internal alterations and refurbishment at ground floor level to the Old Partners' Room.	Approved  04.07.2017
17/00465/ADVT Farringdon Without	Halton House 20 - 23 Holborn London EC1N 2JD	Installation and display of one non-illuminated projecting sign measuring 0.57m high by 0.75m wide located at a height of 2.75m above ground level.	Approved  05.07.2017
17/00487/FULL Farringdon Without	9 - 13 Cursitor Street London EC4A 1LL	Construction of a deck above the flat roof to accommodate 5 no. condensers to be enclosed by a 1.65m high louvred enclosure.	Approved  07.07.2017
17/00409/FULL Langbourn	88 Gracechurch Street London EC3V 0DN	Installation of two air-conditioning condenser units and flue at roof level.	Approved  27.06.2017
17/00410/LBC Langbourn	88 Gracechurch Street London EC3V 0DN	Internal alterations, including installation of lift, in connection with use of part second, third and fourth floors as guest accommodation (7 bedrooms) and installation of two air-conditioning condenser units	Approved  29.06.2017

		and flue at roof level.	
17/00474/FULL Langbourn	21 Lime Street London EC3M 7HB	The use of part of the private roadway for the placing out of tables and chairs associated with the adjacent retail unit (9 sqm).	Approved  07.07.2017
17/00634/MDC Langbourn	21, 21A Lime Street, 8, 10, 10A, 11A & 11B Ship Tavern Passage London EC3	Details of the use of the ground floor retail premises pursuant to condition 17 of planning permission 15/00089/FULL dated 16.04.2015.	Approved  07.07.2017
17/00250/FULLR3 Portsoken	75, 79, 85, 89, 95 & 97 Middlesex Street & 2 & 14 Gravel Lane London E1 7DA	Change of use from shop use (Class A1) (upper level retail storage) to residential use (Class C3) comprising of nine one bedroom affordable flats at podium level and associated external works.	Approved  22.06.2017
17/00439/FULL Portsoken	4 - 6 Gravel Lane London E1 7AW	Installation of a new shopfront, retractable awnings and new high openable windows.	Approved  07.07.2017
17/00434/FULLR3 Tower	London Street, Northern Section, East of Fenchurch Place London EC3R 7JP	Temporary installation of a sculpture, 'Envelope of Pulsation (for Leo)' by Peter Randall-Page, for a temporary period of up to one year to be taken down on or before 01 June 2018.	Approved  20.06.2017
17/00419/FULL Tower	60 Mark Lane London EC3R 7ND	Use of part of ground floor as beauty salon (sui generis) in lieu of permitted Class A3 use (192 sq.m. g/a); installation of external handrails.	Approved  28.06.2017
17/00420/LBC Tower	60 Mark Lane London EC3R 7ND	Internal fit-out at ground floor level in association with use of part of the ground floor as beauty salon (sui generis); installation of external handrails.	Approved  28.06.2017
17/00495/MDC Tower	Bakers Hall 7 - 9 Harp Lane London EC3R 6DP	Details of an acoustic report pursuant to condition 2 of planning permission 15/00227/FULL dated 21 May	Approved  29.06.2017

		2015.	
16/01309/MDC Walbrook	27 - 35 Poultry London EC2R 8AJ	Submission of an Interim Travel Plan pursuant to condition 27 of planning permission 13/01036/FULMAJ dated 03.06.2014.	Approved 29.06.2017
17/00539/MDC Walbrook	15-17 St Swithin's Lane London EC4N 8AL	Details to demonstrate that at least 10% of the bedrooms and suites would be wheelchair accessible pursuant to condition 22 of planning permission dated 24 April 2015 (application number 14/00658/FULMAJ).	Approved 29.06.2017



# Agenda Item 5

<b>Committee(s)</b>	<b>Dated:</b>
Planning and Transportation	25 <sup>th</sup> July 2017
<b>Subject:</b> Valid planning applications received by Department of the Built Environment	<b>Public</b>
<b>Report of:</b> Chief Planning Officer and Development Director	<b>For Information</b>

## Summary

Pursuant to the instructions of your Committee, I attach for your information a list detailing development applications received by the Department of the Built Environment since my report to the last meeting.

Any questions of detail arising from these reports can be sent to [plans@cityoflondon.gov.uk](mailto:plans@cityoflondon.gov.uk).

## Details of Valid Applications

Application Number & Ward	Address	Proposal	Date of Validation
17/00533/FULL Aldgate	117 - 120 Houndsditch, London, EC3A 7BT	Installation of a new shopfront and louvred grille to a window on the rear elevation.	08/06/2017
17/00585/FULMAJ Bassishaw	Garrard House, 31 Gresham Street, London EC2V 7QA	External alterations comprising (infilling of central bay and inset corners, works to facade), extension to existing office building at levels 7 and 8 (2687sq.m), change of use at ground floor level (378sq.m), the creation of ancillary cycle parking and shower facilities at basement level.	12/06/2017
17/00578/FULL Bishopsgate	3 Broadgate, London, EC2M 2QS	Change of use from office (Class B1) to a marketing suite (sui generis) with ground floor retail kiosk (Class A1) and associated refurbishment of building including new external cladding.	06/06/2017
17/00623/FULL Bishopsgate	150 Bishopsgate, London, EC2M 4AF	Application under Section 73 of the Town and Country Planning Act 1990 to vary Conditions 33 and 54 of planning permission 14/001151/FULL dated 02.02.2017 to enable minor material amendments to the approved	19/06/2017

		<p>scheme for alterations to 142- 150 Bishopsgate and 1-17 Devonshire Row (odd numbers), relocation of 1 Stone House Court and redevelopment of Stone House (128-140 Bishopsgate and 77-84 Houndsditch), Staple Hall (87-90 Houndsditch) and 1, 3 and 5 Stone House Court, to provide a mixed use development comprising a luxury hotel, residential accommodation, retail uses (A1 and A3), hard and soft landscaping works including provision of a new public plaza, alterations to vehicular and pedestrian access and highways layout together with ancillary plant, servicing and associated works. The minor material amendments include amendments to elevational detailing, internal layout including mix of residential units, reconstruction of Devonshire Row southern spine wall, alterations to the public plaza and public realm and creation of a ballroom entrance pavilion at the south-west corner of the plaza. (55,286sq.m gea)</p>	
17/00611/FULL Broad Street	<p>Drapers' Hall Throgmorton Avenue, London, EC2N 2DQ</p>	<p>Installation of CCTV security camera on the existing western lantern at the main door to Drapers' Hall in Throgmorton Street. Installation of wrought iron mould (replicating CCTV security camera) on the existing eastern lantern at the main door to Drapers' Hall in Throgmorton Street.</p>	22/06/2017
17/00595/FULL Candlewick	<p>68 King William Street, London, EC4N 7HR</p>	<p>Change of use of room 616 (sixth floor) from office (Class B1) to a flexible use for office (Class B1) or medical clinic (Class D1) (7.5sq.m).</p>	22/06/2017
17/00580/FULL Cheap	<p>6 Frederick's Place, London, EC2R 8AB</p>	<p>Replacement of rear window at first floor level with a door and alterations to existing walkway in lightwell.</p>	08/06/2017
17/00654/FULL Cornhill	<p>Tower 42, 25 Old Broad Street, London, EC2N 1HQ, (Retail Unit 1)</p>	<p>Use of private space for Class A1 purposes and the setting out of three tables and six chairs ancillary to the use of the adjacent retail unit (Total floorspace 10sq.m).</p>	26/06/2017
17/00593/FULL	<p>6 - 7 Ludgate</p>	<p>Change of use at part ground floor</p>	05/07/2017

Farringdon Within	Square, London, EC4M 7AS	and part lower ground floor levels from part B1 and part D1 use to a flexible use for either Class A1/A2/A3/B1/D1 or D2 use (232sq.m GIA).	
17/00536/FULL Farringdon Without	191 Fleet Street, London, EC4A 2NJ	Installation of a shopfront.	15/06/2017
17/00571/FULL Farringdon Without	Middle Temple Hall, Middle Temple Lane, London, EC4Y 9AT	External alterations to include (i) the guttering and rainwater discharge systems (ii) replacement of roof covering (iii) replacement of copper detailing at roof level with lead (iv) installation of a new mansafe system.	19/06/2017
17/00639/FULL Langbourn	Retail Unit A, XL House, 23 Lime Street, London, EC3M 7HB	Change of use of the premises from a shop (Class A1) to flexible mixed use shop (Class A1), cafe (Class A3) and hot food take away (Class A5) (sui generis) or retail use (Class A1).	26/06/2017
17/00576/FULL Lime Street	Lloyds Building, 1 Lime Street, London, EC3M 7DQ	Installation of a ramp to provide access to the building.	06/06/2017
17/00582/FULL Lime Street	1 Great St Helen's, London, EC3A 6AP	Application under S73 of the Town and Country Planning Act 1990 (as amended) to delete condition 2 and vary condition 3 of planning permission 15/01317/FULL dated 08.03.2016 to enable an amendment to the cladding material for the west elevation.	16/06/2017
17/00591/FULL Portsoken	9A Aldgate High Street, London, EC3N 1AH	Installation of new shopfronts, retractable canopies and security shutters.	26/06/2017
17/00431/FULL Tower	10 Trinity Square, London, EC3N 4AJ	Change of use of 11 permanent residential units (Class C3) on 4th, 5th and 6th floors to short-term lets (less than 90 consecutive nights).	02/06/2017
17/00310/FULL Walbrook	The Bank Of England, Threadneedle Street, London, EC2R 8AH	Extension to the termination of the existing roof level generator flues by two metres in height.	15/06/2017

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## PLANNING AND TRANSPORTATION COMMITTEE REPORT

### Points to Note:

- There are 14 Public Lifts/Escalators in the City of London estate. The report below contains details of the one public lift that was out of service more than 95% of the time.
- The report was created on 11<sup>th</sup> July 2017 and subsequently since this time the public lifts or escalators may have experienced further breakdowns which will be conveyed in the next report.

Location And Age	Status as of  11/07/2017	% of time in service between 21/06/2017 and 11/07//2017	Number of times reported Between 21/06/2017 and 11/07//2017	Period of time Not in Use Between 21/06/2017 and 11/07//2017	Comments  Where the service is less than 100%
Speed House SC6459146  Page 31	IN SERVICE	65.2%	9	192	<ol style="list-style-type: none"> <li>1. A problem with the autodialler meant that lift could not be in service for Health and Safety reasons, this fault was recitified within 36 hours.</li> <li>2. An engineer was called to site and identified that their was no power to the lift. Further investigation found the power supply to be faulty and it subsequently took 156 hours to rectify due to severity of the fault.</li> </ol>

*Additional information*

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<b>Committee:</b>	<b>Date:</b>
Planning and Transportation	25 July 2017
<b>Subject:</b> Emperor House 35 Vine Street London EC3N 2PX  Demolition of the existing buildings and redevelopment to provide a new mixed use building, comprising offices (Class B1), incubator offices (Class B1), a shop/ cafe unit (Class A1), student/ incubator tenant accommodation and ancillary facilities (619 rooms) (sui generis), and exhibition space associated with a Scheduled Ancient Monument (sui generis), arranged over basement, lower ground, ground and parts 6, 12, 13 and 14 upper storeys plus plant; including a new pedestrian route, creation of new public realm; associated parking, servicing, and ancillary plant and storage; and other associated works.	<b>Public</b>
<b>Ward:</b> Tower	<b>For Decision</b>
<b>Registered No:</b> 17/00239/FULMAJ	<b>Registered on:</b> 24 March 2017
<b>Conservation Area:</b>	<b>Listed Building:</b> No

### Summary

The proposed development, broadly utilising the high quality design of a previously approved office development, would regenerate the site, removing the existing building and delivering a mixed use development which would enliven this eastern part of the City and contribute to the City's offer of student accommodation, heritage assets/cultural facilities and employment floorspace through the delivery of:

- A 619 room purpose built student housing;
- An exhibition space, curated in consultation with the Museum of London providing access to the Roman Wall, a designated ancient monument;
- A café with direct views over the Roman Wall, available for use by the

general public;

- Office accommodation (Grade A); and
- 911sqm of Incubator accommodation to promote the development of start-up businesses.

Alongside these uses, the development would deliver a new pedestrian access route through the site which would provide unique views over the Roman Wall and an enhanced public realm through on-site landscaping. The contemporary building design would integrate a range of measures to improve sustainability and enhance environmental performance. The high quality building design would reveal the existing ancient monument on site and would enhance the setting of the neighbouring Grade II listed building. Active frontages and proposed landscaping at ground floor level would enliven and enhance the area.

The redevelopment constitutes a sustainable development, which would deliver a number of economic, social and environmental improvements as required by the National Planning Policy Framework and is recommended for approval.

### **Recommendation**

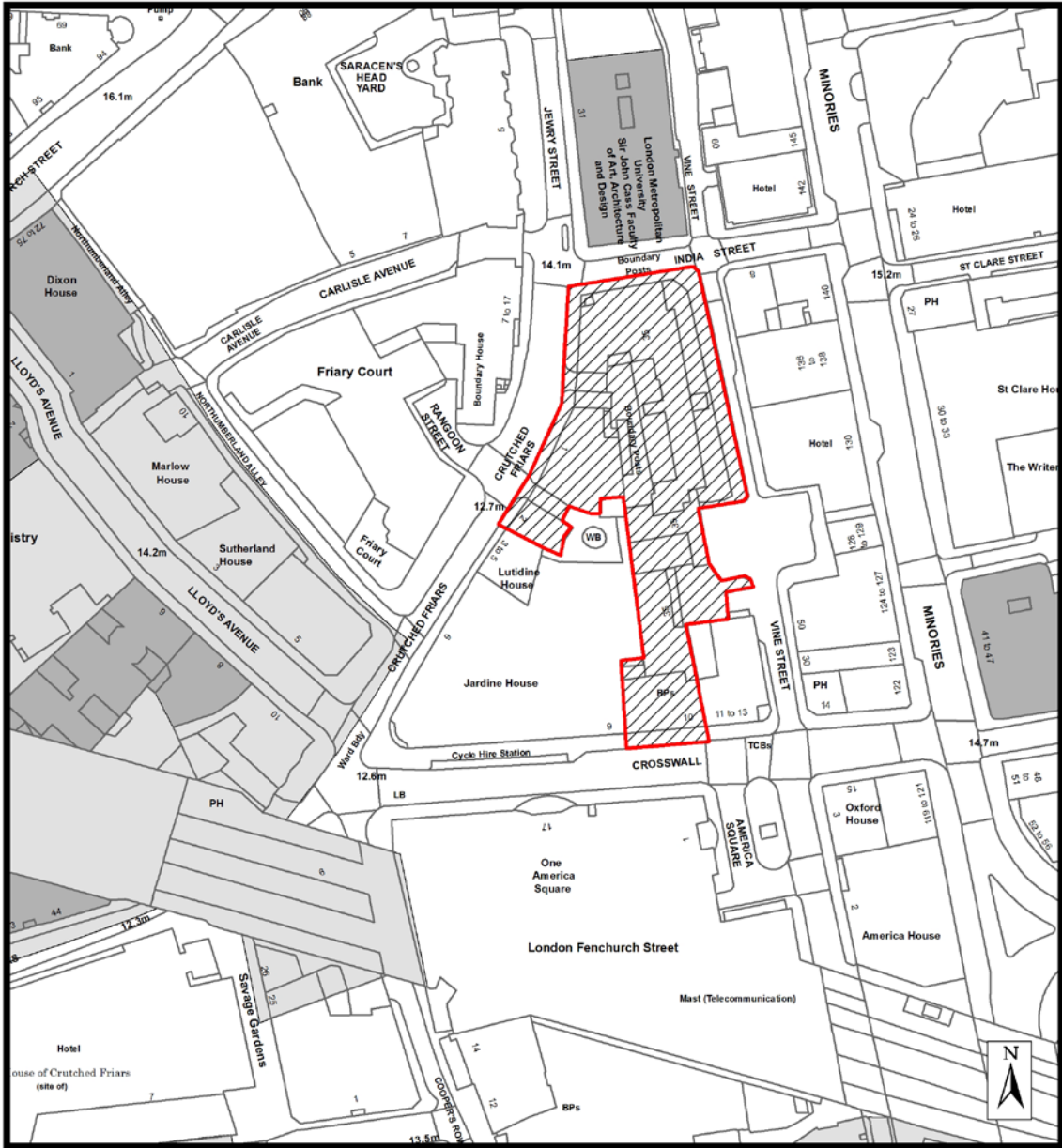
Recommendation

(1) That planning permission be granted for the above proposal in accordance with the details set out in the attached schedule subject to:

planning obligations and other agreements being entered into under Section 106 of the Town & Country Planning Act 1990 and Section 278 of the Highway Act 1980 in respect of those matters set out in the report, the decision notice not to be issued until the Section 106 obligations have been executed;



# Site Location Plan




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**ADDRESS:**

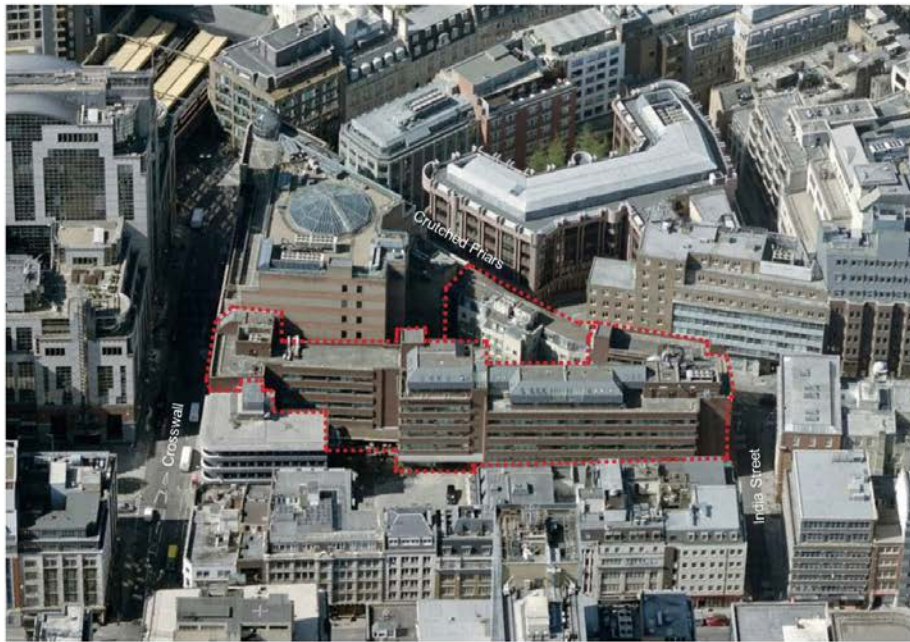
Emperor House, Vine Street

CASE No.  
17/00239/FULMAJ

-  **SITE LOCATION**
-  **LISTED BUILDINGS**
-  **CONSERVATION AREA BOUNDARY**
-  **CITY OF LONDON BOUNDARY**



DEPARTMENT OF THE BUILT ENVIRONMENT





## **Main Report**

### **Site Description and Relevant Planning History**

1. The site is bound by India Street to the north, Vine Street to the east, Crosswall to the south and Jewry Street and Crutched Friars to the west. The buildings comprise six storey Roman Wall House and part five, part six storey Emperor House, which includes Emperor House south, to the southern edge of the site fronting Crosswall. The buildings are currently vacant but previously accommodated the following uses:
  - B1(a) offices 11,738sqm (GIA)
  - A3/A4 restaurant 296sqm
  - Nightclub (sui generis) 276sqm at basement level.
  - 683sqm ancillary space
2. The site is immediately to the south of the Grade II listed Sir John Cass College (now occupied as David Game College) Jewry Street. The Lloyds Avenue Conservation Area and Fenchurch Street Station Conservation Area are in the vicinity of the site and the development would be visible from these.
3. Excavations undertaken as part of the 1970s construction of Emperor House revealed an 11m length of the Roman City Wall which was preserved in situ in the basement of Emperor House. The remains are designated as a Scheduled Ancient Monument. At present there is no public access to it.
4. The surrounding area is characterised by commercial land uses such as offices, restaurant and cafes as well as a number of serviced apartments, residential properties and hotels. The serviced apartments, residential properties and the Chamberlain Hotel are mainly located on Vine Street and Minories.

### **Proposal**

5. The application, submitted by Urbanest UK Ltd is for:
  - Demolition of the existing buildings and redevelopment to provide a new mixed use building comprising:
  - offices (Class B1) (6,806sqm GIA) arranged over average floorplates of 350-500 GIA sqm;
  - incubator offices (Class B1) (911sqm GIA);
  - shop/ cafe unit (Class A1) (330sqm GIA);
  - 619 bedrooms of student/incubator tenant accommodation (645 bed spaces) (17,261sqm GIA);
  - associated ancillary facilities (sui generis) and exhibition space associated with a Scheduled Ancient Monument (sui generis)

(399sqm GIA); and

- associated soft landscaping on Jewry Street and Vine Street.
6. The development would comprise basement, lower ground, ground and parts 6, 12, 13 and 14 upper storeys plus plant (60.275AOD); including a new pedestrian route, creation of new public realm; associated parking, servicing, ancillary plant and storage; and other associated works (26,854 GIA).

### **Relevant Planning History**

7. Planning permission was granted on 30 June 2014 for:
- Demolition of existing buildings and redevelopment of the site to provide an office (Class B1) and retail (Class A1/A3/A4) building comprising basement, lower ground, ground and ten upper floors, together with associated works (Ref.13/00166/FULMAJ).
8. This application largely utilises the previously approved building design, bulk, height and mass with some minor modifications. The proposed development now incorporates Emperor House south, also known as The Crosswall Building. This did not form part of the previous application.
9. There is an existing Urbanest scheme at 52 Minories, approved in December 2008 which provides 177 student bedspaces. (Ref. 08/00738/FULMAJ).

### **Consultations**

10. The application has been submitted following internal pre-application discussions, a number of public exhibition meetings with residents and Member briefings.
11. The views of other City of London departments and external consultees have been taken into account in the preparation of this redevelopment scheme and some detailed matters remain to be dealt with under conditions and the Section 106 Agreement.
12. The following comments have been received:
- Tower Hamlets raised no objections.
  - Thames Water raised no objections but recommended informatives which have been included with the recommendation.
  - Transport for London has requested a £10,000 financial contribution to wayfinding signage. The applicant has agreed to this and it is incorporated into the S106 Agreement. Concerns have been raised over:
    - Access to cycle parking

- Quantum of cycle parking owing to the proposed provision of folding bikes
13. It was recommended that a financial contribution of £210,000 was made towards the Mayor's Cycle Hire Scheme. These matters are addressed in the highways section of this report.
  14. Historic England raised no objections, noting that the scheme is located on a site incorporating the Scheduled Monument, London Wall: section in Roman Wall House, Crutched Friars (SM LO26F). It is noted that the scheme has positive elements regarding the conservation, protection and public display of the remains of London Wall.

### **Neighbour Representations**

15. The application has been advertised by site and press notices and letters sent to neighbouring residential properties. Letters of objection have been received from four residents. Copies are attached to this report. The grounds of objection are summarised as follows:
  - Development scale should better reflect the character of the surrounding area. The scale of the proposed building would be harmful and does not take into account the needs or vision of the community.
  - The use would create an undesirable surge of students, resulting in consumer pressure and would be contrary to City of London policy to promote and retain office space.
  - Detrimental loss of light, contrary to BRE Guidance and a window has been omitted in the Delva Patman Redler report (Nov 2013).
  - Noise and disturbance from the proposed new pedestrian passageway.
  - Roman Wall House is in keeping with the historic character of the surrounding streets and should not be demolished.
  - The passage/public link should be removed. If retained, conditions should be included about noise and cigarette smoke generated.
  - Developer should improve the area by contributing money towards public art.
  - The benefits of students living in an area is greatly outweighed by the harm – noise, disrespect of local amenities and community, increased number of criminals who enter the neighbourhood to prey on naïve students.
  - The proposed passage would result in reduced privacy, increased pedestrian noise, increased traffic noise, noise from the proposed gate to restrict access and increased cigarette smoke.
  - The proposed public realm does little to contribute to the developing diversity and beauty of Aldgate.

- Information submitted with the application indicates that the office space would be viable.
  - There are no plans to provide the necessary support services for the increase in population numbers.
16. These matters are addressed in the assessment of the application. However, the comment regarding the Delva Patman Redler report (Nov 2013) is not addressed directly. That is because the report referred to does not form part of the application documentation for this application. The report was submitted in support of the previously approved office development scheme.
17. Eight letters of support have been received from: the Museum of London, Entrepreneurship Institute Bush House Aldwych, Kings College London (two letters), David Game College, Newcombe House, Surveyor to the Saddlers' Company (John Harding, Daniel Watney LLP), BCDH Capital Holding FC Sarl (Freeholders of Friary Court, 65 Crutched Friars) and Go Native (occupier of 8 India Street). Copies are attached to the report. Reasons for support are summarised as follows:
- Urbanest are recognised for running high quality, well managed facilities with well trained and diligent staff. This would complement King's College London's facilities.
  - Support the long term amenity benefits the proposal would provide, because the proposed accommodation would deliver high quality student facilities, enabling England to better compete with education providers globally.
  - The Roman Wall exhibition would enhance local historical attractions and link Tower Hill with landmarks in and around Aldgate.
  - The development will add to the vitality of the area and assist the growth of education and business.
  - The redevelopment would be a valuable enhancement to this part of the eastern area of the City, replacing the existing obsolete office building and enlivening the area.
  - The student population would make a helpful contribution to the economic and physical vitality of the Square Mile.
  - The proposed use would complement nearby surrounding uses.
  - Proposals represent a high quality design, which would enhance the area.
  - The provision of the Roman Wall exhibition and incubator office accommodation should be commended.
18. Two neutral letters have been received from PCU3ED. The correspondence supports the principle of the proposed development but raises concerns about the development during construction and fire safety matters. These matters are dealt with through the Construction Logistics Plan and through the Building Regulations Process.

19. Notwithstanding this, the applicant has advised that the design does not include any cladding panels with a combustible core. The proposed façade would incorporate appropriate firestopping and cavity barriers and would be designed to comply with the Building Regulations. Consultation has been undertaken with the City's Building Control department and ongoing review will be incorporated at the next design stage.

### **Policy Context**

20. The development plan consists of the London Plan and the City of London Local Plan. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix A to this report.
21. There is relevant City of London guidance, including the Office Use SPD and Planning Obligations, GLA supplementary planning guidance in respect of Planning Obligations and Sustainable Design Construction and Government Guidance contained in the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG).

### **Considerations**

22. The Corporation, in determining the planning application has the following main statutory duties to perform:-
  - To have regard to the provisions of the development plan, so far as material to the application, any local finance considerations so far as material to the application, and other material considerations. (Section 70(2) Town & Country Planning Act 1990);
  - To determine the application in accordance with the development plan unless other material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004);
  - To pay special attention to the desirability of preserving or enhancing the character or appearance of the Lloyds Avenue Conservation Area and Fenchurch Street Station Conservation Area (S 72(1) Planning, Listed Buildings and Conservation Areas Act 1990), which adjoin the site.
23. In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990); in this case the duty is to have special regard to the desirability of preserving the settings of listed buildings.
24. The effect of the duties imposed by section 66(1) and 72(1) of the Planning (Listed buildings and Conservation Areas) Act 1990 is, respectively, to require decision-makers to give considerable weight and



importance to the desirability of preserving the setting of listed buildings and to the desirability of preserving or enhancing the character or appearance of a conservation area.

25. In respect of sustainable development the NPPF states at paragraph 14 that *'at the heart of the NPPF is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision taking... for decision taking this means: approving development proposals that accord with the development plan without delay...'*
26. There are policies in the Development Plan which support the proposal and others which do not. It is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.
27. In considering the planning application before you, account has to be taken of the statutory and policy framework, the documentation accompanying the application and the views of both statutory and non-statutory consultees.
28. It is necessary to assess all of the policies and proposals in the Development Plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.
29. The principal issues in considering this application are:
  - The economic benefits of the scheme;
  - The suitability of the proposed land uses;
  - The appropriateness of the bulk, massing and design of the proposals;
  - The impact of the proposal on heritage assets;
  - Servicing, transport and impact on public highways;
  - The impact of the proposal on nearby buildings and spaces, including environmental impacts such as daylight and sunlight, energy and sustainability;
  - The impact of the development on the residential amenity of neighbouring properties and
  - The extent to which the proposals comply with Government policy advice (NPPF) and with the relevant policies of the Development Plan.

### **Land Use/Principle of Development**

30. The proposed redevelopment of the site would deliver a mix of land uses. In assessing the application it is necessary to consider the acceptability of the loss of existing uses and the suitability of the proposed uses on the site.
31. Table 1 below compares the existing and proposed floor areas by use class on the site:

<b>Land Use</b>	<b>Existing sqm (GIA)</b>	<b>Proposed sqm (GIA)</b>	<b>Net Change sqm (GIA)</b>
Office (Class B1)	11,738	6,806	-4,932
Incubator Office Accommodation (Class B1)	0	911	+911
Student Accommodation (Sui Generis)	0	17,261	+17,261
Retail	296	330	+34
Nightclub (Sui-Generis)	276	0	-276
Exhibition (Sui-Generis)	0	399	+399
Ancillary Space	683	1,147	+528
<b>Total</b>	<b>12,993</b>	<b>26,854</b>	<b>+13,861</b>

**Table 1: Existing and Proposed Floor Areas**

32. The Local Plan supports a variety of land uses. However, the primary focus of the Local Plan is to promote the delivery of a world class business city and the protection and provision of office floorspace, with other uses considered to be complementary. Local Plan policies CS1 and DM1.1 seek to protect existing office accommodation and require proposals for the loss of existing offices to be supported by a viability assessment which considers the long term viability of the building or site for office accommodation. The application is supported by a viability assessment which considers: the viability of refurbishing the existing office accommodation; the viability of redeveloping the site for offices assuming that this scheme matches an extant office permission on the site; and the viability of delivering a greater quantum of office floorspace alongside the student accommodation. The applicant's viability report has been independently reviewed by a consultant appointed by the City Corporation in line with RICS best practice guidance and codes of conduct.
33. The existing vacant office building was built in the 1970s to a specification no longer suitable for contemporary office occupiers. A major refurbishment of the existing buildings would be required to bring them up to the standard necessary to meet current office demand. The applicant's viability appraisal indicates that the likely achievable rents on

a refurbished scheme would not be sufficient to generate a viable return to a developer given the cost of undertaking the refurbishment works. The City's viability consultants have reviewed the assumptions behind the applicant's appraisal and have agreed with the applicant that it would not be viable to refurbish the existing office buildings.

34. The Local Plan requires developers to demonstrate that existing office buildings would not be viable in the longer term, The Office Use Supplementary Planning Document provides further detail and indicates that developers should not only consider the potential for refurbishment of existing buildings, but should also consider whether redevelopment to provide new office accommodation would deliver a viable office scheme. There is an extant planning permission on this site for the demolition of existing buildings and redevelopment of the site to provide an office (Class B1) (25,078sqm) and retail (Class A1/A3) (361sqm) building comprising basement, lower ground, ground and ten upper floors, together with associated works. (25,439sq.m GEA). The applicants have considered whether this development would provide a viable office scheme under the terms of the policy. Their viability assessment concludes that the potential return to a developer would be insufficient to support this development. The City's viability consultants have appraised the applicant's viability study, including the projected office rents and build costs. They consider that the applicant's estimated rents are potentially too conservative and that construction costs may have been over-estimated. However, even allowing for this, the City's consultants conclude that the extant scheme would generate a profit on cost of 12.66%, which is considered to be substantially below the 20% margin expected in current market conditions, and the scheme is therefore unviable.
35. The proposed development provides a student housing scheme, but includes B1 office floorspace targeted at small and medium sized firms and the provision of incubator space for start-ups. To minimise the potential loss of office accommodation, the applicant was asked to consider the viability of increasing the level of office floorspace and reducing the size of the student housing element. The viability appraisal has considered a 'counterfactual scheme', in which the total office floorspace would increase to the level in the existing buildings with a consequent reduction in the number of student bedrooms to 423. The appraisal concluded that increasing office floorspace would reduce the viability of the scheme and that the originally proposed mix of student housing and offices was the optimum that could be delivered. The City's consultants have reviewed this element of the appraisal and have indicated that the potential profit on cost from increasing the office content would be just under 15%, below the target rate of 20% the consultants consider necessary for a mixed use scheme of this type. They conclude that a counterfactual scheme, with a higher office content would therefore also be unviable.

36. Notwithstanding the above, the applicant has explored the opportunity of increasing office floorspace at the site by increasing the floorplates. A modest increase in floorspace could be accommodated by:
- Removing the pedestrian through route
  - Reducing the size of the triple height exhibition space
  - Removing the amenity space and projecting the building further forward on Jewry Street
37. Officers consider that the harm that would be caused by the removal of these elements would not be outweighed by the benefit of the modest increase in office floorspace that could be achieved.

### **Office Accommodation**

38. The proposed 6,806sqm GIA office building would be built over 13 floors (including ground floor), with a small roof terrace at 10th floor level, facing north and would result in a loss of 4,932sqm (GIA), 2,359sqm (NIA) of existing vacant office accommodation. The office would have a separate, set back entrance to the north of the site, from India Street to create an attractive public realm area and enhance the setting of Grade II Sir John Cass College (now David Game College). The space has been designed to be particularly attractive to SMEs, with flexible, open plan floorplates of 350-500sqm GIA per floor. It is anticipated that the office would be multi-let and could potentially accommodate 12+ SME companies. The space has been designed with floor to ceiling glazing on three sides, delivering high levels of natural light and dedicated cycle storage and shower/changing facilities.
39. The development would deliver in addition dedicated incubator office accommodation (911sqm). Urbanest have had success in creating such facilities on two other schemes they have delivered in London but this would be the first of its kind in the City and would be located at part ground and part lower ground floor levels, with a dedicated entrance on Crosswall. This space would have direct views of the Roman Wall exhibition space with access to an internal courtyard and would be fitted out to the same standard as the office space. The space would be constructed and funded by Urbanest and thereafter, provided at a peppercorn rent, meaning that the accommodation would be available to businesses which could not otherwise locate within the City of London. It is proposed that the incubator space would be occupied by King's College London Entrepreneurship Institute through 'The King's 20 Accelerator', a programme run by the Entrepreneurship Institute, which provides financial support to the 20 brightest start-up ventures each year. The programme is open to Alumni of the University from up to the previous seven years. It is proposed that the incubator space would provide co-working office space and ancillary support and resources for these start-up ventures and could accommodate approximately 100 people. The most recent cohort includes ventures from FinTech, MedTech, Education and Media & Consumer Goods. The applicant has

also committed to providing up to 59 rooms to be made available to the incubator occupiers to enable them to live and work in the City. It is proposed that the rooms would be made available for 51 weeks of the year, with the tenancy of the accommodation matching that of the incubator space, anticipated to be 12-18 months. The details of how the incubator space and associated accommodation would be secured through the S106 agreement.

### **Student Accommodation**

40. In considering the student housing element, regard must be had to the need for student housing, the suitability of the site for delivering student housing and the quality of accommodation that would be delivered.
41. The proposal would deliver 619 rooms (645 bed spaces) of purpose built student accommodation with ancillary plant and accommodation, including a laundry room and a common room. The accommodation would be provided over 14 floors above ground floor level, with 6 floors of student accommodation to Emperor House south, 14 floors to the Vine Street block and 13 floors on Jewry Street. The 619 rooms would provide a mix of bedroom types including studios, en-suite clusters, non en-suite clusters, and twin bedrooms, with 10% proposed to be wheelchair accessible/adaptable. The proposed design and layout would deliver high quality student accommodation. The accommodation would be for students attending King's College London, who have signed an agreement with the applicant for a 10 year period. This link or with another identified University would be secured by the S106 Agreement in order for the development to be in accordance with London Plan Paragraph 3.53B.
42. The London Plan (2016) states that London's universities make a significant contribution to its economy and labour market (Policies 3.18 and 4.10) and states that it is important that the attractiveness and potential growth of Universities is not compromised by inadequate provision for new student accommodation. The London Plan estimates that there will be a requirement for 20,000-31,000 student accommodation places over the 10 years to 2025 and recognises that the provision of specialist student accommodation (as proposed here) is necessary to meet the need and to reduce the pressure on other elements of housing stock currently occupied by students, especially in the private rented sector (London Plan 2016 paragraph 3.52).
43. The City of London Local Plan recognises that a thriving residential community contributes to the City of London's vitality and makes it livelier and safer outside working hours. The Local Plan identifies clustered locations for the delivery of future housing developments. The application site is located 'near to' the Mansell Street residential cluster and policy DM 21.1 identifies the area as suitable for the provision of new residential accommodation, including student accommodation, to sit alongside commercial and other land uses. There is a need for student accommodation and this site offers a suitable location for its delivery.

The provision of 619 rooms of student accommodation would meet the City's Annual Targets for a period of four years, which is considered to be a substantial benefit of the proposal.

44. Urbanest have indicated that the growing demand for purpose built student accommodation and the agreement with King's College London to occupy the site mean there is a quick development timescale, with commencement on site anticipated for autumn 2017 and completion and occupation by September 2021.
45. The supplementary information submitted with the application, including the Student Management Plan, indicates that the site would be well managed. Staff would be on site 24/7 to oversee the running of the accommodation and ensure that students do not congregate outside the building. Running the site in accordance with the Student Management Plan would ensure that the development would not detrimentally increase the current levels of noise and disturbance in the area and thereby protect residential amenity.
46. The applicant has indicated that the student accommodation would employ approximately 30 full time staff to manage the facility. From experience on other sites within London, Urbanest has indicated that staff are typically from the local area.
47. The mix of uses, combined with the management of the student accommodation would ensure that the development would be in accordance with Local Plan Policy DM 21.7 (Student housing and hostels).

### **Café/Shop**

48. A café would be located on ground and lower ground floor levels, accessible from a dedicated entrance on Vine Street as well as from the student accommodation and incubator space. The café would overlook the Roman Wall exhibition space and could be made available for events associated to the Roman Wall in the evening. The facility is considered to be a complementary facility to the office, student accommodation, Roman Wall Exhibition and incubator space. Its delivery would be in accordance with Local Plan policy DM 20.3.
49. The site previously incorporated a wine bar/restaurant and a night club located at basement level. During pre-application discussions, the replacement of these use classes was considered but it was concluded that this would have the potential to give rise to greater noise and disturbance to neighbouring properties and that an A1 use would be more appropriate.

## **Roman Wall**

50. The buildings on the site incorporate a significant section of the Roman and medieval London defensive wall (11m), which is a scheduled ancient monument. The monument consists of the wall, foundations of a former bastion or tower attached to it and possibly elements of the original Roman defensive ditch. The monument is within the modern party wall between the two properties and is a visible feature in the basements of Emperor House and Roman Wall House. It is one of the locations identified in the Museum of London 'London Wall Walk' and marked by a blue ceramic Wall Walk plaque. The 2nd century wall survives to a height of 2 metres above the Roman ground level and the later, 4th century, rectangular bastion extends 5.4 metres from the face of the wall. The monument is a good example of Roman construction techniques and is well preserved.
51. The scheme would create an attractive exhibition space, curated in partnership with the Museum of London provided access to the Roman Wall. The space would be located at the basement of the building and would be a triple height space, accessible from an entrance on Jewry Street and from the proposed café. It would be visible 24/7 through a glazed wall from the new pedestrian link route running from Jewry Street to Vine Street, with the line of the Roman Wall marked on the pavement. The exhibition space would be open seven days a week, free of charge and would provide a new cultural and visitor attraction within the City. It is proposed that the space could be used for events, sponsored or managed by; Urbanest UK Ltd, City of London Corporation, or King's College London (or other University partner). Each sponsor or manager would be limited to 10 events, with no more than 40 events per year. The space would be made available for school visits on Wednesday mornings. Details of this would be secured by S106 agreement.
52. The cost of delivering the exhibition space would be £10-15 million, in addition to the on-going running and insurance costs and is considered to be a positive contribution and substantial benefit to the City of London which would preserve, protect, safeguard and enhance an ancient monument in its setting, in accordance with policies CS12 and DM 12.4. Furthermore, the provision of an exhibition facility would deliver a very high quality, cultural visitor attraction, which would increase awareness of the City's cultural heritage assets, in accordance with policy CS11.

## **Design**

53. The proposed buildings comprise 14 storeys at ground floor and above, with two basements. Plant is incorporated within the building at 14th floor level and in the basement. The facades would be predominantly glazed in a curtain wall system. Photovoltaic panels and green roofs would be incorporated into the proposal.

54. The overall design of the building, including its height, bulk and massing were originally considered for an office development at the site, consented in 2014 (Ref. 13/00166/FULMAJ).

### Bulk, Height and Massing

55. The height, bulk and mass of the building corresponds with the extant planning permission and was at that time informed by a number of considerations which have not altered since that time. The proposal is designed to ensure that the development would not harm the views of the Tower of London from the key vantage points from the south bank of the river and from Tower Bridge and from within the Tower itself.
56. At 14 storeys (60.275AOD), the scheme would be taller in relation to its immediate neighbours which vary in height from four to eight storeys. The scheme would have a typical floor to floor height of 3.3m in the office space and 2.85m in the student accommodation. Consequently, the office building would be ground plus 11 storeys and the student accommodation ground plus 13, whilst fitting within the envelope of the extant permission. The proposed height of the building continues to be considered appropriate for the following reasons:
- The site is at the junction of three roads which could accommodate a building with more prominence and scale to give robust support to this corner. Jardine House on the western end of the street block currently fulfils a similar role as it rises towards the corner. There are a number of taller buildings in the surrounding area, such as America Square to the south and buildings on Minorities to the east.
  - In comparison with the existing building, the development line would be brought forward by 3m which would extend over the existing hard landscaped area on Vine Street. This area makes little contribution in townscape terms and appears incongruous, particularly given the line of the building on the opposite side of Vine Street, close to the edge of the pavement. The proposed re-alignment of the building line would ensure a better sense of definition to Vine Street (which was historically the case) as well as re-defining and enclosing the square as a coherent urban space.
  - On the corner of Jewry Street and India Street, the proposal includes an attractive area of public realm.
57. The proposed height and bulk of the building is considered appropriate.

### Architectural Approach

58. The design of the scheme is characterised by the interplay between the dynamic curving roof form on Vine Street and the strong 'bookend' elevation on India Street and its distinctive arched roof profile. Despite the irregular shape of the site, the various elements complement each other resulting in an appropriate sense of architectural unity for the building.



59. The design of the curved roof is effective in minimising the bulk of the building in views along Vine Street and the eaves line of the curved roof would relate satisfactorily with the scale of buildings in Vine Street. The northern corner of the building is cut away, which would result in a more dynamic, vertically proportioned north elevation and would break up the bulk of the building on the corner of Vine Street and India Street.
60. The curved roof form would result in a strong visual termination of the building and would enclose and conceal plant. The building's maintenance units would be set within the western roof. Conditions have been recommended to ensure that these are concealed from view.
61. The building would make a 'bookend' statement to India Street. At this point, the north façade cantilevers over the principal office entrance, creating a small pedestrian piazza; the generous 8.1m height of this space would mean that the building would not appear over-bearing on this narrow street.
62. The Vine Street elevation is set back at its southern end, breaking down the scale of this elevation and providing a clear and convincing definition to the square on Vine Street.
63. The ground floor elevations would be glazed resulting in a vibrant frontage.
64. The building would include large elements of glazing, particularly to the office development. There would be fritting at lower levels and to the Vine Street elevation of the office building in order to provide privacy. Louvres are proposed to the elevations to provide solar shading. The Student Accommodation would have a slightly adapted design from the office accommodation and previously approved development because of reduced floor to ceiling heights and would incorporate glazing, fritting, louvres and perforated aluminium panels which would complement the design of the office building.
65. The new uses proposed for the site have resulted in some design amendments to the consented scheme. Namely:
  - Student accommodation requires a shallower plan form and a new slot through the centre of the scheme with a glazed link bridge.
  - A new vertical design, facing onto the Jewry Street approach.
  - Incorporation of proposed 7 storey Emperor House South/Crosswall building.
  - New pedestrian route at ground level.
  - New landscaped space on Jewry Street.
  - Review of façades.
66. The Emperor House South/Crosswall building has been incorporated into the scheme with six storeys of student accommodation above the incubator entrance off Crosswall. The elevations follow the principles set out in the main building but on a smaller scale, using the same material palettes.

## The London Views Management Framework and Protected Vistas

67. Policy CS13 of the City's Core Strategy seeks to implement the Mayor's London View Management Framework (LVMF) SPG, to manage designated views of strategically important landmarks (St Paul's Cathedral and the Tower of London), river prospects, townscape views and linear views. The site falls outside the Protected Vistas.
68. Verifiable wire-line outlines have been submitted to ensure a thorough assessment of the proposal's wider impact on two key LVMF views, from the area around City Hall and from Tower Bridge, both focussing on the Tower of London. In these views, the scheme would be almost completely concealed from view. The proposal would not harm these or other LVMF viewpoints.

## Setting of the Tower of London World Heritage Site

69. The proposal has been assessed in relation to its impact on the key relevant views from and to the Tower of London. The development would be almost wholly concealed from view, located behind existing building on the skyline. The proposal would not harm the setting, appreciation of or the Outstanding Universal Value of the Tower of London World Heritage Site.

## Impact on the setting of Listed Buildings

70. Policy CS12 of the Local Plan seeks to safeguard the City's listed buildings and their settings. The development is directly opposite the Grade II listed Sir John Cass College (David Game College), a red brick and Portland stone faced building of 1899 (architect, A W Cooksey). The proposal would not harm the setting of this building. Although much taller than the six storey listed building, it would not be over-scaled or overbearing in relation to it. The development would provide a prominent backdrop to the listed building in views southwards along Crutched Friars. The relationship of modest scaled historic buildings, viewed against taller modern buildings is characteristic of this part of the City and the classical gravitas of the listed building would ensure it remains a prominent listed building on Vine Street.
71. Moving the building line on Vine Street eastwards would result in the south elevation of Sir John Cass College (David Game College) being partly obscured in views northwards along Vine Street. Historically the building line of Vine Street was further east and Sir John Cass College would have been sited originally in a tight grain of comparatively narrow streets. In view of this and of the better sense of enclosure and definition of Vine Street resulting from the proposed realignment of the east elevation, the impact of the development obscuring more of the south elevation of the listed building in views along Vine Street is considered acceptable.

72. From the Monument, a listed building and Scheduled Ancient Monument, the proposal is located a considerable distance to the east and would not be at a height or have a visual impact which would harm views of any important landmarks or other designated or undesignated heritage assets viewed from the Monument. In addition, the proposed development would not harm views of or an appreciation of the Monument from surrounding viewpoints.

#### Impact on the setting of Conservation Areas

73. Policy CS12 of the Core Strategy seeks to preserve and enhance the City's Conservation Areas. The development site does not lie within or adjoin any Conservation Areas. The Lloyd's Avenue and Fenchurch Street Station Conservation Areas are located to the west. The views from both Conservation Areas looking north-eastwards along Crutched Friars are dominated by Jardine House and although the development would be visible in the backdrop of this corner building, its impact on the Conservation Areas would not be significant. The proposal would not harm the character and appearance of either the Lloyd's Avenue or Fenchurch Street Station Conservation Areas.

#### London Wall Scheduled Ancient Monument

74. The proposals include the display of the Roman Wall monument in a dedicated space, with public access from Crutched Friars, Vine Street, the café and reception area. It is proposed to make the monument a prominent and central feature of the basement, ground floor and public realm in a triple height space clearly visible from the surrounding streets, proposed ground floor and pedestrian route. The monument would be viewed with a series of displays of objects excavated from the site prior to construction of the existing building and at America Square, information about the history of the area from the Roman period to the present day, including trades carried out on the site. A graphic wall on the north elevation of the pedestrian route would be seen in conjunction with a display of artefacts on the north wall of the basement display, and this would visually link the ground floor and basement areas. It is proposed to suspend a silhouette above the monument to indicate its original scale and form.
75. It would be possible to view the monument in the round and appreciate the internal and external sides of the wall and bastion. The monument and displays would be visible in views from Crutched Friars and Vine Street, the proposed new pedestrian route and the proposed ground floor, placing it within a prominent position within the building and surrounding townscape. It is proposed to mark the line of the wall at ground and basement level which would indicate the scale of the wall and link the streetscape with the monument visible at ground and basement floors of the new building. The 'London Wall Walk' plaque would be re-sited at ground level.

76. The setting, presentation and public access to the monument within the proposed building would be considerably enhanced by the proposals. The proposals to mark the line of the wall and display material would provide information to set the wall in its archaeological and historic context and its place within the modern townscape. This would enliven the ground floor elevations of the building in Vine Street and India Street and raise understanding and awareness of the monument as a place to visit.
77. The detailed design of the proposal to mark the line of the wall, display cases and other explanatory materials would be covered by conditions.
78. Conditions as well as any necessary Section 106 agreements are recommended to cover the proposed display, presentation and public access to the Roman and medieval wall at basement and ground levels, including displays along the new pedestrian route and open space on the north side of the site, explanatory materials, design of the basement and ground floor finish including marking the line, scale and form of the wall.

### **Archaeology**

79. The site is in an area of important archaeological potential. Where not removed by the existing double basements on the site, and outside the area of the scheduled ancient monument, there is potential for buried or obscured archaeological remains to survive on the site. There is potential for remains of the lower levels of the medieval and later city ditch to survive. There are areas where localised sections of London wall, including fabric from the Roman period to the 17th century, may survive in the modern party wall construction, which follows the historic alignment of the wall. A Historic Environment Assessment has been submitted with the application and archaeological evaluation has been carried out.
80. The proposed development would have basements at the same depth and to the same footprint as the existing buildings. There would be no ground reduction below the existing basement levels with the exception of areas of new piled foundations and in some areas these would have an impact on potential archaeological remains. A scheme for the protection of the monument during demolition and construction has been submitted.
81. Conditions are recommended to cover a programme of archaeological work, basement and foundation design and protection of the monument during demolition and construction.

## **Access**

82. The proposals would comply with access requirements and would provide:
- 2 disabled parking spaces with electric vehicle charging points, on-street within the courtyard area on Vine Street; and
  - 5% of student rooms would be fully accessible and a further 5% are capable of conversion.
83. The new pedestrian route through the site is considered to be a major benefit to the proposal but there is a 1.5m change in levels between the western and eastern parts of the site. Extensive pre-application discussions were held to consider the most appropriate way to address the change in level and unfortunately, a pedestrian ramp would not be appropriate owing to the steep gradient. An external lift has therefore been proposed. The ongoing quality and maintenance of the lift by the occupier would be secured by the S106 agreement. Subject to the S106 agreement, the proposed development would be in accordance with policy DM 10.8.

## **Landscaping**

84. The development seeks to deliver an enhanced public realm and a landscape strategy has been submitted with the application. A dedicated large planter with surrounding seating is to be installed on Crutched Friars, which would be visible in views when travelling down Crutched Friars from Aldgate. 'Avenue Trees' would be planted along Vine Street and living roofs would be installed at levels three, four, five, six, 11 and 13. In these respects, the proposed development would comply with policies DM 10.2 and DM 10.4.

## **Residential Amenity**

85. Local Plan Policy DM 21.3 relates to protecting the amenity of existing residents. The site is in close proximity to residential building. The impact of the development on privacy, daylight and sunlight and noise and disturbance must be considered.

## **Noise and Disturbance**

86. Local Plan policy DM 21.3 relates to the residential environment and seeks to protect the amenity of existing residents by:
- Resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements;
  - Requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.

87. The potentially noise generating uses proposed by the development are the exhibition space, café and the student accommodation. The proposed office and incubator accommodation are unlikely to generate noise disturbance apart from the proposed 10th floor roof terrace. A condition has been included restricting hours of use in order to protect residential amenity.
88. Officers are satisfied that the proposed hours of use of the exhibition space and café which would be secured via the S106 agreement would ensure the use would not give rise to detrimental noise and disturbance to surrounding dwellings. In fact, the provision of the free facility is likely to encourage people inside the building rather than walking tours which currently stand outside and so there could be an improvement to the existing situation.
89. The proposed student accommodation has the potential to increase pedestrian movements around the site at a range of times and therefore potential for noise and disturbance to neighbouring properties. The applicant has submitted a Student Management Plan with the application, the details of which would be secured by the S106 agreement. The on site management, restricting loitering outside the building would ensure any potential disturbance would be mitigated. Mitigation measures proposed can be summarised as follows:
- Building would be managed by on-site team.
  - Management team would be on duty from 08.00-20.00 Monday-Sunday
  - Overnight security staff and retained resident student wardens and night wardens
  - Visible on-duty staff at main entrance reception desk.
  - Noise and disturbance generated by groups loitering outside the site would be enforced against under the terms of student residents' individual tenancy agreements.
  - Move-In Strategy – this would be staggered over three weekends. Students are allocated a day and 30-minute time slot for arrival and drop-off at the property. Where necessary, Urbanest has agreed to liaise with the City police, Transport for London, The City Corporation highways management and local residents.
  - Students will be provided with details of car parks within a 10-15 minute walk.
  - Form an ongoing Community Liaison Group
90. Residents have raised concerns about the proposed pedestrian access route. The applicant proposes to install anti-skateboarding measures and also suggested installing roller shutters and closing the route through from 10pm -6am. Improved accessibility and enhancing connectivity is a strategic aim of the Local Plan. The route would be well managed by the Student Housing development and because the route

offers 24 hours views down to the Roman Wall exhibition space, there is some reluctance to restrict access. The applicant has indicated that they would be happy to close the route if Members considered it appropriate and necessary in order to protect the amenity of nearby residential properties and this could be secured by condition.

91. In regards to noise from plant, an acoustic report has been submitted with the application. This indicates that plant could be operated without detrimentally impacting on neighbouring properties in respect of noise and disturbance. Conditions have been included with the recommendation.
92. The conditions and S106 agreement would ensure that the development should not detrimentally impact on residential amenity in respect of noise and disturbance.

### Overlooking

93. Privacy to nearby neighbouring residential properties from the proposed uses would be achieved by the installation of fritting on windows of the office building facing towards Vine Street and the layout of rooms with the inclusion of louvres used to ensure that only oblique, glimpsed views to the neighbouring properties would be possible from the Student Accommodation.

### Daylight and Sunlight

94. A daylight and sunlight impact assessment has been carried out in accordance with the Building Research Establishment Report (BRE) 'Site Layout Planning for Daylight and Sunlight 2011' to test the impact of the proposals on the following surrounding residential buildings:
95. Residential properties which were assessed are:
  - 60 Vine Street
  - 8 India Street
  - 136-138 Minories
  - 128-129 Minories
  - 124-127 Minories and 50 Vine Street
  - 3 America Square
  - 27 Minories
  - 140 Minories
96. Three methods have been used to calculate the impact on daylight:
  - Vertical Sky Component (VSC) – the general test of potential for daylight to a building by measuring light on the outside plane of

windows

- No-Sky Line (NSL) – indicating distribution of daylight within a room
  - Average Daylight Factor (ADF) assessing the quality and distribution within a defined room area.
97. In preparing the assessment, the applicant has undertaken a comparative analysis between:
- I. the existing situation on site and the proposed building, and
  - II. the consented proposal against the proposed building.
98. The previously approved scheme recognised that the impact of the development on surrounding properties would have an adverse impact on the daylight and sunlight to a number of the residential and short term let properties in Vine Street, although all those units (apart from two short let studio apartments at 8 India Street) would receive daylighting levels which would meet the minimum recommended ADF levels. It was concluded that although the reduction in daylighting would detrimentally affect the residential amenity of these units they would still retain compliant levels of daylight. In regards to sunlight, the proposal would detract from residential amenity although it is largely the nature of City developments, in particular because of their size and close proximity of the buildings, that the recommended sunlight levels are not always reached.
99. The updated assessment, submitted with this application demonstrates that the proposed development, taking into account the minor design alterations proposed, would result in a negligible difference to VSC, NSL and ADF compared to the extant scheme. There are a number of examples where the results see a minor improvement to VSC, NSL and ADF values.
100. There would be no difference in impact to sunlight when compared to the permitted scheme.
101. Officers are satisfied that the impact on daylight and sunlight compared to the permitted scheme would be imperceptible to the human eye when compared to the consented scheme would be minor adverse and the development would therefore comply with BRE Guidance and Local Plan policies DM 10.7 and DM 21.3.

### Impact on Services

102. Residents have raised concerns about the impact of the development on local amenities and services. Many students' needs are principally met by their University. For example, all full time students are required to register with their University Doctor and so would not impact on local services. The increased population has the potential to enhance the provision of other services such as shops in the locality.



## Highways

103. A Transport Assessment has been submitted which examines the transport impact of the proposed scheme. No car parking or motor cycle parking is proposed, other than the provision of two fully marked out accessible car parking spaces on Vine Street. These should be served by electrical charging points and this would be secured by planning condition.
104. The development would deliver an overprovision of cycle parking compared to policy requirements. Table 2 below details the proposed level of cycle parking by land use and by type as well as the London Plan requirement. Shower facilities are proposed in the office element but is not considered necessary in the student accommodation owing to the proposed use.

Use	Number of spaces by Cycle Parking Type					Total	London Plan
	Fold up	Two Tier	Semi-vertical	Sheffield Stands	External Sheffield stands		
Student Accommodation	140	N/A	181	3	17	<b>341</b>	339
Office	N/A	44	45	2	N/A	<b>91</b>	91
Incubator	N/A	N/A	12	1	3	<b>16</b>	14
Café	N/A	N/A	N/A	3	10	<b>13</b>	11
<b>Total</b>	<b>140</b>	<b>44</b>	<b>238</b>	<b>9</b>	<b>30</b>	<b>461</b>	<b>455</b>

**Table 2: Proposed Cycle Parking Provision**

105. It is proposed that 140 cycle parking spaces would be lockers for fold away bikes. The developer would provide the bikes for student use/hire at no charge. Transport for London raised objections about the provision of lockers with fold away bikes, requesting the provision of standard bicycle racks and a £210,000 financial contribution to the Mayor's Cycle Hire Scheme to reduce pressure on the existing cycle hire network.
106. Officers consider that the proposed cycle parking would be appropriate to the development. Urbanest's experience of managing student accommodation indicates that a number of students are from abroad and are therefore unlikely to bring a full size bicycle with them. The provision of folding bikes would make cycles available to students who would not otherwise use them and is considered to be a good design solution to meet the specific needs of this scheme. In respect of the financial contribution to the cycle hire scheme, this is not considered to be appropriate in this case because the student accommodation would not place pressure on the existing cycle hire scheme as the use by students is likely to fall outside of peak hours by office users. Furthermore, by providing a free cycle hire facility on site, through the fold up bikes, this would also reduce pressure on the Mayor's Cycle Hire Scheme.

107. Interim Office and Student Travel Plans have been submitted with the application. It is also recommended that a Cycle Action Plan be secured by S106 to encourage cycling and detail the management of cycling facilities on site. These would be secured by S106 agreement and submitted once occupiers of the offices are identified.

### Servicing and Deliveries

108. The development would replace the two existing service yards that serve Emperor House (service yard 1) and Roman Wall House and Jardine House (service yard 2) with a single on-site service yard to serve the new development and Jardine House. Access would be from Crutched Friars and would be designed to enable all vehicles to enter and exit in a forward gear and can accommodate 7.5 tonne Light Goods Vehicles. This level of provision has been calculated to be suitable for the servicing requirements of the new development and Jardine House. The servicing management plan indicates that the office element is anticipated to have 16 deliveries a day, the student accommodation would have 10 deliveries per weekday and 1-2 deliveries at the weekend. The café is expected to generate 1-2 deliveries per day. Waste would be stored and collected from the service yard.
109. The applicant has undertaken a review of an existing Urbanest facility at King's Cross which has 669 student bedrooms. This receives 10 deliveries per day (that are known about and recorded). Additional ad-hoc deliveries are made by bicycle and motorbike. These do not remove capacity from the loading bay or the highway network. The existing single yellow line outside the site, at the Vine Street student entrance permits loading/unloading and would be managed by staff on the site.
110. The co-ordination of servicing and deliveries is detailed in a preliminary Delivery and Servicing Management Plan. This Plan would be finalised and submitted for approval by the City of London prior to occupation and once tenants are known.

### Construction

111. The applicant has prepared a Construction Management. This would be secured by condition.

### Wayfinding

112. The applicant has agreed through discussions with TfL to make a financial contribution of £10,000 towards the updating of Legible London signage in the area.

### Other Legal Agreements

113. The upper floors of the development would oversail the highway at 9.2m above the public highway and would be subject to a separate S177 Licence.
114. A small element of stopping up to the public highway is required on Vine Street.
115. An area of tree planting/ landscaping would be subject to section 142 Highways Act 1980 Licence.

### Sustainability

116. The London Plan (2016) climate change policies require development proposals to make the fullest contribution to mitigating climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures, prioritising decentralised energy supply and incorporating low and zero carbon energy technologies. All developments are required to make the fullest contribution to London's adaptation to climate change by managing flood risk and by reducing the urban heat island effect through sustainable design and urban greening.
117. The applicant has prepared an Energy Statement and a Sustainability Statement. The supporting statement shows that the site could achieve BREEAM 'Excellent' for the development. A post completion assessment is recommended and included as a condition.
118. The Energy Statement demonstrates the development could achieve a 24.2% improvement in carbon emissions compared with 2010 Building Regulations. This falls short of the 35% improvement over Building Regulations. The scheme includes:
  - Installation of on-site CHP (this must comply with air quality requirements) 'be clean'
  - High efficiency condensing gas boilers 'be lean'
  - Photovoltaic panels 'be green'
119. In order to meet carbon reduction targets, a Carbon Offset payment is included in the S106 Agreement. The financial contribution is only an estimate at this stage and could change if further carbon savings can be made during the design process.
120. In support of the application, the applicant has prepared an Air Quality Impact Assessment, which indicates that the development would be air quality neutral, in accordance with policy DM 15.6.

### Secured by Design

121. The proposed development would comply with the principles of Secured by Design. The introduction of active ground level frontages encourages natural surveillance. Sensitively designed lighting to enhance the design

characteristics of the building would enhance visibility around the site and the development would be monitored by CCTV.

122. On-site measures such as fob access, 'air lock' door systems and on-site security would enhance security within the buildings.

### **Planning Obligations and Community Infrastructure Levy**

123. The development would require planning obligations in a Section 106 agreement to mitigate the impact of the proposal and make it acceptable in planning terms and to contribute to the improvement of the City's environment and facilities. It would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.

124. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.

125. The CIL contributions are set out below.

#### Mayoral CIL

<b>Liability in accordance with the Mayor of London's policies</b>	<b>Contribution</b>	<b>Forwarded to the Mayor</b>	<b>City's charge for administration and monitoring</b>
Mayoral Community Infrastructure Levy payable	£693,050	£665,328	£27,722
Mayoral planning obligation net liability*	£0	£0	-
Administration and Monitoring Charge	£3,500	-	£3,500
<b>Total liability in accordance with the Mayor of London's policies</b>	<b>£696,550</b>	<b>£665,328</b>	<b>£31,222</b>

\*Net liability on the basis of the CIL charge remaining unchanged and subject to variation.

#### City CIL and S106 Planning Obligations

<b>Liability in accordance with the City of London's policies</b>	<b>Contribution</b>	<b>Available for allocation</b>	<b>Retained for administration and monitoring</b>
City CIL	£1,039,575	£987,596	£51,979
City Planning Obligation Affordable Housing	£277,220	£274,448	£2,772

City Planning Obligation Local, Training, Skills and Job Brokerage	£41,583	£41,167	£416
City Carbon Offsetting	£123,480	£122,245	£1,235
Legible London	£10,000	£9,900	£100
City Non-Financial Monitoring Charge	£3,750	-	£3,750
<b>Total liability in accordance with the City of London's policies</b>	<b>£1,495,608</b>	<b>£1,435,356</b>	<b>£60,252</b>

### City's Planning Obligations

126. The obligations set out below are required in accordance with the City's SPD. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.

- 1) Affordable Housing Contribution (£277,220)
- 2) Carbon Offsetting Contribution (£123,480)
- 3) Delivery and Servicing Management Plan (Consolidated Deliveries)
- 4) Highway Schedule of Conditions and other Remedial Highway Works (S278 agreement)
- 5) Incubator Offices – ensuring their provision in perpetuity, quality of fit out and rents
- 6) Incubator Accommodation – restricting quantum and length of occupation to 51 weeks per annum
- 7) Incubator Business and Management Plan
- 8) Free public access to Scheduled Ancient Monument Exhibition Space
- 9) Lift Access (Public Realm) – ensuring maintenance
- 10) Legible London Wayfinding Contribution (£10,000)
- 11) Local Training, Skills and Job Brokerage Strategy (Demolition)
- 12) Local Training, Skills and Job Brokerage Strategy (Construction)
- 13) Local Training, Skills and Job Brokerage Contribution
- 14) Local Procurement Strategy
- 15) Monitoring Costs Contribution
- 16) Schedule Ancient Monument / Exhibition Space Management Plan
- 17) Student accommodation – must be linked to a university

- 18) Students living in the accommodation must attend a HEFCE Institution
- 19) Student Management Plan
- 20) Travel Plan
- 21) Cycling Action Plan
- 22) Tree Planting on Vine Street
- 23) Public Realm Access and Pedestrian Route – provision and maintenance
- 24) Utility Connections to the Development

127. Officers request that they be given delegated authority to continue to negotiate and agree the terms of the proposed obligations as necessary.

#### Monitoring and Administrative Costs

128. A 10 year repayment period would be required whereby any unallocated sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.
129. The applicant will pay the City of London's legal costs and the City Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

#### Site Specific Mitigation

130. The City will use CIL to mitigate the impact of development and provide necessary infrastructure but in some circumstances it may be necessary additionally to seek site specific mitigation to ensure that a development is acceptable in planning terms. Other matters requiring mitigation are still yet to be fully scoped.

#### Conclusion

131. The proposed development would deliver a high quality mixed use development which would contribute to the delivery of Grade A office accommodation suitable for SMEs and specialist incubator office accommodation for start-up businesses, enlivening and regenerating this part of the City.
132. The incubator space would be funded through the delivery of 619 student housing units. The student housing would contribute to the mix of uses in this part of the City, support the on-going growth of higher education in London and introducing a new working population to the City as well as contributing to the City's overall housing targets.
133. The scheme would achieve significant improvements to the setting of and public access to the remains of the Roman London Wall by

providing an exhibition space with free access to the public, secured by S106 agreement. The design and location of the proposed café would offer an attractive space to enjoy views over the Roman Wall.

134. The proposed improvements to the public realm, including new open space on Jewry Street and the new east-west pedestrian route through the site would enhance the character of this location.
135. By utilising the design and mass of the previously approved scheme, the bulk and mass of the development would ensure that neighbouring properties would receive minimum BRE recommended ADF levels. Utilising a Student Management Plan on the site would ensure there would be no detrimental noise or disturbance to surrounding properties.
136. The development is designed to achieve a reduction in carbon emissions, would achieve off street servicing and would provide a fully accessible building.

## BACKGROUND PAPERS

### Internal

Email from Kelly Wilson (Market and Consumer Protect) dated 02 June 2017

### External

Memo from Gary Surridge – 18.04.2017  
Memo from Mrs Julie Devonshire – 18.04.2017  
Letter from Tower Hamlets – 21.04.2017  
Historic England Letter Ref. P00567314 – 28.04.2017  
Memo from Ms Paloma Lisboa – 29.04.2017  
Memo from Mr Neil Pama – 03.05.2017  
Email from Thames Water – 08.05.2017  
Memo from Mr Ralph Luck – 09.05.2017  
Memo from Mr Archibald Hunter – 10.05.2017  
Memo from Mr John Harding – 11.05.2017  
Letter from PCU3ED dated 16.05.2017  
Objection letter from Steve Parvitt – Flat 7 Fenchurch House, 136-138  
Minories 31.05.2017  
Objection email from Kate Aspinall – 05.06.2017  
Objection email from Brian Noone – Flat 11 Fenchurch House 136-138  
Minories 05.06.2017  
Memo from Mr Robert Buchele – 05.06.2017  
Objection email from Christopher Murphy – 06.06.2017  
Email from Susan Davis – 06.07.2017  
Letter from Gerald Eve – 06.07.2017

Air Quality Impact Assessment prepared by AECOM;  
Applicant's Supporting Statement prepared by Urbanest;  
Building / Student Management Plan prepared by Urbanest;  
Daylight and Sunlight Report prepared by Point2 Surveyors;  
Daylight and Sunlight Report Updated June 2017 prepared by Point2  
Surveyors;  
Delivery and Servicing Management Plan prepared by Caneparo Associates;  
Demand Analysis Report prepared by JLL;  
Design and Access Statement prepared by Hopkins Architects, David Bonnett  
Associates, Metaphor, and Townshend Landscape Architects, including  
Townscape and Visual Impact Assessment prepared by Peter Stewart  
Consultancy;  
Draft Construction Management Plan prepared by Balfour Beatty  
Energy Statement prepared by MTT;  
Environmental Noise Survey prepared by Hann Tucker Associates;  
Flood Risk Assessment and SUDS Strategy prepared by Robert Bird Group;  
Historic Environment Assessment prepared by Museum of London  
Archaeology;  
Noise Impact Assessment



Office Economic (Viability) Assessment prepared by Gerald Eve;  
Office Market Report prepared by BNP Paribas;  
Planning Statement prepared by Gerald Eve LLP;  
Roman Wall House & Emperor House, Roman Wall Display Exhibition, Stage 2 Report, dated 10 March 2017  
Statement of Community Involvement prepared by Quatro;  
Sustainability Statement (including BREEAM Pre-Assessments) prepared by MTT;  
Transport Assessment prepared by Caneparo Associates;  
Workplace Travel Plan prepared by Caneparo Associates  
Economic Assessment Report prepared by GVA dated July 2017

Memo: Transport for London Response Note. File Ref. N03-DB-TfL  
Response Note Vine Street (170515) May 2017.

Gerald Eve Note - Planning Benefits Case and Relevant Material  
Considerations

## **LONDON PLAN POLICIES**

Policy 2.10 Enhance and promote the unique international, national and London wide roles of the Central Activities Zone (CAZ) and as a strategically important, globally-oriented financial and business services centre.

Policy 2.11 Ensure that developments proposals to increase office floorspace within CAZ include a mix of uses including housing, unless such a mix would demonstrably conflict with other policies in the plan.

Policy 3.8 Taking account of housing requirements identified at regional, sub-regional and local levels, boroughs should work with the Mayor and local communities to identify the range of needs likely to arise within their areas and ensure that new developments offer a range of housing choices.

Policy 4.1 Promote and enable the continued development of a strong, sustainable and increasingly diverse economy;  
Support the distinctive and crucial contribution to London's economic success made by central London and its specialist clusters of economic activity;  
Promote London as a suitable location for European and other international agencies and businesses.

Policy 4.2 Support the management and mixed use development and redevelopment of office provision to improve London's competitiveness and to address the wider objectives of this Plan, including enhancing its varied attractions for businesses of different types and sizes.

Policy 4.6 Support the continued success of London's diverse range of arts, cultural, professional sporting and entertainment enterprises and the cultural, social and economic benefits that they offer to its residents, workers and visitors.

Policy 4.10 Support the new and emerging economic sectors including supporting the provision of specialist accommodation.

Policy 5.1 Mitigate climate change by achieving an overall reduction in London's carbon dioxide emissions of 60% below 1990 levels by 2025.

Policy 5.2 Development proposals should make the fullest contribution to minimising carbon dioxide emissions.

Policy 5.3 Development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation. Major development proposals should meet the minimum standards outlined in supplementary planning guidance.

Policy 5.6 Development proposals should evaluate the feasibility of Combined Heat and Power (CHP) systems, and where a new CHP system is appropriate also examine opportunities to extend the system beyond the site boundary to adjacent sites.

Policy 5.7 Major development proposals should provide a reduction in carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.

Policy 5.10 Promote and support urban greening, such as new planting in the public realm (including streets, squares and plazas) and multifunctional green infrastructure, to contribute to the adaptation to, and reduction of, the effects of climate change.

Policy 5.13 Development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so.

Policy 6.1 The Mayor will work with all relevant partners to encourage the closer integration of transport and development.

Policy 6.3 Development proposals should ensure that impacts on transport capacity and the transport network are fully assessed.

Policy 6.9 Developments should provide secure, integrated and accessible cycle parking facilities and provide on-site changing facilities and showers for cyclists, facilitate the Cycle Super Highways and facilitate the central London cycle hire scheme.

Policy 6.10 Developments should ensure a high quality pedestrian environment.

Policy 6.13 The maximum standards set out in Table 6.2 should be applied to planning applications. Developments must:

ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles

provide parking for disabled people in line with Table 6.2

meet the minimum cycle parking standards set out in Table 6.3

provide for the needs of businesses for delivery and servicing.

Policy 7.2 All new development in London to achieve the highest standards of accessible and inclusive design.

Policy 7.4 Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.

Policy 7.6 Buildings and structures should:

a be of the highest architectural quality

b be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm

c comprise details and materials that complement, not necessarily replicate, the local architectural character

- d not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings
- e incorporate best practice in resource management and climate change mitigation and adaptation
- f provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces
- g be adaptable to different activities and land uses, particularly at ground level
- h meet the principles of inclusive design
- i optimise the potential of sites.

Policy 7.8 Development should identify, value, conserve, restore, re-use and incorporate heritage assets, conserve the significance of heritage assets and their settings and make provision for the protection of archaeological resources, landscapes and significant memorials.

Policy 7.12 New development should not harm and where possible should make a positive contribution to the characteristics and composition of the strategic views and their landmark elements identified in the London View Management Framework. It should also, where possible, preserve viewers' ability to recognise and to appreciate Strategically Important Landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated Viewing Places.

Policy 7.14 Implement Air Quality and Transport strategies to achieve reductions in pollutant emissions and minimise public exposure to pollution.

Policy 7.15 Minimise existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals and separate new noise sensitive development from major noise sources.

Policy 8.2 Development proposals should address strategic as well as local priorities in planning obligations.

## Relevant Local Plan Policies

### ***CS1 Provide additional offices***

To ensure the City of London provides additional office development of the highest quality to meet demand from long term employment growth and strengthen the beneficial cluster of activities found in and near the City that contribute to London's role as the world's leading international financial and business centre.

### ***CS4 Seek planning contributions***

To manage the impact of development, seeking appropriate developer contributions.

### ***CS8 Meet challenges facing Aldgate area***

To regenerate the amenities and environment of the Aldgate area for businesses, residents, workers, visitors and students, promoting development and investment.

### ***CS10 Promote high quality environment***

To promote a high standard and sustainable design of buildings, streets and spaces, having regard to their surroundings and the character of the City and creating an inclusive and attractive environment.

### ***CS11 Encourage art, heritage and culture***

To maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Destination Strategy.

### ***CS12 Conserve or enhance heritage assets***

To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors.

### ***CS13 Protect/enhance significant views***

To protect and enhance significant City and London views of important buildings, townscape and skylines, making a substantial contribution to protecting the overall heritage of the City's landmarks.

### ***CS15 Creation of sustainable development***

To enable City businesses and residents to make sustainable choices in their daily activities creating a more sustainable City, adapted to the changing climate.

### ***CS16 Improving transport and travel***

To build on the City's strategic central London position and good transport infrastructure to further improve the sustainability and efficiency of travel in, to, from and through the City.

### ***CS17 Minimising and managing waste***

To support City businesses, residents and visitors in making sustainable choices regarding the minimisation, transport and management of their waste, capitalising on the City's riverside location for sustainable waste transfer and eliminating reliance on landfill for municipal solid waste (MSW).

### ***CS18 Minimise flood risk***

To ensure that the City remains at low risk from all types of flooding.

### ***CS20 Improve retail facilities***

To improve the quantity and quality of retailing and the retail environment, promoting the development of the five Principal Shopping Centres and the linkages between them.

### ***DM1.1 Protection of office accommodation***

To refuse the loss of existing (B1) office accommodation to other uses where the building or its site is considered to be suitable for long-term viable office use and there are strong economic reasons why the loss would be inappropriate. Losses would be inappropriate for any of the following reasons:

- a) prejudicing the primary business function of the City;
- b) jeopardising the future assembly and delivery of large office development sites;
- c) removing existing stock for which there is demand in the office market or long term viable need;
- d) introducing uses that adversely affect the existing beneficial mix of commercial uses.

### ***DM1.3 Small and medium business units***

To promote small and medium sized businesses in the City by encouraging:

- a) new accommodation suitable for small and medium sized businesses or occupiers;
- b) office designs which are flexible and adaptable to allow for sub-division to create small and medium sized business units;
- c) continued use of existing small and medium sized units which meet occupier needs.

***DM1.5 Mixed uses in commercial areas***

To encourage a mix of commercial uses within office developments which contribute to the City's economy and character and provide support services for its businesses, workers and residents.

***DM3.2 Security measures***

To ensure that security measures are included in new developments, applied to existing buildings and their curtilage, by requiring:

- a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;
- b) measures to be integrated with those of adjacent buildings and the public realm;
- c) that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm;
- d) developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles;
- e) the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;
- f) an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

***DM10.1 New development***

To require all developments, including alterations and extensions to existing buildings, to be of a high standard of design and to avoid harm to the townscape and public realm, by ensuring that:

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;

- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design.

#### ***DM10.4 Environmental enhancement***

The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes for the enhancement of highways, the public realm and other spaces. Enhancement schemes should be of a high standard of design, sustainability, surface treatment and landscaping, having regard to:

- a) the predominant use of the space, surrounding buildings and adjacent spaces;
- b) connections between spaces and the provision of pleasant walking routes;
- c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
- d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
- e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;
- f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
- g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;

- h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
- i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
- j) the use of high quality street furniture to enhance and delineate the public realm;
- k) lighting which should be sensitively co-ordinated with the design of the scheme.

#### ***DM10.7 Daylight and sunlight***

- 1) To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.
- 2) The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.

#### ***DM10.8 Access and inclusive design***

To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished), open spaces and streets, ensuring that the City of London is:

- a) inclusive and safe for of all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;
- b) convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
- c) responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

#### ***DM12.1 Change affecting heritage assets***

- 1. To sustain and enhance heritage assets, their settings and significance.
- 2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.
- 3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.



4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.
5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

#### ***DM12.4 Archaeology***

1. To require planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.
2. To preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and to seek a public display and interpretation, where appropriate.
3. To require proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to advance understanding.

#### ***DM15.1 Sustainability requirements***

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.
2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:
  - a) BREEAM or Code for Sustainable Homes pre-assessment;
  - b) an energy statement in line with London Plan requirements;
  - c) demonstration of climate change resilience measures.
3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.
4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.
5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

### ***DM15.2 Energy and CO2 emissions***

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.
2. For all major development energy assessments must be submitted with the application demonstrating:
  - a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;
  - b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;
  - c) where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;
  - d) anticipated residual power loads and routes for supply.

### ***DM15.3 Low and zero carbon technologies***

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.
2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered
3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.
4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

### ***DM15.5 Climate change resilience***

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.
2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

### ***DM15.6 Air quality***

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.
2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.
3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).
4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.
5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.
6. 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 building in the development in order to ensure maximum dispersion of pollutants.

### ***DM15.7 Noise and light pollution***

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.
2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise

conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.

3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.
4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.
5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.

#### ***DM16.1 Transport impacts of development***

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:
  - a) road dangers;
  - b) pedestrian environment and movement;
  - c) cycling infrastructure provision;
  - d) public transport;
  - e) the street network.
2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

#### ***DM16.2 Pedestrian movement***

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.
2. The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:
  - a) the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
  - b) the shortest practicable routes between relevant points.

3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.
4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.
5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.
6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

### ***DM16.3 Cycle parking***

1. On-site cycle parking must be provided in accordance with the local standards set out in Table 16.2 or, for other land uses, with the standards of the London Plan. Applicants will be encouraged to exceed the standards set out in Table 16.2.
2. On-street cycle parking in suitable locations will be encouraged to meet the needs of cyclists.

### ***DM16.4 Encouraging active travel***

1. Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision for showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.
2. Where facilities are to be shared with a number of activities they should be conveniently located to serve all proposed activities.

### ***DM16.5 Parking and servicing standards***

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.
2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and

with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.

3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.
4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.
5. Coach parking facilities for hotels (use class C1) will not be permitted.
6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.
7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

#### ***DM17.1 Provision for waste***

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.
2. On-site waste management, through techniques such as recycle sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

#### ***DM17.2 Designing out construction waste***

New development should be designed to minimise the impact of deconstruction and construction waste on the environment through:

- a) reuse of existing structures;
- b) building design which minimises wastage and makes use of recycled materials;
- c) recycling of deconstruction waste for reuse on site where feasible;

- d) transport of waste and construction materials by rail or river wherever practicable;
- e) application of current best practice with regard to air quality, dust, hazardous waste, waste handling and waste management

### ***DM18.2 Sustainable drainage systems***

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.
2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.
3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

### ***DM19.2 Biodiversity and urban greening***

Developments should promote biodiversity and contribute to urban greening by incorporating:

- a) green roofs and walls, soft landscaping and trees;
- b) features for wildlife, such as nesting boxes and beehives;
- c) a planting mix which encourages biodiversity;
- d) planting which will be resilient to a range of climate conditions;
- e) maintenance of habitats within Sites of Importance for Nature Conservation.

### ***DM20.3 Retail uses elsewhere***

To resist the loss of isolated and small groups of retail units outside the PSCs and Retail Links that form an active retail frontage, particularly A1 units near residential areas, unless it is demonstrated that they are no longer needed.

### ***DM20.4 Retail unit sizes***

1. Proposals for new retail uses should provide a variety of unit sizes compatible with the character of the area in which they are situated.
2. Major retail units (over 1,000sq.m) will be encouraged in PSCs and, where appropriate, in the Retail Links in accordance with the sequential test.

### ***DM21.3 Residential environment***

1. The amenity of existing residents within identified residential areas will be protected by:
  - a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
  - b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.
2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.
3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.
4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.
5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

### ***DM21.7 Student housing and hostels***

1. Proposals for new student accommodation and hostels will be refused where it would:
  - a) prejudice the primary business function of the City;
  - b) result in the loss of office buildings or sites, contrary to policy DM 1.1;
  - c) result in an excessive concentration of student housing and/or hostels;
  - d) have an adverse impact on the residential amenity of the area;
  - e) involve the loss of permanent residential accommodation.
2. Proposals for student housing must be supported by identified further or higher educational institutions operating in the Central Activities Zone and provide accommodation for their own students.
3. Self-contained student housing will be expected to contribute to the supply of affordable housing in accordance with Policy CS21.



4. The loss of existing student housing and hostels will be resisted unless:

- a) the accommodation is required to meet residential needs as part of a published strategy by a local service provider;
- b) it is vacant and has been actively marketed as student or hostel accommodation at reasonable terms and there is no demand from another organisation for a hostel in that location.

## SCHEDULE

APPLICATION: 17/00239/FULMAJ

### Emperor House 35 Vine Street London

**Demolition of the existing buildings and redevelopment to provide a new mixed use building, comprising offices (Class B1), incubator offices (Class B1), a shop/ cafe unit (Class A1), student/ incubator tenant accommodation and ancillary facilities (619 rooms) (sui generis), and exhibition space associated with a Scheduled Ancient Monument (sui generis), arranged over basement, lower ground, ground and parts 6, 12, 13 and 14 upper storeys plus plant; including a new pedestrian route, creation of new public realm; associated parking, servicing, and ancillary plant and storage; and other associated works.**

## CONDITIONS

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.  
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
- 2 Before any works including demolition are begun a site survey and survey of highway and other land at the perimeter of the site shall be carried out and details must be submitted to and approved in writing by the local planning authority indicating the proposed finished floor levels at basement and ground floor levels in relation to the existing Ordnance Datum levels of the adjoining streets and open spaces. The development shall be carried out in accordance with the approved survey unless otherwise agreed in writing by the local planning authority.  
REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
- 3 Works shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison set out therein. A staged scheme of protective works may be submitted in

respect of individual stages of the development process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme.

REASON: To protect the amenities of nearby residents and commercial occupiers in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to any work commencing in order that the impact on amenities is minimised from the time that development starts.

- 4 Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall include relevant measures from Section 3 of the Mayor of London's Construction Logistics Plan Guidance for Developers issued in April 2013, and specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Cyclist Safety (CLOCS) Standard for Construction Logistics, Managing Work Related Road Risk. The demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

REASON: To ensure that demolition works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition work commencing in order that the impact on the transport network is minimised from the time that demolition starts.

- 5 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

(b) details of the proposed new facade(s) including detailed elevations, cross sections and plans of doors and windows at scale 1:10 with cross-sections of all external frames and glazing at scale 1:1;

(c) details of design, type and position of fritting to windows;

(d) details (including 1:10 elevations, plans and cross-sections) of louvres, plant screens and photovoltaic panels;;

(e) details of ground floor elevations including details of gates/shutters to service bay;

(f) details of soffits, lighting, hand rails and balustrades;

(g) details of junctions with adjoining premises;

(h) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at roof level

(i) details of plant and ductwork to serve the [A1] use(s);

(j) details of ventilation and air-conditioning for the [A1] use(s);  
(k) details of external surfaces within the site boundary including hard and soft landscaping;

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.

- 6 No works except demolition to basement slab level shall take place until the developer has secured the implementation of a programme of archaeological work to be carried out in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority. This shall include all on site work, including details of any temporary works which may have an impact on the archaeology of the site and all off site work such as the analysis, publication and archiving of the results. All works shall be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority.  
REASON: In order to allow an opportunity for investigations to be made in an area where remains of archaeological interest are understood to exist in accordance with the following policy of the Local Plan: DM12.4.
- 7 No works except demolition to basement slab level shall take place before details of the foundations and piling configuration, to include a detailed design and method statement, have been submitted to and approved in writing by the Local Planning Authority, such details to show the preservation of surviving archaeological remains which are to remain in situ.  
REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
- 8 All Parish Markers and commemorative plaques on the existing building shall be carefully removed prior to demolition commencing, stored for the duration of building works, reinstated and retained for the life of the building on the new building in accordance with detailed specifications including fixing details which shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the works affected thereby.  
REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: DM12.1.
- 9 Unless otherwise agreed in writing with the Local Planning Authority, works including monitoring of the London Wall monument, method statement for the conservation works, safe removal of the existing modern structures adjacent to the monument and all works to protect the monument for the duration of the implementation of the scheme shall be carried out in accordance with the 'Roman Wall Protective Works' dated March 2017, hereby approved.

REASON: To ensure the protection of the significance and setting of the scheduled ancient monument and that the Local Planning Authority may be satisfied with the detail of the proposed works and to ensure a satisfactory appearance in accordance with the following policies of the Core Strategy and Unitary Development Plan 2002: CS10, CS12, ARC2 and ARC3

10 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all works pursuant to this consent shall be carried out in accordance with the approved details:

- a. details of any proposals arising from any condition and structural surveys of the London Wall;
- b. details of protection measures to the London Wall following completion of the development;
- c. details of basement level, ground level and all finishes in the area of the display space of the London Wall;
- d. details of the marking out of the line, scale and form of the London Wall on internal and external surfaces of the basement display area, ground floor and basement floors of the building;
- e. details of the directional information and interpretative material on the ground floor and external elevations, including the new external landscaping and the new pedestrian route;
- f. details of the display wall and cases within the proposed basement display and ground floors, to a scale of not less than 1:5, including materials of the display walls, cases, objects and wording;
- g. details of the reinstatement of the 'London Wall Walk' plaque

REASON: To ensure the protection of the significance and setting of the scheduled ancient monument and that the Local Planning Authority may be satisfied with the detail of the proposed works and to ensure a satisfactory appearance in accordance with the following policies of the Core Strategy and Unitary Development Plan 2002: CS10, CS12, ARC2 and ARC3

11 Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site during construction of the development has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall include relevant measures from Section 3 of the Mayor of London's Construction Logistics Plan Guidance for Developers issued in April 2013, and specifically address [driver training for] the safety of vulnerable road users through compliance with the Construction Logistics and Cyclist Safety (CLOCS) Standard for Construction Logistics, Managing Work Related Road Risk. The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

REASON: To ensure that construction works do not have an adverse impact on public safety and the transport network in accordance with

London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to construction work commencing in order that the impact on the transport network is minimised from the time that construction starts.

- 12 No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.  
REASON: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.
- 13 Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:  
(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: green roofs, bio-retention areas, attenuation tanks, rainwater pipework, hydrobrakes, pumps, design for system exceedance; surface water flow rates shall be restricted to no greater than stated in Flood Risk Assessment Issue 5, provision should be made for an attenuation volume capacity capable of achieving this should;  
(b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.  
(c) Evidence that Thames Water have been consulted and consider the proposed discharged rate to be satisfactory.  
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS18, DM18.2, DM18.3.
- 14 Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:  
(a) A Lifetime Maintenance Plan for the SuDS system to include:  
- A full description of how the system would work, it's aims and objectives and the flow control arrangements;  
- A Maintenance Inspection Checklist/Log;

- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS18, DM18.2, DM18.3.

- 15 A post construction BREEAM assessment demonstrating that a target rating of 'Excellent' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' rating) shall be submitted as soon as practicable after practical completion.  
REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.
- 16 Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of 321 pedal cycles and 140 fold up bikes in lockers. The cycle parking provided on the site must remain ancillary to the use of the building and must be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking.  
REASON: To ensure provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the following policy of the Local Plan: DM16.3.
- 17 The development shall incorporate such measures as are necessary within the site to resist structural damage arising from an attack with a road vehicle or road vehicle borne explosive device, details of which must be submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun.  
REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
- 18 No live or recorded music shall be played that it can be heard outside the premises or within any residential or other premises in the building.  
REASON: To safeguard the amenity of the adjoining premises and the area in general in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 19 No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to

Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3.

- 20 Any generator on the site shall be used solely on intermittent and exceptional occasions when required in response to a life threatening emergency or an exceptional event requiring business continuity and for the testing necessary to meet that purpose and shall not be used at any other time. At all times the generator shall be operated to minimise noise impacts and emissions of air pollutants and a log of its use shall be maintained and be available for inspection by the Local Planning Authority.

REASON: To minimise adverse air quality in accordance with policies DM15.6 and DM 21.3 of the Local Plan and policies 7.14 B a and c of the London Plan.

- 21 No boilers that have a dry NO<sub>x</sub> emission level exceeding 40 mg/kWh (measured at 0% excess O<sub>2</sub>) shall at any time be installed in the building.

REASON: To comply with policy DM15.6 of the Local Plan and policies 7.14B a and c of the London Plan.

- 22 (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA<sub>90</sub> (10 minutes) during which plant is or may be in operation.

(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.

(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.

REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 23 The refuse collection and storage facilities shown on the drawings hereby approved shall be provided and maintained throughout the life of the building for the use of all the occupiers.

REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1.



- 24 2 car parking spaces with electric vehicle charging facilities, suitable for use by people with disabilities shall be provided on the premises in accordance with details to be submitted to and approved in writing by the Local Planning Authority before any works affected thereby are begun, and shall be maintained throughout the life of the building and be readily available for use by disabled occupiers and visitors without charge to the individual end users of the parking.  
REASON: To ensure provision of suitable parking for people with disabilities in accordance with the following policy of the Local Plan: DM16.5.
- 25 The roof terraces hereby permitted shall not be used or accessed between the hours of 21.00 on one day and 07.00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency.  
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 26 The public highway(s) known as Vine Street and Crutched Friars shall remain fully open and unobstructed until such time as the necessary Stopping-up Order has come into effect.  
REASON: To ensure compliance with the terms of Section 247 and 257 of the Town and Country Planning Act 1990.
- 27 The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission: UVS\_3000\_P1, UVS\_3100\_P1, UVS\_3101\_P1, UVS\_3102\_P2, UVS\_3103\_P2, UVS\_3104\_P2, UVS\_3105\_P2, UVS\_3106\_P2, UVS\_3107\_P2, UVS\_3108\_P2, UVS\_3109\_P2, UVS\_3110\_P2, UVS\_3111\_P2, UVS\_3112\_P2, UVS\_3113\_P2, UVS\_3114\_P2, UVS\_3115\_P2, UVS\_4100\_P1, UVS\_4101\_P1, UVS\_4102\_P1, UVS\_4103\_P1, UVS\_4104\_P1, UVS\_5000\_P1, UVS\_5001\_P1, UVS\_5002\_P1, UVS\_5003\_P1, Roman Wall Protective Works, dated March 2017  
REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

## INFORMATIVES

- 1 In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways:

detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available;

a full pre application advice service has been offered;

where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.

- 2 Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
- 3 No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.
- 4 Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing for example, a nonreturn valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions.
- 5 There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer.

Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted for extensions to existing buildings. The applicant is advised to visit [thameswater.co.uk/buildover](http://thameswater.co.uk/buildover)

- 6 Thames Water would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what

measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing [wwqriskmanagement@thameswater.co.uk](mailto:wwqriskmanagement@thameswater.co.uk). Application forms should be completed on line via [www.thameswater.co.uk/wastewaterquality](http://www.thameswater.co.uk/wastewaterquality).

# Comments for Planning Application 17/00239/FULMAJ

## Application Summary

Application Number: 17/00239/FULMAJ

Address: Emperor House 35 Vine Street London EC3N 2PX

Proposal: Demolition of the existing buildings and redevelopment to provide a new mixed use building, comprising offices (Class B1), incubator offices (Class B1), a shop/ cafe unit (Class A1), student/ incubator tenant accommodation and ancillary facilities (sui generis), and exhibition space associated with a Scheduled Ancient Monument (sui generis), arranged over basement, lower ground, ground and parts 6, 12, 13 and 14 upper storeys plus plant; including a new pedestrian route, creation of new public realm; associated parking, servicing, and ancillary plant and storage; and other associated works.

Case Officer: Alison Hayes

## Customer Details

Name: Mr Gary Surridge

Address: Museum of London 150 London Wall London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: For the reasons described in our letter (dated 18 Jan 2017) the Museum of London supports this application.

# Comments for Planning Application 17/00239/FULMAJ

## Application Summary

Application Number: 17/00239/FULMAJ

Address: Emperor House 35 Vine Street London EC3N 2PX

Proposal: Demolition of the existing buildings and redevelopment to provide a new mixed use building, comprising offices (Class B1), incubator offices (Class B1), a shop/ cafe unit (Class A1), student/ incubator tenant accommodation and ancillary facilities (sui generis), and exhibition space associated with a Scheduled Ancient Monument (sui generis), arranged over basement, lower ground, ground and parts 6, 12, 13 and 14 upper storeys plus plant; including a new pedestrian route, creation of new public realm; associated parking, servicing, and ancillary plant and storage; and other associated works.

Case Officer: Alison Hayes

## Customer Details

Name: Mrs Julie Devonshire

Address: Entrepreneurship Institute Bush House Aldwych, London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment:

AM



PLANNING TRANSPORTATION	
PSDD	PPD
TPD	LTP
OM	SSE
NO	PP
FILE	DD
28 APR 2017	
128848	

17/00239

A Hayes  
 City of London  
 P O Box 270  
 Guildhall  
 London  
 EC2P 2EJ

Place Directorate  
 Development Management  
 Town Hall, Mulberry Place  
 5 Clove Crescent  
 London  
 E14 2BG  
[www.towerhamlets.gov.uk](http://www.towerhamlets.gov.uk)

**Application Number:** PA/17/01025  
**Your ref:** 17/00239/FULL

**Enquiries to:** Simon Westmorland  
**Tel:** 0207 364 7511  
**Email:** Simon.Westmorland@towerhamlets.gov.uk

21 April, 2017

Dear A Hayes,

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)  
 DEVELOPMENT MANAGEMENT PROCEDURE ORDER 2015**

**OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY**

**Location  
 Proposal**

Emperor House, 35 Vine Street, London EC3N 2PX  
 Demolition of the existing buildings and redevelopment to provide a new mixed use building, comprising offices (class b1), incubator offices (class b1), a shop/ cafe unit (class a1), student/ incubator tenant accommodation and ancillary facilities (sui generis), and exhibition space associated with a scheduled ancient monument (sui generis), arranged over basement, lower ground, ground and parts 6, 12, 13 and 14 upper storeys plus plant; including a new pedestrian route, creation of new public realm; associated parking, servicing, and ancillary plant and storage; and other associated works

Thank you for your letter requesting the observations of the London Borough Tower Hamlets on the above application. I would be grateful if you would take the observations set out about into consideration:-

The London Borough of Tower Hamlets raises no objection to this application.



If you require any further information please contact the officer named at the top of this letter.

Yours sincerely,



**Owen Whalley, Divisional Director - Planning and Building Control**



LONDON OFFICE

Ms Alison Hayes  
City of London  
Guildhall  
PO BOX 270  
London  
EC2P 2EJ

PLANNING & TRANSPORTATION		
PSDD	CPO	PPD
TPD	28 APR 2017	LTP
OM		SSE
No		PP
FILE		DD

Direct Dial: 020 7973 3739

Our ref: P00567314

Dear Ms Hayes

**Arrangements for Handling Heritage Applications Direction 2015 & T&CP (Development Management Procedure) (England) Order 2015  
EMPEROR HOUSE 35 VINE STREET LONDON EC3N 2PX  
Application No 17/00239/FULL**

Thank you for your letter of 7 April 2017 notifying us of the application for planning permission relating to the above site. We do not wish to comment in detail, but offer the following general observations.

**Historic England Advice**

The scheme is located on a site incorporating the Scheduled Monument identified as **London Wall: section in Roman Wall House, Crutched Friars (SM LO26F)**. The monument comprises a section of the Roman wall at Crutched Friars which forms part of the property boundary of Emperor House to the east and Roman Wall House to the west and is visible within their basements. It represents part of the eastern side of the London Wall circuit and includes a fragment of walling, 11m in length, with an additional section of its core to the south (located behind C20 party walling) and the remains of a bastion extending from the eastern face of the Wall. The scheduled area includes a 2m buffer around the wall and its bastion for the support and protection of the monument.

The proposed scheme concerns the demolition of the existing buildings and redevelopment to provide a new mixed use building which includes offices, a shop/ cafe unit, student/ incubator tenant accommodation and ancillary facilities, and exhibition space associated with a Scheduled Ancient Monument , arranged over basement, lower ground and ground floors. This application follows a previous scheme that was granted planning permission incorporating our advice and subject to the conditions of Scheduled Monument Consent (SMC) which was granted on 21st September 2015 (Ref: S00116004).

The present applicant has, over several months, engaged with us with regard to the new plans for the site and, in particular, those affecting the Scheduled Monument. We are content that the new scheme retains the positive elements regarding the



1 WATERHOUSE SQUARE 138-142 HOLBORN LONDON EC1N 2ST

Telephone 020 7973 3700  
HistoricEngland.org.uk







LONDON OFFICE

conservation, protection and public display of the remains of London Wall that were discussed and agreed for the previous scheme and for which SMC was granted. The existing SMC covers the proposals as outlined in the new planning application and, as such, the new scheme will also be subject to the conditions included within that consent as per the 1979 Ancient Monuments and Archaeological Areas Act (as amended).

We would expect to be continually consulted as this project progresses, as per the conditions of the consent, and also with regard to a future Conservation Management Plan for the site. This will look to safeguard the ongoing conservation and maintenance of the site and the monument and will be expected to work in conjunction with a Section 17 Management Agreement to be agreed with Historic England.

**Recommendation**

We recommend that the application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.

Please note that this response relates to Scheduled Monument matters only. If there are any non-designated archaeological implications to the proposals it is recommended that you contact the Assistant Director for the Historic Environment (City of London), Kathryn Stubbs, for further advice.

Yours sincerely



**Iain Bright**  
Assistant Inspector of Ancient Monuments



cc Kathryn Stubbs



# Comments for Planning Application 17/00239/FULMAJ

## Application Summary

Application Number: 17/00239/FULMAJ

Address: Emperor House 35 Vine Street London EC3N 2PX

Proposal: Demolition of the existing buildings and redevelopment to provide a new mixed use building, comprising offices (Class B1), incubator offices (Class B1), a shop/ cafe unit (Class A1), student/ incubator tenant accommodation and ancillary facilities (619 rooms) (sui generis), and exhibition space associated with a Scheduled Ancient Monument (sui generis), arranged over basement, lower ground, ground and parts 6, 12, 13 and 14 upper storeys plus plant; including a new pedestrian route, creation of new public realm; associated parking, servicing, and ancillary plant and storage; and other associated works.

Case Officer: Alison Hayes

## Customer Details

Name: Ms Paloma Lisboa

Address: 165 Great Dover Street London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: Dear Sirs,

I am writing in support of Urbanest's proposed scheme at Vine Street.

Kings College London houses students at Urbanest Westminster Bridge in Lambeth and also at Urbanest Tower Bridge, 52 Minories in The City Corporation. The reasons we choose to work with Urbanest are based around the excellent specification of their properties, the location and most importantly, the overall management of the properties. The Urbanest team is on-site 24/7 working closely with our students, managing all elements of student life in a well-structured and organised fashion.

Their teams on-site are well trained, diligent and meet frequently with us to keep us updated on the student experience in the property. As a result, we are keen to work with Urbanest again on the proposed scheme at Vine Street because of their track record of managing residences in such a professional manner.

# Comments for Planning Application 17/00239/FULMAJ

## Application Summary

Application Number: 17/00239/FULMAJ

Address: Emperor House 35 Vine Street London EC3N 2PX

Proposal: Demolition of the existing buildings and redevelopment to provide a new mixed use building, comprising offices (Class B1), incubator offices (Class B1), a shop/ cafe unit (Class A1), student/ incubator tenant accommodation and ancillary facilities (619 rooms) (sui generis), and exhibition space associated with a Scheduled Ancient Monument (sui generis), arranged over basement, lower ground, ground and parts 6, 12, 13 and 14 upper storeys plus plant; including a new pedestrian route, creation of new public realm; associated parking, servicing, and ancillary plant and storage; and other associated works.

Case Officer: Alison Hayes

## Customer Details

Name: Mr Niel Pama

Address: 31 Jewry Street London

## Comment Details

Commenter Type: Neighbour

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Residential Amenity

Comment: David Game College occupies a 58,000 sqft building alongside the proposed development. Although, we appreciate that there will be some noise from the demolition of the existing building, we are very supportive of the amenities that this new development will provide and these far outweigh the possible, short term inconvenience.

We have been very pleased with the amount of information that we have been given regarding the proposed development and how Urbanest plans to mitigate the noise and the dust that will result from the building works.

Urbanest, will as a result of this new build be able to support us in our ambitions of providing the complete student experience for our students. The UK has great standards of education but for too long has it lagged behind the likes of Canada, USA, Australia etc. in the facilities it provides for its students. It is our intention to work with our new neighbour and their state of the art creation, so that we will be able to combine the best of London, the best of British education and the best facilities available and as a result, put us and this part of London on a better footing to compete on the global stage.

The plans for the restoration and exhibition of the section of the Roman Wall under the existing premises, will enhance the local historical attractions of the area and link Tower Hill nicely with the landmarks in and around Aldgate. At present the route that stretches between the two is devoid of much for tourists to see, but this will all change with their plans to reveal the wall and have a

permanent exhibition open to the public.

We hope that their development plans are given the go ahead.

**From:** COL - Contact Centre  
**To:** Pln - CC - Development Dc  
**Subject:** FW: PLN FW: 3rd Party Planning Application - 17/00239/FULMAJ COL:05094185  
**Date:** 09 May 2017 08:21:43

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-----Original Message-----

From: [BCTAdmin@thameswater.co.uk](mailto:BCTAdmin@thameswater.co.uk) [mailto:[BCTAdmin@thameswater.co.uk](mailto:BCTAdmin@thameswater.co.uk)]  
Sent: 08 May 2017 13:11  
To: PlanningQueue  
Subject: 3rd Party Planning Application - 17/00239/FULMAJ

Corporation of London  
DTS Ref: 36020  
Department of Planning & Transportation  
Ref: 17/00239/FULMAJ  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Our  
Your

8 May 2017

Dear Sir/Madam

Re: EMPEROR HOUSE, 35 VINE STREET, LONDON, EC3N 2PX

#### Waste Comments

Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions.

There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted for extensions to existing buildings. The applicant is advised to visit [thameswater.co.uk/buildover](http://thameswater.co.uk/buildover)

Thames Water would advise that with regard to sewerage infrastructure capacity, we would not have any objection to the above planning application.

'We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing [wwgriskmanagement@thameswater.co.uk](mailto:wwgriskmanagement@thameswater.co.uk). Application forms should be completed on line via [www.thameswater.co.uk/wastewaterquality](http://www.thameswater.co.uk/wastewaterquality)."

#### Water Comments

Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and

minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

Yours faithfully  
Development Planning Department

Development Planning,  
Thames Water,  
Maple Lodge STW,  
Denham Way,  
Rickmansworth,  
WD3 9SQ  
Tel: 020 3577 9998  
Email: [devcon.team@thameswater.co.uk](mailto:devcon.team@thameswater.co.uk)

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We provide the essential service that's at the heart of daily life.

# Comments for Planning Application 17/00239/FULMAJ

## Application Summary

Application Number: 17/00239/FULMAJ

Address: Emperor House 35 Vine Street London EC3N 2PX

Proposal: Demolition of the existing buildings and redevelopment to provide a new mixed use building, comprising offices (Class B1), incubator offices (Class B1), a shop/ cafe unit (Class A1), student/ incubator tenant accommodation and ancillary facilities (619 rooms) (sui generis), and exhibition space associated with a Scheduled Ancient Monument (sui generis), arranged over basement, lower ground, ground and parts 6, 12, 13 and 14 upper storeys plus plant; including a new pedestrian route, creation of new public realm; associated parking, servicing, and ancillary plant and storage; and other associated works.

Case Officer: Alison Hayes

## Customer Details

Name: Mr Ralph Luck

Address: King's College London 57 Waterloo Road London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: King's College strongly supports this application particularly in respect of the student residences aspect and the innovation space. it will add vitality to the area and assist the growth of education and business.

# Comments for Planning Application 17/00239/FULMAJ

## Application Summary

Application Number: 17/00239/FULMAJ

Address: Emperor House 35 Vine Street London EC3N 2PX

Proposal: Demolition of the existing buildings and redevelopment to provide a new mixed use building, comprising offices (Class B1), incubator offices (Class B1), a shop/ cafe unit (Class A1), student/ incubator tenant accommodation and ancillary facilities (619 rooms) (sui generis), and exhibition space associated with a Scheduled Ancient Monument (sui generis), arranged over basement, lower ground, ground and parts 6, 12, 13 and 14 upper storeys plus plant; including a new pedestrian route, creation of new public realm; associated parking, servicing, and ancillary plant and storage; and other associated works.

Case Officer: Alison Hayes

## Customer Details

Name: Mr Archibald Hunter

Address: Newcombe House London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: We occupy the serviced apartments at India Street and America Square which are close to the application site and write in respect of the above planning application for the redevelopment of Emperor House and Roman Wall House, Vine Street, London EC3.

We operate more own brand, award-winning serviced apartments in London than any other operator - over 1,300 and growing. Our buildings range from boutique schemes in cobbled streets and sympathetic refurbishments of historic buildings to the very best of modern architecture.

Apart from our own serviced apartments, we work with a growing network of like-minded operators who pride themselves on the quality of their accommodation and the supporting services they provide - all carefully selected and managed by our partnership team.

We think therefore that the redevelopment would be a valuable enhancement to the this part of the Eastern area of the City close to Aldgate and the Eastern City boundary with Tower Hamlets. We consider that the mixed-use scheme is appropriate in this part of the City and will replace an obsolete office building which currently does little to enliven the area.

The design is of high quality and we note the provision of the incubator office accommodation, Roman Wall exhibition and public realm commitments which are important to creating focus and interest and will make the site more permeable.

We are of the view that the student population created by the scheme will make a helpful contribution to the economic and physical vitality of the Square Mile.

Our schemes at India Street and America Square close to the site would provide useful short term



accommodation for visiting parents and academic staff and our schemes can therefore support the proposed uses - we are familiar with Urbanest's model and this seems an ideal solution to a fairly difficult site. The orientation of the scheme with its entrance along Vine Street is to be particularly commended

In conclusion, we fully support the planning

# Comments for Planning Application 17/00239/FULMAJ

## Application Summary

Application Number: 17/00239/FULMAJ

Address: Emperor House 35 Vine Street London EC3N 2PX

Proposal: Demolition of the existing buildings and redevelopment to provide a new mixed use building, comprising offices (Class B1), incubator offices (Class B1), a shop/ cafe unit (Class A1), student/ incubator tenant accommodation and ancillary facilities (619 rooms) (sui generis), and exhibition space associated with a Scheduled Ancient Monument (sui generis), arranged over basement, lower ground, ground and parts 6, 12, 13 and 14 upper storeys plus plant; including a new pedestrian route, creation of new public realm; associated parking, servicing, and ancillary plant and storage; and other associated works.

Case Officer: Alison Hayes

## Customer Details

Name: Mr John Harding

Address: Daniel Watney LLP 165 Fleet Street London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I am the Surveyor to The Saddlers' Company and write on their behalf in their capacity as freeholder of part of the site, in respect of the planning application for Emperor House and Roman Wall House, Vine Street.

I have reviewed the submitted planning application and discussed the proposals with the applicant. Accordingly, I am pleased to support these proposals. I consider that this mixed use scheme is appropriate in this part of the City of London and will make a welcome addition to the fabric of the City.

I also consider the proposals represent a high quality design, which integrates the uses in a well thought out way; the provision of the incubator office accommodation and Roman Wall exhibition is to be particularly commended. The applicant's commitment to the public realm is welcome.

I consider that the student population created by the scheme will make a valuable contribution to the vitality of the Square Mile.

In summary I fully support this planning application and would be grateful for our views to be relayed to the Members of the Planning and Transportation Committee.

Response from Program Planning Professionals Ltd trading as Pcubed planning application 13/00166/FULMAJ:  
Emperor House, Vince Street & Roman Wall House, Crutched Friars

Ms Alison Hayes  
Department of the Built Environment  
City of London  
PO Box 270  
Guildhall  
London, EC2P 2EJ

16 May 2016

**Ref: Planning Application: 17/00239/FULMAJ**

**Emperor House & Roman Wall House, 35-36 Vine Street & 1-2 Crosswall, London EC3**

Dear Ms Hayes,

I'm contacting you on behalf of Program Planning Professionals Ltd, also trading as Pcubed, in respect of the above planning application submission by Urbanest to officially register our response.

As freehold owners of the adjoining property, Lutidine House, we will be enveloped by the proposed building site with all the health, safety and operational issues this will inevitably entail. There also exists a party wall and these issues will be separately addressed through the provisions within the Party Wall Act, 1996.

Pcubed occupy all 7 floors and the basement of our site at Crutched Friars which is our EMEA head office; of our 180 UK based staff, 70 are regularly based in Lutidine House, with periodic increases in this number.

#### **London's Continued Prosperity & Brexit**

We understand that the City of London Planning Department, Department of the Built Environment and the City of London Corporation in general will be keen to support all investment that contributes to London's long-term prosperity and future as a global economic centre of excellence, especially post Brexit.

Private investment in the City is always a sign of confidence in London's continued status as a global centre for commerce, home to many internationally renowned leading academic institutions and research centres, a cultural and historic centre and a major tourist destination.

Where space can be better utilised and modernised it can only improve the general area and this regeneration, multi-use proposal would be in line with these aspirations.

That said, any developments within the City of London should also make consideration of the impact of these major construction projects on existing, established, rate-paying companies, especially the operational and financial burden this may place upon incumbent businesses.

Developers, residents, corporations and businesses owners rely on The Department of the Built Environment and Planning teams to balance all these considerations on behalf of all parties concerned in a consistent, fair and open forum.

## **Urbanest Application**

The Urbanest proposal is well considered; it addresses student accommodation, business diversity and community betterment and future investment – not to mention guaranteed business revenues for the City of London.

Initial engagement with the senior stakeholder Urbanest team and Pcubed has been positive and in good faith.

## **Concerns**

There are, however, certain assurances we seek and, provided these matters are dealt with, we can see a positive and mutually beneficial co-existence.

Our primary concerns in respect of this development fall into four main categories;

1. Health and safety
2. Potential impact on our business operations, including financial impact
3. Access to our building
4. Framework for effective resolution forum,

We would seek assurances from the applicant and CoL with specific reference to the items below:

### **1. Emergency Egress**

There are currently two emergency egress routes that are facilitated by access via Roman Wall House; under the proposed scheme this building is scheduled for demolition. Our primary concern is the loss of the roof top escape, which currently takes evacuees onto the roof of Roman Wall House and down an external metal staircase to the rear of that building, through the ground floor office and out into the loading bay, then into Crutched Friars.

Urbanest have indicated that there are two sets of plans; their preferred option illustrates no physical link between the adjoining properties.

- i. Urbanest have submitted a statement of intent to fund an upgrade to Pcubed's existing L3 fire alarm system and to advise upon, research and implement a self-contained fire safety solution.

The exact solution is yet to be determined and agreed as further technical research is required.

- ii. The alternative scheme submitted by the applicant indicates a fire escape into the student accommodate block.

Whilst this latter solution is not ideal for either parties, it is the fall-back option in the event the first option is not technically possible.

Response from Program Planning Professionals Ltd trading as Pcubed planning application 13/00166/FULMAJ:  
Emperor House, Vince Street & Roman Wall House, Crutched Friars

Further liaison between the respective fire safety experts and fire system providers is required and discussions are now underway.

Accordingly, and in the absence of any legally binding obligation from Urbanest, we do need to reserve the position while the parties are actively engaged in resolving the matter. We will notify you as soon as any such resolution occurs.

### **2 & 3 Noise and dust pollution, vibrations and employee wellbeing.**

Health and safety is of paramount importance to all parties concerned in this process. Given the proximity of the build to Pcubed premises and the immediate impact on their staff, visitors, and their working environment, we are concerned about the impact upon the health & safety and well-being of our staff.

It is a given that all building works will generate considerable noise, dust and ground shaking vibrations. The main concerns here are;

- the scale and duration of the works and the long-term impact on the health and safety of our staff
- the increased maintenance to the lift, air conditioning and heating system and the increased cleaning regime throughout the building
- the impact of noise and vibrations of heavy machinery, heavy goods vehicles and crane operations on our employees and our normal business operations
- The ability for Pcubed to use its current meeting room facilities throughout the works and to work under these conditions for a prolonged period – this is scheduled to be a four-year build
- Increased traffic and safe and uninterrupted access to Lutidine House

Urbanest and Pcubed representatives met on 12<sup>th</sup> May, 2017; it was agreed that equipment to monitor the noise, dust and vibration levels would be installed.

It is understood much of the heavy goods will initially enter through the Vine Street entrance. However, increased traffic and especially large construction vehicles, will pose increased safety issues, including carbon monoxide emissions.

We would ask that in addition to the that equipment to monitor the noise, dust and vibration levels, a carbon monoxide monitor be placed inside the ground level of Lutidine House.

### **4. Asbestos**

We are confident Urbanest and their team will make us aware of any pertinent safety issues relating to this specific topic and that their construction partners and safety experts have extensive experience and are qualified to deal with this as legally required.

### **5. Establish framework of co-operation and escalation process**

Engagement with Urbanest has been positive, informative and gives us confidence we are dealing with an ethical and considerate neighbour. That said, even good neighbours can sometimes have issues that require arbitration.

Notwithstanding the legal and mandatory requirements of the HSE construction practice guidelines, City of London Code of Practices for Deconstruction and Construction Sites, the Considerate Constructors Scheme Code of Practice, Pcubed seek assurances that concerns or issues that arise during the term of this project will be speedily addressed and resolved to everyone's satisfaction within an agreed co-operation framework forum.

This applies also for Urbanest and it will be to everyone's advantage to agree a process and lines of communication so interruptions and inconvenience are mitigated, and hopefully avoided altogether.

The issues should include, but not be confined to,

- compensations for power outage and data / server interruptions
- in the case of Pcubed, damage to Party Wall(s) or building
- extermination of vermin (prior to non-existing activity) during the excavations
- contamination of water table

This forum should comprise of named persons representing the developers, official health & safety advisors, and City of London officials to discuss issues that may arise with a view to achieving resolution within the agreed framework process.

We are confident of Urbanest's support in this objective and seek assurances and engagement from the principal Planning Officer in this regard.

### **Summary**

In short, provided there is a viable fire escape solution to replace the loss of the roof top egress, general health and safety concerns are suitably managed and Urbanest remain open to discussions in respect of Pcubed's increased maintenance costs, we support this planning application

We are supportive but must reserve our position until the fire escape issue is fully resolved in a manner that is capable of legal enforcement or dealt with as part of the planning process.

Yours faithfully,

Susan Davis  
Facilities Manager

## Addendum

### Emergency Access Routes

6<sup>th</sup> Floor internal  
Fire Exit Door

Internal stairwell  
from 6<sup>th</sup> floor to Roof  
Fire Exit

Route from Pumbed roof  
towards external  
stairwell & LRP demise



External stairwell from roof

External Stairwell from LRP demise to loading bay exit  
ground floor

Response from Program Planning Professionals Ltd trading as Pumbed planning application 13/00166/FULMAJ:  
Emperor House, Vince Street & Roman Wall House, Crutched Friars





To :

Annie Hampson – Director of Planning : City of London Authority

Alison Hayes – Planning Officer : City of London Authority

From :

Steve Pavitt. Flat 7 Fenchurch House. 136-138 Minories. LONDON. EC3N 1NT

OBJECTION to Urbannest UK Ltd. Planning Application : Emperor House and Roman Wall House

REF : 17/00239/FULMAJ

DATE : 31<sup>st</sup> May 2017

Annie / Alison, I am OBJECTING to the planning application that has been submitted by Urbanest and am requesting that planning permission is DENIED. I have three key objections :

1. **The City of London have a stated policy to promote and retain office space in the City of London. This development is student accommodation led and a huge deviation from this policy stance.**

Urbanest have sought to prove that office space in this part of the city of London is not a viable proposition, I would like to raise the following reasons why they are wrong.

- Urbanest present the marketing efforts of Savills over a 3 month period, which included Christmas, as some sort of evidence that there is not a major demand for office space in the area. On the contrary, this very short period of activity generated 5 bids, 3 of which were for office space based schemes, this is a clear majority of the bidders. If a proper period of marketing had been undertaken then I'm sure additional bids would have emerged as well.
- Urbanest also present an economic assessment report from Geraldeve. I'm not exactly sure what the purpose of this report is as it was commissioned by Urbanest to suit their own purposes and it was published after they had already purchased the site so they clearly didn't use it to inform a buying decision. The report content shows that a redeveloped site would provide a greater return than a refurbished site, this is hardly news! The report basically goes on to state several points which prove there is no independence at all in this report and it is entirely self-serving on behalf of Urbanest. This report should be dismissed.
- The City of London have recently approved a new office development at 80 Fenchurch Street, probably less than 100 metres from the proposed development on Vine Street. It consists of 14 floors of office space. I note that the CoL were happy to approve this and the developers felt there was a viable market for the property. This is contrary to all the nonsense I have heard from Urbanest about this area and their empty claim that there is no demand for office space. 80 Fenchurch House is in the same area, the same quadrant, the same sector, there can be no silly claims about it not being a relevant example as to why Urbanest are wrong about the economic viability of 100% office space on Vine Street
- I'm actually confused about Urbanest's position on the viability of office space generally. Their proposed planning application contains space for 600 office space occupants. This is a significant amount of office space, it is not an add-on, an afterthought or just a few incubator places. It is a significant office footprint which they are very reluctant to talk

about. So, if a very significant 600 person office space proposal is economically viable, then the already approved 100% office scheme is also viable.

**2. The scale of the student accommodation proposal is extremely large and overbearing**

- The site proposes around 750 bedrooms some of which could have more than one occupant if people stay together which course some will choose to do. The last population count in the city of London was a little over 8,000 people. So the City of London would be allowing a planning application through which would increase the whole of the CoL population by 10% on just one site which is smaller than a football pitch! The quadrant which Urbanest are so keen to discuss in relation to office space probably has less than 100 residents at present, this would increase to nearly 1,000. This is a massive and overbearing imposition of a huge population of people in an area where there are quite frankly hardly any amenities.

**3. The Extreme loss of light**

- The Prescription Act of 1832 states that the owner of a building with windows that have received natural daylight for 20 years or more is entitled to forbid any construction or other obstruction that would deprive him or her of that illumination. Neighbors cannot build anything that would block the light without permission
- The shocking loss of 60% of light that residents of Fenchurch House are expected to suffer as a result of this development should not be allowed, it goes directly against the Prescription Act and it is an unacceptable burden for residents
- If an office scheme is to go ahead a new re-designed and smaller proposal should be submitted

**So to summarise :**

**My key 3 points of objection :**

**CoL 'Office Space First' Policy :** The Urbanest reports questioning the economic viability of a 100% office space development can be dismissed as they are not independent

**CoL 'Office Space First' Policy :** The City of London clearly disagree with Urbanest on economic viability for a 100% office scheme as they approved a 14 storey office development at 80 Fenchurch Street which is in the same area and quadrant

**CoL 'Office Space First' Policy :** Urbanest themselves think a 600 person office development is viable, this is a significant size and proves the whole site is economically viable as office space

**Overbearing Population Increase :** A 10% increase in the City of London's population on a small football pitch sized site at the expenses of economically viable office space is an overbearing increase in population and a serious loss of economic capacity to the City of London

**Extreme Loss of Light.** 60% loss of light to residents in direct contravention of the Prescriptions Act of 1832 is unacceptable

I look forward to details of the planning meeting on the 23<sup>rd</sup> of June, my partner and I would like to attend.

Thanks, Steve Pavitt

**Hassall, Pam**

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**From:** PLN - Comments  
**Subject:** FW: Objection to the application for Emperor House (17/00239/FULMAJ)

**From:** Kate Aspinall [mailto:]  
**Sent:** 05 June 2017 09:04  
**To:** PLN - Comments  
**Subject:** Objection to the application for Emperor House (17/00239/FULMAJ)

Dear Alison,

I am writing to OBJECT to the application for Emperor House (17/00239/FULMAJ). am requesting that planning permission is DENIED.

My husband and I live in the residential building across the street from the proposed site, 136-138 Minories. We are excited about the area and enthusiastic about the revival to this historic district.

I hope that in weighing this decision, which will alter this area greatly for better or worse, that you take into account residents – the documents in support of the application seem to come largely from business owners and universities not in the neighbourhood who stand to profit from the student housing.

Here is a brief summary of my issues with the application:

1. **Scale** – to better reflect the character of the area: height to conform to surrounding area better
2. **Change of use** - influx of students creates an undesirable surge in type of consumer pressure & countering City of London policy to promote and retain office space
3. **Extreme loss of light** – we stand to lose a dramatic amount of light to all of our living spaces; this FAILS three of the four BRE categories according to the Daylight and Sunlight Analysis by Delva Patman Redler (SG/sg/10047, Nov 2013) – please could this and the height be reconsidered.
4. **Design/Beautification** – I request that even if scale and historic character must be disproportionate then the Council require the developers to spend money on public art, to be administered by local residents – a true aesthetic boon to the community.
  - a. **Passageway** – the passageway proposed would increase noise – of gates opening and closing, etc – as well as generate more pedestrian traffic which includes smoke that funnels up into our windows, etc. Please could provisions be made to protect morning and evening noise levels if current plans go ahead
  - b. **Non-demolition of historic buildings** - Roman Wall House on Jewry Street is in keeping with historic character of the surrounding streets, to demolish it would be to lose a bit more of what makes the area an historic and aesthetic draw to workers, locals and tourists alike

I look forward to discussing the matter further.



Sincerely,

Kate Aspinall

Flat 11, Fenchurch House

136-138 Minories

EC3N 1NT

K/T

To :  
Annie Hampson – Director of Planning : City of London Authority  
Alison Hayes – Planning Officer : City of London Authority

From :  
Brian Noone  
Flat 11, Fenchurch House  
136-138 Minories  
LONDON EC3N 1NT

5 June 2015

**OBJECTION to Urbannest UK Ltd. Planning Application : Emperor House and Roman Wall House**

**REF : 17/00239/FULMAJ**

Dear Annie and Alison,

I am writing to **OBJECT** to the application for Emperor House.

My wife and I live in the residential building across the street from the proposed site, 136-138 Minories, and we are enthusiastic residents of Aldgate, looking forward very much to the continued revival of this historic district.

I note that the documents in support of the application come largely from business owners and universities not in the neighbourhood who stand to profit from the student housing: they are, for the most part, not residents and are not invested in making Aldgate into one of London's great neighbourhoods.

I am objecting to the application on several grounds, detailed below in sections.

I look forward to discussing the matter further.

Sincerely,  
Brian Noone

#### **SUMMARY**

I **OBJECT** to the proposed development and wish planning permission to be **DENIED** on the following grounds. If the proposal is accepted, I request the following conditions/changes be implemented.

#### **1. BUILDING HEIGHT**

##### **1.1 SCALE**

- I request the reconsideration of the height of the new building as regards the integrity of the character of the surrounding neighbourhood

##### **1.2 LIGHT**

- I request the reconsideration of the height of the new building as regards the dramatic (60%+) loss of light that will be suffered by the development's only residential neighbours

##### **1.3 REDEVELOPMENT POSSIBILITIES**

- I request the height of the new development to be reconsidered, as the Economic Assessment presents positive profits for all possible uses, including keeping the building at its current height.

## 2. CHANGE OF USE

-I request the rejection of the current proposal on the grounds that accommodation for transient students harms the character of the neighbourhood, and this change of character is not compensated by the change of profitability (which, according to the Economic Assessment is a difference of 3.8%).

-At the very least, I request that before approval a thorough assessment is undertaken to understand the impact of such a dramatic increase in residents in such a small area with, at the moment, few of the necessary services and restricted road access.

## 3. DESIGN

### 3.1 PASSAGE

-I request the "public link" NOT be included in the revised proposal on the grounds of privacy and noise.

-If the public link is retained, I request enforceable conditions on the noise and the cigarette smoke generated.

### 3.2 BEAUTIFICATION

-Since the developer's only justification for the proposed building's extreme height is aesthetic, I request that the Council require the developers to spend money on public art, to be administered by local residents – a true aesthetic boon to the community.

## 1. BUILDING HEIGHT

I urge the Council to reconsider the height of the proposed development. I understand the Council approved a project in 2014 with a similar height (13/00166/FULMAJ), but I don't believe the objections were adequately put forth or responded to.

### 1.1 SCALE

Firstly, the height of the proposed building is disproportionate to the surrounding buildings. "The height of the immediate surrounding buildings vary from 4 upwards to 8 storeys," according to the Design Observations document from the first application 13/00166/FULMAJ (23 Dec 2014). The proposed building is 11 storeys tall, in no way proportionate to the existing structures, including a Grade II-listed heritage building.

Aldgate is an area of significant growth potential – a mixed-use district with an exceptionally rich history and a target for incoming funds and attention. Retention of heritage-scale buildings is crucial to retaining the character of the neighbourhood, to ensure that it is not just another quarter of high-rises (which could be located anywhere) but instead is a historically-sensitive, beautiful place that draws people to it.

Aldgate has not been a focus for Londoners or visitors for years because it has not heeded this advice. As the Aldgate Masterplan by Tower Hamlets council says on the opening page of its report, speaking of Aldgate:

"A legacy of poorly designed, large scale office blocks detracts from the quality of the public realm."

Do not let this legacy continue with another poorly designed, large scale building that doesn't take into account the needs or vision of the community.

The only justification given by the developers is summed up in that same Design Observations document (23 Dec 2014), relating to the previous application (13/00166/FULMAJ). The extreme height of the newly proposed building is justified in the following manner:

"The site is a 'bookend' site on the junction of three roads which justifies a building with more prominence and scale in townscape terms to robustly visually support the corner."

This is not bourn out by the rest of the City. The most prominent "bookend" site in the City of London is arguably No 1 Poultry, which is 5 or 6 storeys tall, and it robustly visually supports the corner very well. (For years, you will remember, there was a proposal to put an 18-storey tower on that site at Poultry – a proposal that failed, to the benefit of the cityscape.)

There is absolutely no aesthetic grounding for the extreme height of the proposed building. Height is more profitable, certainly, but it is not more visually robust, and it is if anything a detriment to the historic neighbourhood.

## 1.2 LIGHT

The Daylight and Sunlight Analysis by Delva Patman Redler (SG/sg/10047, Nov 2013) for the previous project forecasts a dramatic reduction in light for the only neighbouring residential building, 136-138 Minories – a reduction that is very similar to the new proposal.

To begin, the assessment includes only 4 of the 5 floors of the building (there is a flat on floor 5 not mentioned in the report) – an oversight that one hopes is not an indication of the overall competence of DPR.

The amount of light reduction forecast by DPR is dramatic – to take only one flat as an example (other flats are worse):

VSC (Vertical Sky Component):

Window 1: -60.98%

Window 2: -61.90%

Window 3: -62.38%

Window 4: -62.41%

These "do not meet the BRE recommendations" according to the report. All windows in the building "fail".

NSL (No Sky Line)

Window 1: -59.35%

Window 2: -58.09%

Window 3: -55.62%

Window 4: -69.98%

These also "do not meet the BRE recommendations" according to the report. All windows in the building "fail".

ADF (Average Daylight Factor)

Window 1: -43.07%

Window 2: -43.66%

Window 3: -43.91%

Window 4: -43.89%

Average Probable Sunlight Hours

Window 1: -72.41%

Window 2: N/A (bedroom)

Window 3: N/A (bedroom)

Window 4: -61.54%

These also "do not meet the BRE recommendations" according to the report. All windows in the building "fail".

The numbers for the revised Daylight/Sunlight Report (22 March 2017) do not differ significantly from any of the above.

The development will dramatically reduce the amount of the light in flats at 136-138 Minories by more than 60%.

This is unacceptable planning: it is the creation of a tower where none is needed that not only harms the neighbourhood's character but also harms the very few permanent residents that it already has. In addition to diminishing their experience in their own homes, it also devalues their properties due to loss of light – a double impact that seems hard to justify.

### 1.3 REDEVELOPMENT

The report prepared by Gerald Eve on behalf of Urban Nest regarding the change of use – Emperor House and Roman Wall House Economic Assessment (A Lifecycle Cost - Benefit Analysis) (17 May 2017, dated January 2017) – demonstrates no need for the change of use, let alone for the redevelopment at all.

The report compares three possible uses of the site:

- 1) refurbishment of current premises
- 2) the 2014 office redevelopment
- 3) the 2017 student resident redevelopment.

The conclusion is, in short: all three would be profitable.

They are profitable to different degrees, but all three would bring profits to developers. So the question for the Council is: How much profit is the right amount, and who should benefit?

I contend that the primary beneficiary should be the neighbourhood: the historic character of the area is under threat from overdevelopment and retaining the scale of the surrounding buildings should be paramount.

As the Aldgate Masterplan notes about Aldgate on its opening page,

"A legacy of poorly designed, large scale office blocks detracts from the quality of the public realm."

The fewer tall buildings, the better off the public realm – and that is good for everyone in the neighbourhood.

### 2. CHANGE OF USE

If the height of the building must be retained, then the only concern here is, according to the Gerald Eve analysis, a choice between:

- 2) the 2014 office redevelopment
- 3) the 2017 student resident redevelopment.

The difference in this case is between an estimated profit of 12.7% (2) and an estimated profit of 13.2% (3).

The difference of estimated profit represents a figure for the office that is just 3.8% lower than the figure for the student residence, meaning the profits of the office would be 96.2% as high as the profits of the student residence. This is quite a small difference.

The primary beneficiary should be Aldgate and the City. Would transient students bring enough of a benefit (and not too many costs) to the neighbourhood, as compared to offices?

Having lived near students for years, I think the benefits of short-term students (increased restaurant revenue, perhaps also retail) are heavily outweighed by the costs: namely, noise, disrespect for local amenities and community, and the increased number of criminals who enter the neighbourhood looking to prey on naïve students.



The report also makes questionable assumptions about foreign students' willingness to come to the UK. The lack of serious attention to the influence of Brexit on student numbers in the report has me questioning the profitability figures.

What's more, there appears to be no serious enquiry into the effects of increasing the City's resident population by approx. 6.8%. This is a substantial increase (11,000 + 750), and it remains unclear whether the narrow streets that surround the site would be suitable for the all-hours foot, bicycle and automobile traffic that would be involved in the new development. It would seem irresponsible to approve the student housing project before investigating its most serious potential ramifications.

For these reasons, I urge you to reject the change of use for the premises.

### 3. DESIGN

Several aspects of the revised design introduce new problems for neighbours.

#### 3.1 PASSAGE

The proposed passage, separating the office and residential blocks and running between Vine Street and Crutched Friars, is called a "public link" in the design. It is best visible on page 30 of the Design and Access Statement (labelled (3)).

The passage in effect creates a new street directly outside 136-138 Minories, perpendicular to the residential windows. This directly:

- A) reduces privacy
  - Only a sliver of the residential space can be seen from the public roadway at the moment. With the passage, that will increase significantly
- B) increases pedestrian noise
  - More people, especially people in transit, will mean more noise at all hours when the passage is open to the public
- C) increases traffic noise
  - At the moment, very little traffic noise from Crutched Friars reaches 136-138 Minories, but if the passage is constructed, traffic noise will increase significantly thanks to its unobstructed transmittance through the passage.
- D) passage gate noise
  - For safety reasons the proposal was refined to restrict the opening hours of the passage. Presumably the passage will have some type of gate that requires opening and closing at the exceptional hours of 6am and 10pm. The gate will likely make noise – noise at hours when many people sleep – and this needs to be accounted for.
- E) increases the amount of pedestrian traffic, which will increase the cigarette smoke
  - This is already problematic with the current gap between the buildings and likely only to become worse with such a dramatic increase in the number of residents and office workers in the building, as well as the narrowing of the gap

The Environmental Noise Survey by Hann Tucker Associates that accompanies the application makes no reference to these noises, and nowhere in the application is the privacy of the residents of 136-138 Minories considered.

I request that the design be modified to exclude the passage.

If the passage is retained, I request conditions on the passage that limit the potential for noise: conditions such as the decibel level acceptable for the gate mechanisms and on-duty staff in the new development who can be held accountable for excess noise and whose details are made available to neighbours.

### 3.2 BEAUTIFICATION

In the Design Observations document (23 Dec 2014), relating to the previous application (13/00166/FULMAJ), the extreme height of the newly proposed building is justified in the following manner:

**"The site is a 'bookend' site on the junction of three roads which justifies a building with more prominence and scale in townscape terms to robustly visually support the corner."**

This is an aesthetic argument. Yet nowhere else in the Design and Access Statement is serious consideration given to the public realm. A modest Public Realm Strategy is offered in section 6.0 of the Design and Access Statement, but it does little to contend with the developing diversity and beauty of Aldgate.

Public art is a notable and effective way to further beautify an area beyond its architecture. I request that the proposal be amended to include permanent provision for public art, paid for by the project developers but implemented by the citizens of Aldgate – those who live and work here. More than extending the height of the building skyward, the deployment of public art could genuinely give the corner and district more prominence and more robust visual support.

# Comments for Planning Application 17/00239/FULMAJ

## Application Summary

Application Number: 17/00239/FULMAJ

Address: Emperor House 35 Vine Street London EC3N 2PX

Proposal: Demolition of the existing buildings and redevelopment to provide a new mixed use building, comprising offices (Class B1), incubator offices (Class B1), a shop/ cafe unit (Class A1), student/ incubator tenant accommodation and ancillary facilities (619 rooms) (sui generis), and exhibition space associated with a Scheduled Ancient Monument (sui generis), arranged over basement, lower ground, ground and parts 6, 12, 13 and 14 upper storeys plus plant; including a new pedestrian route, creation of new public realm; associated parking, servicing, and ancillary plant and storage; and other associated works.

Case Officer: Alison Hayes

## Customer Details

Name: Mr Robert Buchele

Address: Finsbury Circus House 15 Finsbury Circus London

## Comment Details

Commenter Type: Neighbour

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: We write on behalf of BCDH Capital Holding FC Sarl who are the freeholders of Friary Court, 65 Crutched Friars. We have reviewed the submitted planning application and discussed the proposals. We welcome the proposed mixed-use development and we are pleased to support the application.

We believe that a mixed-use scheme is appropriate for this area of the Eastern Fringe of the City. The Hopkins designed scheme represents a high quality addition to Crutched Friars which at present is adversely impacted by the existing buildings that have been empty for some time. The improved frontage and entrance to the proposed incubator accommodation on Crosswall will also be a much-welcomed addition.

It would appear that the mix of uses are integrated well and that the development will animate the area positively and the creation of a new public walkway linking Vine Street to Crutched Friars / Jewry Street alongside the Roman Wall should be commended.

## Hayes, Alison

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**From:** PLN - Comments  
**Subject:** FW: Objection :- Urbannest Planning Application Emperor House 17/00239/FULMAJ

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**From:** Murphy, Chris []  
**Sent:** 06 June 2017 16:47  
**To:** Hampson, Annie; Hayes, Alison  
**Subject:** Objection :- Urbannest Planning Application Emperor House 17/00239/FULMAJ

Annie/Allison,

For the attention of the Committee ~ below I set out my objections to the revised planning application:-

### Student accommodation

The previous planning approval for, 'substantial office accommodation', was based on the City planners desire to provide office accommodation in this area of the City i.e. proximate to Ledenhall and Fenchurch street, and Aldgate itself, where similar developments already exist or are in the process of construction. I have not seen any subsequent evidence proving that there is now a justification for providing student accommodation in this particular location on the basis that there is no current demand for business accommodation.

To allow the proposed planning application will be to provide very expensive accommodation for wealthy students who do not study in the City itself, with the consequence of increasing the population of the city by approximately 10%.

In turn there is no proposal to provide the necessary support services.

Currently there are a number of people living in Emperor House, and even with a relatively small number of people living in the building there is a negative effect on the resident of Fenchurch House, from lights being on throughout the night, 7 days a week. Imagine the overall effect of p to 1000 individuals living opposite Fenchurch House.

The addition transport usage will no doubt contribute negatively to 'pollution' in the city.

It is appreciated that the area is one of significant historical interest and that Vine Street will attract additional tourism with the opening up of the view of the Roman Wall. Tourism in this area should be a priority. The mix of offices and increased tourist presence is understandable. The addition of a significant increase in the residential population on top of the increase in tourism is excessive and inappropriate. What is appropriate is a reasonably large office block that is not so detrimental to the existing residents.

### Noise

Vine street is already a popular place for inventive, 'Ripper tour' guides to bring their customers to and in order to moderate the noise level in this narrow street where noise reverberate, I would request that the insertion of a 'public link' is rejected, should this planning application be approved in its current form. I understand that the provision of such a 'link' is not at the behest of the developer but at the request of the Planning Authority itself.

### Loss of light ~ Daylight/Sunlight Report 22/03/17

The substantial loss of light to the Fenchurch house residential accommodation of 60%, should lead to a review of the building design, as it seems excessive to reduce the level of light which has been enjoyed by the residents for decades, so dramatically.

Regards

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Christopher Murphy  
Flat 8 Fenchurch House

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**Adjei, William**

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**From:** Hayes, Alison  
**Sent:** 10 July 2017 11:54  
**To:** Adjei, William  
**Subject:** FW: URGENT - Fire Safety Concerns  
**Attachments:** RE PLN FW Urbanest Planning Application Ref 1700239FULMAJ PP-05850410 COL05094511

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**From:** Davis, Susan [REDACTED]  
**Sent:** 06 July 2017 15:02  
**To:** Hayes, Alison  
**Subject:** URGENT - Fire Safety Concerns

Dear Alison,

**Re: Planning Application 17/00239/FULMAJ, Emperor & Roman Walls Houses, 35 – 35 Vine Street & 1 – 2 Crosswall**

As you know, our company's submission to the CoL Planning team in respect of the above development was positive and in principle remains so, provided our safety and operational concerns are properly addressed.

The primary assurance we sought was a viable and safe alternative should Urbanest remove the existing roof access exterior emergency egress and through their network of agents commissioned a fire safety study based on a single stairwell solution.

That was prior to the Grenfell Tower tragedy and, in light of these terrible events, our Directors have asked that I commission an independent fire safety study. We have contacted a company called M10 Fire Consultants and we are now awaiting their report.

If their findings support the conclusions of the prior studies, we will agree a heads of terms with Urbanest. This will effectively a guarantee to bear the upgrade costs for these works.

However, if the M10 report differs in its recommendations we will need to ask the Planning & Dept. of the Built Environment to consider Urbanest's alternative planning submission that illustrates a physical link/ corridor connecting both Lutidine House and the new development.

This email is just to make you aware that the second plan may need to be considered. Is there anyone in your team of CoL that would be able to read both the fire study reports and input into the planning application hearing?

Regards,

Susan.

**Susan Davis**  
Facilities Manager  
PCU3ED

Program Planning Professionals Ltd.  
3-5 Crutched Friars | London | EC3N 2HT | United Kingdom (England-3025947)

**ACKNOWLEDGED**



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**GERALDEVE**

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Department of the Built Environment  
City of London  
PO Box 270  
Guildhall  
London EC2P 2EJ  
FAO: Alison Hayes

6 July 2017

Our ref: NJB/JRA/HFA/J7740  
Your ref: 17/00239/FULMAJ

Dear Madam,

**Emperor House and Roman Wall House**  
Ref: 17/00239/FULMAJ

We write further to the recent letters of objection to the above planning application, received from residents of Fenchurch House, 136-138 Minories. For reference, I have set out below the objections to which this letter responds:

- Letter of objection from Mr Pavitt dated 31 May 2017
- Letter of objection from Mr Noone dated 5 June 2017
- Letter of objection from Mrs Aspinall dated 5 June 2017
- Letter of objection from Mr Murphy dated 6 June 2017

Our consultation programme has included regular engagement with the residents of Fenchurch House throughout the planning process. Specifically, we have met Mr Pavitt and Mr Murphy on the following occasions:

- 25 November – Public Exhibition
- 13 February – Briefing day
- 20 April – 1 to 1 late night tour of Urbanest's Westminster Bridge Road development (Mr Pavitt)
- 04 May – 1 to 1 late night tour of Urbanest's Hoxton development (Mr Pavitt and Mr Murphy)

On every occasion we have sought to address the concerns which have been raised by residents, and have been open and transparent in presenting the full details of the proposed scheme.

We wrote to Mr Murphy and Mr Pavitt in February this year following our briefing meeting to provide clarification and address the issues which had been raised, particularly in relation to issue of

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mature tree planting along Vine Street and to confirm that there wouldn't be any outdoor balcony areas accessible to students.

Invitations to attend both the public exhibition in November, and the Briefing Day in February were extended to Mr Noone and Mrs Aspinall, though we did not receive any comments from them on the proposals prior to the application.

The objection letters raise similar issues which can be broadly summarised as follows:

- Loss of office floor space and the viability of the site for office use;
- Design and scale of the proposed building;
- Scale of proposed student accommodation and concern of the impact on amenity and the local area;
- Daylight and Sunlight;
- New pedestrian link

We respond to the above points of objection raised in the letters as follows:

#### **Office Floorspace**

The application documents include a detailed analysis of the viability of the site for office development. There is no prospect that that extant planning permission for office redevelopment will come forward in the long term, given amongst other things the location of the site and market conditions.

Savills have confirmed to us that their marketing period included advertising in the property press and direct marketing, plus presentations to over 200 UK and International investors, which generated 25 property inspections. We understand that a number of office and other commercial developers were interested in the Site when it came to the market, however no commercial developers could ultimately make the redevelopment scheme a viable proposition (as was the case for London & Regional who were selling the site, and who are a specialist commercial developer).

Mr Pavitt raised the point that the marketing of the Site was insufficient. Urbanest did not market the Property for office development. This was conducted by the vendor's agent, Savills a respectable and national marketing agent. The marketing period took place in Q3 2015. Urbanest viewed the site in October 2015 and was invited by the vendor to make an offer by 18 November 2015. There is no evidence from Savills which indicates that a longer market period would have resulted in additional bids. Also, the marketing period was prior to the EU Referendum in June 2016, in arguably a stronger market. If this exercise was repeated now, there would be an even lower prospect of success.

As is required by the City's validation requirements for an application of this nature the applicant submitted an Economic Assessment, in support of the planning application. Whilst the report was prepared following the purchase of the site, the report does reflect inputs, which are in Urbanest's own appraisals and informed the pre-purchase decisions. This report is being independently

assessed by GVA, a professional, reputable and experienced advisor who have been appointed by the City of London.

80 Fenchurch Street is cited by Mr Pavitt as a recent example of office redevelopment in the vicinity of the Site. 80 Fenchurch Street is located in a more core position with a more commercially favourable address. That said, this site has currently been mothballed, with no recent site activity. It is noted that the planning application for this site was submitted in 2008. Six years after the submission of an application for detailed planning permission, the City of London granted conditional approval following the completion of a Section 106 Agreement on 11th November 2014. Despite being sold in 2014, the scheme has still not come forward. This illustrates the fragility of the office market in this part of the City.

Urbanest has always envisaged a mixed use, student and office scheme for this site. This reflects other recent Urbanest schemes which are truly mixed use. Unlike commercial developers considering the site for a large floorplate office redevelopment, Urbanest were able to consider a scheme based on the floorspace of the approved scheme, which meant a viable redevelopment could be proposed. Indeed, it is only because there is a prior commitment with King's College London (KCL) for the student accommodation element of the scheme that Urbanest can offer the proposed office floorspace in this location. Given the market and viability concerns relating to the location of the site, even the quantum of office floorspace being proposed is economically challenging, and it is not considered sustainable to provide traditional office floorspace.

Urbanest has designed the office element of their scheme to specifically meet the market in this peripheral location, and ensure it is deliverable. The proposed office element of the scheme will comprise 6,806 sqm (GIA) spread across eleven upper floors with floorplates ranging from 350-500 sqm. The office floorspace has been designed to respond to the requirement for SME office space in the 300-1000 sqm range, as identified in the City of London's 'Clusters and Connectivity' research report (2016). Given the floorplate sizes and location of the building, it is expected the building will be multi-let and offer an opportunity for potentially circa 12+ SME companies. This is in addition to the incubator office space of 911 sqm (GIA) which is being offered at peppercorn rent and will be taken up by King's College.

The applicant has taken care to ensure this element of the scheme is designed to meet the expectations of the market to ensure that the proposals will come forward immediately, should the City of London grant planning permission. The proposed office accommodation has been designed to specifically meet the requirements of the SME market, which is suitable for this part of the City. The provision of the new office building and incubator space would accord with the City's objectives to meet the specific requirements of SMEs and start-ups as promoted by policy. The scheme will result in a smaller quantum, but a higher quality of office accommodation, which is considered to be sustainable and deliverable to the market and which will add to the mix of commercial uses in the area.

Urbanest have been open about their ambitions for a mixed use development for the site throughout the pre-application process and have not been reluctant to discuss the commercial elements of the scheme.

#### **Student Accommodation**

In total the proposed development will include 619 student rooms, spread across a range of different room types including studios, ensuite rooms, non-ensuite rooms and twin-share rooms. 26

(4%) of the rooms will be twin share rooms. All other rooms will be single occupancy rooms. As with all of their other schemes across central London, Urbanest will strongly enforce their policy of not allowing sharing or sub-letting rooms. This will be included in the Student Management Plan, which will be enforceable through the S106 Agreement. The total number of students renting rooms would therefore be a maximum of 643, significantly less than the numbers cited in the letters of objection and not an increase in the population of the City by 10%.

In the context of this highly accessible central London location, this is not considered to be an excessive population of students. Urbanest have an excellent track record of owning and operating student residences of this scale across central London. A Student Management Plan submitted with the application demonstrates how Urbanest would operate the student accommodation, including details relating to security and management of anti-social behaviour. Urbanest provide 24/7 on-site management for all of their buildings, and would maintain a regular dialogue with local residents in order to address any concerns, should they arise.

Evidence of how Urbanest developments are operated and managed was provided to Mr Pavitt and Mr Murphy. At their request Urbanest arranged two late night tours which they attended where they were able to experience first-hand the professional way in which the buildings are operated by the on-site management team. There was no indication of anti-social behaviour at any point on these visits, and it is notable that no examples were referred to in the objection letters. Urbanest work very closely with their university partners to actively manage their accommodation, and as a result have developed a reputation among universities as London's premier student accommodation provider.

A Student Demand Analysis report, prepared by JLL, was submitted with the application which demonstrates that there is considerable demand for additional student accommodation and a shortage of supply in central London. Indeed, only one student housing development has been delivered in the City in the last 10 years. The proposed student accommodation will support and enhance the City's role as an international centre of learning, as well as its economic function. Those who have studied in the City may be more willing to work there in the future.

The development will not have adverse impacts on local amenities and services. Student's amenities' will primarily be served by their University. The area is well served by healthcare services, and the introduction of student accommodation will not have a significant impact. All full time students are required to register at their respective university GP and, as a result, there will be no requirement to register at a practice local to their accommodation.

We do not consider that the proposed development will result in significant additional effects on the local transport and highway networks. This is, principally, because the proposed development would result in a significant reduction in trips during the weekday AM and PM peak periods and per day compared to the consented office development, which will be beneficial to the highway and transport networks. The proposed development is car-free, with the exception of disabled parking, and provides cycle parking in excess of London Plan standards. In terms of servicing, the proposals would result in a reduction in the number of deliveries to the Site when compared to the extant planning permission for office-led redevelopment. The proposals include a dedicated servicing bay which is accessed from Crutched Friars, some distance from the nearest residential properties.

It should also be noted that the scheme is considered likely to have positive social and economic impacts on the local economy, through increased local spend from students and office workers, and by bringing a vacant site back into use.

The student bedrooms will be let by King's College London to their students. The development will provide a range of different room types including studios, ensuite rooms, non-ensuite rooms and twin-share rooms. This will ensure that rooms are available at a range of different price levels. We would also note that it is proposed that a small number of the student bedrooms in the development could be made available to tenants of the incubator accommodation. Bedrooms in the southern 'Crosswall' part of the building (comprising 59 bedrooms) could be let either to students or qualifying tenants of the incubator accommodation, with rooms priced to match the weekly rents paid by students, providing incubator tenants with affordable accommodation in the City.

### **Design, Height and Massing of Proposed Building**

The height and massing of the proposed building has previously been considered acceptable by the City of London under planning permission 13/00166/FULMAJ which is a material consideration in the determination of this application and remains valid until 29 June 2019. The proposed development represents a high quality design, which responds effectively to the opportunities and constraints of the site.

Given the extant planning permission, it would be erroneous to think that if the current scheme were unsuccessful a future scheme would be "re-designed and smaller" as stated by Mr Pavitt. We also note that the principle of demolition of both existing buildings has been established by the extant planning permission.

The proposal will contribute to the improvement of local amenity through the provision of a new area of public realm on Jewry Street, which exceeds that provided by the extant planning permission. In terms of cultural offer, the proposals will also provide public access to Roman Wall and a new exhibition, curated by Museum of London, at a cost to the applicant of approximately £10-15m. We would point out that the Roman Wall exhibition is proposed as a central part of a genuinely mixed use building, and its educational and cultural function is well suited in this context. It is unlikely that a wholly commercial scheme would be able to incorporate the Roman Wall exhibition in this way.

The proposed Roman Wall exhibition and new public realm are public benefits which will enhance the local area. It is not considered reasonable for the scheme to additionally provide public art.

### **Daylight and Sunlight**

In terms of daylight and sunlight, the form of the proposed scheme is almost identical on the northern portion of the site to the scheme approved by the City in 2013. In that instance, the members of the Planning and Transportation Committee concluded that the impact was acceptable.

The Proposed Development has been designed within the same external envelope as the extant planning permission on the northern part of the site, which was previously considered acceptable by the City of London. Where massing has changed in the Proposed Development compared to the previously approved scheme, it has been purposely located as far away from surrounding residential accommodation as possible, the primary change being to the Emperor House South element of the development fronting Crosswall.

The submitted Daylight and Sunlight Report demonstrates that in the small number instances where there is a change in the levels of daylight and sunlight amenity to surrounding buildings

when compared against the extant planning permission, these changes would be imperceptible to the occupants of those buildings.

#### **Pedestrian Link**

The proposed pedestrian route linking Jewry Street to Vine Street would provide a significant public benefit to the area in improving permeability and accessibility. The route would also provide a 'picture window' with excellent views overlooking the remnants of the City Wall below, which would be a further public benefit. The pedestrian link was discussed with local residents throughout the consultation process and in response to feedback anti-skateboard measures have been incorporated as well as an offer to close the route from 10pm-6am if necessary. The pedestrian link would be maintained and managed by Urbanest's on-site management team.

The pedestrian link would not lead to a significant increase in noise, either from road traffic or additional pedestrians.

#### **Conclusion**

In summary, the current proposals have been carefully considered. The Proposed Development comprises a truly mixed-use scheme consisting of offices, incubator accommodation, student accommodation, retail and public exhibition space. The viability analysis relating to the loss of the existing offices on the Site and the analysis relating to the extant permission, satisfactorily demonstrates that the continued use of the buildings and Site for full office use would not be viable. It is considered that the loss of the existing buildings would not have a detrimental impact on the provision for office development and the demand for long term employment growth in accordance with Policy CS1.

The proposed office accommodation designed for this specific location, and unlike the consented scheme and other developments in the locality, is deliverable. The combined area of the offices and incubator space measures 7,717 sqm GIA. Whilst the proposed office accommodation represents a slightly smaller quantum than the existing provision, the accommodation will be of a high quality and more efficient than the existing buildings.

In total the proposed development will include 619 student rooms. In accordance with policy the Proposed Development is supported by King's College London. The accommodation will be fully managed by Urbanest, and will not result in an overbearing increase in the local population.

The daylight and sunlight impacts are very similar to that previously approved by the City.

We trust that the above responses are helpful in addressing the issues raised by objectors and can be taken into consideration.

Yours faithfully,



**Gerald Eve LLP**

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<b>Committee:</b>	<b>Date:</b>
Planning and Transportation	25 July 2017
<b>Subject:</b> Wood Street Police Station 37 Wood Street London EC2P 2NQ  Erection of a nine storey tower extension, infill of existing courtyard, internal refurbishment, conversion of basements, provision of car and cycle parking, refuse and recycling storage and associated works for police station (sui generis) use (Total new floorspace 2897sq.m GEA).	<b>Public</b>
<b>Ward:</b> Bassishaw	<b>For Decision</b>
<b>Registered No:</b> 17/00130/FULMAJ	<b>Registered on:</b> 17 March 2017
<b>Conservation Area:</b> NO	<b>Listed Building:</b> Grade II*

## Summary

Planning permission and listed building consent are sought for the erection of a nine storey tower extension, infill of existing courtyard, internal refurbishment, conversion of basements, provision of car and cycle parking, refuse and recycling storage and associated works for police station (sui generis) use. This report deals with the relevant considerations for both applications.

The proposed development would provide additional accommodation for the City Police and facilitate the rationalisation of the three existing Police stations within the City of London. The services provided by the Police Station are strategically located at this site, in close proximity the Guildhall and other City administrative provisions.

The proposal would ensure the long term use of the site and provide a building of sufficient floorspace to enable the consolidation of the critical services of the City of London Police estate within one central location.

A Statement of Need has been submitted in support of the applications setting out the reasons for the proposed future rationalisation and consolidation of the City Police facilities.

The existing building provides 12,438sq.m of floorspace (GEA), the proposed development would provide 15,335sq.m of floorspace (GEA) an increase of 2897sq.m (GEA).

Three letters of objection have been received from the Friends of City Gardens and two members of the public in relation to the protection of a pair of kestrels nesting on the building.

Historic England is concerned that the extension would cause serious harm to the aesthetic value of the building. They considered that, provided a clear justification for the Police operational needs to alter and extend the tower extension could be demonstrated, and that it was shown why other sites were not suitable to accommodate a consolidated service, this harm could be partially mitigated through carefully detailed design.

The Twentieth Century Society objects to the proposals on the grounds that substantial harm would be caused to the Grade II\* listed building. The Society is not convinced that it has been demonstrated that the consolidation of the Police's use on this particular site has a public benefit that can outweigh this harm.

It is considered that the proposals would result in less than substantial harm to the special architectural or historic interest of the building in terms of its aesthetic significance. The harm is outweighed by the public benefits of the proposal which comprise the intensification of the use of building as the continued headquarters of the City of London Police in a form that allows local and national policing and security duties to be carried out in modern accommodation that meets current day requirements.

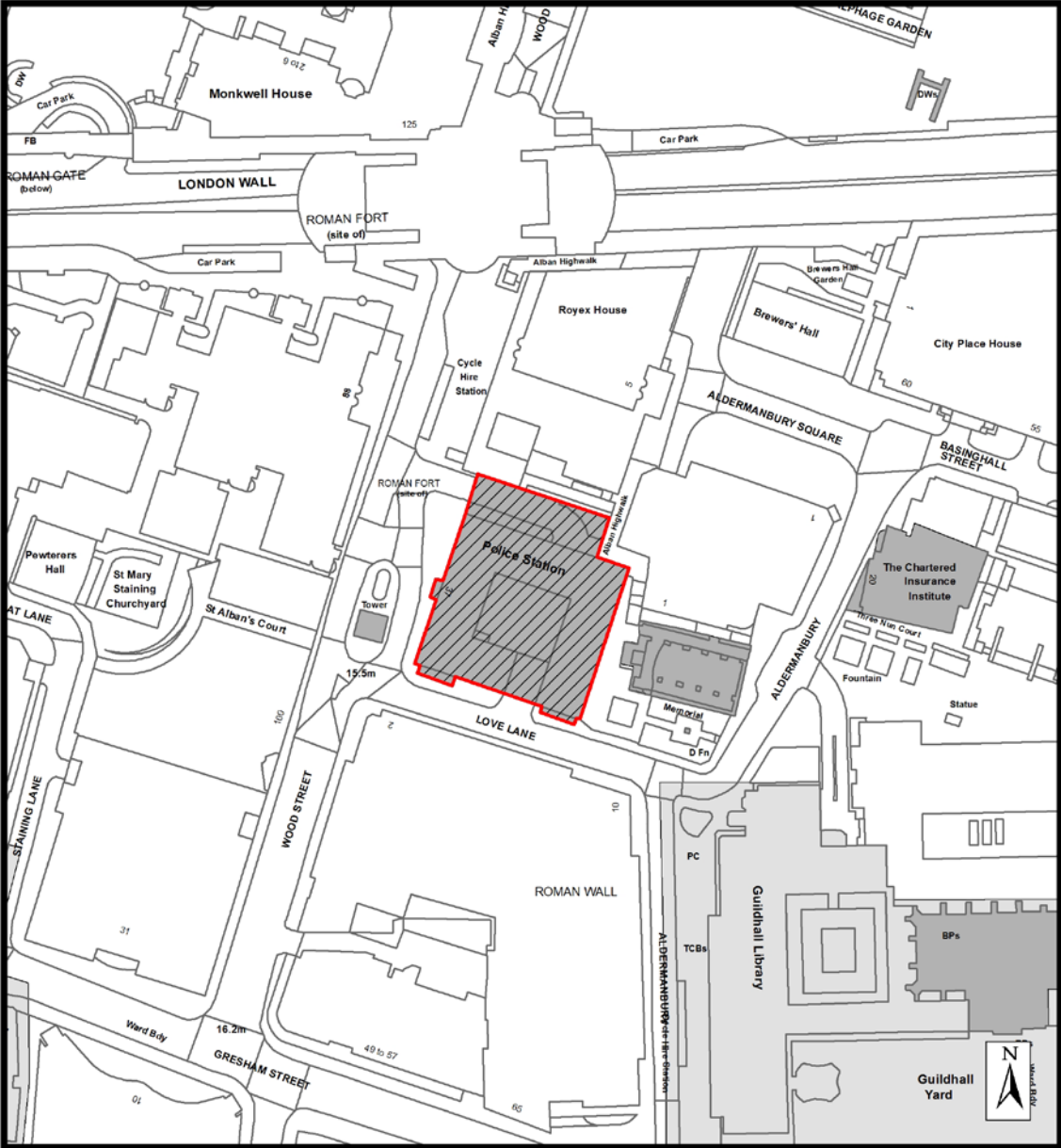
The National Planning Casework Unit has requested that applications sent to them for determination under Regulation 13 of the Planning (Listed Buildings and Conservation Areas) Regulations 1990 are referred to them with an indication of what the decision of the City of London, as Local Planning Authority, would have been if it were determining the application. This applies to the listed building consent application and not the planning application.



## **Recommendation**



Planning permission be granted for the development referred to above in accordance with the details set out on the attached schedule.

# Site Location Plan



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ADDRESS:  
Police Station, Wood Street

-  SITE LOCATION
-  LISTED BUILDINGS
-  CONSERVATION AREA BOUNDARY
-  CITY OF LONDON BOUNDARY

CASE No.  
17/00130/FULL &  
17/00131/LBC



DEPARTMENT OF THE BUILT ENVIRONMENT



## **Main Report**

### **Site**

1. 37 Wood Street is owned by the City of London Corporation. The building was completed by architects McMorran and Whitby in 1966 as the City of London Police Headquarters. On 24 April 1998 the building was listed, Grade II\*. The City of London Police occupies the whole building. The building comprises a perimeter block wrapping around the central courtyard with three wings of four storeys' and a tower to the north-east of 13 storeys, constructed of Portland Stone.
2. The site is bounded by Wood Street to the west, Love Lane to the south, St Mary Aldermanbury Garden to the east and Aldermanbury Square further north beyond the adjacent building.
3. The vehicular access to the site is off Wood Street via a ramp that continues to the lower basement level. Pedestrian access is off Wood Street and centred on the primary elevation.
4. The Grade II\* listed St. Alban Tower, 35 Wood Street is adjacent to the site. St. Mary Aldermanbury Garden which contains the footings of the former Church of St Mary the Virgin, and the Monument to John Heminge & Henry Condell both of which are listed Grade II, is located to the east.
5. The building is not in a conservation area.

### **Proposals**

6. Planning permission and listed building consent are sought for the erection of a nine storey tower extension, infill of existing courtyard, internal refurbishment, conversion of basements, provision of car and cycle parking, refuse and recycling storage and associated works for police station (sui generis) use. This report deals with the relevant considerations for both applications.
7. The proposed development would provide additional accommodation for the City Police and facilitate the rationalisation of the three existing Police stations within the City of London. The services provided by the Police Station are strategically located at this site, in close proximity the Guildhall and other City administrative provisions.
8. The proposal would ensure the long term use of the site and provide a building of sufficient floorspace to enable the consolidation of the critical services of the City of London Police estate within one central location.
9. A Statement of Need has been submitted in support of the applications setting out the reasons for the proposed future rationalisation and consolidation of the City Police facilities.

10. The existing building provides 12,438sq.m of floorspace (GEA), the proposed development would provide 15,335sq.m of floorspace (GEA) an increase of 2897sq.m (GEA).
11. The National Planning Casework Unit has requested that applications sent to them for determination under Regulation 13 of the Planning (Listed Buildings and Conservation Areas) Regulations 1990 are referred to them with an indication of what the decision of the City of London, as Local Planning Authority, would have been if it were determining the application. This applies to the listed building consent application and not the planning application.

### **Consultations**

12. The views of other City of London departments have been taken into account in the consideration of this scheme.
13. Following receipt of the planning application and listed building consent the applications were advertised in the press, site notices were put up on the site, and statutory and non-statutory bodies were consulted.
14. Thames Water advises they have no objections to the proposals.
15. Historic England advise that the building is one of London's finest post-war classical buildings and although the interior of the building is generally of a much lower quality than the exterior, some interesting spaces survive, including some high quality communal rooms (Rolfe Hall and the Wakefield Mess), good staircases, and barrel-vaulted ceilings in the section house tower. Historic England supports the principal of retaining the building as a working police station and acknowledges that many of the elements of the proposals would result in little or no harm – or indeed enhancement – to the significance of the building. The principal issue for consideration (by HE) is the proposed tower. HE considers that the extension would cause serious harm to the aesthetic value of the building because it damages the original, very carefully considered, architectural composition of the building complex. However, following discussion of the proposals at pre-application stage with the architects, HE considered that, provided a clear justification for the Police's operational needs to alter and extend the tower extension could be demonstrated, and that it was shown why other sites were not suitable to accommodate a consolidated service, harm to the appearance of the tower could be partially mitigated through carefully detailed design which the applicant has sought to address.
16. Three letters of objection have been received from the Friends of City Gardens and two members of the public in relation to the protection of a pair of kestrels nesting on the building.
17. The Twentieth Century Society objects to the proposals on the grounds that substantial harm would be caused to the Grade II\* listed building. The Society is not convinced that it has been demonstrated that the consolidation of the Police's use on this particular site has a public benefit that can outweigh this harm.

18. Copies of the representations are appended in date order to this report, and should be referred to in order to appreciate the full extent of the points raised.

### **Policy Context**

19. The development plan consists of the London Plan and the City of London Local Plan. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix A to this report.
20. Government Guidance is contained in the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG).

### **Considerations**

21. The Corporation, in determining the planning application has the following main statutory duties to perform:-
22. To have regard to the provisions of the development plan, so far as material to the application and to any other material considerations. (Section 70 Town & Country Planning Act 1990);
23. To determine the application in accordance with the development plan unless other material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).
24. In considering whether to grant planning permission or listed building consent for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990); the effect of the duties imposed by section 66(1) is to require decision-makers to give considerable weight and importance to the desirability of preserving the special architectural and historic interest of the listed building.
25. In considering the applications for planning permission and listed building consent before you, account has to be taken of the statutory and policy framework, the documentation accompanying the application, and the views of both statutory and non-statutory consultees.

### **Principal Issues**

26. The principal issues in considering this application are:
  - The extent to which the proposals comply with Government policy advice (NPPF).
  - The extent to which the proposals comply with the relevant policies of the Development Plan.

- The impact of the proposal on heritage assets.
- The need for the proposed rationalisation and consolidation of the City Police facilities on this site.

## **Heritage Considerations**

### **Identification of Heritage Assets and their significance**

27. Paragraph 129 of the NPPF states that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including the setting of any asset). The assessment of significance should be taken into account when considering the impact of a proposal.
28. The designated heritage assets of relevance in the consideration of this case are Wood Street Police Station, as well as the setting of: the Grade II\* listed tower of the former Church of St Alban Wood Street, the Grade II listed footings of the former Church of St Mary the Virgin, and the Grade II Listed Monument to John Heminge & Henry Condell within the former Churchyard of Church of St Mary Aldermanbury.
29. Wood Street Police Station was designed by Donald McMorran, a noted British architect practicing in the immediate post-war period. The particular interest of Wood Street Police Station is its refined neo-classical appearance, characteristic of the McMorran & Whitby practice, applied to a highly unusual pairing of a four storey palazzo element with a tower. The building is a very individual response to the prevailing international style of modern architecture that was being constructed across the country and particularly in the City in the late 1950s and early 1960s. The building is solely occupied by the City of London Police and contains offices, a custody suite, and stables for the police's Mounted Division, car parking, sports facilities and two principal rooms - the Rolfe Hall, and the Wakefield Mess.
30. The nearby heritage assets of the tower of the former Church of St Alban's in Wood Street, the footings of the former Church of St Mary the Virgin, and the monument to John Heminge & Henry Condell within the former Churchyard of Church of St Mary Aldermanbury, are all located adjacent to Wood Street Police Station which forms part of their immediate setting.
31. The City Police wish to retain the building in use as a police station by bringing the building up to modern police standards and to consolidate operations onto one site by addressing existing building inefficiencies, reconfiguring accommodation areas and extending the building to provide additional floorspace.
32. The major changes proposed are:
  - Infilling the central courtyard area creating space to allow the provision of a new custody suite at ground floor level, the creation of new circulation spaces around the building to address the current sequential circulation routes, providing additional floorspace lit by a

central atrium.

- Utilising the two existing basement levels currently in car park use as additional office or support functions. The atrium to the courtyard infill block would bring daylight down to these levels.
- The provision of a new tower on the site of the basement car park access ramp against the northern face of the existing tower. The extension would connect into and extend the existing narrow and inefficient floor areas of the existing tower and would rise from below ground up to Level 8, with plant accommodation above. The new tower element would have a significant impact on the external appearance of the building.

### **Heritage Policies**

33. Policy 7.8 of the Mayor's London Plan states that "Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail." Paragraph 7.31A of the supporting text states "Substantial harm to or loss of a designated heritage asset should be exceptional, with substantial harm to or loss of those assets designated of the highest significance being wholly exceptional. Where a development proposal will lead to less than substantial harm to the significance of a designated asset, this harm should be weighed against the public benefits of the proposal, including securing its optimal viable use. Enabling development that would otherwise not comply with planning policies, but which would secure the future conservation of a heritage asset should be assessed to see if the benefits of departing from those policies outweigh the disbenefits."
34. Policy CS12 of the Local Plan seeks to conserve or enhance the significance of the City's heritage assets and their settings by: safeguarding the City's listed buildings and their settings, while allowing appropriate adaptation and new uses.
35. Policy DM12.1 of the Local Plan relates to managing change affecting all heritage assets and ensuring that the proposals sustain and enhance heritage assets, their settings and significance. Policy DM12.3 relates to listed buildings and seeks to ensure that listed building consent is granted for the alteration of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting. Furthermore that "Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings". (12.1.4)
36. Chapter 12 of the NPPF is relevant in this instance as it sets out key policy considerations for applications relating to designated heritage assets. Other relevant guidance is provided by Historic England including the documents Conservation Principles, Good Practice Advice Notes, including Note 3 - The Setting of Heritage Assets and Building in Context (HE/CABE).



37. The NPPF defines a heritage asset as “A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.” Wood Street Police Station is Grade II\* Listed, a designation applied only to “particularly important buildings of more than special interest”.
38. Paragraph 134 of the NPPF states that “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including securing its optimum viable use”.

#### **Extent to which the proposed development complies with the heritage policies of Development Plan**

39. The proposal has been assessed in relation to the relevant heritage policies of the London Plan and Local Plan. The proposed extensions and internal alterations to Wood Street Police Station would be of a high quality and sympathetic to the building in terms of form, materials, and appearance but would cause a degree of harm to the building. This harm would result from: Infilling the central courtyard area and creating new additional floorspace lit by a central atrium which would introduce significant changes to the building’s floorplan and circulation routes and would result in the loss of original fabric, and; the provision of a new tower against the northern face of the original tower element would significantly change the external appearance of the building. This harm is considered in the overall context of the scheme as set out below.

#### **Impact on the setting and significance of listed buildings**

40. The element of the proposals that would potentially have an impact on the three nearby listed buildings is the new tower extension on the north side of the building’s existing tower. The church tower of the former Church of St Alban’s in Wood Street is located in the centre of Wood Street adjacent to the south west corner of the police station building. The police station tower extension would be visible from only a short stretch of Wood Street, further north. There is, only one location from where the new police station tower and the listed church tower could be seen at the same time. In views from this location the new tower element would not be harmful to the setting to the listed church tower.
41. The proposals would not be harmful to the settings of the remains of the former Church of St Mary the Virgin, or the monument to John Heminge & Henry Condell within the former Churchyard of Church of St Mary Aldermanbury, as these two structures are located immediately east of Wood Street Police Station and none of the changes to the building would be apparent within their setting.

## **DESIGN**

### **Design policies**

42. Policy 7.4 of the London Plan states that “development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings.” Policy CS12 of the Local Plan sets out the City’s design policies: “To promote a high standard of design and sustainable buildings, streets and spaces, having regard to their surroundings and the historic and local character of the City...” and seeks to ensure that “...bulk, height, scale, massing, quality of materials and detailed design of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces.” Whilst “Encouraging design solutions that make effective use of limited land resources. Ensuring that development has an appropriate street level presence and roofscape and a positive relationship to neighbouring buildings and spaces.”
43. Paragraph 3.10.8 “In assessing development schemes detailed consideration will be given to the bulk and massing and special characteristics of their locality. All development proposals are expected to have a high standard of design and detailing”. 3.10.13 “The design and execution of extensions and alterations to buildings, such as entrances and windows, are of considerable importance since they have a cumulative effect on the overall character and appearance of the City. Extensions or alterations should be considered in relation to the architectural character of the building, designed to minimise their impact and integrated with the design of the building. Alterations and extensions should achieve a successful design relationship with their surroundings, taking full account of the local context and the setting of the building”.
44. Chapter 14 of the NPPF sets out the key policy considerations in relation to design. Paragraph 60 states “Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.”
45. NPPF paragraphs 63 and 64 state that “In determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area.” and “Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.”

### **Extent to which the proposed development complies with the design policies of the Development Plan and NPPF Guidance**

46. The proposal has been assessed in relation to the relevant design policies of the London Plan and Local Plan and guidance in the NPPF. It is considered that the design of the proposed development would be high quality and although it introduces a significant degree of change to

the building, it also seeks to retain and enhance aspects of key significance.

47. At the outset of the project the building was carefully assessed to establish which elements of the structure were deemed to be of high, medium and low significance with the aim of minimising the impact of the proposals to radically update the building to meet the current accommodation requirements of the City Police. The areas identified as having particularly high importance are: the building's external envelope and massing composition, the main stair, the main reception area, the cell block, Rolfe Hall, the secondary stair and lobby to the Assembly Hall, the Wakefield Mess, and Levels 10, 11 and 12 as examples of the hierarchy of living accommodation provided. With the exception of the overall massing composition, these areas would be retained or refurbished in the proposals. Details of the principal changes are as follows:
48. Courtyard Infill. The central courtyard is an area of low significance and was originally designed to provide space for the preparation and mounting of police horses stabled in the building. The police horses will no longer be stabled on site and its function is therefore largely redundant. The courtyard provides an opportunity to expand the building whilst projecting natural light deep into the building through a glazed atrium. The provision of a new custody suite is fundamental to the continued use of the building as an operational police station. The existing cells do not meet current standards, due to restrictions imposed by Home Office standards and have to be replaced to sustain the long term use of the building as an operational police station. It has been established that a new and compliant custody suite can only be achieved by utilising the central courtyard space. The infill enables the existing constrained sequential circulation routes to be augmented. The courtyard infill structure would be effectively free-standing providing open plan accommodation from ground level to level three. The building's existing walls to the courtyard would be retained and existing external finishes would become internal walls, the new infill space being entered via enlarged window openings.
49. New Tower Extension. The relatively recent construction of the tall building at 5 Aldermanbury, immediately adjacent to the site has restricted views of the northern facades of the police station, whereby these parts of the building are visible in oblique views only from directly opposite 5 Aldermanbury and from the pedestrian route below the building. For this reason the northern facade of the existing tower has been selected as the most appropriate location for a major extension.
50. The present tower was constructed for residential use (police section house) and has a small footprint. Today the tower spaces are generally used for offices resulting in inefficient layouts that do not meet current needs. The extension would be located above the car park ramp with its western face in line with the west face of the tower. The height and massing of the proposed extension has been designed following a detailed examination of the proportions of the existing building. In order

to minimise the risk of harm to the existing building the extension has been designed to be deferential to the original design. The height has been designed to ensure that the needs of the police are met but the extension remains largely concealed from view. The extension would be separated from the tower by a glazed link to clearly differentiate it and ensure it reads as a subservient addition to the McMorran and Whitby composition.

51. The grid of the tower has been generated by the size and detailing of the fenestration and the vertical subdivision of alternate storey heights. Facing materials for the extension would be buff coloured brick with stone which references the material of the internal courtyard and which clearly contrasts with the Portland stone of the original tower. When viewed externally the extension would rise from a Portland Stone plinth. The proportion and grid of the tower's original fenestration is drawn through the extension to be repeated on its external facade. Larger height windows at the base and top of the tower, the centrally aligned fenestration on the east and west facades and the masonry detailing are all derived from the language and detailing on the original tower.
52. From the restricted area within Wood Street from which the tower would be visible the extension would be seen to rise above the building's existing rusticated base and vehicle entrance archways, becoming visible at Level 02. The new tower would rise to Level 09 with open plant above. Internally the new floor areas, accessed via enlarged window openings, would combine, via the glazed link, with the existing tower floors which would have their existing partitions removed, to provide two large open plan areas per floor. The existing tower walls enclosed by the glazed link would be retained and existing external finishes would become internal walls.
53. Basement Conversion. The building's two basement levels are large but are currently underused. Existing areas such as squash courts are no longer used for their original function and the Police do not require the same level of on-site parking. The atrium within the courtyard infill provides an opportunity to bring additional natural light down to the basement levels. It is intended that these areas are used for office or other support functions.
54. Other Internal Areas. The stable block, characterised by its white glazed brick interior, forms an important element connected to the past operation of the police station. The stable area would be retained with minimal changes and utilised for secure storage and archive facilities.
55. Within the building, Rolfe Hall and the Wakefield Mess, congregational and social spaces respectively, have under gone only a moderate degree of change since the building opened. These rooms will be retained and sympathetically refurbished to return them largely to their original appearance.
56. The public reception, principal stairs, secondary stairs and associated foyers, the remaining residential floors within the tower, and other areas

identified as having high significance will be retained and sympathetically refurbished.

57. Windows. The fenestration to Wood Street Police Station comprises the original single glazed windows in timber frames. They are predominantly vertical sliding sashes with centre pivot sashes onto circulation areas. The majority of windows have received retro fitted methods for protection against blast and overlooking from adjacent buildings. The methods employed to date do not meet the required standards for a modern police station operating under current threat levels. The existing frames and glass cannot accept the level of modification required to strengthen and re-glaze to a suitable standard.
58. It is proposed to retain and refurbish existing windows where they face into internal spaces. However, where windows are externally facing, it is proposed to remove the existing window frames and replace them with a wood faced aluminium framed specialist window system. This would ensure the windows would be suitable for preventing injury to occupants from bomb blast and forced entry through the use of laminated glazing, frame composition and fixing back to the surrounding structure. Details of these replacement windows would be conditioned to ensure that the appearance of any replacement windows would be substantively similar to the existing window designs.

### **Impact on Heritage Significance**

59. The proposed development has been designed to meet the current and future needs of the City Police. The proposed works within the courtyard and basement would not be visible from the surrounding streets. The external visual impact is limited to the new tower element visible from limited areas from Wood Street and Aldermanbury Place. Where it is visible, the new tower is of a form and massing that is subservient to the historical massing and has been designed to reflect the scale and proportions of the existing building whilst being clearly identifiable as a more recent intervention. Careful consideration has been given to the form and massing of the extension and the window proportions are derived from the rhythm of the existing facades. The vertical glazed slot provides a visual break between the new building and the historical facade enabling the original Portland stone facade to be clearly visible. Internal spaces have been carefully assessed to ensure that the areas of key significance have been retained.
60. Historic England's Conservation Principles document sets out a method for assessing systematically and consistently the heritage values that can be ascribed to a place by grouping them into four categories:  
Evidential value: the potential of a place to yield evidence about past human activity. Historical value: the ways in which past people, events and aspects of life can be connected through a place to the present. Aesthetic value: the ways in which people draw sensory and intellectual stimulation from a place. And, Communal value: the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory.

61. The building is perhaps the most notable designed by McMorran and Whitby and is of considerable aesthetic value for its connection with this practice. Despite the careful consideration given to the design and massing of the new tower extension, McMorran and Whitby's unique pairing of palazzo and tower elements would inevitably be compromised. The building has been relatively little altered since its construction and the proposals would lead to considerable internal change and loss of original fabric and so evidential value. However, the scheme results in the areas of least significance being the most altered. The building has considerable historic and communal value. The retention of the building as an operational police station and the retention and refurbishment of its key internal spaces retains the building's historic and communal value.
62. The building does have a truly singular appearance and form that is recognised as part of its Grade II\* listing. The proposals, due to their impact on the appearance of the building, the loss of original fabric, and the radical change to the internal floorplan and form of the accommodation, will result in harm to the building. However, there are elements of the proposals that would be of benefit to the building, for example; the refurbishment of the most significant of its internal spaces for example, the fact that its characteristic appearance and overall palazzo and tower form will still be clearly recognisable, and that its historic and communal value will be largely retained through it remaining in uses as an operational Police Headquarters building. The new extension would only be visible from a strictly limited area. These factors combined with the care and attention that has been given to the design of the new tower extension mean that although there will be harm to the heritage significance of Wood Street police station, this is considered to be less than substantial harm.
63. Paragraph 134 of the NPPF states that "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including securing its optimum viable use".

### **Public Benefit**

64. The public benefits arising from the proposal have been set out in the document "Wood Street Police Station Operational Justification" set out below:  
***Introduction***
65. *The redevelopment proposals for Wood Street Police Station are at the heart of establishing a new era for the City of London Police, its operational policing environment and the way it delivers its services to the public for the foreseeable future.*
66. *Without the successful delivery of transforming Wood Street Police Station into a modern, 21st Century operating facility, the City of London is at serious risk of increasing crime and threat from terrorist-related*

activities. The outcome being the City of London Police failing in its duty to protect the local community and the City's global status suffering. Failure to deliver the estate as now planned will severely impact upon the Force's ability to provide adequate policing within the city from a central location. Not only will there be a bigger crime response time, but a reputational damage to the Force.

67. This Operational Justification Statement sets out the City of London Police's reasons for why the proposed Wood Street Police Station redevelopment must be delivered. It explains the need behind the proposal, what the current operational situation is, the consideration of alternative sites in arriving at the Wood Street location, the proposal itself and finally the operational justification for the scheme.
68. This statement supports the detailed planning and listed building consent application and is to be used by the City of London Planning Authority in forming a balanced judgement against the proposal's potential impact on receptors such as the building's Grade II\* listed building status.

#### **The Need for Redeveloping Wood Street Police Station**

69. Wood Street was designed and built in the 1960s as a police station. It has historically served as the Force Headquarters and provides a central location from which to police the City. The history and legacy of the building is important to the City of London Police and we are keen to remain at this site. However, the intended function of a police station in the 1960s focused on public access and as a place for the public to request assistance in person. Officers also attended these stations to parade prior to deployment and used them as a base for report writing and completion of notes. Wood Street is no longer fit for the purpose it was designed.
70. The police station was designed to serve the needs of the City of London Police and the City community almost 60 years ago. Today's Force operates within a different policing model, has significant national policing commitments and has to keep pace with new and evolving crime trends and security threats. The Force is also subject to the requirements and recommendations of a variety of external agencies including the Home Office, Her Majesty's Inspectorate of Constabulary and the Security Services.
71. A modern, 21st century police station is no longer seen as a focal point of physical access, neither does it provide local overnight sleeping accommodation as was previously built into the facility. The public engage with a modern Force in a variety of different ways now, including telephony and IT internet access. Officers require portable modern mobile technology at all times, whether on their person or in their vehicles, and this has to maintain a resilient and reliable connection back to a command and control centre to respond with appropriate resources as required. Our future facilities need to be the technological base of our operations, with sophisticated communication links to front-line officers, serious crime investigation units, forensics and a 'state of the art' custody environment.

72. *These requirements relate not only to standards around the delivery of local policing services and the physical security requirements of its police estate, but also to the Force's fulfilment of its national policing obligations - in areas such as anti-terrorism, public order and civil contingencies.*
73. *The City of London Police needs to operate within a sustainable and secure environment that can meet the future needs of, the requirements placed upon, and the threats faced by an operational police force from 2017 onwards. Some of the key objectives from the City of London Policing Plan include:*
- *The identified priorities for the Police accommodation review*
  - *Protecting our communities from terrorism or serious harm*
  - *Protecting the City of London and the UK from fraud*
  - *Responding to the business and resident community*
  - *Providing excellent value for money*
74. *The need for the proposed redevelopment is a key part of maintaining our national security and the public benefit that the scheme will create is a material planning consideration which should weigh in favour in finding support for the proposed planning and listed building consent application.*

#### **Current Situation**

75. *The existing estate comprises three buildings spread across the City and one newer building within the Guildhall complex that was refurbished in 2014. The original three buildings are now not fit for purpose and this is placing the Force at risk.*
76. *The reasons for each of the three sites not being fit for purpose are as follow:*
1. *Bishopsgate*  
*Bishopsgate is located at the eastern end of the city and is limited in its operational capabilities. Lack of Policing and operational deployment from this site is seriously restrictive.*
  2. *New Street*  
*New Street is a leased office facility and not fit for purpose for City of London Police operations.*
  3. *Snow Hill*  
*Snow Hill is too small a facility for City of London operations with no vehicle parking available for the operational fleet.*

#### **Alternative Sites**

77. *In coming to the position that Wood Street Police Station presents the best option for delivering the City of London Police's operational requirements in the future, alternative options were considered. This was undertaken through an assessment of sites that are in the City of*



*London's ownership and sites that are not In the City of London's ownership but could accommodate the proposal. The findings are documented in Appendix A.*

- 78. The focus of the assessment was opportunities that the City already owns as this has the advantage that the building assets are within the City's control and so there is a far greater likelihood of successful delivery. Such sites are limited to only the Barbican Centre Exhibition Halls I and II, and Walbrook Wharf.*
- 79. The redevelopment of the Barbican Exhibition Centre Halls could deliver 81,355sqft. However, vertical extensions would be required to what is a Grade II Listed Building causing heritage impacts as well as potentially impacting the amenity of residents in this location. Other constraints would be a shortfall in floorspace and spreading across two buildings while there would also be a loss of valuable exhibition space. The site would present a much more constrained option than Wood Street.*
- 80. At 22,500sqft, Walbrook Wharf would only be able to accommodate a small proportion of the City of London Police's facilities, made more difficult by complex departmental space efficiency requirements. This option would clearly fail to meet the objective to locate facilities in a single place.*
- 81. In terms of sites outside of the control of the City of London, more than 100 live and expected planning applications and developments were reviewed. This number was reduced to some 20 sites' potential being assessed. All sites were discounted for various reasons, which are summarised as:*
  - Lack of floorspace capacity;*
  - Land assembly and transaction complexities;*
  - Longevity of existing leases;*
  - Land building values;*
  - Poor location - periphery of the City;*
  - Viability posed by site constraints;*
  - Length of time to deliver site;*
- 82. Further to the list of reasons, the City does not control these assets and as such the likelihood of delivery is compromised. Likewise, it is also recognised that the City of London Police are not considered a 'good neighbour' for City occupiers and businesses and as such developers will not willingly consider allocating part of their investment schemes to the Force.*
- 83. The assessment concluded that:*
  - There are no alternative buildings in the City that can realistically accommodate the entire uniform and operational headquarter functions of the City of London Police;*
  - Creating the new Home Office compliant custody suite, but not*

*building the new tower extension above results in specialist Police functions being located elsewhere which significantly impacts the operational effectiveness of the City of London Police; and*

- *The new tower extension, as proposed, is an essential requirement to provide additional floor area and a modern fit for purpose headquarter building for the City of London Police.*
84. *Our priority must be the co-location and consolidation of operational areas within a central site. Out of the buildings in the existing estate, Wood Street is geographically clearly the prime location for the deployment and response of operational teams. Utilising alternative sites would cause the Force Headquarters to be located at the extreme west or east of the City. Operationally, that has been determined as too great a risk to the Force. S Operational Justification - Redevelopment of Wood Street.*

#### ***Operational Justification – Redevelopment of Wood Street***

85. *The redevelopment proposals for Wood Street Police Station are at the heart of establishing a new era for the City of London Police, its operational policing environment and the way it delivers its services to the public for the foreseeable future.*
86. *Without the successful delivery of transforming Wood Street Police Station into a modern, 21st Century operating facility, the City of London is at serious risk of increasing crime and threat from terrorist and other related activities. The outcome being the City of London Police failing in its duty to protect the local community with the City's global status suffering. Failure to deliver the estate as now planned will severely impact upon the Force's ability to provide adequate policing within the city from a central location. Not only will there be a bigger crime response time, but a reputational damage to the Force.*
87. *The expansion of Wood Street police station will enable the delivery of far more effective policing services within the City of London. Wood Street will represent an iconic but, more importantly, central, secure facility in which to base all police operations. Police Forces face significant budget challenges for the foreseeable future and the ability to integrate operational teams and share resources across the Force will be greatly enhanced by locating all our key essential services in a central operational base. It will enable enhanced and more efficient sharing of knowledge, skills and expertise across policing functions that will improve how we work. That can only be achieved by consolidating our key operational teams working adjacently within one central core and safe location.*
88. *By providing policing services not from several localised and out-dated sites, but from a centrally located, modern police station, equipped with the latest technology and facilities and complying with existing standards, the City of London Police would be better placed to meet its policing requirements, provide a more positive working environment for its officers and staff, and deliver its vision of providing a world-class service to the public and the City.*

89. *Failure to expand the facility as proposed will place risks upon the Force that could result in another review of the proposals. Without the expansion and flexibility to integrate our operations within this site, we have to consider the alternative that the Force could not remain within the facility; it would simply not provide us with the necessary development space for our future operational requirements.*
90. *The basis for redeveloping the Wood Street site is that it is already recognised as the headquarters of the City of London Police. It sits at the heart of the 'square mile' and it is operationally critical that geographically our headquarters is positioned in this location to enable quick operational deployment to all parts of the City, within a cohesive command and control structure.*
91. *Since the original submission of the concept plans, further detailed work I evaluation of the designs has determined that the additional space is vital for the future operation of the Force within Wood Street. Without this additional space, the City of London Police would be faced with the decision that the proposals to expand the site are not sufficient and would compromise the Force beyond the possible tolerance level for modern policing. Thus, the need for the proposed redevelopment is a key part of maintaining our national security and the public benefit that the scheme will create.*

#### **Planning Application Proposals**

92. *The planning and listed building consent application has been prepared following extensive consultation with the City of London Planning, Design, Conservation and Highways Officers, with technical specialists at Historic England and a range of other key stakeholders. This has also included a detailed space planning exercise by the Force themselves to evaluate and justify the proposed scheme.*
93. *The proposal has been driven by key fundamental requirements for the future estate, which include:*
- *More efficient service models*
  - *Modern estate - sustainable for next 30+ years*
  - *Operational resilience for the Force*
  - *Robust and flexible I.T. infrastructure*
  - *Links to local and national Policing objectives*
94. *The main operational benefits and impact upon the space planning for the Wood Street facility have included:*
- *Operational benefits for the safety and security of the City of London*
  - *Increased police presence and visibility, including more patrols within the City*
  - *Improved prisoner handling due to adjacently located operational teams within the new Wood Street design*

- *Improved 'business continuity' through fit-for-purpose, modern and secure headquarters*
  - *Relocation of key City of London Police resources within a centrally located position within the City*
  - *Relocation of the Force's vehicle fleet to London Wall to support operational deployments from the new Wood Street facility, improving officer access and response times*
  - *Co-location of front-line officers, community officers and CID -this will lead to improvements in response times, prisoner handling and overall efficiency*
  - *Establishing a central base for City of London officers to operate from will increase our mobilisation of front-line officers, including greater visibility of the streets*
  - *Enhanced more immediate command and control availability in dealing with major incidents and terrorism*
  - *Responding to the current national threat levels that exist in relation to police forces and their respective officers and staff by providing secure operating facilities within one core building*
  - *Relocating the Joint Control & Contact Centre of the City of London Police and City of London Corporation into one secure operating area within the Wood Street design*
  - *Providing a safe and resilient base for response to any major incidents within the City from a core and secure location*
  - *More effective policing and prisoner handling with resources contained within one central site. Enhanced prisoner cell space within the new design will retain officers within the City of London Corporation footprint, thus reducing abstractions from front line operations and officer availability for local policing*
  - *Reduction in the national threats currently faced by City of London Police officers & staff by securely locating all operational teams within one central & secure location*
  - *Supporting our local and national terrorism and threat response and intelligence function by relocating operational response areas to a secure facility*
  - *Providing a modern, highly secure police building that meets the current standards of security requirements for the Force to operate from.*
95. *Plans have been carefully prepared for a comprehensive redevelopment including a new tower, infilling of the courtyard and lower levels within the building to create much needed*

### **Conclusion**

96. *In conclusion, Wood Street was designed to serve the needs of the City of London Police and the City community almost 60 years ago. Today's*

*Force operates within a different policing model, has significant national policing commitments and must keep pace with new and evolving crime trends and security threats. The Force is also subject to the requirements and recommendations of a variety of external agencies including the Home Office, Her Majesty's Inspectorate of Constabulary and the Security Services. The City of London Police engage with a number of national and international agencies. With the changing pace of modern policing, there are a number of urgent deadlines and requirements that must be completed with. Failure to do so will significantly impact upon the overall performance of the Force and severely damage our reputation in national policing.*

97. *The need for the proposed redevelopment is a key part of maintaining our national security and the public benefit that the scheme will create is a material planning consideration which should weigh in favour in finding support for the proposed planning and listed building consent application.*
98. *This statement has demonstrated that any perceived harm to the listed building or loss of fabric is necessary to achieve the substantial public benefits that outweigh this perceived harm or loss and the planning application should be supported.”*

### **Energy and sustainability**

99. The NPPF, London Plan and Local Plan seek to ensure that sustainability is integrated into designs for all developments.
100. The London Plan requires an assessment of the energy demand that demonstrates the steps taken to apply the Mayor's energy hierarchy to achieve carbon reductions and to use renewable energy sources.  
London
101. Plan policy requires non domestic buildings to achieve a 35% carbon emissions reduction over Part L (2013) of the Building Regulations. Policy CS15 of the Local Plan supports this approach.
102. An energy statement has been submitted in relation to the new build element of the proposed development. Energy consumption reduction would be achieved by design features and the use of energy efficient building measures. The building is currently connected to the Citigen district heating network (DHN), and it is proposed to maintain this connection.
103. The reduction in carbon emissions with the proposed energy efficient measures in place would result in a 53.9% carbon saving which exceeds the target set by the Mayor.
104. A BREEAM pre-assessment has been submitted which demonstrates the refurbishment and extension of the existing building would achieve a 'very good' rating. Policy CS15 has not been complied with and a condition is recommended for further details of a BREEAM assessment

to be submitted prior to demolition to demonstrate how an 'Excellent' rating could be achieved.

105. Two areas of green roof would be provided on the building. These would be extensive roofs providing the benefits of rainwater management and bio-diversity.

### **Access**

106. The existing pedestrian and vehicle access points to the site would be retained as existing. Access to the main entrance would be via the existing pedestrian ramp.
107. The accessibility of the building would be improved; all areas of the building will become fully accessible. The courtyard infill rationalises the internal circulation and removes the change in level which currently exists between the parts of the building which are accessed via the external courtyard. New lifts are to be installed which would be fully accessible and DDA compliant toilet facilities would be provided on all floors of the building.

### **Daylight & Sunlight**

108. A letter prepared by Delva Patman Redler has been submitted in support of this application which advises that there would be no material impact in daylight, sunlight and overshadowing of the nearby St. Alban Tower, or the St. Mary Aldermanbury Garden.

### **Transport, Servicing & Parking**

109. The existing police station is serviced partly from the courtyard and partly from the basement. It is proposed that in the new arrangement servicing would be from the street. This would increase the servicing on the surrounding streets but it is not clear by how much. The police have advised that the volume and nature of deliveries are confidential information for security purposes which would make a condition on a servicing and management plan unacceptable to them. On street servicing would normally be contrary to adopted planning policy DM 16.5, which sets out that "On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded". The proposed arrangement is necessary to deliver the floorspace requirements of the City of London Police.
110. The existing police station provides 75 car parking spaces, 8 motor cycle parking spaces and some cycle parking within the basement. The proposed scheme provides 17 car parking spaces and 8 motor cycle parking spaces. 153 cycle spaces are provided at basement level and this is in compliance with the London Plan and is conditioned.

111. The scheme results in a displacement of 58 car parking spaces from the building, it proposed that these spaces would be located within the police car parking areas of London Wall Car Park as part of the 80 spaces granted planning permission on 1 June 2017. To ensure that London Wall Car park is available to house the vehicles displaced from Wood Street Police Station a condition has been applied requiring this parking to be available before the proposed development is occupied.

### **Archaeology**

112. The site is in an area of significant archaeological potential, located within the Roman and medieval City Wall and the Roman fort. Investigations in the area have recorded Roman and medieval remains including Roman Cripplegate Fort, Medieval Alban's Church and evidence of medieval occupation.

113. The building has a double basement which extends across the entire site. The construction of this basement in the 1960s is likely to have removed all archaeological deposits and structures across the site, with the exception of any deeply cut features. The existing basements would be adapted but not extended. Due to the proposed construction of the new tower, sub-structure groundworks are likely to be required. The proposed development would have an impact on any archaeological remains and a condition is recommended to cover a programme of archaeological work and foundation design.

### **Security**

114. The threat to the City of London Police is considerable and complex with the existing location and constraints of the Wood Street Police Station adding to the challenges. The City of London Police's Counter Terrorism Unit have carried out a thorough review of the site and proposals, however the details of the measures to be implemented are not appropriate for the public domain. Any external or internal alterations required to the building, as a result of security measures proposed, may require separate applications for planning permission and listed building consent.

### **Representations**

115. Three letters of objection have been received from the Friends of City Gardens and two members of the public in relation to the protection of a pair of nesting kestrels on the building.

116. The 2015 and 2016 London bird reports indicate a pair of kestrels has been breeding on the site for a number of years. The applicant has agreed to a condition requiring the submission of an ecology assessment detailing measures to protect the pair of kestrels prior to demolition and construction works commencing.

117. The Twentieth Century Society have objected to the proposals on the basis that;
- i) No conservation management plan was in place prior to the proposals being developed which would have ensured a conservation led approach to the project.
  - ii) The proposed alterations would lead to substantial harm as; the new tower extension would substantially harm the composition of the built ensemble of the buildings, loss of the courtyard would be damaging in terms of the loss of the void/solid relationship, the conversion to open-plan offices would serve to increase the level of harm overall, and that the original timber windows would be replaced.
  - iii) The potential for alternative uses had not been fully explored.
118. In response to these points the applicant's submission material provides the following responses:
119. As a conservation management plan was not in place for the building, a comprehensive Statement of Significance was prepared to provide a detailed assessment of significance which then formed the basis of the design development of the proposals.
120. As outlined earlier in this report it is acknowledged that the proposals would cause a degree of harm to the building but it is considered that the alterations would cause less than substantial harm to the building, rather than substantial harm. Paragraph 133 of the NPPF states that where a proposal will lead to substantial harm to a designated heritage asset, local planning authorities should generally refuse consent. The tests for assessing whether public benefits could outweigh the harm are more onerous.
121. The applicants have provided additional information that clarifies that the windows require replacement not for reasons of being in poor condition but to meet current security specifications.
122. The potential for alternative uses has not been fully explored. The City of London Police requires the building to remain as an operational police station. The City of London Police Justification states that suitable alternative sites for the police to relocate to are not available.

### **CIL and Planning Obligations**

123. The proposed development would result in payment of the Mayoral Community Infrastructure Levy (CIL) to help fund the provision of Crossrail.
124. This contribution would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.



125. The Mayoral CIL is payable as follows:

Mayoral CIL

<b>Liability in accordance with the Mayor of London's policies</b>	<b>Contribution</b>	<b>Forwarded to the Mayor</b>	<b>City's charge for administration and monitoring</b>
Mayoral Community Infrastructure Levy payable	£135,550	£130,128	£5,422
Administration and Monitoring Charge	£3,500	-	£3,500
<b>Total liability in accordance with the Mayor of London's policies</b>	£139,050	£130,128	£8,922

\*Net liability on the basis of the CIL charge remaining unchanged and subject to variation.

126. The City of London is the Freehold Owner of the building. It is not possible for the LPA to enter into the usual format of section 106 Agreement as legally it is not possible to enter into an agreement or take enforcement action should it be required where both parties are the same legal entity. In some cases it is possible to enter into a unilateral undertaking. However, where matters can be dealt with by way of condition Planning Practise Guidance advises conditions should be used, which is the case in this application.

127. The scheme is not liable for City CIL, as stated in paragraph 14 of the City of London Planning Obligations SPD; development that is used wholly or mainly for the operational purposes of the emergency services, attracts a nil rate charge. Under the City's Planning Obligations SPD and Local Plan, affordable housing, and local training and skills Section 106 contributions are required for commercial and residential development. As the use class sought for this application is sui generis, and the development is for police operational purposes, this is not "commercial" or residential development and Section 106 contributions are not required.

## **Conclusions**

128. The proposal has been assessed in accordance with the relevant statutory duties, and having regard to the development plan and other relevant policies, and relevant advice including the NPPF. The proposals would result in less than substantial harm to the special architectural or historic interest of the building in terms of its aesthetic significance. The harm is outweighed by the public benefits of the proposal which comprise the intensification of the use of building as the headquarters of the City of London Police in a form that allows local and national policing and security duties to be carried out in modern accommodation that meets current day requirements.

## **Background Papers**

### Internal

Memo 24.04.17 Department of Markets and Consumer Protection

### External

Letter 31.08.16 Spectrum  
Letter 20.02.17 WYG  
Email 29.03.17 Thames Water  
Letter 05.04.17 Heritage England  
Letter 21.04.17 Dr Charles Fentiman  
Letter 21.04.17 Friends of City Gardens  
Letter 22.04.17 Mr Kenneth Murray  
Letter 02.05.17 Twentieth Century Society

Archaeological Desk-Based Assessment prepared by CgMS Consulting  
BREEAM New Construction 2014 Pre-assessment Report prepared by WYG  
Daylight and Sunlight Review prepared by Delva Patman Redler  
Explosive Ordnance Desktop Threat Assessment prepared by Dynasafe  
Extended Phase 1 Habitat Survey prepared by WYG  
Transport Assessment prepared by WYG  
Framework Travel Plan prepared by WYG  
Acoustic Assessment prepared by Spectrum Acoustic Consultants  
Energy Statement prepared by WYG  
Geo-Environmental Study prepared by BRD  
Flood Risk Assessment & Drainage Strategy (May 2017) prepared by WYG  
Air Quality Assessment (January 2016) prepared by PBA  
Air Quality Assessment Addendum (July 2017) prepared by PBA

## **Appendix A**

### London Plan Policies

The London Plan policies which are most relevant to this application are set out below:

Policy 3.1 Protect and enhance facilities and services that meet the needs of particular groups and communities.

Policy 3.2 New developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help to reduce health inequalities.

Policy 4.6 Support the continued success of London's diverse range of arts, cultural, professional sporting and entertainment enterprises and the cultural, social and economic benefits that they offer to its residents, workers and visitors.

Policy 5.2 Development proposals should make the fullest contribution to minimising carbon dioxide emissions.

Policy 5.3 Development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation. Major development proposals should meet the minimum standards outlined in supplementary planning guidance.

Policy 5.12 Development proposals must comply with the flood risk assessment and management requirements set out in PPS25 and address flood resilient design and emergency planning; development adjacent to flood defences will be required to protect the integrity of existing flood defences and wherever possible be set back from those defences to allow their management, maintenance and upgrading to be undertaken in a sustainable and cost effective way.

Policy 5.13 Development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so.

Policy 6.3 Development proposals should ensure that impacts on transport capacity and the transport network are fully assessed.

Policy 7.2 All new development in London to achieve the highest standards of accessible and inclusive design.

Policy 7.3 Creation of safe, secure and appropriately accessible environments.

Policy 7.4 Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.

Policy 7.6 Buildings and structures should:

- a be of the highest architectural quality

- b be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm
- c comprise details and materials that complement, not necessarily replicate, the local architectural character
- d not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings
- e incorporate best practice in resource management and climate change mitigation and adaptation
- f provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces
- g be adaptable to different activities and land uses, particularly at ground level
- h meet the principles of inclusive design
- i optimise the potential of sites.

proposal is part of a strategy that will meet the criteria set out in this policy.

Policy 7.8 of the Mayor's London Plan states that "Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail."

.Policy 7.14 Implement Air Quality and Transport strategies to achieve reductions in pollutant emissions and minimise public exposure to pollution.

## Relevant Local Plan Policies

### ***DM12.1 Change affecting heritage assets***

1. To sustain and enhance heritage assets, their settings and significance.
2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.
3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.
4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.
5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

### ***CS10 Promote high quality environment***

To promote a high standard and sustainable design of buildings, streets and spaces, having regard to their surroundings and the character of the City and creating an inclusive and attractive environment.

### ***CS12 Conserve or enhance heritage assets***

To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors.

### ***DM10.1 New development***

To require all developments, including alterations and extensions to existing buildings, to be of a high standard of design and to avoid harm to the townscape and public realm, by ensuring that:

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;

- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design.

### ***DM12.3 Listed buildings***

1. To resist the demolition of listed buildings.
2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

### ***DM19.2 Biodiversity and urban greening***

Developments should promote biodiversity and contribute to urban greening by incorporating:

- a) green roofs and walls, soft landscaping and trees;
- b) features for wildlife, such as nesting boxes and beehives;
- c) a planting mix which encourages biodiversity;
- d) planting which will be resilient to a range of climate conditions;
- e) maintenance of habitats within Sites of Importance for Nature Conservation.

## SCHEDULE

APPLICATION: 17/00130/FULMAJ

**Wood Street Police Station 37 Wood Street London**

**Erection of a nine storey tower extension, infill of existing courtyard, internal refurbishment, conversion of basements, provision of car and cycle parking, refuse and recycling storage and associated works for police station (sui generis) use (Total new floorspace 2897sq.m GEA).**

## CONDITIONS

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.  
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
- 2 Works shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the development process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme.  
REASON: To protect the amenities of nearby residents and commercial occupiers in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to any work commencing in order that the impact on amenities is minimised from the time that development starts.
- 3 Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall include relevant measures from Section 3 of the Mayor of London's Construction Logistics Plan Guidance for Developers issued in April 2013, and specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Cyclist Safety (CLOCS) Standard for Construction Logistics, Managing Work Related Road Risk. The demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved



amendments thereto as may be agreed in writing by the Local Planning Authority.

REASON: To ensure that demolition works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition work commencing in order that the impact on the transport network is minimised from the time that demolition starts.

- 4 Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site during construction of the development has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall include relevant measures from Section 3 of the Mayor of London's Construction Logistics Plan Guidance for Developers issued in April 2013, and specifically address [driver training for] the safety of vulnerable road users through compliance with the Construction Logistics and Cyclist Safety (CLOCS) Standard for Construction Logistics, Managing Work Related Road Risk. The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

REASON: To ensure that construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to construction work commencing in order that the impact on the transport network is minimised from the time that construction starts.

- 5 Before any works including demolition are begun a site survey and survey of highway and other land at the perimeter of the site shall be carried out and details must be submitted to and approved in writing by the local planning authority indicating the proposed finished floor levels at basement and ground floor levels in relation to the existing Ordnance Datum levels of the adjoining streets and open spaces. The development shall be carried out in accordance with the approved survey unless otherwise agreed in writing by the local planning authority.

REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 6 Before any works hereby permitted are begun an Air Quality Assessment, that includes an assessment as to whether the

development is air quality neutral, shall be submitted to and approved in writing by the Local Planning Authority.

(a) If the development is not at least air quality neutral, a scheme to mitigate the air quality impact of the development shall also be submitted and approved in writing by the Local Planning Authority prior to any works taking place. The mitigation scheme shall prioritise mitigation on-site unless it can be demonstrated that on-site provision is impractical or inappropriate.

(b) Prior to changes to combustion plant or process conditions detailed in the approved Air Quality Assessment taking place, details shall be submitted in writing to and approved by the Local Planning Authority.

REASON: In order to positively address local air quality, particularly nitrogen dioxide and particulates PM10 in accordance with the City of London Air Quality Strategy 2015 and the following policy of the Local Plan: DM15.6 and policies 7.14B c and d of the London Plan.

- 7 Before any works including demolition are begun an ecology assessment detailing measures to protect the pair of Kestrels that are nesting on the building must be submitted to and approved by the Local Planning Authority and carried out in accordance with the assessment. REASON: To safeguard the habitat of nesting birds in accordance with the following policies of the Local Plan: CS15, DM19.2.

- 8 A pre-construction BREEAM assessment demonstrating that a target rating of 'Excellent' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' rating) shall be submitted to and approved in writing by the Local Planning Authority prior to demolition. REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.

- 9 Archaeological evaluation shall be carried out in order to compile archaeological records in accordance with a timetable and scheme of such archaeological work submitted to and approved in writing by the Local Planning Authority before any commencement of archaeological evaluation work. REASON: To ensure that an opportunity is provided for the archaeology of the site to be considered and recorded in accordance with the following policy of the Local Plan: DM12.4.

- 10 No works except demolition to basement slab level shall take place until the developer has secured the implementation of a programme of archaeological work to be carried out in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority. This shall include all on site work, including details of any temporary works which may have an impact on the archaeology of the site and all off site work such as the

analysis, publication and archiving of the results. All works shall be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority.

REASON: In order to allow an opportunity for investigations to be made in an area where remains of archaeological interest are understood to exist in accordance with the following policy of the Local Plan: DM12.4.

- 11 No works except demolition to basement slab level shall take place before details of the foundations and piling configuration, to include a detailed design and method statement, have been submitted to and approved in writing by the Local Planning Authority, such details to show the preservation of surviving archaeological remains which are to remain in situ.  
REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
- 12 No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.  
REASON: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.
- 13 Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:  
(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: green roofs, bio-retention areas, attenuation tanks, rainwater pipework, hydrobrakes, pumps, design for system exceedance; surface water flow rates shall be restricted to no greater than stated in Flood Risk Assessment Issue 5, provision should be made for an attenuation volume capacity capable of achieving this should;  
(b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.  
(c) Evidence that Thames Water have been consulted and consider the proposed discharged rate to be satisfactory.  
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a

satisfactory external appearance in accordance with the following policies of the Local Plan: CS18, DM18.2, DM18.3.

- 14 Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

(a) A Lifetime Maintenance Plan for the SuDS system to include:

- A full description of how the system would work, its aims and objectives and the flow control arrangements;
- A Maintenance Inspection Checklist/Log;
- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS18, DM18.2, DM18.3.

- 15 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

(a) particulars and samples of the materials to be used on all external faces of the building including external ground and upper level surfaces;

(b) details of the proposed new facades including typical details of the fenestration;

(c) details of the new glazed link structure between the existing tower and the extension;

(d) details of refurbishment of existing windows and details of new windows;

(e) details of brick detailing and stone jointing of tower extension structure;

(f) details of all alterations to the existing facade;

(g) measures to be taken during the period of demolition and construction for the protection of the trees within St. Mary Aldermanbury Garden.

(h) details of the integration of plant, window cleaning arrangements, flues, fire escapes and other excrescences at roof level;

(i) details of plant and ductwork to serve the premises.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.

- 16 Prior to the occupation of the building the car parking facility at London Wall Car Park, approved on 1 July 2017, must be completed and 58 car parking spaces shall be made available for police vehicles

displaced by the proposed development and shall be maintained as such thereafter.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM21.3.

- 17 Details of the construction, planting irrigation and maintenance regime for the proposed green wall(s)/roof(s) shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.  
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.
- 18 Any generator on the site shall be used solely on intermittent and exceptional occasions when required in response to a life threatening emergency or an exceptional event requiring business continuity and for the testing necessary to meet that purpose and shall not be used at any other time. At all times the generator shall be operated to minimise noise impacts and emissions of air pollutants and a log of its use shall be maintained and be available for inspection by the Local Planning Authority.  
REASON: To minimise adverse air quality in accordance with policies DM15.6 and DM 21.3 of the Local Plan and policies 7.14 B a and c of the London Plan.
- 19 (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.  
(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.  
(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.  
REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 20 No doors, gates or windows at ground floor level shall open over the public highway.  
REASON: In the interests of public safety
- 21 The vehicular parking provided on the site must remain ancillary to the use of the building and shall be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors.  
REASON: To ensure that the parking spaces provided remain ancillary to the use of the building in accordance with the following policy of the Local Plan: DM16.5.
- 22 Three car parking spaces suitable for use by people with disabilities shall be provided on the premises in accordance with details to be submitted to and approved in writing by the Local Planning Authority before any works affected thereby are begun, and shall be maintained throughout the life of the building and be readily available for use by disabled occupiers and visitors without charge to the individual end users of the parking.  
REASON: To ensure provision of suitable parking for people with disabilities in accordance with the following policy of the Local Plan: DM16.5.
- 23 Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of 153 pedal cycles. The cycle parking provided on the site must remain ancillary to the use of the building and must be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking.  
REASON: To ensure provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the following policy of the Local Plan: DM16.3.
- 24 Changing facilities and showers shall be provided adjacent to the bicycle parking areas and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.  
REASON: To make travel by bicycle more convenient in order to encourage greater use of bicycles by commuters in accordance with the following policy of the Local Plan: DM16.4.
- 25 An Interim Travel Plan shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the building hereby permitted. Within 6 months of first occupation a full Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The offices in the building shall thereafter be operated in accordance with the approved Travel Plan (or any amended Travel Plan that may be approved from time to time by the Local Planning

Authority) for a minimum period of 5 years from occupation of the premises. Annual monitoring reports shall be submitted to the Local Planning Authority during the same period.

REASON: To ensure that the Local Planning Authority may be satisfied that the scheme provides a sustainable transport strategy and does not have an adverse impact on the transport network in accordance with the following policy of the Local Plan: DM16.1.

- 26 The refuse collection and storage facilities shown on the drawings hereby approved shall be provided and maintained throughout the life of the building for the use of all the occupiers.  
REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1.
- 27 Provision shall be made for disabled people to obtain access to the building via the principal entrance without the need to negotiate steps and shall be maintained for the life of the building.  
REASON: To ensure that disabled people are able to use the building in accordance with the following policy of the Local Plan: DM10.8.
- 28 There must be no building, roof structures or plant above the top storey, including any building, structures or plant permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.  
REASON: To ensure protection of the view of St Paul's Cathedral and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS14, DM10.1 DM12.1.
- 29 The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission:  
Drawing No. 014100\_P110 proposed site plan Rev A A1  
014100\_P200-3 Proposed Floor Plans Level -02 Rev B  
Drawing No.014100\_P201-3 Proposed Floor Plans Level -01 REV B  
Drawing No. 014100\_P202-3 Proposed Floor Plans Level 00 REV C  
Drawing No. 014100\_P203-3 Proposed Floor Plans Level 01 REV B  
Drawing No. 014100\_P204-3 Proposed Floor Plans Level 02 REV B  
Drawing No. 014100\_P205-3 Proposed Floor Plans Level 03 REV B  
Drawing No. 014100\_P206-3 Proposed Floor Plans Level 04 REV B  
Drawing No. 014100\_P207-3 Proposed Floor Plans Level 05 REV B  
Drawing No. 014100\_P208-3 Proposed Floor Plans Level 06 REV B  
Drawing No. 014100\_P209-3 Proposed Floor Plans Level 07 REV B  
Drawing No. 014100\_P210-3 Proposed Floor Plans Level 08 REV B  
Drawing No. 014100\_P211-3 Proposed Floor Plans Level 09 REV B  
Drawing No. 014100\_P212-3 Proposed Floor Plans Level 10 REV B  
Drawing No. 014100\_P213-3 Proposed Floor Plans Level 11 REV B  
Drawing No. 014100\_P214-3 Proposed Floor Plans Level 12 REV B  
Drawing No. 014100\_P215-3 Proposed Floor Plans Level 13 REV B

Drawing No. 014100\_P220 Servicing & Waste Management Strategy Rev B  
 Drawing No. 014100\_P250-2 Proposed Townscape South & West Rev C  
 Drawing No. 014100\_P251-2 Proposed Townscape North & East Rev C  
 Drawing No. 014100\_P255-2 Proposed Streetscape Elevation South onto Love Lane  
 Drawing No. 014100\_P256-2 Proposed Streetscape Elevation West onto Wood Street Rev C  
 Drawing No. 014100\_P257-2 Proposed Streetscape Elevations North Rev C  
 Drawing No. 014100\_P258-2 Proposed Streetscape Elevations East Rev C  
 Drawing No. 014100\_P260-3 Proposed Elevation South onto Love Lane Rev  
 Drawing No. 014100\_P261-3 Proposed Elevation West onto Wood Street Rev C  
 Drawing No. 014100\_P262-3 Proposed Elevation North onto Aldermanbury Place Rev C  
 Drawing No. 014100\_P263-3 Proposed Elevation East onto St Mary Aldermanbury Garden Rev C  
 Drawing No. 014100\_P264-3 Proposed Courtyard Elevation Rev B  
 Drawing No. 014100\_P265-3 Proposed Courtyard Elevation Rev B  
 Drawing No. 014100\_P270-3 Section A-A Proposed Rev A  
 Drawing No. 014100\_P271-3 Section B-B Proposed Rev A  
 Drawing No. 014100\_P272-3 Section C-C Proposed Rev A  
 REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

## INFORMATIVES

- 1 In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways:

detailed advice in the form of statutory policies in the Core Strategy/ Unitary Development Plan, Supplementary Planning documents, and other written guidance has been made available;

a full pre application advice service has been offered;

where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.



- 2 This permission is granted having regard to planning considerations only and is without prejudice to the position of the City of London Corporation as ground landlords; and the work must not be instituted until the consent of the City of London Corporation as freeholders has been obtained.
- 3 The correct street number or number and name must be displayed prominently on the premises in accordance with regulations made under Section 12 of the London Building Acts (Amendment) Act 1939. Names and numbers must be agreed with the Department of the Built Environment prior to their use including use for marketing.
- 4 The Director of Markets and Consumer Protection (Environmental Health Team) advises that:

#### Noise and Dust

(a)

The construction/project management company concerned with the development must contact the Department of Markets and Consumer Protection and provide a working document detailing steps they propose to take to minimise noise and air pollution for the duration of the works at least 28 days prior to commencement of the work. Restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.

(b)

Demolition and construction work shall be carried out in accordance with the City of London Code of Practice for Deconstruction and Construction. The code details good site practice so as to minimise disturbance to nearby residents and commercial occupiers from noise, dust etc. The code can be accessed through the City of London internet site, [www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk), via the a-z index under Pollution Control-City in the section referring to noise, and is also available from the Markets and Consumer Protection Department.

(c)

Failure to notify the Markets and Consumer Protection Department of the start of the works or to provide the working documents will result in the service of a notice under section 60 of the Control of Pollution Act 1974 (which will dictate the permitted hours of work including noisy operations) and under Section 80 of the Environmental Protection Act 1990 relating to the control of dust and other air borne particles. The restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.

(d)

Construction work shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise from the site has been submitted to and approved by the Markets and Consumer Protection Department.

#### Air Quality

(e)

Compliance with the Clean Air Act 1993

Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.

#### Boilers and CHP plant

(f)

The City is an Air Quality Management Area with high levels of nitrogen dioxide. All gas boilers should therefore meet a dry NO<sub>x</sub> emission rate of <40mg/kWh in accordance with the City of London Air Quality Strategy 2015.

(g)

All gas Combined Heat and Power plant should be low NO<sub>x</sub> technology as detailed in the City of London Guidance for controlling emissions from CHP plant and in accordance with the City of London Air Quality Strategy 2015.

(h)

When considering how to achieve, or work towards the achievement of, the renewable energy targets, the Markets and Consumer Protection Department would prefer developers not to consider installing a biomass burner as the City is an Air Quality Management Area for fine particles and nitrogen dioxide. Research indicates that the widespread use of these appliances has the potential to increase particulate levels in London to an unacceptable level. Until the Markets and Consumer Protection Department is satisfied that these appliances can be installed without causing a detriment to the local air quality they are discouraging their use. Biomass CHP may be acceptable providing sufficient abatement is fitted to the plant to reduce emissions to air.

(i)

Developers are encouraged to install non-combustion renewable technology to work towards energy security and carbon reduction targets in preference to combustion based technology.

## Standby Generators

(j)

Advice on a range of measures to achieve the best environmental option on the control of pollution from standby generators can be obtained from the Department of Markets and Consumer Protection.

(k)

There is a potential for standby generators to give out dark smoke on start up and to cause noise nuisance. Guidance is available from the Department of Markets and Consumer Protection on measures to avoid this.

## Cooling Towers

(l)

Wet cooling towers are recommended rather than dry systems due to the energy efficiency of wet systems.

## Noise Affecting Residential Properties

(m)

The proposed residential flats are close to busy roads and are in an existing commercial area which operates 24 hours a day. The scheme should include effective sound proofing of the windows and the provision of air conditioning or silent ventilation units to enable the occupants to keep their windows closed to benefit from the sound insulation provided. This may need additional planning permission.

(n)

The proposed residential units are located in a busy City area that operates 24 hours a day and there are existing road sweeping, deliveries, ventilation plant and refuse collection activities that go on through the night. The units need to be designed and constructed to minimize noise disturbance to the residents. This should include acoustic treatment to prevent noise and vibration transmission from all sources. Sound insulation treatment needs to be provided to the windows and either air conditioning provided or silent ventilation provided to enable the windows to be kept closed yet maintain comfortable conditions within the rooms of the flat. This may need additional planning permission.

## Ventilation of Sewer Gases

(o)

The sewers in the City historically vent at low level in the road. The area containing the site of the development has suffered smell problems from sewer smells entering buildings. A number of these

ventilation grills have been blocked up by Thames Water Utilities. These have now reached a point where no further blocking up can be carried out. It is therefore paramount that no low level ventilation intakes or entrances are adjacent to these vents. The Director of Markets and Consumer Protection strongly recommends that a sewer vent pipe be installed in the building terminating at a safe outlet at roof level atmosphere. This would benefit the development and the surrounding areas by providing any venting of the sewers at high level away from air intakes and building entrances, thus allowing possible closing off of low level ventilation grills in any problem areas.

#### Food Hygiene and Safety

(p)

Further information should be provided regarding the internal layout of the proposed food/catering units showing proposals for staff/customer toilet facilities, ventilation arrangements and layout of kitchen areas.

(q)

If cooking is to be proposed within the food/catering units a satisfactory system of ventilation will be required. This must satisfy the following conditions:

Adequate access to ventilation fans, equipment and ductwork should be provided to permit routine cleaning and maintenance;

The flue should terminate at roof level in a location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. It cannot be assumed that ductwork will be permitted on the exterior of the building;

Additional methods of odour control may also be required. These must be submitted to the Markets and Consumer Protection Department for comment prior to installation;

Ventilation systems for extracting and dispersing any emissions and cooking smells to the external air must be discharged at roof level and designed, installed, operated and maintained in accordance with manufacturer's specification in order to prevent such smells and emissions adversely affecting neighbours.

(r)

From the 1 July 2007, the Health Act 2006 and associated Regulations prohibited the smoking of tobacco products in all enclosed or partially enclosed premises used as workplaces or to which the public have access. All such premises are required to provide signs prescribed by Regulations. Internal rooms provided for smoking in such premises are no longer permitted. More detailed guidance is available from the Markets and Consumer Protection Department (020 7332 3630) and from the Smoke Free England website: [www.smokefreeengland.co.uk](http://www.smokefreeengland.co.uk).

- 5 You are advised that Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
- 6 This approval relates only to the details listed above and must not be construed as approval of any other details shown on the approved drawings.

17 MAR 2017



# Wood Street Police Station Operational Justification



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## City of London Police

### Operational Justification Statement

#### **1 Introduction**

- 1.1 The redevelopment proposals for Wood Street Police Station are at the heart of establishing a new era for the City of London Police, its operational policing environment and the way it delivers its services to the public for the foreseeable future.
- 1.2 Without the successful delivery of transforming Wood Street Police Station into a modern, 21<sup>st</sup> Century operating facility, the City of London is at serious risk of increasing crime and threat from terrorist-related activities. The outcome being the City of London Police falling in its duty to protect the local community and the City's global status suffering. Failure to deliver the estate as now planned will severely impact upon the Forces ability to provide adequate policing within the city from a central location. Not only will there be a bigger crime response time, but a reputational damage to the Force.
- 1.3 This Operational Justification Statement sets out the City of London Police's reasons for why the proposed Wood Street Police Station redevelopment must be delivered. It explains the need behind the proposal, what the current operational situation is, the consideration of alternative sites in arriving at the Wood Street location, the proposal itself and finally the operational justification for the scheme.
- 1.4 This statement supports the detailed planning and listed building consent application and is to be used by the City of London Planning Authority in forming a balanced judgement against the proposal's potential impact on receptors such as the building's Grade II\* listed building status.

#### **2 The Need for Redeveloping Wood Street Police Station**

- 2.1 Wood Street was designed and built in the 1960s as a police station. It has historically served as the Force Headquarters and provides a central location from which to police the City. The history and legacy of the building is important to the City of London Police and we are keen to remain at this site. However, the intended function of a police station in the 1960s focused on public access and as a place for the public to request assistance in person. Officers also attended these stations to parade prior to deployment and used them as a base for report writing and completion of notes. Wood Street is no longer fit for the purpose it was designed.



- 2.2 The police station was designed to serve the needs of the City of London Police and the City community almost 60 years ago. Today's Force operates within a different policing model, has significant national policing commitments and has to keep pace with new and evolving crime trends and security threats. The Force is also subject to the requirements and recommendations of a variety of external agencies including the Home Office, Her Majesty's Inspectorate of Constabulary and the Security Services.
- 2.3 A modern, 21<sup>st</sup> century police station is no longer seen as a focal point of physical access, neither does it provide local overnight sleeping accommodation as was previously built into the facility. The public engage with a modern Force in a variety of different ways now, including telephony and IT internet access. Officers require portable modern mobile technology at all times, whether on their person or in their vehicles, and this has to maintain a resilient and reliable connection back to a command and control centre to respond with appropriate resources as required. Our future facilities need to be the technological base of our operations, with sophisticated communication links to front-line officers, serious crime investigation units, forensics and a 'state of the art' custody environment.
- 2.4 These requirements relate not only to standards around the delivery of local policing services and the physical security requirements of its police estate, but also to the Force's fulfilment of its national policing obligations - in areas such as anti-terrorism, public order and civil contingencies.
- 2.5 The City of London Police needs to operate within a sustainable and secure environment that can meet the future needs of, the requirements placed upon, and the threats faced by an operational police force from 2017 onwards. Some of the key objectives from the City of London Policing Plan include:
- The identified priorities for the Police accommodation review
  - Protecting our communities from terrorism or serious harm
  - Protecting the City of London and the UK from fraud
  - Responding to the business and resident community
  - Providing excellent value for money
- 2.6 The need for the proposed redevelopment is a key part of maintaining our national security and the public benefit that the scheme will create is a material planning consideration which should weigh in favour in finding support for the proposed planning and listed building consent application.

### **3 Current Situation**

3.1 The existing estate comprises three buildings spread across the City and one newer building within the Guildhall complex that was refurbished in 2014. The original three buildings are now not fit for purpose and this is placing the Force at risk.

3.2 The reasons for each of the three sites not being fit for purpose are as follow:

1. *Bishopsgate*

Bishopsgate is located at the eastern end of the city and is limited in its operational capabilities. Lack of Policing and operational deployment from this site is seriously restrictive.

2. *New Street*

New Street is a leased office facility and not fit for purpose for City of London Police operations.

3. *Snow Hill*

Snow Hill is too small a facility for City of London operations with no vehicle parking available for the operational fleet.

### **4 Alternative Sites**

4.1 In coming to the position that Wood Street Police Station presents the best option for delivering the City of London Police's operational requirements in the future, alternative options were considered. This was undertaken through an assessment of sites that are in the City of London's ownership and sites that are not in the City of London's ownership but could accommodate the proposal. The findings are documented in Appendix A.

4.2 The focus of the assessment was opportunities that the City already owns as this has the advantage that the building assets are within the City's control and so there is a far greater likelihood of successful delivery. Such sites are limited to only the Barbican Centre Exhibition Halls I and II, and Walbrook Wharf.

4.3 The redevelopment of the Barbican Exhibition Centre Halls could deliver 81,355sqft. However, vertical extensions would be required to what is a Grade II Listed Building causing heritage impacts as well as potentially impacting the amenity of residents in this location. Other constraints would be a shortfall in floorspace and spreading across two building while there would also be a loss of valuable exhibition space. The site would present a much more constrained option than Wood Street.

- 4.4 At 22,500sqft, Walbrook Wharf would only be able to accommodate a small proportion of the City of London Police's facilities, made more difficult by complex departmental space efficiency requirements. This option would clearly fail to meet the objective to locate facilities in a single place
- 4.5 In terms of sites outside of the control of the City of London, more than 100 live and expected planning applications and developments were reviewed. This number was reduced to some 20 sites' potential being assessed. All sites were discounted for various reasons, which are summarised as:
- Lack of floorspace capacity;
  - Land assembly and transaction complexities;
  - Longevity of existing leases;
  - Land / building values;
  - Poor location – periphery of the City;
  - Viability posed by site constraints;
  - Length of time to deliver site;
- 4.6 Further to the list of reasons, the City does not control these assets and as such the likelihood of delivery is compromised. Likewise, it is also recognised that the City of London Police are not considered a 'good neighbour' for City occupiers and businesses and as such developers will not willingly consider allocating part of their investment schemes to the Force.
- 4.7 The assessment concluded that:
- There are no alternative buildings in the City that the can realistically accommodate the entire uniform and operational headquarter functions of the City of London Police;
  - Creating the new Home Office compliant custody suite, but not building the new tower extension above results in specialist Police functions being located elsewhere which significantly impacts the operational effectiveness of the City of London Police; and
  - The new tower extension, as proposed, is an essential requirement to provide additional floor area and a modern fit for purpose headquarter building for the City of London Police.

- 4.8 Our priority must be the co-location and consolidation of operational areas within a central site. Out of the buildings in the existing estate, Wood Street is geographically clearly the prime location for the deployment and response of operational teams. Utilising alternative sites would cause the Force Headquarters to be located at the extreme west or east of the City. Operationally, that has been determined as too great a risk to the Force.

**5 Operational Justification – Redevelopment of Wood Street**

- 5.1 The redevelopment proposals for Wood Street Police Station are at the heart of establishing a new era for the City of London Police, its operational policing environment and the way it delivers its services to the public for the foreseeable future.
- 5.2 Without the successful delivery of transforming Wood Street Police Station into a modern, 21<sup>st</sup> Century operating facility, the City of London is at serious risk of increasing crime and threat from terrorist and other related activities. The outcome being the City of London Police failing in its duty to protect the local community with the City's global status suffering. Failure to deliver the estate as now planned will severely impact upon the Forces ability to provide adequate policing within the city from a central location. Not only will there be a bigger crime response time, but a reputational damage to the Force.
- 5.3 The expansion of Wood Street police station will enable the delivery of far more effective policing services within the City of London. Wood Street will represent an iconic but, more importantly, central, secure facility in which to base all police operations. Police Forces face significant budget challenges for the foreseeable future and the ability to integrate operational teams and share resources across the Force will be greatly enhanced by locating all our key essential services in a central operational base. It will enable enhanced and more efficient sharing of knowledge, skills and expertise across policing functions that will improve how we work. That can only be achieved by consolidating our key operational teams working adjacently within one central core and safe location.
- 5.4 By providing policing services not from several localised and out-dated sites, but from a centrally located, modern police station, equipped with the latest technology and facilities and complying with existing standards, the City of London Police would be better placed to meet its policing requirements, provide a more positive working environment for its officers and staff, and deliver its vision of providing a world-class service to the public and the City.

- 5.5 Failure to expand the facility as proposed will place risks upon the Force that could result in another review of the proposals. Without the expansion and flexibility to integrate our operations within this site, we have to consider the alternative that the Force could not remain within the facility; it would simply not provide us with the necessary development space for our future operational requirements.
- 5.6 The basis for redeveloping the Wood Street site is that it is already recognised as the headquarters of the City of London Police. It sits at the heart of the 'square mile' and it is operationally critical that geographically our headquarters is positioned in this location to enable quick operational deployment to all parts of the City, within a cohesive command and control structure.
- 5.7 Since the original submission of the concept plans, further detailed work / evaluation of the designs has determined that the additional space is vital for the future operation of the Force within Wood Street. Without this additional space, the City of London Police would be faced with the decision that the proposals to expand the site are not sufficient and would compromise the Force beyond the possible tolerance level for modern policing. Thus, the need for the proposed redevelopment is a key part of maintaining our national security and the public benefit that the scheme will create.

## **6 Planning Application Proposals**

- 6.1 The planning and listed building consent application has been prepared following extensive consultation with the City of London Planning, Design, Conservation and Highways Officers, with technical specialists at Historic England and a range of other key stakeholders. This has also included a detailed space planning exercise by the Force themselves to evaluate and justify the proposed scheme.
- 6.2 The proposal has been driven by key fundamental requirements for the future estate, which include:
- More efficient service models
  - Modern estate – sustainable for next 30+ years
  - Operational resilience for the Force
  - Robust and flexible I.T infrastructure
  - Links to local and national Policing objectives
- 6.3 The main operational benefits and impact upon the space planning for the Wood Street facility have included:
- Operational benefits for the safety and security of the City of London
  - Increased police presence and visibility, including more patrols within the City

- Improved prisoner handling due to adjacently located operational teams within the new Wood Street design
- Improved 'business continuity' through fit-for-purpose, modern and secure headquarters
- Relocation of key City of London Police resources within a centrally located position within the City
- Relocation of the Force's vehicle fleet to London Wall to support operational deployments from the new Wood Street facility, improving officer access and response times
- Co-location of front-line officers, community officers and CID – this will lead to improvements in response times, prisoner handling and overall efficiency
- Establishing a central base for City of London officers to operate from will increase our mobilisation of front-line officers, including greater visibility of the streets
- Enhanced / more immediate command and control availability in dealing with major incidents and terrorism
- Responding to the current national threat levels that exist in relation to police forces and their respective officers and staff by providing secure operating facilities within one core building
- Relocating the Joint Control / Contact Centre of the City of London Police and City of London Corporation into one secure operating area within the Wood Street design
- Providing a safe and resilient base for response to any major incidents within the City from a core and secure location
- More effective policing and prisoner handling with resources contained within one central site. Enhanced prisoner cell space within the new design will retain officers within the City of London Corporation footprint, thus reducing abstractions from front line operations and officer availability for local policing
- Reduction in the national threats currently faced by City of London Police officers / staff by securely locating all operational teams within one central / secure location
- Supporting our local and national terrorism and threat response and intelligence function by relocating operational response areas to a secure facility
- Providing a modern, highly secure police building that meets the current standards of security requirements for the Force to operate from.

6.4 Plans have been carefully prepared for a comprehensive redevelopment including a new tower, infilling of the courtyard and lower levels within the building to create much needed additional space and reflect the unique operational requirements of the Force.

## **7 Conclusion**

- 7.1** In conclusion, Wood Street was designed to serve the needs of the City of London Police and the City community almost 60 years ago. Today's Force operates within a different policing model, has significant national policing commitments and must keep pace with new and evolving crime trends and security threats. The Force is also subject to the requirements and recommendations of a variety of external agencies including the Home Office, Her Majesty's Inspectorate of Constabulary and the Security Services. The City of London Police engage with a number of national and international agencies. With the changing pace of modern policing, there are a number of urgent deadlines and requirements that must be completed with. Failure to do so will significantly impact upon the overall performance of the Force and severely damage our reputation in national policing.
- 7.2** The need for the proposed redevelopment is a key part of maintaining our national security and the public benefit that the scheme will create is a material planning consideration which should weigh in favour in finding support for the proposed planning and listed building consent application.
- 7.3** This statement has demonstrated that any perceived harm to the listed building or loss of fabric is necessary to achieve the substantial public benefits that outweigh this perceived harm or loss and the planning application should be supported.

**Ian Dyson**

**City of London Police Commissioner**

## **APPENDIX A: Wood Street Alternative Options - February 2017**

1. Following the request of Historic England, the following report sets out the alternative scenarios that have been considered to address the City of London Police ("CoLP") space requirements, bearing in mind the Grade II\* Listed significance of Wood Street Police Station and specifically the impact the proposed extension may have on the existing building.
2. Two scenarios have been considered in addition to the proposed Wood Street solution. These are as follows:

**Scenario 1:** An alternative headquarters in the City for the CoLP; and

**Scenario 2:** Wood Street is retained without a new tower extension but still includes the new Custody suite at ground level (requiring at least 20,000 sq ft of operational Police space elsewhere).

### **City of London Police Operational Continuity**

3. A core element of the Police Accommodation Strategy is to retain the main uniform headquarters in Wood Street Police Station, for three reasons:
  - Wood Street is the original historic home of the CoLP;
  - Its central location cannot be equalled in the City; and
  - It is the only CoLP building that has current potential to be upgraded to a modern, fit for purpose Police headquarters building; there simply is not enough space at either Bishopsgate or Snow Hill to accommodate the complex operational requirements, even if these buildings were capable of being extended.

### **Third Party Opportunities**

4. The City has reviewed all live and expected planning applications and developments, amounting to over 100 that would deliver a sufficient size building within the City of London. The most likely opportunities are summarised under scenario 1 in this report, however, they are all highly valuable, purpose built investment assets and it is unlikely that they will be available for sale or occupation by the CoLP.
5. The City does not control these assets and as such the likelihood of delivery is compromised. It is also recognised that the CoLP are not considered a 'good neighbour' for City occupiers and businesses and as such developers will not willingly consider allocating part of their investment schemes to the CoLP.

### **City Opportunities**

6. The main focus of the scenarios considered are opportunities that the City already owns as this has the advantage that the building assets are within the City's control and so there is a far greater likelihood of successful delivery.



Summary of alternative City owned opportunities:

Scenario	Best Options	NIA sq ft	Comment
1	<b>Barbican Centre Exhibition Halls I &amp; II</b> (Major re-development)	Ex Hall I 39,075 Ex Hall II 42,280 <u>Total 81,355</u>	Requires vertical extensions to increase size to sufficient level – high planning risk (Grade II listed), impacts residents, too small and split across 2 buildings.
2	<b>Walbrook Wharf</b> (Entire front office)	<u>22,500</u>	Complex departmental space efficiencies required, which are not viable. Insufficient space.

7. The outcome of this exercise confirms that there are no alternative headquarter options available. Whilst smaller opportunities exist within the City's control, these have been discounted due to Police operational reasons; as it is confirmed elsewhere, the centralisation of key Police teams within a single, modern headquarter building is fundamental to improving operational effectiveness.

**Conclusion**

The City of London Corporation has reviewed alternatives to refurbishing and extending Wood Street Police Station, however, it has concluded that:

- There are no alternative buildings in the City that can realistically accommodate the entire uniform and operational headquarter functions of the City of London Police;
- Creating the new Home Office compliant custody suite, but not building the new tower extension above results in specialist Police functions being located elsewhere which significantly impacts the operational effectiveness of the City of London Police; and
- The new tower extension, as proposed, is an essential requirement in order to provide additional floor area and a modern fit for purpose headquarter building for the City of London Police.

### Alternative Headquarter Options (Excl. Wood Street)

<b>Property</b>
Headquarter replacement (inc. 20 parking bays)
Guildhall Yard East
Parking (c. 102 bays)
Satellite & Misc. Facilities

### Potential City Solutions

<b>Property</b>	<b>NIA (approx. sq ft)</b>	<b>Comments</b>	<b>Suitable Alternative</b>
<b>Barbican Centre Exhibition Halls I &amp; II (Development opportunity)</b>	Ex Hall I 39,075 Ex Hall II 42,280 <u>Total</u> 81,355	Technical refurbishment and fit out costs could be high and to get requires physical, vertical extension to increase footprint to 110,000 sq ft. Site benefits from parking facilities immediately below. Poor floor to ceiling height. Both halls are Grade II listed. Potential conflict with residents.	<b>No</b> <i>Too small, availability unclear, impact on local area, split buildings.</i>
<b>65/65a Basinghall Street &amp; CII (Development opportunity)</b>	c.100,000	Long term development potential but City do not own entire site. Space planning to relocate existing occupants of 65 & 65a required. Parking solution below. High opportunity cost and high planning risk.	<b>No</b> <i>Requires site assembly with adjoining owner. Likely to be too small in any event.</i>
<b>21 New Street &amp; Bishopsgate Police Station (Development opportunity)</b>	c. 500,000	Long term development (10 years to deliver and occupy). Requires purchase of New Street (recently sold to third party) and Victoria Avenue (subject to 7 years unexpired lease) to realise full potential. Car parking an issue due to Crossrail tunnels 30m below site.	<b>No</b> <i>timing site assembly issues - 21 New St - Victoria Ave 7 year leases unexpired</i>
<b>Baynard Castle Car Park</b>	Significant	Long term development potential reliant on negotiated transaction with BT (lease expiry 2078). Parking solution.	<b>No</b> <i>Timeline unlikely, third party transaction required</i>
<b>Minorities Car Park</b>	Significant	Long term development potential reliant on joint scheme with adjoining China Minshing Bank (previously Soc Gen) building. Parking solution.	<b>No</b> <i>Timeline unlikely, third party transaction required</i>

Potential City Solutions (continued)

Property	NIA (approx. sq ft)	Comments	Consider Further?
Farringdon East, Lindsay St. (Development opportunity)	89,000	Currently Crossrail site. Development proposal of modern office space; available c.2019. City own 20% of freehold. Other owners interest in deal with CoLP unlikely. Complexities of lease / purchase to be considered. Parking issue as railway lines run directly below, however, facilities at Smithfield may offer potential solution. Leaves 20,000 sq ft shortfall.	<b>No</b> <i>too small lease, purchase cost and impact on area</i>
Leith House, 55 Gresham St. (Development opportunity)	120,000	Subject to long lease (168 years unexpired – lease extension ongoing). Modern office space available 2018/19. Complexities of lease / purchase (and high cost) to be considered.	<b>No</b> <i>opportunity cost lease / purchase cost tenant type and impact on area</i>
Museum of London (MoL) & Bastion House (Development opportunity)	650,000	Long term development potential (10 years to deliver and occupy, assuming no delay relocating MoL). Substantial investment required to realise potential. Requires relocation of MoL and vacant possession of Bastion House (currently occupied). Car parking solution to remain at LWCP. Only available from 2022.	<b>No</b> <i>Timing and impact on other infrastructure delivery</i>
Fleet Street Estate (Development opportunity)	400,000 GIA	Full feasibility assessment yet to be undertaken. High cost to deliver as well as high opportunity cost. Parking requirement likely to be an issue.	<b>No</b> <i>no parking, impact on area and opportunity cost</i>
Calcutta House Site (Development opportunity)	500,000	Current lease commitments expire 2026. Requires further site assembly to deliver estimated 500k sq ft. Located on far eastern City boundary. CoLP use would sterilise entire development potential.	<b>No</b> <i>availability 2026 location lease / purchase cost opportunity cost</i>
Creechurch Place	275,000	High quality office development available now. Long lessee unlikely to consider CoLP as desirable tenant. Complexities of lease / purchase (and high opportunity cost) to be considered.	<b>No</b> <i>Reliant on 3rd party, impact on area and opportunity cost</i>
60 to 70 St. Mary's Axe (Can of Ham)	300,000	High quality office development available 2019. Long lessee unlikely to consider CoLP as desirable tenant. Complexities of lease / purchase (and high cost + opportunity cost) to be considered.	<b>No</b> <i>Reliant on 3rd party, impact on area and/ opportunity cost</i>

### Potential External Solutions

Property	NIA (approx. sq ft)	Comments	Consider Further?
<b>120 Moorgate, EC2</b>	128,000	Earliest completion 2020. Demolition of existing and creation of 105,000 sq ft office & 23,000 sq ft of ground and basement retail over 10 floors (consented not commenced).	<b>No Not viable / not in City control to deliver</b>
<b>One Braham 1 Braham Street, E1</b>	300,000	Earliest completion 2018/19. Planning granted for the construction of a new 18 storey office building. Located to far east beyond City boundary (consented not commenced).	
<b>Shoreditch Estate Shoreditch High Street, E1</b>	320,000	Earliest completion 2019. Proposal to retain and refurbish the existing buildings for a commercially led mixed use scheme, ranging from 4 to 13 storeys, provision of off-street parking included in current proposal (consented not commenced).	
<b>Aldgate Union 10 Whitechapel High Street,</b>	310,000	Earliest completion 2017. Floor by floor refurbishment of the building (planning being worked up).	
<b>City Place House 55 Basinghall Street, EC2</b>	170,000	Potential future scheme. Earliest completion 2020 (potential future scheme).	
<b>City Gate House 39 Finsbury Square, EC2</b>	178,000	Earliest completion 2019. Potential refurbishment when Bloomberg exits in 2018 (potential future scheme).	
<b>41 Tower Hill, EC3</b>	190,000	Earliest completion 2022. CoL freehold of the car park (potential future scheme).	
<b>Boardwalk House 5 Appold Street, EC2</b>	332,000	British Land reviewing options for site (potential future scheme).	
<b>Tenter House 45 Moorfields, EC2</b>	200,000	Earliest completion 2020. Architects currently working up a revised scheme of circa 200,000 sq ft (revised planning being worked up).	
<b>20 Old Bailey, EC4</b>	240,000	Earliest completion 2017. Recladding and extension of the existing building to provide 235,000 sq ft (under construction / space available).	

21 FEB 2017



Our Ref: A090129-72

Planning Portal Ref: PP-05133921

Date: 20<sup>th</sup> February 2017

**SUBMITTED VIA PLANNING PORTAL**

Rob Chipperfield  
Principal Planning Officer  
Department of the Built Environment  
City of London Corporation  
PO Box 270  
Guildhall  
London  
EC2P 2EJ



Dear Mr Chipperfield,

**PLANNING AND LISTED BUILDING CONSENT APPLICATION**  
**PROPOSED REDEVELOPMENT OF 37 WOOD STREET, LONDON, EC2P 2NQ**

Further to our recent pre-application meetings, please find attached a planning and listed building consent application for the following development proposal at 37 Wood Street, London submitted on behalf of our client the City of London Corporation:

*"Erection of a new 9 storey tower, infill of the courtyard, internal refurbishments and conversion of basements to provide additional office floorspace; car and cycle parking; refuse and recycling storage; and associated works at 37 Wood Street".*

Accordingly, please find enclosed the following:

- Application forms and certificates
- CIL Form
- Planning Statement prepared by WYG ✓
- Design and Access Statement prepared by Seven Architecture ✓
- Heritage Assessment prepared by Seven Architecture ✓
- Drawing No. 014100\_P100 Site Location Plan Rev A3
- Drawing No. 014100\_P109 Existing Site Plan Rev A1
- Drawing No. 014100\_SK200 Existing Floor Plans Level -02 Rev B A1
- Drawing No. 014100\_SK201 Existing Floor Plans Level -01 Rev B A1
- Drawing No. 014100\_SK202 Existing Floor Plans Level 00 Rev B A1
- Drawing No. 014100\_SK203 Existing Floor Plans Level 01 Rev B A1
- Drawing No. 014100\_SK204 Existing Floor Plans Level 02 Rev B A1

100 St John Street, EC1M 4EH, London,  
Tel: +44 (0)20 7250 7500 Email: chris.tennant@wyg.com www.wyg.com

WYG Environment Planning Transport Limited. Registered in England & Wales Number: 3050297  
Registered Office: Arndale Court, Headingley, Leeds, LS6 2UJ



creative minds safe hands



- Drawing No. 014100\_SK205 Existing Floor Plans Level 03 Rev B A1
- Drawing No. 014100\_SK206 Existing Floor Plans Level 04 Rev B A1
- Drawing No. 014100\_SK207 Existing Floor Plans Level 05 Rev B A1
- Drawing No. 014100\_SK208 Existing Floor Plans Level 06 Rev B A1
- Drawing No. 014100\_SK209 Existing Floor Plans Level 07 Rev B A1
- Drawing No. 014100\_SK210 Existing Floor Plans Level 08 Rev B A1
- Drawing No. 014100\_SK211 Existing Floor Plans Level 09 Rev B A1
- Drawing No. 014100\_SK213 Existing Floor Plans Level 11 Rev B A1
- Drawing No. 014100\_SK214 Existing Floor Plans Level 12 Rev B A1
- Drawing No. 014100\_SK215 Existing Floor Plans Level 13 Rev B A1
- Drawing No. 014100\_P250-1 Existing Townscape South & West Rev B A1
- Drawing No. 014100\_P251-1 Existing Townscape North & East Rev B A1
- Drawing No. 014100\_P255-1 Existing Streetscape Elevation South onto Love Lane Rev B A1
- Drawing No. 014100\_P256-1 Existing Streetscape Elevation West onto Wood Street Rev B A1
- Drawing No. 014100\_P257-1 Existing Streetscape Elevations North Rev B A1
- Drawing No. 014100\_P258-1 Existing Streetscape Elevations East Rev B A1
- Drawing No. 014100\_P260-1 Existing Elevation South onto Love Lane Rev B A1
- Drawing No. 014100\_P261-1 Existing Elevation West onto Wood Street Rev B A1
- Drawing No. 014100\_P262-1 Existing Elevation North onto Aldermanbury Place Rev B A1
- Drawing No. 014100\_P263-1 Existing Elevation East onto St Mary Aldermanbury Garden Rev B A1
- Drawing No. 014100\_P264-1 Existing Courtyard Elevation Rev B A1
- Drawing No. 014100\_P265-1 Existing Courtyard Elevations Rev B A1
- Drawing No. 014100\_P270-1 Section A-A Existing Rev A A1
- Drawing No. 014100\_P271-1 Section B-B Existing Rev A A1
- Drawing No. 014100\_P272-1 Section C-C Existing Rev A A1
- Drawing No. 014100\_P110 Proposed Site Plan Rev A A1
- Drawing No. 014100\_P200-3 Proposed Floor Plans Level -02 Rev B
- Drawing No. 014100\_P201-3 Proposed Floor Plans Level -01 REV B
- Drawing No. 014100\_P202-3 Proposed Floor Plans Level 00 REV C
- Drawing No. 014100\_P203-3 Proposed Floor Plans Level 01 REV B
- Drawing No. 014100\_P204-3 Proposed Floor Plans Level 02 REV B
- Drawing No. 014100\_P205-3 Proposed Floor Plans Level 03 REV B
- Drawing No. 014100\_P206-3 Proposed Floor Plans Level 04 REV B
- Drawing No. 014100\_P207-3 Proposed Floor Plans Level 05 REV B
- Drawing No. 014100\_P208-3 Proposed Floor Plans Level 06 REV B
- Drawing No. 014100\_P209-3 Proposed Floor Plans Level 07 REV B
- Drawing No. 014100\_P210-3 Proposed Floor Plans Level 08 REV B
- Drawing No. 014100\_P211-3 Proposed Floor Plans Level 09 REV B
- Drawing No. 014100\_P212-3 Proposed Floor Plans Level 10 REV B
- Drawing No. 014100\_P213-3 Proposed Floor Plans Level 11 REV B
- Drawing No. 014100\_P214-3 Proposed Floor Plans Level 12 REV B
- Drawing No. 014100\_P215-3 Proposed Floor Plans Level 13 REV B
- Drawing No. 014100\_P250-2 Proposed Townscape South & West Rev C
- Drawing No. 014100\_P251-2 Proposed Townscape North & East Rev C
- Drawing No. 014100\_P255-2 Proposed Streetscape Elevation South onto Love Lane Rev C
- Drawing No. 014100\_P256-2 Proposed Streetscape Elevation West onto Wood Street Rev C
- Drawing No. 014100\_P257-2 Proposed Streetscape Elevations North Rev C
- Drawing No. 014100\_P258-2 Proposed Streetscape Elevations East Rev C
- Drawing No. 014100\_P260-3 Proposed Elevation South onto Love Lane Rev C
- Drawing No. 014100\_P261-3 Proposed Elevation West onto Wood Street Rev C
- Drawing No. 014100\_P262-3 Proposed Elevation North onto Aldermanbury Place Rev C



- Drawing No. 014100\_P263-3 Proposed Elevation East onto St Mary Aldermanbury Garden Rev C
- Drawing No. 014100\_P264-3 Proposed Courtyard Elevation Rev B
- Drawing No. 014100\_P265-3 Proposed Courtyard Elevation Rev B
- Drawing No. 014100\_P270-3 Section A-A Proposed Rev A
- Drawing No. 014100\_P271-3 Section B-B Proposed Rev A
- Drawing No. 014100\_P272-3 Section C-C Proposed Rev A
- Drawing No. 014100\_P200-2 Demolition Floor Plans Level -02 REV B
- Drawing No. 014100\_P201-2 Demolition Floor Plans Level -01 REV B
- Drawing No. 014100\_P202-2 Demolition Floor Plans Level 00 REV C
- Drawing No. 014100\_P203-2 Demolition Floor Plans Level 01 REV B
- Drawing No. 014100\_P204-2 Demolition Floor Plans Level 02 REV B
- Drawing No. 014100\_P205-2 Demolition Floor Plans Level 03 REV B
- Drawing No. 014100\_P206-2 Demolition Floor Plans Level 04 REV B
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- Drawing No. 014100\_P210-2 Demolition Floor Plans Level 08 REV B
- Drawing No. 014100\_P211-1 Demolition Floor Plans Level 09 REV B
- Drawing No. 014100\_P212-2 Demolition Floor Plans Level 10 REV B
- Drawing No. 014100\_P213-2 Demolition Floor Plans Level 11 REV B
- Drawing No. 014100\_P214-2 Demolition Floor Plans Level 12 REV B
- Drawing No. 014100\_P215-2 Demolition Floor Plans Level 13 REV B
- Drawing No. 014100\_P260-2 Demolition Elevation South onto Love Lane Rev A
- Drawing No. 014100\_P261-2 Demolition Elevation West onto Wood Street Rev A
- Drawing No. 014100\_P262-2 Demolition Elevation North onto Aldermanbury Place Rev A
- Drawing No. 014100\_P263-2 Demolition Elevation East onto St Mary Aldermanbury Garden Rev A
- Drawing No. 014100\_P264-2 Demolition Courtyard Elevation Rev A
- Drawing No. 014100\_P265-2 Demolition Courtyard Elevation Rev A
- Drawing No. 014100\_P270-2 Section A-A Demolition Rev A
- Drawing No. 014100\_P271-2 Section B-B Demolition Rev A
- Drawing No. 014100\_P272-2 Section C-C Demolition Rev A
- Archaeological Desk-Based Assessment prepared by CgMS Consulting ✓
- BREEM New Construction 2014 Pre-assessment Report prepared by WYG
- Daylight and Sunlight Review prepared by Delva Patman Redler ✓
- Explosive Ordnance Desktop Threat Assessment prepared by Dynasafe ✓
- Extended Phase 1 Habitat Survey prepared by WYG ✓
- Transport Assessment prepared by WYG ✓
- Framework Travel Plan prepared by WYG ✓

Due to file size, the following documents are unable to be submitted via the Planning Portal and will follow by post on a CD.

- Acoustic Assessment prepared by Spectrum Acoustic Consultants ✓
- Energy Statement prepared by WYG
- Flood Risk Assessment & Drainage Strategy prepared by WYG ✓
- Geo-Environmental Study prepared by BRD
- Drawing No. 014100\_SK212 Existing Floor Plans Level 10 Rev B A1

The statutory fee for this planning application has been calculated to be £14,245.00 and an internal recharge has been arranged.



I would be grateful if you could confirm receipt of this planning application and we look forward to confirmation that it has been validated. If you have any queries, please contact me or my colleague, Rochelle Fleming, at this office.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'wyg'.

**Christopher Tennant MRTPI**  
**Director & Head of Planning – London**  
For and on behalf of WYG Environment, Planning & Transport

Enc



Ref: PJB7891/15389

Date: 31 August 2016

**SPECTRUM**  
HEALTH CONSULTANTS

Andrew Charalambous  
WYG  
100 St John Street  
London  
EC1M 4EH



Dear Andrew

**ACOUSTIC ASSESSMENT OF MECHANICAL PLANT INSTALLATION FOR CITY OF LONDON POLICE STATION, 37 WOOD STREET, EC2P**

WYG are assisting the City of London Police to modernise their existing Police Station including the formation of a new tower as well as in-filling and adapting the courtyard to provide accommodation that meets the Service's current needs. The proposed re-development includes new mechanical plant equipment to meet the HVAC requirements of the building.

Spectrum Acoustic Consultants prepared an assessment of noise from mechanical plant in February, 2016 (ref. PJB7723/15389). Since that time a number of revisions to the proposed scheme have taken place, necessitating updating of the noise assessment. This letter provides the new analysis and recommendations for this purpose.

WYG are aware that the installation of the plant must comply with the City of London's standard requirements for plant noise levels. The purpose of this technical letter is to analyse the environmental noise emission from the proposed plant and to determine whether suitable noise levels can be achieved for nearby noise-sensitive premises in accordance with the Council's standards requirements.

**1. PLANT NOISE - CRITERION FOR ACCEPTABILITY**

Spectrum Acoustic Consultants have made contact with Garry Seal, an Environmental Health Officer in the Pollution Team of City of London's Department of Markets & Consumer Protection. He advised the following in respect of his department's requirements for the development.

Prior to your formal pre-app on 23rd November I can advise that the main concern for the Pollution Team would be that the noise from the new plant [should] not increase the noise levels in the area and this would normally be [controlled] by condition:

*(a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.*

*(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.*

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*(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.*

Spectrum have previously been in contact with this department to question whether the requirement to meet 10 dB below background applied at nearby office areas because these receptors are not 'residential areas' as assessed by BS4142. At that time, the Pollution Team confirmed that assessment at office receptor locations was the department's requirement in order to prevent creeping background. As a result, the allowable noise level from plant at this site is 10 dB below background noise at the nearest residential or office window.

City of London's normal practice requires that the assessment is undertaken for the quietest time when plant may be required to run. In addition, the survey of background noise can be conducted with any existing plant running, so that any existing plant noise is considered to be a characteristic of the overall noise environment.

## **2. SITE DESCRIPTION AND PROPOSALS**

The City of London Police Station is located at 37 Wood Street in the City of London. It is bounded by Wood Street to the west, Love Lane to the south, Aldermanbury to the east and the multi-storey office building at 5 Aldermanbury Square to the north. The existing premises is a 4-sided building enclosing a central courtyard. In general, the building comprises 2 levels of basement with 4 storeys above ground level and a double pitched roof. However, in north east wing of the building includes a tower which extends to 13 storeys (and roof level plant space) with gabled ends and a double pitched roof. There is also a flat roof above the 4<sup>th</sup> storey along the southern wing extending from the roof ridge to level with the courtyard.

Other local features surrounding the site include office buildings opposite Love Lane to the south, opposite Wood Street to the west and on the north side of St Mary Aldermanbury's Garden. In general, these buildings are taller than the main City of London Police (CoLP) station, although the CoLP tower is taller than most nearby buildings, except 5 Aldermanbury Square to the North.

There is a single residence within the former Saint Alban Church Tower, located between the north and south bound carriageways of Wood Street, immediately to the west of the CoLP building.

A location plan is shown in Attachment 1.

The proposals include infilling the central courtyard while maintaining lightwells down to Basement Level 1. A new tower is to be located north of the existing tower, extending to 9 storeys in height. A number of key floor plan, elevation and section drawings are shown in Attachment 2.

### **2.1 Plant proposals**

All existing plant is to be stripped out. New plant will be located at a number of locations throughout the building. However, in many cases, these will not be in open-air locations and will be remote from the location at which air enters or exits and where, consequently, noise could be emitted from the building. In summary, the 'externally audible' plant locations are:

- A. Horizontal meshed air intake 1m above Love Lane street level in the south east corner of the building.
- B. 2 Trane Flex 180 Z Chillers within a new plant well on the 4<sup>th</sup> floor, southern side. The existing flat roof above is to be stripped out and replaced by a horizontal louvre above the chillers. Air to discharge vertically through these louvres.
- C. Air intake to the chillers through the northern face of the south wing of the building, through existing window apertures (6 No.).
- D. Air intake for an air handling unit within the west wing 4<sup>th</sup> floor through existing east-facing window apertures (4 No.). These overlook the central courtyard.
- E. Toilet extract discharging through a penthouse louvre located on the flat roof over level 4 south wing.

- F. Air handling unit exhaust discharge through the (existing) chimney on the south west corner of the building.
- G. Air intake for an air handling unit within the east wing 4<sup>th</sup> floor through the roof hip on the north eastern corner of the wing of the existing building.
- H. AHU exhaust discharge through the (existing) chimney on the south east corner of the building.
- I. 22 Daikin condensing units within a compound on the newly formed flat roof above the central courtyard, surrounded by a 2.2m high barrier.
- J. 3 Trane Flex 180 Z chillers within a compound on the newly formed flat roof above the central courtyard, surrounded by a 2.2m high barrier.
- K. Condenser compound on the existing 4<sup>th</sup> floor roof – north eastern corner (6 individual units), surrounded by a 2.2m high barrier.
- L. Condenser compound on the existing 4<sup>th</sup> floor roof – between the eastern and northern wings (1 unit), surrounded by a 2.2m high barrier.
- M. Air inlet louvres on the eastern face of the new tower at Level 07 to Level 09.
- N. Exhaust air discharge louvres on the eastern face of the new tower at Level 05 to Level 07.
- O. Condenser compound on the roof of the new tower (6 individual units).
- P. Toilet extract discharging through a louvre located on the flat roof over the new tower extension.
- Q. AHU fresh air supply louvre through the southern roof pitch of the existing tower.
- R. AHU exhaust air louvre through the southern roof pitch of the existing tower.

The location of these external features are noted in Attachment 2.

Noise levels around the site are controlled by road traffic on surrounding and distant roads, as well as existing plant noise.

## 2.2 Plant operation

The plant can operate continuously (24 hr) but would be demand controlled and, therefore, wouldn't operate at full duty in the quietest part of the night. The highest load upon the system is likely to occur during the daytime / afternoon period.

## 3. BACKGROUND NOISE SURVEY

### 3.1 Date, location and equipment

Ambient noise measurements were carried out during a site survey between 6 and 10 November, 2015, consisting of automatic unattended noise measurements on the site at two locations as shown in Attachment 1. These locations were:

- Location 1      At ridge level (5<sup>th</sup> floor) extended on a pole level with the western (Wood Street) façade. This location is used for the assessment of the residence to the west.
- Location 2      At gable level (13<sup>th</sup> floor) extended on a pole above and to the east of the existing tower over St Mary Aldermanbury's Garden. Results at this location are representative of ambient conditions for nearby offices.

In both cases, the microphones were in free field conditions. The locations were nearby office and residential windows on either side of the site. Therefore, the measured noise levels are representative of the ambient noise conditions for receptors located generally around the building.

The following equipment was used during the survey:

- Bruel & Kjaer Type 2250 Sound Level Meter s/n 2739650
- Bruel & Kjaer Type 4189 Microphone s/n 2983518
- Bruel & Kjaer Type 4231 Acoustic Calibrator s/n 2730221

- Bruel & Kjaer Type 2250 Sound Level Meter s/n 3000713
- Bruel & Kjaer Type 4189 Microphone s/n 2780512
- Bruel & Kjaer Type 4231 Acoustic Calibrator s/n 3001598
- 2 No. Bruel & Kjaer Type UA 1404 Outdoor microphone attachments, and
- 2 No. Bruel & Kjaer Type AO 0441 10m microphone extension cables

Before and after the survey, the sound level meters were field-calibrated in accordance with the manufacturer's guidelines. Drift was less than 0.1 dB and therefore acceptable. The meters, microphones and field calibrators are laboratory calibrated biennially in accordance with UKAS procedures or to traceable National Standards.

The weather during the survey period was mainly dry with little wind, although there were periods of short sharp showers during the survey, which were not considered sufficient to adversely elevate the minimum measured background noise level. This represents acceptable conditions for measurements undertaken.

Measurements have been summarised into contiguous 5 minute periods to present the noise profile throughout the period of noise monitoring. Noise metrics consisted of equivalent continuous (LAeq) noise levels and maximum (Lmax) noise levels as well as statistical noise levels (termed Ln, where n is the percentage of time the level is exceeded during the measurement period). This included LA90 levels. Measurements were stored for later analysis.

### 3.2 Results

The results of the measurements are shown graphically in Attachment 3. The results have been summarised into relevant daytime (08:00-20:00 hours) and night-time (23:00-07:00 hours) periods, coinciding with relevant assessment periods for plant operation.

BS 4142:2014 *Methods for rating and assessing industrial and commercial sound* states that

*"The monitoring duration should reflect the range of background sound levels for the period being assessed. In practice, there is no "single" background sound level as this is a fluctuating parameter. However, the background sound level used for the assessment should be representative of the period being assessed. To obtain a representative background sound level a series of either sequential or disaggregated measurements ought to be carried out for the period(s) of interest, possibly on more than one occasion. A representative level ought to account for the range of background sound levels and ought not automatically to be assumed to be either the minimum or modal value.*

BS4142 provides an example statistical analysis of background sound levels taken from a long-term survey. A similar approach has been adopted here to obtain these values.

Table 1 below summarises the representative measured daytime and night time background noise levels for assessment purposes.

Location	Daytime (0800-2000)	Night-time (2300-0700)
	LA90 (10 minute) dB	LA90 (10min) dB
1	58	50
2	58	52

**Table 1:** Summary of the measured day and night time background noise levels

These are the levels used within the assessment reported here to specify the criteria for acceptability from plant.

#### 4. TECHNICAL REQUIREMENTS FOR CONTROL OF MECHANICAL PLANT NOISE.

The CoL standard requirements are that the details of the plant and equipment to be used within the plant areas be provided and approved, along with an assessment to indicate that noise from the plant complies with the Council's limits as well as a description of any mitigation required to ensure this. It also specifies that noise from the operation of this plant should be at least 10 dB(A) below the background noise level outside any nearby noise sensitive property with all equipment operating together.

Accordingly, the noise targets for assessment purposes are as shown in Table 2, below.

Location	Daytime (0800-2000) LA90 (10 minute) dB	Night-time (2300-0700) LA90 (10min) dB
1	48	40
2	48	_note 1

**Table 2:** Laeq plant noise limits for compliance with plant noise condition.

**Note 1:** Offices are not occupied during the night-time period therefore no noise criterion applies here.

#### 5. PLANT NOISE LEVEL PREDICTION METHOD

##### 5.1 Available plant information and assessment approach

Attachment 2 indicates the external locations of proposed plant from which plant noise could be emitted. At present, general information is available about the plant that will be used within the building, but not detailed information such as plant selections, manufacturers, duct design, flow rates, etc. Accordingly, the precise information that is needed to predict noise from the plant proposals is unavailable. This is wholly in keeping with the design development process. That is, this type of detail is rarely available at the planning stage.

As a result, it is not possible to calculate the likely noise level from the plant specifically for the purposes of specifying noise mitigation requirements, if any.

Even so, it is still possible to provide information which is relevant to a planning stage assessment and which can accompany the planning application for the proposals. This is done in the following way.

Given that we know the locations around the building from which noise can be emitted, it is possible to calculate the limiting sound power at each of these location in order that the Table 2 limits will not be exceeded. This results in a list of sound power limits at each of these plant locations. These limits can then form the basis for a planning condition for the plant and serve as plant noise limits for the mechanical equipment specification. Subsequent mechanical system design can then include noise control measures to meet these limits.

##### 5.2 Calculation of plant noise emission

The proposals result in a number of noise sources that are located at various locations around the building which will undergo varying degrees of screening, distance attenuation and reflection to nearby receptors. In addition, there are a number of noise-sensitive receivers at varying heights and locations.

Accordingly, the analysis method which is appropriate to use is a numerical noise model of the building and surrounding area. This uses information about the noise emission, propagation path difference, screening, diffraction, reflection, etc. to calculate the component noise level for a number of noise sources at a number of receptor locations. These can then be accumulated and / or ranked for each receptor as a guide to the significance of each source at each receiver and as an aid to noise control design.

The particular noise prediction model that has been used for this analysis is Bruel & Kjaer's Type 7810 'Predictor' software. This acoustic model implements the procedures set out in ISO 9613-2:1996 "Acoustics – Attenuation of sound during propagation outdoors Part 2: General method of calculation to determine noise levels". Plant noise sources have been modeled as individual point sources, area sources or line sources, as appropriate for the type and source of external element at the locations shown in the Attachment 2 drawings. The proposed buildings have been modeled as solid bodies, around which sound can diffract. Receptor positions representing the most affected office and residential windows have been modeled as being 2m above the internal floor level.

A layout plan and 3D visualisation of the Predictor noise model showing external plant element locations, roof plant, buildings and receptors is shown in Attachment 4.

The 'at source' noise levels from all plant operating together are then adjusted to ensure that the predicted noise from plant operation complies with the noise limits set out in Table 2, above, for all receptor locations.

## 6. PLANT NOISE LEVEL PREDICTION RESULTS AND NOISE MITIGATION MEASURES

### 6.1 Results

The numerical noise model prediction results for the proposed plant are shown in Attachment 5.

This shows that the highest predicted noise level at any location surrounding the development does not exceed  $L_{Aeq}$  48 dB during the daytime or at  $L_{Aeq}$  40 dB at Saint Alban Tower in Wood Street at night. This complies with both the 'daytime' noise level limit and the 'night-time' limit in Table 2.

The sound power limits that are necessary for each individual external element of the plant scheme are as shown in Table 3. The 'plant item' in the first column relates to the description of each item in Section 2.1.

Plant Item	Daytime $L_{WA}$ limit (dB)	Night-time $L_{WA}$ limit (dB)
A	73	73
B	77 (total for 2 chillers)	70 (total for 2 chillers)
C	69 per window	64 per window
D	85 per window	60 per window
E	73	68
F	64	57
G	69	69
H	69	69
I	80 (total for 22 condensers)	74 (total for 22 condensers)
J	80 (total for 2 chillers)	72 (total for 2 chillers)
K	75 (total for 6 condensers)	68 (total for 6 condensers)
L	74 (1 condenser)	69 (1 condenser)
M	67	67
N	67	67
O	73 (total for 6 condensers)	73 (total for 6 condensers)
P	71	71
Q	75	65
R	75	65

**Table 3.** Sound power limits to comply with allowable noise levels

## 6.2 Noise control

As discussed above, it is not possible to indicate whether the 'base plant' as installed would comply with these noise limits or if additional noise control would be required in order to meet them. This is because the 'at source' plant information and details of the noise propagation path within the building are not known at this stage.

Even so, the following general comments can be made.

The louvre sound power levels in the new tower are quite low. It is likely that some noise control would be required in order to meet these limits. Nevertheless, the louvres are a long distance away from the plant within the building, offering ample opportunity to include, for example, in-line silencers within the duct between the plant and the louvre to meet these limits.

The chiller sound power limits above are lower than would be expected from standard plant. However, the design of the plant well allows for silenced inlet and discharge. As regards noise from the top of the chiller units, attenuation can be achieved by the use of an acoustic louvre across the top of the well or by silencers attached to the top of the chiller units. As regards air intake noise through the northern façade of the plant well, this can be achieved by acoustic louvres within the window apertures.

All of the air intake and exhaust louvres for air handling equipment can be readily fitted with in-line silencers or acoustic louvres in order to meet the targets above.

Condenser compounds can acoustically screened by enclosures comprised of acoustic louvres.

## 6.3 Discussion

It needs to be borne in mind that, in carrying out this assessment, a number of cautious assumptions about noise emission from the plant have been included within the model. These are:

- All of the equipment operates at its full rated duty. In fact, the operation of the plant will be demand-based and will 'ramp up or down' according to thermostatic, speed and timing controls. As described in this report, the maximum duty is likely to occur at peak periods of demand which are typically during late afternoons during working periods when heat loads in the server room are at their highest.
- All equipment items operate together. This would rarely be the case.
- This 'worst case' operating condition has been compared with the representative lowest measured LA90 noise levels, i.e. those that occur when activity in the surrounding area is at its lowest. Therefore, the noisiest plant operating condition and the quietest ambient condition are compared. These two situations would generally not be expected to coincide.
- The assessment is based on external noise levels, not internal levels. Noise levels inside offices, where people could be disturbed, will be much lower due to the sound insulation of the building envelope.

However, even taking these conservative assumptions into account the predicted noise levels are at or below the allowable level for the daytime and night-time periods and therefore comply with the guideline for acceptability established within this assessment.

## 7. CONCLUSION

In summary, suitably low levels of plant noise can be provided for the offices and for the residence nearby the proposed plant in accordance with the normal requirements of the City of London. This takes into account the changes to the building introduced in the latest scheme proposals (August 2016)

I would recommend that a copy of this document be forwarded to the Council for their consideration. If you have any questions or require further information, please don't hesitate to contact me.

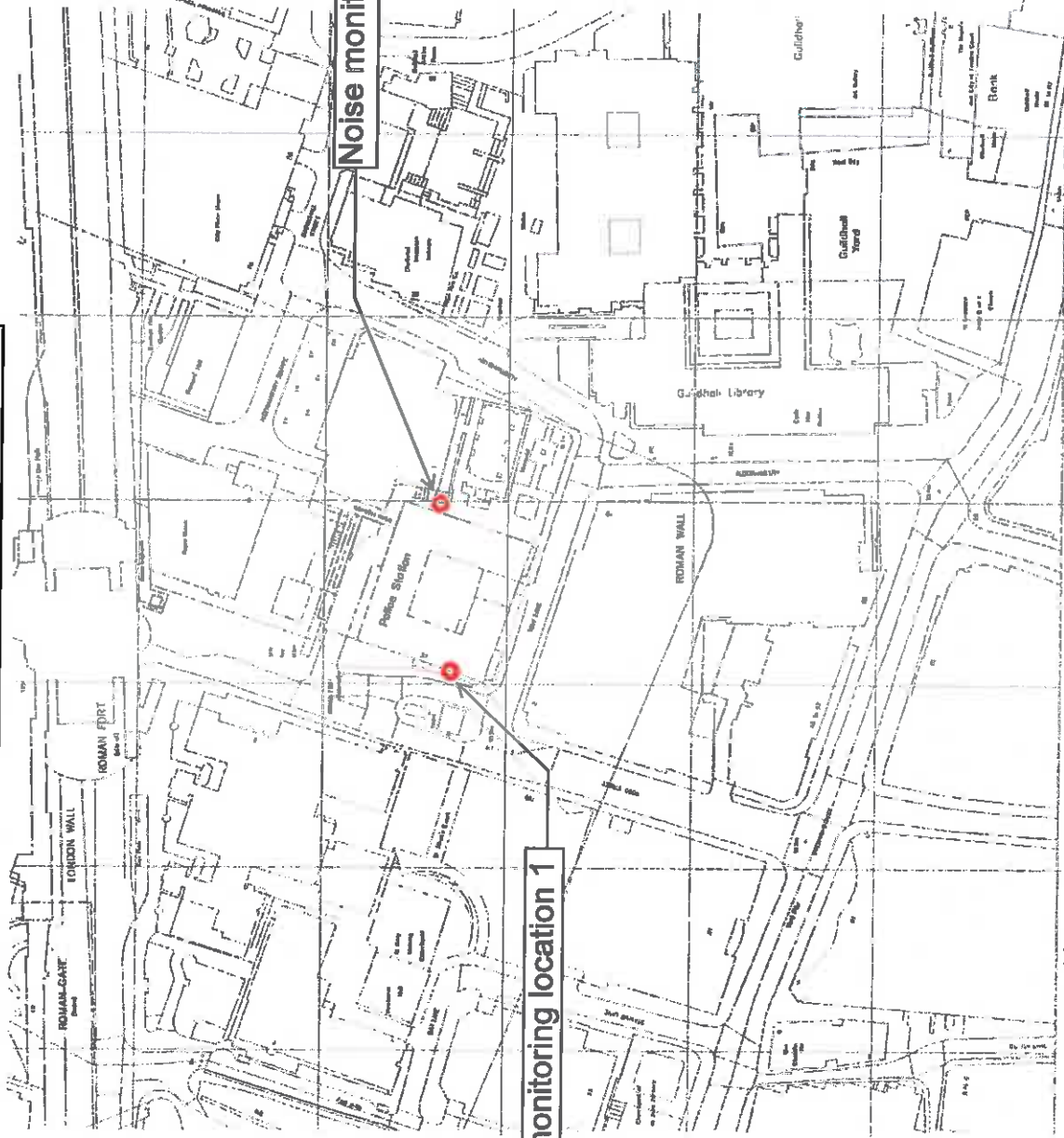
Yours sincerely



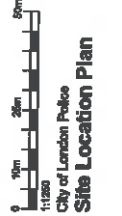
**Phill Banks**  
**Principal Consultant**



**Attachment 1 - 1 page**



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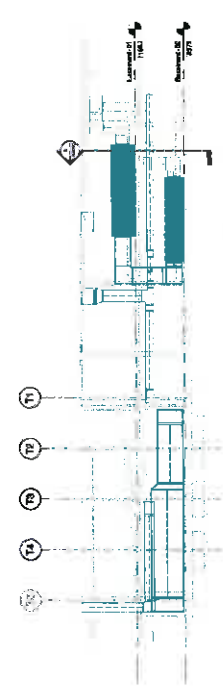
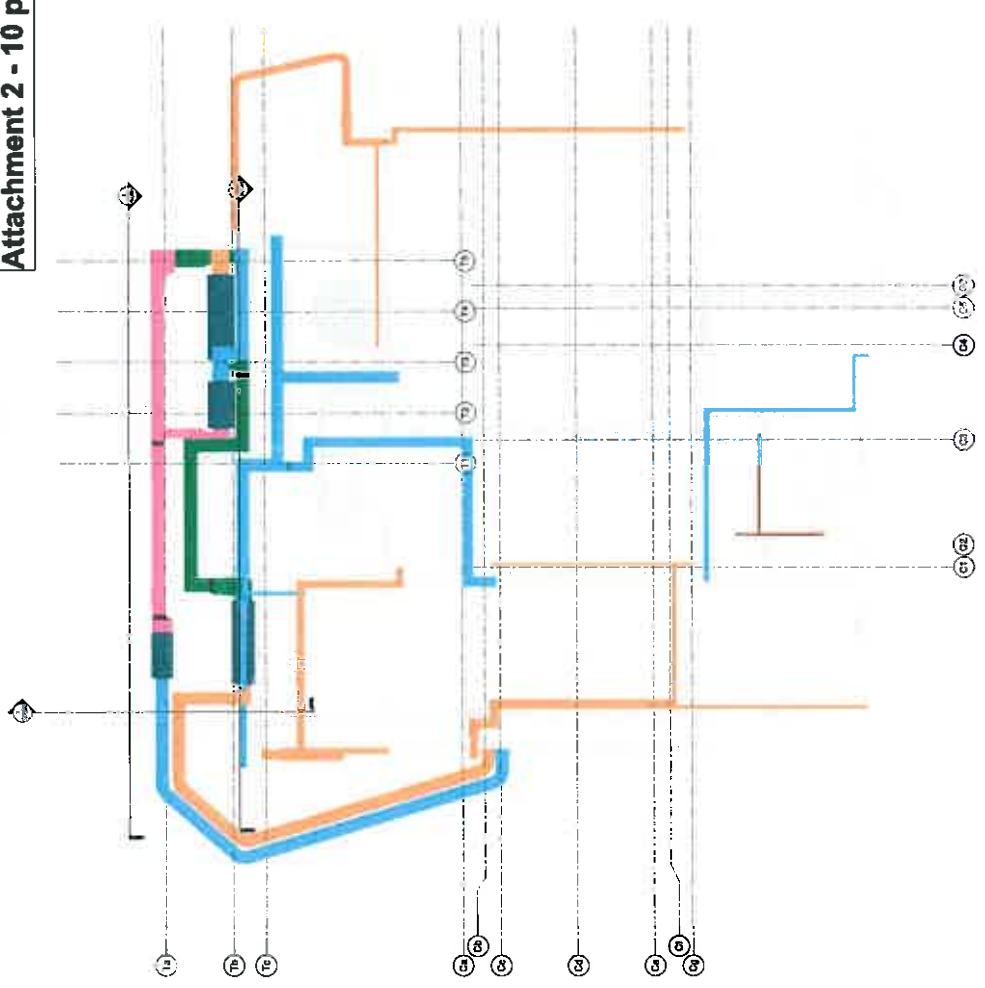
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  2. THIS IS A PRELIMINARY DRAWING AND ALL OTHER DIMENSIONS SHALL BE TAKEN FROM THE FINAL DRAWING. DISCREPANCIES BETWEEN THE TWO DRAWINGS SHALL BE RESOLVED BY THE PROJECT MANAGER.
  3. ALL SETBACKS AND DIMENSIONS TO BE CHECKED ON SITE BY CONTRACTOR BEFORE WORK COMMENCES.

client	WYG
project	City of London Police Wood Street
drawing title	S16 Location Plan
drawing number	014100_SK_100
revision	
drawing status	Planning
scale	1:1250 @ A3
date	09/20/15
drawn by	Author
checked by	Checker

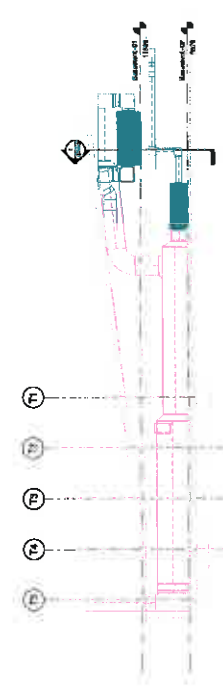
**seven**  
 www.seven.co.uk  
 11 Wood Street, London, EC2A 4PU  
 T: +44 (0)20 7421 1234  
 F: +44 (0)20 7421 1235  
 E: info@seven.co.uk  
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**Attachment 2 - 10 pages**

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2 Basement Floorplan Section A  
1:1/8



3 Basement Floorplan Section B  
1:1/8

- Legend - Ventilation**
- Exhaust
  - Supply
  - Return
  - Exhaust
  - Supply
  - Return
  - Exhaust
  - Supply
  - Return

**FOR INFORMATION ONLY**

DATE	DESCRIPTION	BY

GAP WOOD ST. POLICE STATION

1000 GARDEN STREET,  
GAP WOOD, ONTARIO  
L4G 1N6



CITY OF LONDON POLICE - WOOD ST. POLICE STATION

IPV3-01 - VENTILATION LAYOUT

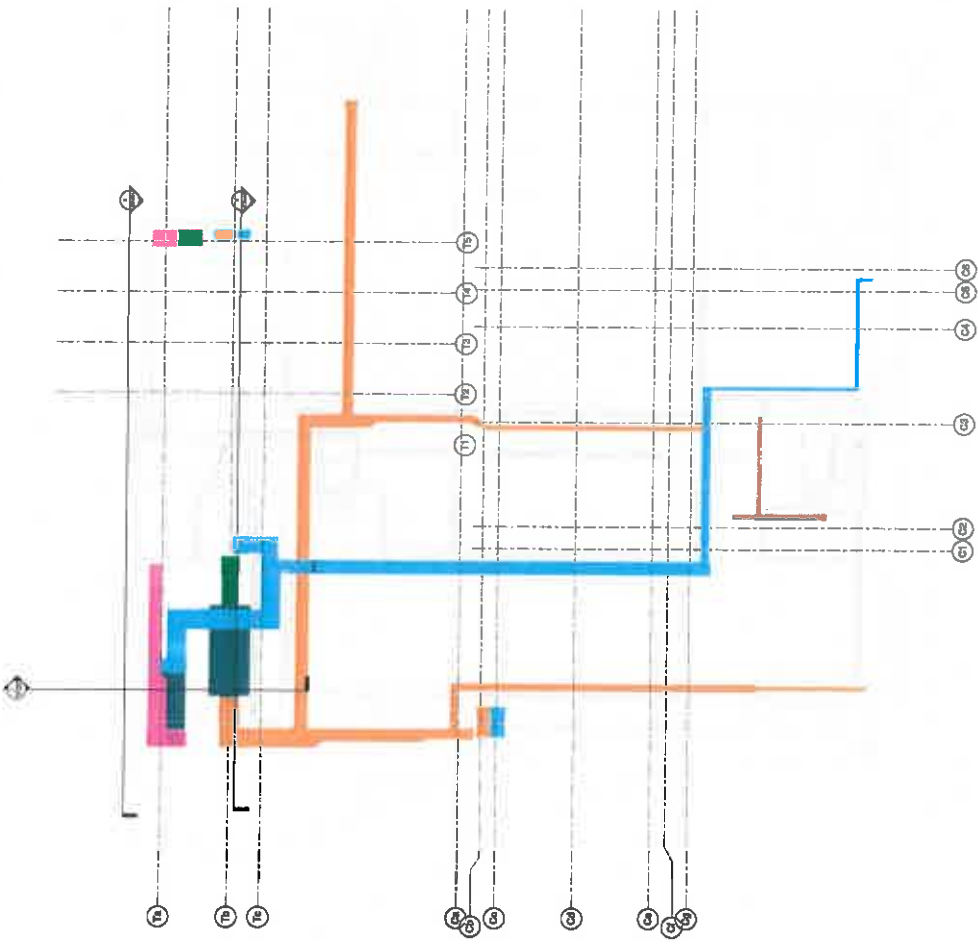
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ADDRESS: 577001

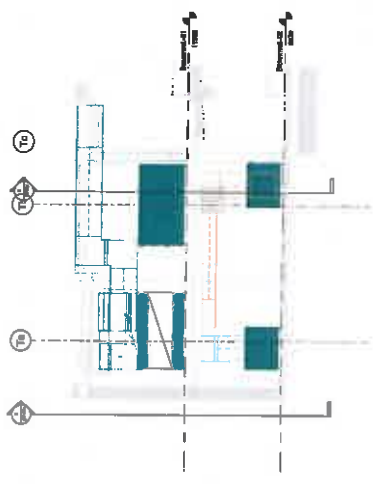
© 2010 Dym Inc.

M - Legend - Ventilation  
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1 Ventilation Layout - Basement - 01  
1:100



2 Basement Mezzanine Section C  
1:100

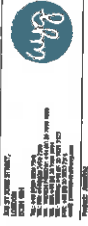
Legend - Ventilation  
Supply  
Return  
Exhaust  
Intake  
Supply to Exhaust

M - Legend - Ventilation  
1:100

FOR INFORMATION ONLY

PROJECT NAME	WOOD ST. POLICE STATION
DATE	15/05/2018

WOOD ST. POLICE STATION  
CITY OF LONDON POLICE, WOOD ST. POLICE STATION










CITY OF LONDON POLICE, WOOD ST. POLICE STATION

LEVEL -01 - VENTILATION LAYOUT

Drawn by	AM	Checked by	AM	Approved by	AM
Date	15/05/2018	Date	15/05/2018	Date	15/05/2018
Project No.	14	Client	City of London Police	Address	157/158 Wood St, London EC2A 3AF
Revision	1	Scale	1:100	Sheet No.	05/79/02

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DATE: 11/11/2011 10:52:23 AM  
 PROJECT: 11100 - Ventilation Layout

- Legend - Ventilation**
-  CONCRETE WALL
  -  AIRWAY WALL
  -  AIRWAY FLOORING
  -  RETRACTION CHARGE
  -  INSULATION FLOORING
  -  SPONGE INSULATION
  -  FLOOR OF TANK STRUCTURE

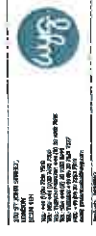
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**FOR INFORMATION ONLY**

PROJECT: 11100 - Ventilation Layout  
 DRAWING: 11100 - Ventilation Layout

CAP WOOD ST. POLICE STATION



CITY OF LONDON POLICE, WOOD ST. POLICE STATION

JOB: 11100 - VENTILATION LAYOUT

DATE	TIME	USER	DESCRIPTION
11/11/2011	10:52:23	...	...

① Level 00 - Ventilation Layout  
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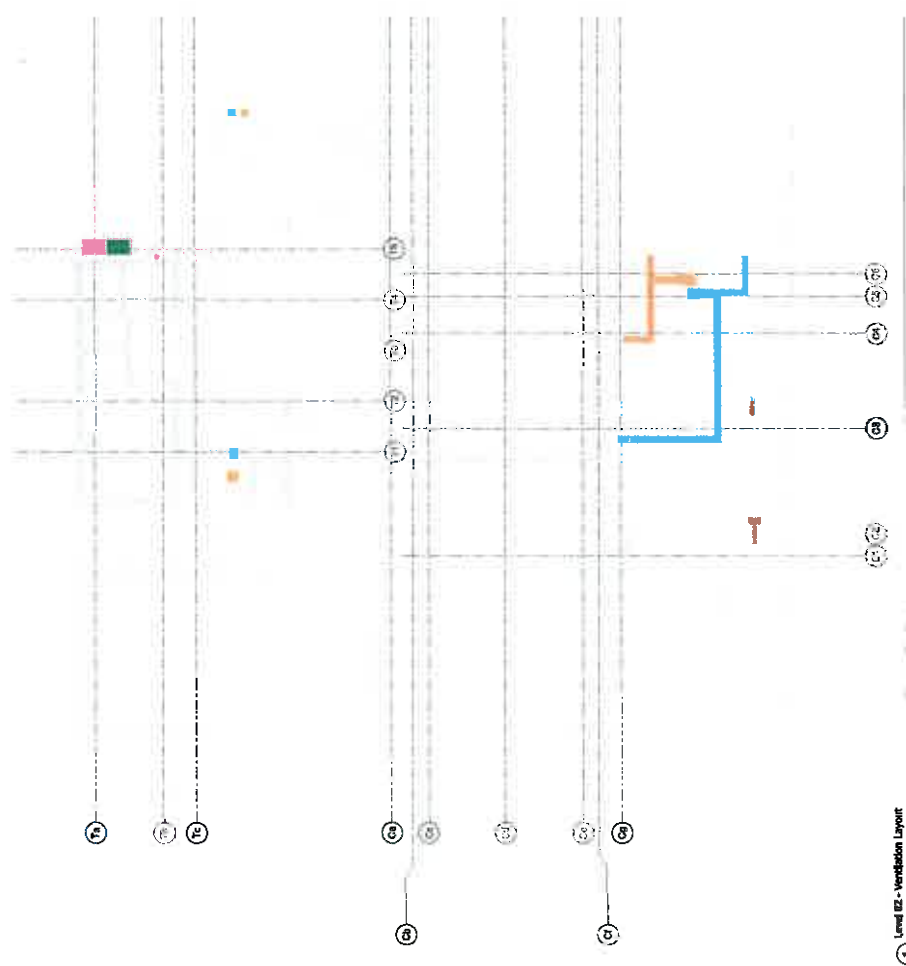
Item A



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- Legend - Ventilation**
- Mechanical
  - Mechanical
  - Mechanical
  - Mechanical
  - Mechanical
  - Mechanical
  - Mechanical
  - Mechanical
  - Mechanical
  - Mechanical

**M - Legend - Ventilation**  
1:20



**1** Level 02 - Ventilation Layout  
1:20

**FOR INFORMATION ONLY**

NEW SPENCER STREET, LONDON, W1A 1JF  
POLICE STATION

**04P WOOD ST. POLICE STATION**



WOOD ST. POLICE STATION  
100 WOOD ST. LONDON EC4A 3DF  
POLICE STATION

**CITY OF LONDON POLICE, WOOD ST. POLICE STATION**

**FIVE 02 - VENTILATION LAYOUT**

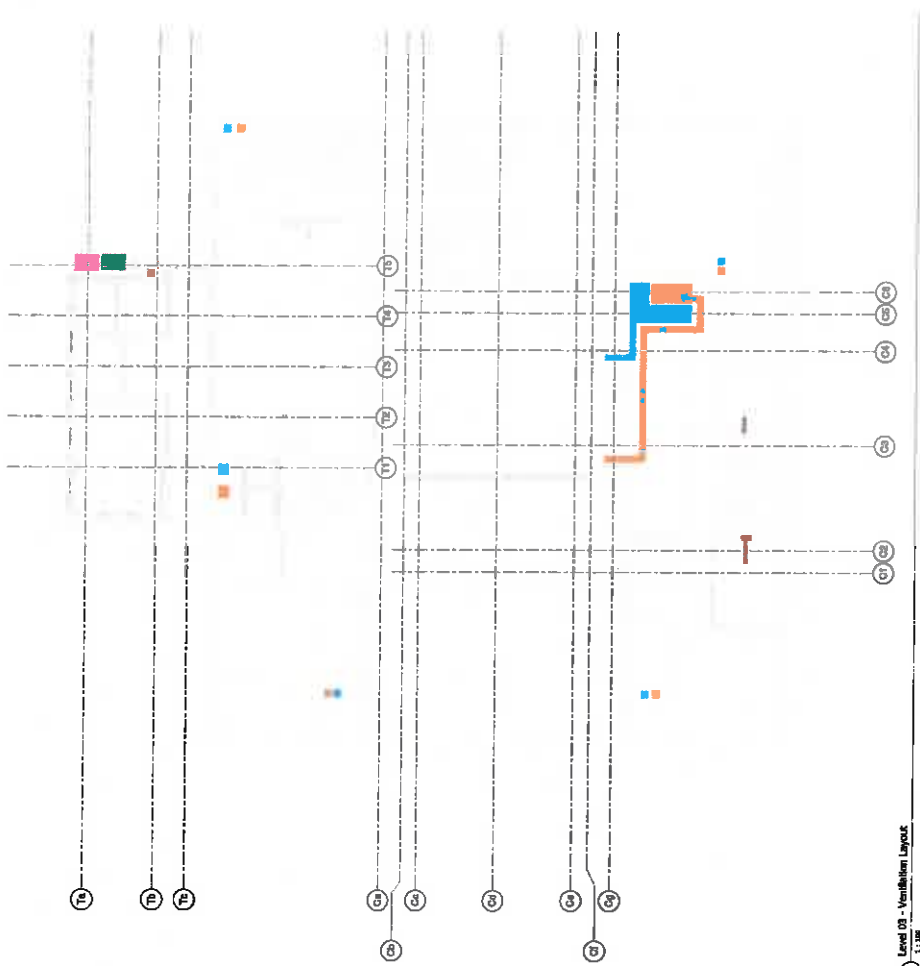
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Revision No.	1	Contract No.	100/02
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Check	AM	Contract Date	10/10/10
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Scale	1:20	Contract Ref	100/02

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- Legend - Ventilation**
- AIR INTAKE
  - AIR EXHAUST
  - MECHANICAL EXHAUST
  - MECHANICAL INTAKE
  - NATURAL EXHAUST
  - NATURAL INTAKE

**M - Legend - Ventilation**  
1:20

- NOTES**
1. CONSULT ARCHITECT FOR ALL COMMENTS AND REVISIONS.
  2. ALL WORK SHALL BE IN ACCORDANCE WITH ALL APPLICABLE CODES AND REGULATIONS.
  3. ALL WORK SHALL BE IN ACCORDANCE WITH ALL APPLICABLE CONTRACT DOCUMENTS.
- M - Notes - Ventilation**  
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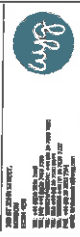


**1 Level 03 - Ventilation Layout**  
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**FOR INFORMATION ONLY**

DATE	DESCRIPTION	BY	DATE

CAMP WOOD ST. POLICE STATION



CITY OF LONDON POLICE, WOOD ST. POLICE STATION

**LEVEL 03 - VENTILATION LAYOUT**

DATE	DESCRIPTION	BY	DATE

ADDRESS: 11 (57)006

Contract No. 04

FOR INFORMATION ONLY

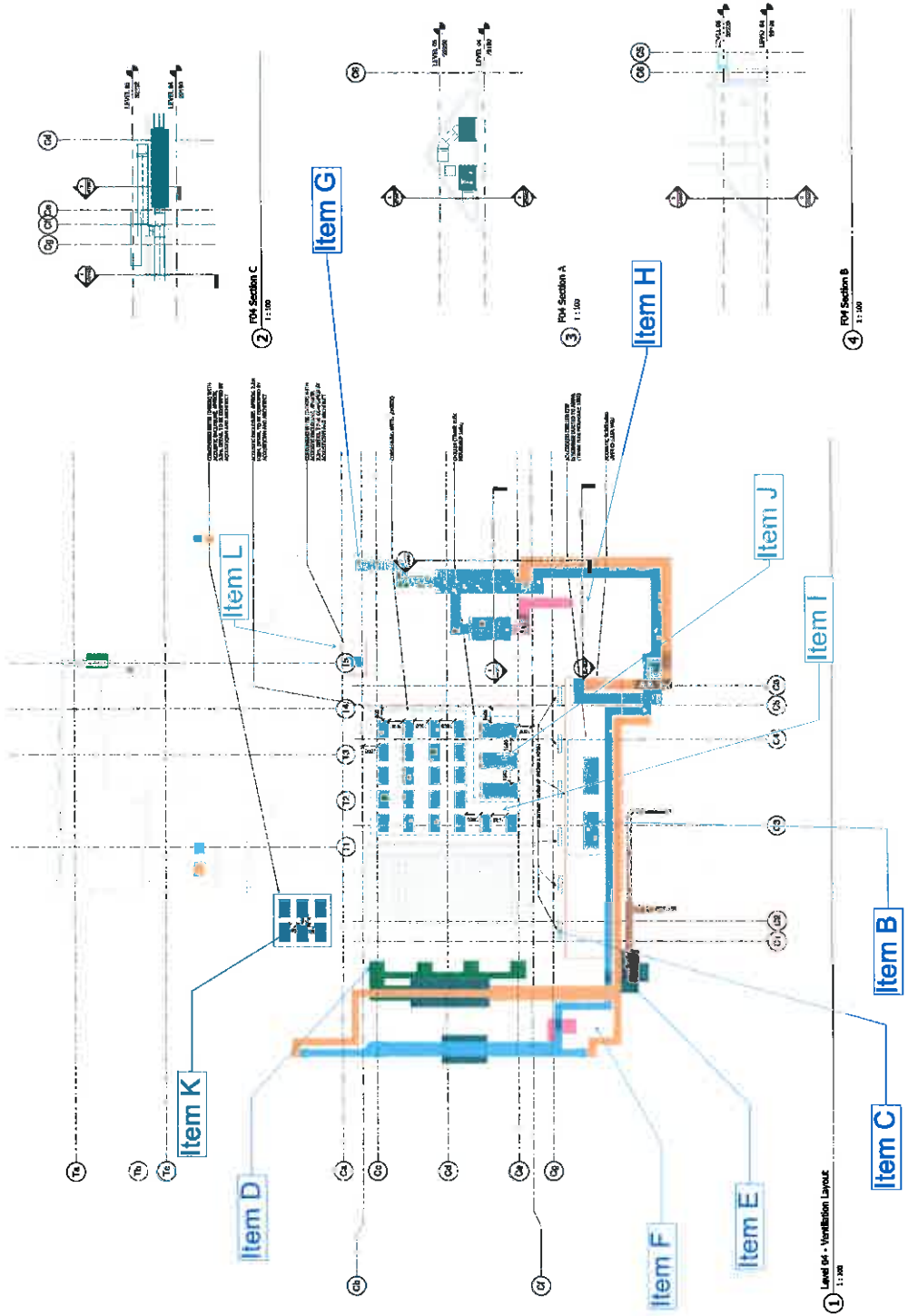
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  - NATURAL
  - MECHANICAL
  - MECHANICAL
  - MECHANICAL
  - MECHANICAL

**M - Legend - Ventilation**  
1:150

**NOTES**

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2. MECHANICAL VENTILATION SYSTEMS SHALL BE INSTALLED IN ACCORDANCE WITH THE FOLLOWING:
3. MECHANICAL VENTILATION SYSTEMS SHALL BE INSTALLED IN ACCORDANCE WITH THE FOLLOWING:

**M - Notes - Ventilation**  
1:150



**Level 04 - Ventilation Layout**  
1:150

**FOR INFORMATION ONLY**

DATE: 15/01/2024  
DRAWN: [Name]  
CHECKED: [Name]  
APPROVED: [Name]

MAP WORLD 51, HITES, GAITHERN



CITY OF LONDON POLICE, WOODS IS, POLICE  
STATION

Drawing Title:

**LEVEL 04 - VENTILATION & EXTERNAL CIRCULAR  
PLANT LAYOUT**

Project No:	1000000000
Sheet No:	04/001
Revision:	01
Author:	[Name]
Checker:	[Name]
Approver:	[Name]
Date:	15/01/2024

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ON THE BASIS OF THE INFORMATION AND DATA PROVIDED TO ME BY YOU

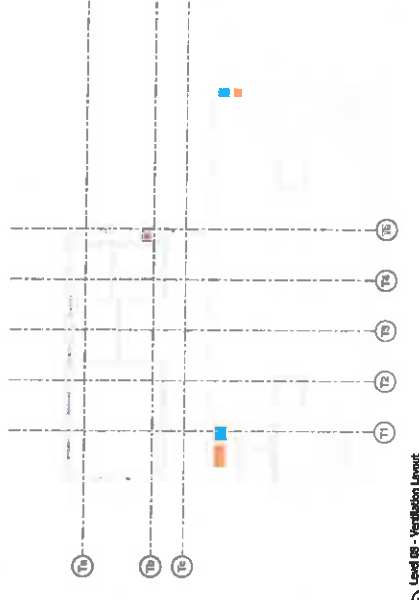
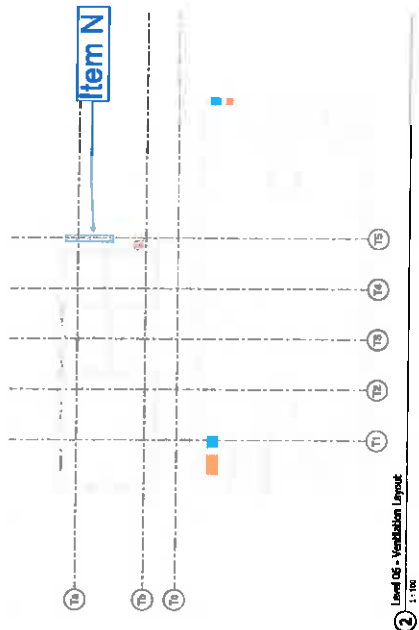
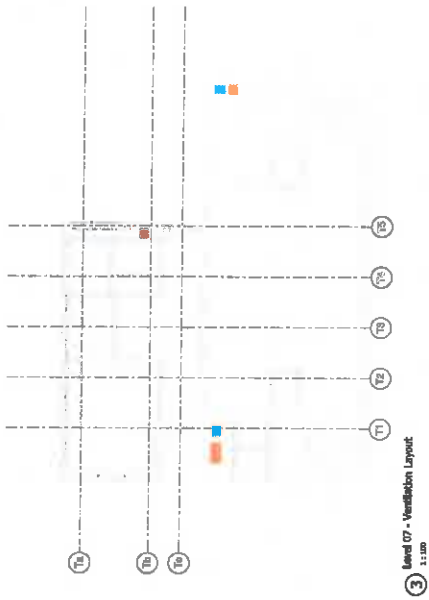
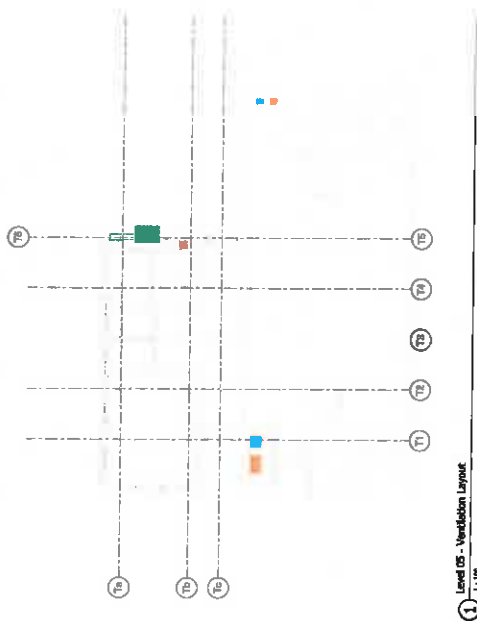
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- SUPPLY GRILLE
  - SUPPLY FAN
  - SUPPLY DUCT
  - RETURN GRILLE
  - RETURN FAN
  - RETURN DUCT
  - VENTILATOR

M - Legend - Ventilation  
1:150

**NOTES**

1. REFER TO THE VENTILATION SYSTEM DESIGN FOR THE LOCATION AND SIZE OF ALL SUPPLY AND RETURN GRILLES.
2. REFER TO THE VENTILATION SYSTEM DESIGN FOR THE LOCATION AND SIZE OF ALL SUPPLY AND RETURN DUCTS.
3. REFER TO THE VENTILATION SYSTEM DESIGN FOR THE LOCATION AND SIZE OF ALL SUPPLY AND RETURN FANS.

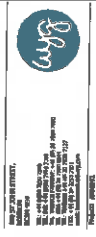
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**FOR INFORMATION ONLY**

FOR THE PROJECT: 175 WOOD ST. POLICE STATION  
DESCRIPTION: POLICE STATION

OLD WOOD ST. POLICE STATION



CITY OF LONDON POLICE, WOOD ST. POLICE STATION

Project Address:

Project Name	175 WOOD ST. POLICE STATION
Client	CITY OF LONDON POLICE
Address	175 WOOD ST. LONDON EC4A 3DF
Project No.	57008
Date	15/08/2024
Scale	1:150
Author	M
Checker	M
Project Manager	
Client Representative	

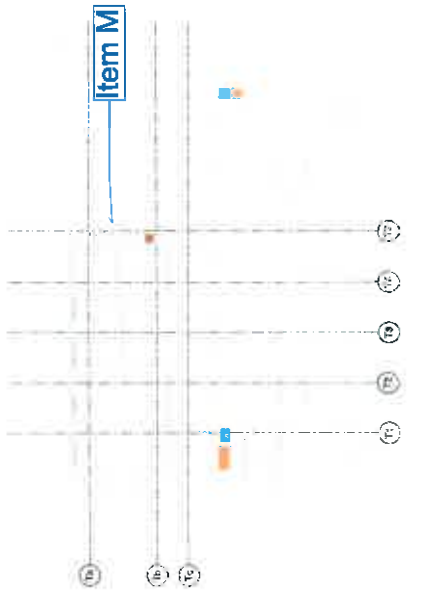
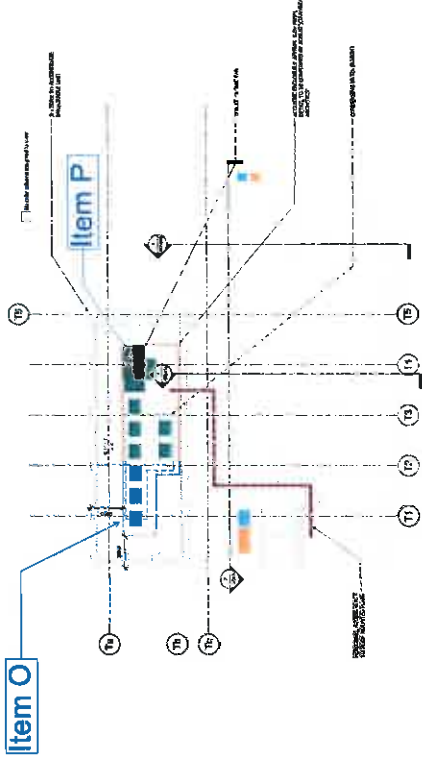
- Legend - Ventilation**
- Air Flow
  - Supply Air
  - Return Air
  - Exhaust Air
  - Make-up Air
  - Exhaust Air
  - Return Air

M - Legend - Ventilation  
1:100

**NOTES**

1. VENTILATION SYSTEMS SHALL BE DESIGNED TO MAINTAIN THE AIR QUALITY WITHIN THE WORK AREA.
2. ALL VENTILATION SYSTEMS SHALL BE DESIGNED TO MAINTAIN THE AIR QUALITY WITHIN THE WORK AREA.
3. VENTILATION SYSTEMS SHALL BE DESIGNED TO MAINTAIN THE AIR QUALITY WITHIN THE WORK AREA.

M - Legend - Ventilation  
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**FOR INFORMATION ONLY**

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CAP WOOD ST. POLICE STATION

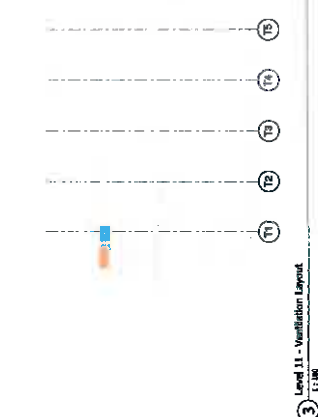
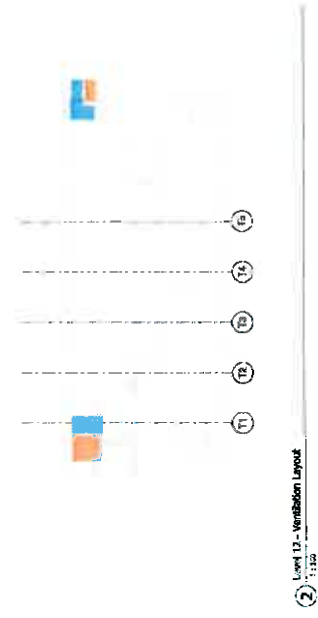


CITY OF LONDON POLICE, WOOD ST. POLICE STATION

PROJECT NO: 10, 11 & 12 - VENTILATION AND PLANT LAYOUT

DATE:	DATE:	DATE:	DATE:

Drawn by: (57)009



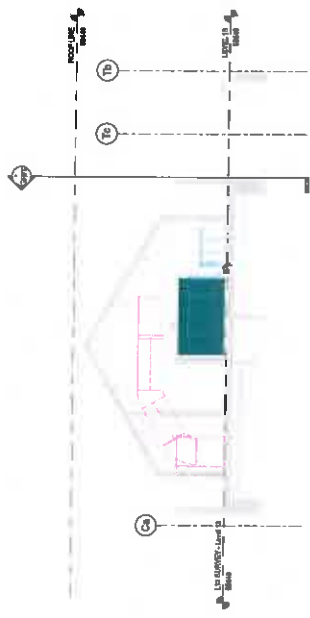
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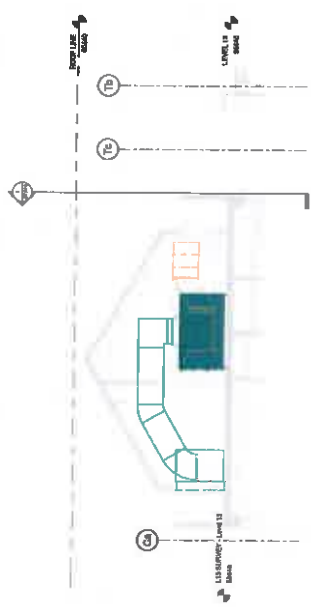
-  ceiling fan
-  wall fan
-  floor fan
-  ceiling fan with light fixture
-  ceiling fan with light fixture and diffuser
-  ceiling fan with light fixture and diffuser and sensor
-  ceiling fan with light fixture and diffuser and sensor and control panel

**M - Legend - Ventilatoren**  
1:30

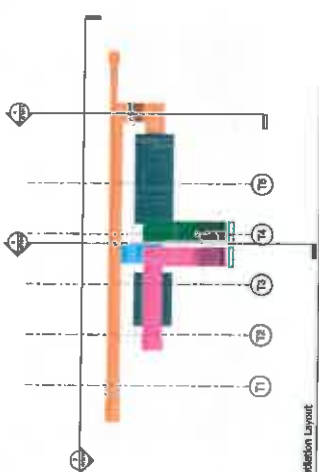
- NOTES**
1. ALL FANS SHALL BE INSTALLED IN ACCORDANCE WITH THE CITY OF LOS ANGELES MECHANICAL CODE.
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  3. ALL FANS SHALL BE INSTALLED IN ACCORDANCE WITH THE CITY OF LOS ANGELES MECHANICAL CODE.
- M - Notes - Ventilatoren**  
1:30



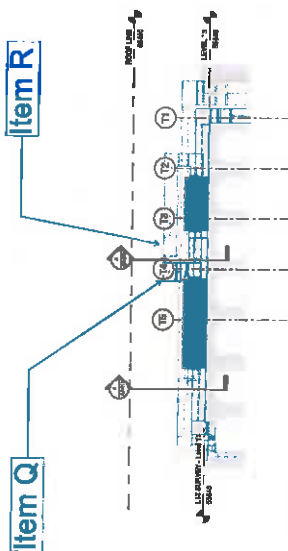
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**F13 Section C**  
1:30



**Level 13 - Ventilation Layout**  
1:30

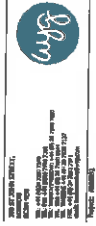


**F13 Section A**  
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**FOR INFORMATION ONLY**

DATE	DESCRIPTION	BY	CHECKED
08/14/2018	ISSUE FOR PERMIT	J. HARRIS	J. HARRIS

**CMP WOOD ST. POLICE STATION**



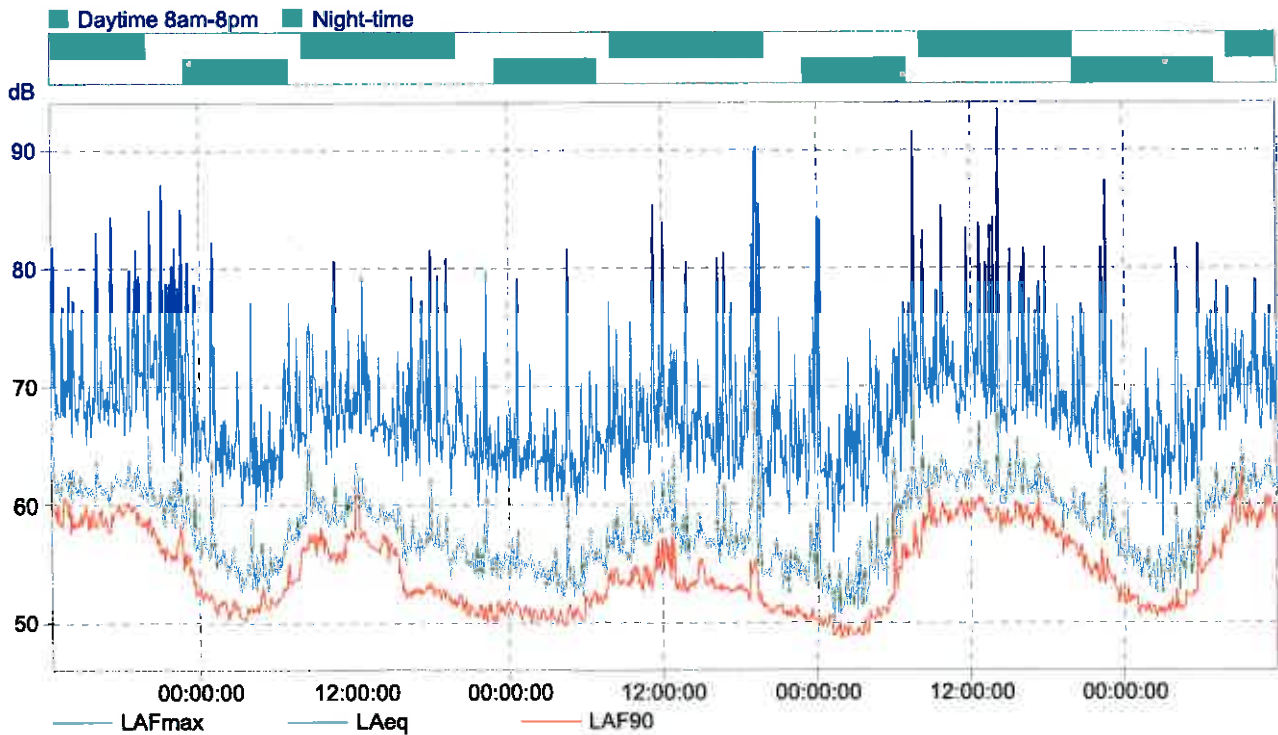
**CITY OF LOS ANGELES POLICE WOOD ST. POLICE STATION**

**LEVEL 13 - VENTILATION & PLANT LAYOUT**

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Project No.	18-000000000000000000	Revision	01
Revision	01	Date	08/14/2018
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Drawn by	J. HARRIS	Scale	AS SHOWN
Checked by	J. HARRIS	Sheet No.	01
Approved by	J. HARRIS	Total Sheets	01
Project Manager	J. HARRIS	Project Location	CMP WOOD ST. POLICE STATION
Project Engineer	J. HARRIS	Project Address	400 N WOOD ST, LOS ANGELES, CA 90012
Project Architect	J. HARRIS	Project City	LOS ANGELES, CA
Project Designer	J. HARRIS	Project State	CA
Project Contractor	J. HARRIS	Project Country	USA
Project Subcontractor	J. HARRIS	Project Continent	NA

City of LA Logo

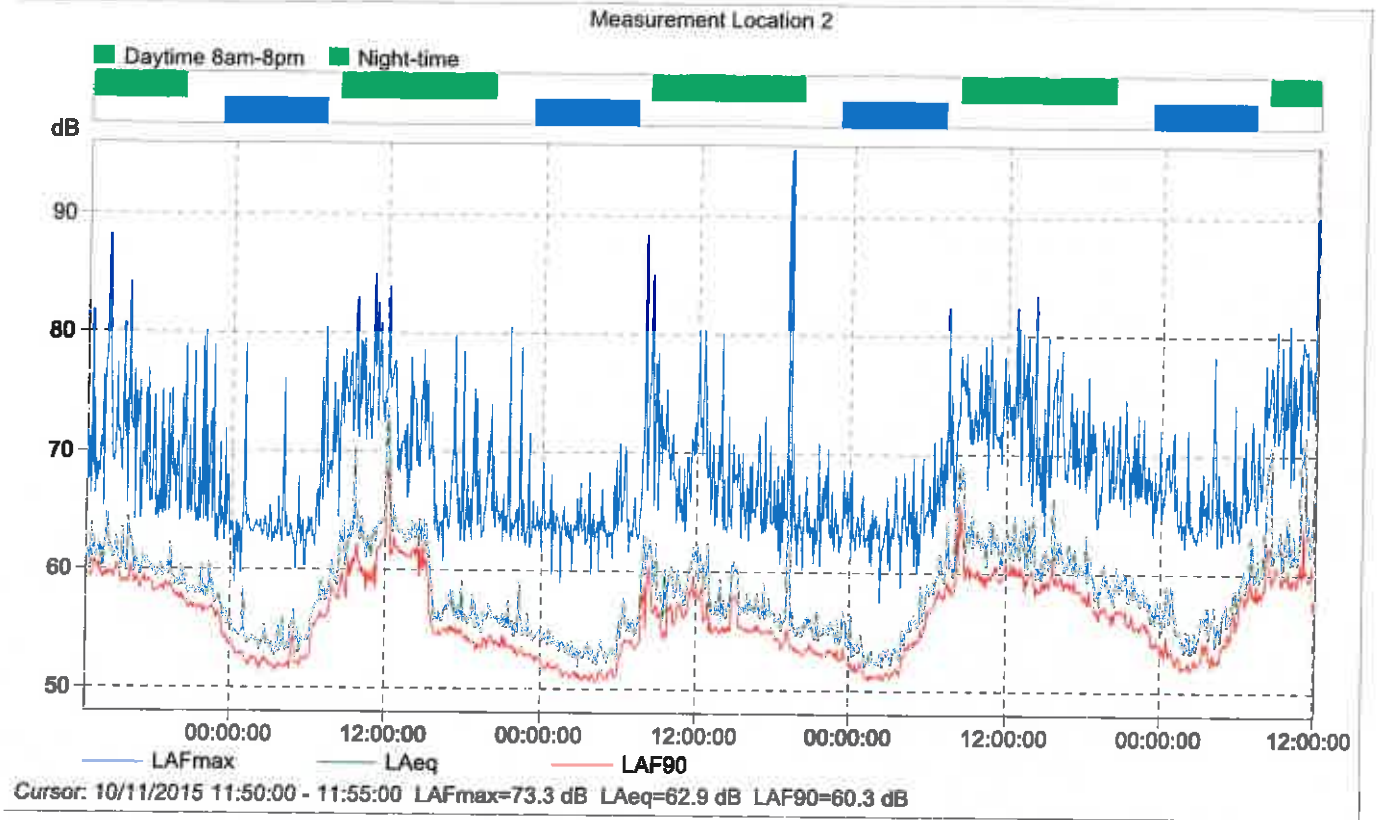
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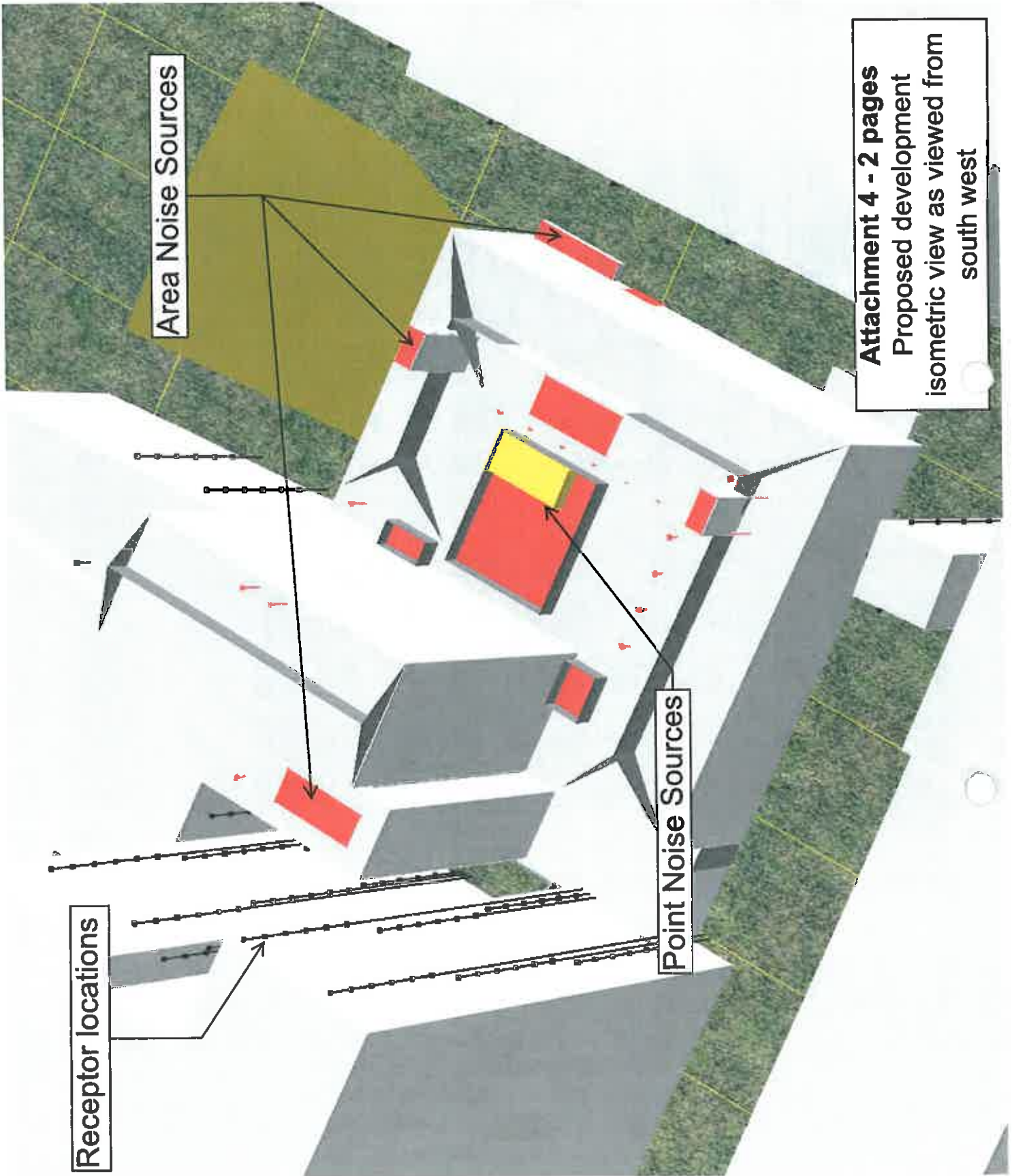
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Unmarked	06/11/2015 12:25:40	13:07:17	91.5	61.6	59.1	51.4
(All) Daytime 8am-8pm	06/11/2015 12:30:00	47:10:00	93.4	63.2	61.2	54.1
(All) Night-time	06/11/2015 22:55:00	35:05:00	87.4	59.5	56.6	50.7
Daytime 8am-8pm	06/11/2015 12:30:00	7:30:00	84.3	63.6	61.8	58.8
Daytime 8am-8pm	07/11/2015 08:00:00	12:00:00	81.5	61.8	59.2	53.2
Daytime 8am-8pm	08/11/2015 08:00:00	12:00:00	90.2	60.5	60.4	53.2
Daytime 8am-8pm	09/11/2015 08:00:00	12:00:00	93.4	64.0	62.4	58.5
Daytime 8am-8pm	10/11/2015 08:00:00	3:40:00	79.0	64.5	62.4	59.1
Night-time	06/11/2015 22:55:00	8:05:00	82.2	59.0	56.3	51.4
Night-time	07/11/2015 23:00:00	8:00:00	81.6	57.7	54.9	50.6
Night-time	08/11/2015 23:00:00	8:00:00	84.2	59.5	56.4	49.7
Night-time	09/11/2015 20:00:00	11:00:00	87.4	60.6	57.7	51.7

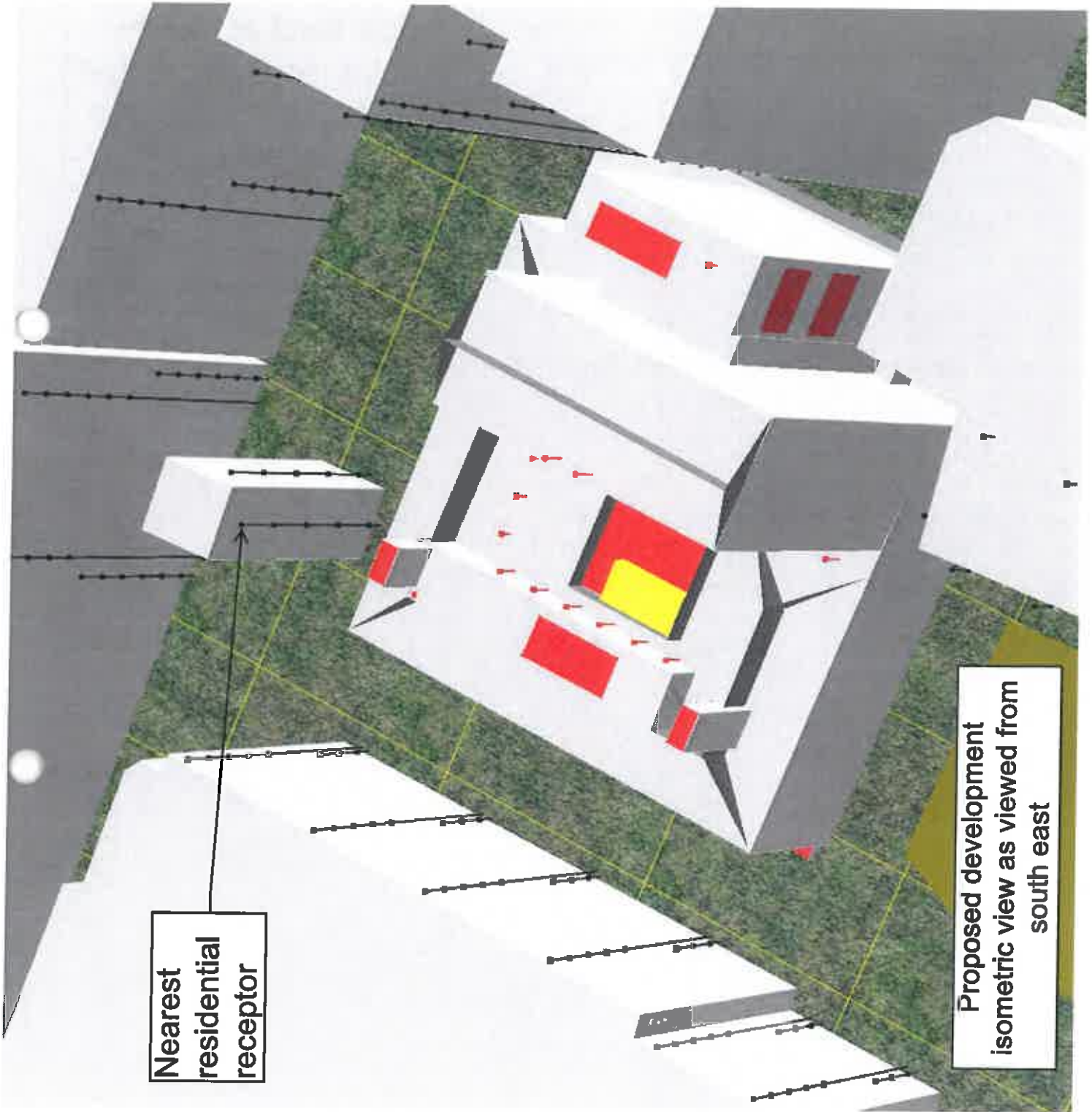
Attachment 3 - 2 pages



Name	Start time	Duration	LAFmax [dB]	LAF10 [dB]	LAeq [dB]	LAF90 [dB]
Total	06/11/2015 12:45:17	95:18:29	95.6	62.6	60.3	52.9
Unmarked	06/11/2015 12:45:17	16:13:29	90.1	60.4	58.4	53.8
(All) Daytime 8am-8pm	06/11/2015 12:50:00	47:05:00	95.6	64.1	62.3	55.6
(All) Night-time	06/11/2015 23:00:00	32:00:00	79.0	58.1	55.5	51.8
Daytime 8am-8pm	06/11/2015 12:50:00	7:10:00	88.1	62.4	61.1	58.7
Daytime 8am-8pm	07/11/2015 08:00:00	12:00:00	84.9	64.7	62.5	55.0
Daytime 8am-8pm	08/11/2015 08:00:00	12:00:00	95.6	61.1	61.1	55.0
Daytime 8am-8pm	09/11/2015 08:00:00	12:00:00	83.4	65.0	62.4	58.5
Daytime 8am-8pm	10/11/2015 08:00:00	3:55:00	81.0	69.7	65.3	59.6
Night-time	06/11/2015 23:00:00	8:00:00	79.0	57.2	55.0	52.2
Night-time	07/11/2015 23:00:00	8:00:00	70.7	56.0	54.0	51.3
Night-time	08/11/2015 23:00:00	8:00:00	71.5	58.6	55.6	51.7
Night-time	09/11/2015 23:00:00	8:00:00	78.3	59.3	56.7	52.9



**Attachment 4 - 2 pages**  
Proposed development  
isometric view as viewed from  
south west



City of London Police Wood Street Station Redevelopment  
Plant Noise Model

Noise sources specified as  
Limiting Sound Power Levels

Report: Table of Results  
Model: Plant Noise Model - V4  
LAeq: total results for receivers  
Group: (main group)  
Group Reduction: Yes

**Attachment 5 - 3 pages**  
**Predicted overall plant**  
**noise level at nearby**  
**receptor locations sorted**  
**from highest to lowest**  
**(Daytime)**

Name	Receiver	Description	Height	Day	Night
	S_High_4_E		27.00	48	
	NE_2_F		17.00	48	
	N_Hi_5_A		38.00	48	
	N_Mid_5_F		35.00	48	
	S_High_5_E		27.00	48	
	S_High_4_D		24.00	48	
	S_High_3_E		27.00	48	
	N_Mid_0_D		36.00	48	
	N_Hi_6_A		38.00	48	
	N_Mid_6_F		35.00	48	
	N_Mid_2_D		36.00	48	
	N_Mid_0_E		39.00	48	
	NE_2_E		14.00	48	
	E2_F		20.00	48	
	S_High_5_D		24.00	48	
	S_High_3_D		24.00	48	
	N_Hi_3_A		38.00	48	
	N_Mid_2_E		39.00	48	
	N_Hi_5_B		41.00	47	
	N_Hi_4_A		38.00	47	
	N_Hi_3_B		41.00	47	
	N_Mid_0_F		42.00	47	
	S_High_4_C		21.00	47	
	N_Hi_6_B		41.00	47	
	N_Mid_2_F		42.00	47	
	N_Hi_0_A		45.00	47	
	N_Hi_2_A		45.00	47	
	S_High_6_E		27.00	47	
	N_Hi_4_B		41.00	47	
	N_Hi_3_C		44.00	47	
	N_Mid_1_D		36.00	47	
	N_Hi_2_B		48.00	47	
	N_Hi_0_B		48.00	47	
	N_Hi_0_C		51.00	47	
	Castle2_E		22.00	47	40
	N_Mid_1_E		39.00	47	
	S_High_3_C		21.00	47	
	N_Hi_3_E		50.00	47	
	N_Hi_5_C		44.00	47	
	S_High_5_C		21.00	47	
	N_Mid_1_B		30.00	47	
	S_High_6_D		24.00	47	
	N_Hi_3_F		53.00	47	
	N_Mid_1_C		33.00	47	
	N_Hi_3_D		47.00	46	
	N_Hi_4_C		44.00	46	
	N_Hi_6_C		44.00	46	
	N_Mid_1_F		42.00	46	
	N_Hi_2_C		51.00	46	
	N_Hi_1_A		45.00	46	

All shown dB values are A-weighted

Predictor V11.00



City of London Police Wood Street Station Redevelopment  
Plant Noise Model

Noise sources specified as  
Limiting Sound Power Levels

Report: Table of Results  
Model: Plant Noise Model - V4  
LAeq: total results for receivers  
Group: (main group)  
Group Reduction: Yes

Name	Description	Height	Day	Night
N_Mid_1_A		27.00	46	
NE_2_D		11.00	46	
S3_Low_B		5.00	46	
N_Hi_0_D		54.00	46	
N_Mid_3_F		35.00	46	
Castle1_E		22.00	46	40
N_Hi_5_E		50.00	46	
N_Hi_6_E		50.00	46	
N_Hi_1_B		48.00	46	
N_Mid_2_C		33.00	46	
N_Hi_5_D		47.00	46	
N_Hi_4_E		50.00	46	
N_Hi_4_D		47.00	46	
S_High_2_E		27.00	46	
N_Hi_6_D		47.00	46	
NE_1_F		17.00	46	
NW_Lo_1_F		24.00	46	
S3_Low_C		8.00	46	
E2_E		17.00	46	
N_Hi_6_F		53.00	46	
N_Hi_1_C		51.00	46	
S_High_6_C		21.00	46	
N_Hi_5_F		53.00	45	
N_Hi_4_F		53.00	45	
N_Hi_0_E		57.00	45	
W_High_2_F		35.00	45	
N_Mid_2_B		30.00	45	
S_High_1_E		27.00	45	
N_Hi_2_D		54.00	45	
W_High_2_E		32.00	45	
N_Mid_2_A		27.00	45	
NW_Lo_1_E		21.00	45	
S_High_4_B		18.00	45	
S_High_2_D		24.00	45	
N_Hi_1_D		54.00	45	
S_High_3_B		18.00	45	
S3_Low_A		2.00	45	
NE_1_E		14.00	45	
S_High_1_D		24.00	45	
N_Mid_4_F		35.00	45	
N_Hi_0_F		60.00	45	
NW_Lo_2_F		24.00	45	
E3_F		20.00	45	
W_High_2_D		29.00	45	
W_High_3_F		35.00	45	
N_Mid_6_E		32.00	45	
W_High_3_E		32.00	45	
N_Hi_1_E		57.00	45	
N_Mid_0_C		33.00	45	
W_High_3_C		26.00	45	

All shown dB values are A-weighted

Predictor V11.00

City of London Police Wood Street Station Redevelopment  
Plant Noise Model

Noise sources specified as  
Limiting Sound Power Levels

Report: Table of Results  
Model: Plant Noise Model - V4  
LAeq: total results for receivers  
Group: (main group)  
Group Reduction: Yes

Name	Receiver	Description	Height	Day	Night
	NE_0_F		17.00	44	
	W_High_2_C		26.00	44	
	Castle3_E		22.00	44	38
	NE_2_C		8.00	44	
	S_High_3_A		15.00	44	
	S_High_5_B		18.00	44	
	N_Hi_2_E		57.00	44	
	W_High_3_D		29.00	44	
	S_High_2_C		21.00	44	
	N_Hi_1_F		60.00	44	
	NE_0_E		14.00	44	
	W_High_3_B		23.00	44	
	N_Mid_3_E		32.00	44	
	S_High_4_A		15.00	44	
	NE_1_D		11.00	44	
	N_Hi_2_F		60.00	44	
	S_High_1_C		21.00	44	
	N_Mid_5_E		32.00	44	
	NW_Lo_2_E		21.00	44	
	W_High_4_E		32.00	44	
	S4_Low_C		8.00	44	
	S4_Low_B		5.00	43	
	W_High_4_F		35.00	43	
	S_High_6_B		18.00	43	
	W_High_2_B		23.00	43	
	S_High_2_B		18.00	43	
	W_High_1_F		35.00	43	
	S2_Low_C		8.00	43	
	W_High_4_D		29.00	43	
	S2_Low_B		5.00	43	
	NE_0_D		11.00	43	
	NW_Lo_1_D		18.00	43	
	N_Mid_0_B		30.00	43	
	E3_E		17.00	43	
	S_High_2_A		15.00	43	
	NW_Lo_0_F		24.00	43	
	NE_2_B		5.00	43	
	N_Mid_0_A		27.00	43	
	S_High_5_A		15.00	43	
	S_High_1_B		18.00	43	
	E1_F		20.00	43	
	W_High_1_E		32.00	43	
	W_High_4_C		26.00	43	
	E2_D		14.00	43	
	NE_1_C		8.00	43	
	Castle1_D		17.00	42	36
	NW_Lo_2_D		18.00	42	
	NE_0_C		8.00	42	
	N_Mid_3_D		29.00	42	
	S_High_1_A		15.00	42	

All shown dB values are A-weighted

Predictor V11.00

Hassall, Pam

From: Pln - CC - Development Dc  
Subject: FW: PLN FW: 3rd Party Planning Application - 17/00130/FULMAJ COL:05092461

-----Original Message-----

From: [BCTAdmin@thameswater.co.uk](mailto:BCTAdmin@thameswater.co.uk) [<mailto:BCTAdmin@thameswater.co.uk>]  
Sent: 29 March 2017 08:12  
To: PlanningQueue  
Subject: 3rd Party Planning Application - 17/00130/FULMAJ

Corporation of London  
54940  
Department of Planning & Transportation  
17/00130/FULMAJ  
PO. Box 270  
Guildhall  
London  
EC2P 2EJ

Our DTS Ref:

Your Ref:

29 March 2017

Dear Sir/Madam



Re: WOOD STREET POLICE STATION, 37 WOOD STREET, LONDON, EC2P 2NQ

Waste Comments

Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. The contact number is 0800 009 3921. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

Thames Water would advise that with regard to sewerage infrastructure capacity, we would not have any objection to the above planning application.

Legal changes under The Water Industry (Scheme for the Adoption of private sewers) Regulations 2011 mean that the sections of pipes you share with your neighbours, or are situated outside of your property boundary which connect to a public sewer are likely to have transferred to Thames Water's ownership. Should your proposed building work fall within 3 metres of these pipes we recommend you email us a scaled ground floor plan of your property showing the proposed work and the complete sewer layout to [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk) to determine if a building over / near to agreement is required.

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised

to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions.

'We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing [wwriskmanagement@thameswater.co.uk](mailto:wwriskmanagement@thameswater.co.uk). Application forms should be completed on line via [www.thameswater.co.uk/wastewaterquality](http://www.thameswater.co.uk/wastewaterquality)."

#### Water Comments

On the basis of information provided, Thames Water would advise that with regard to water infrastructure capacity, we would not have any objection to the above planning application.

Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

Yours faithfully  
Development Planning Department

Development Planning,  
Thames Water,  
Maple Lodge STW,  
Denham Way,  
Rickmansworth,  
WD3 9SQ  
Tel: 020 3577 9998  
Email: [devcon.team@thameswater.co.uk](mailto:devcon.team@thameswater.co.uk)

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We provide the essential service that's at the heart of daily life.



Historic England



LONDON OFFICE

Mr Rob Chipperfield  
Corporation of London  
Department of Planning & Transportation  
PO Box 270  
Guildhall  
LONDON  
EC2P 2EJ

Direct Dial: 020 7973 3707

Our ref: P00565849

5 April 2017

Dear Mr Chipperfield

**Arrangements for Handling Heritage Applications Direction 2015 &  
T&CP (Development Management Procedure) (England) Order 2015  
WOOD STREET POLICE STATION 37 WOOD STREET LONDON EC2P 2NQ  
Application No 17/00130/FULMAJ**

Thank you for your letter of 28 March 2017 notifying Historic England of the application for planning permission relating to the above site. Our specialist staff have considered the information received and we do not wish to offer any comments on this occasion.

#### **Recommendation**

**This application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.**

It is not necessary for us to be consulted again on this application. However, if you would like further advice, please contact us to explain your request. We can then let you know if we are able to help further and agree a timetable with you.

In returning the application to you without comment, Historic England stresses that it is not expressing any views on the merits of the proposals which are the subject of the application.

Please note that this response relates to historic building and historic area matters only. If there are any archaeological implications to the proposals it is recommended that you contact the Greater London Archaeological Advisory Service for further advice (Tel: 020 7973 3712).



1 WATERHOUSE SQUARE 138-142 HOLBORN LONDON EC1N 2ST

Telephone 020 7973 3700  
HistoricEngland.org.uk

Historic England is subject to the Freedom of Information Act, 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.



Historic England

LONDON OFFICE

Yours sincerely



**Jane Cook**  
Business Officer  
E-mail: [jane.cook@HistoricEngland.org.uk](mailto:jane.cook@HistoricEngland.org.uk)



1 WATERHOUSE SQUARE 138-142 HOLBORN LONDON EC1N 2ST

Telephone 020 7973 3700  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)



*Historic England is subject to the Freedom of Information Act, 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.*

## Broughton, Helen

---

**From:** PLN - Comments  
**Subject:** FW: Comments for Planning Application 17/00130/FULMAJ

**From:** PLN - Comments  
**Sent:** 21 April 2017 15:01  
**To:** PLN - Comments  
**Subject:** Comments for Planning Application 17/00130/FULMAJ

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 3:01 PM on 21 Apr 2017 from Dr Charles Fentiman.

### Application Summary

**Address:** Wood Street Police Station 37 Wood Street London EC2P 2NQ

**Proposal:** Erection of a nine storey tower, infill of existing courtyard, internal refurbishment, conversion of basements to provide car and cycle parking; refuse and recycling storage; and associated works for police station (sui generis) use (Total new floorspace 2752sq.m GEA).

**Case Officer:** Rob Chipperfield

[Click for further information](#)

### Customer Details

**Name:** Dr Charles Fentiman

**Email:**

**Address:** 31 Nutham Lane Southwater Horsham

### Comments Details

**Commenter Type:** Member of the Public

**Stance:** Customer objects to the Planning Application

**Reasons for comment:** - Residential Amenity

**Comments:** The proposed development at the Wood Street Police Station has been brought to my attention and having led the City Breeding Bird Surveys in the last two years I find it very disappointing that the long term presence of a pair of nesting Kestrels on the building has not been considered in the planning so far and the Extended Phase 1 Habitat Survey by WYG Environmental Planning Transport Ltd has completely missed this, rather well-known nest site. This survey was completed in November 2015, which was the first year of the current survey, but the existence of this nest was well know before we started this survey in April 2015. I am a Chartered Engineer, so I am rather



disappointed that the report signed off by two Chartered Ecologists who failed to become aware of this, however this was clearly a desk study rather than a field report. The data of our surveys, collected sightings have been added to the GiGL database, but it is possible that the most recent findings had not yet been entered by the date of the report, which is therefore out of date.

These reports in collaboration with FOCG can be found on the Friends of City Gardens website.

<http://www.friendsofcitygardens.org.uk/Breedingbirds15.pdf>  
<http://www.friendsofcitygardens.org.uk/Breedingbirds16.pdf>

The survey is continuing through the 2017 breeding season and the pair are nesting again, and to date both display and mating have been seen at the nest entrance. The nest site is easy to see from the East, and it is the left hand portal at the top of the tower.

The Extended Phase 1 Habitat Survey does point out (page 15 section 5.3.1) "However, noise or vibration caused by construction could make the adult leave an active nest and result in the death of the young. This could be interpreted as an offence under the Wildlife and Countryside Act 1981." In fact it would be an offence since it is a known nest site of a scarce BoCC Amber listed species.

I should explain that breeding sites of many raptor species such as Kestrels are traditional (owned by the pair and used year after year, until the death or old age of one of the pair when a replacement takes over). So should the pair be disturbed to the extent of abandoning this nest then the City of London is very likely to lose the only breeding pair of this scarce species. There are no other nest sites known in the City.

In describing the field work, Peregrine Falcon is mentioned, but they have not been observed at the Police Station other than occasionally flying past. It is perhaps the case that the professional ecologist misidentified the species of falcon present, but in Urban London the Peregrine Falcons are now probably more numerous than the Kestrel.

The report does conclude (page 17) that "It is recommended that any work which may impact birds are timed to avoid the nesting season". I believe that this is essential!

In fact, a specific plan should be created to safeguard this pair and their nest site. This should be a condition of Planning and this plan should be open to scrutiny to ensure that it minimises the risk of losing the only nesting Kestrels in the City.

I am also concerned about the potential for disturbance of other nesting bird species, such as Black Redstarts. These are known to nest in the immediate area, and we have records that show that territories extend to include the Police Station, so measures to avoid disturbing them, and perhaps enhancements to the building to help this rare species would be most welcome. The City population of Black Redstarts is significant in terms of the UK status of this rare species (BoCC Red Listed).

Dr Charles Fentiman, CEng, PhD, FIMMM

**We wish to object to the Planning Application to Wood Street Police Station based on the following comments**

**17\_00130\_FULMAJ**

**Sarah Hudson, Chair, on behalf of Friends of City Gardens**

**Comments on Habitat Survey**

1. The ecology assessment is dated November 2015, more than 17 months old. This means that it does not take into account data on species logged with GiGL for the 2015 and 2016 Breeding Birds Survey (<http://www.friendsofcitygardens.org.uk/Breedingbirds15.pdf> and <http://www.friendsofcitygardens.org.uk/Breedingbirds16.pdf>)

And more recent bird surveys (RSPB Big garden Birdwatch 2016 and 2017 and nest box cleaning surveys 2015, 2016 and 2017).

Before final Planning Approval is sought the Ecological Survey should be updated as much of the information contained within it is now outdated and inaccurate.

2. Ref. Table 1 - this is now outdated. Postman's Park is now a SLINC under the City's BAP 2016 - 2020 and Noble Street has been recommended for upgrading to SBINC status. The proximity of all these sites to Wood Street Police Station indicates the importance of keeping disturbance to a minimum during the construction process and ensuring that no physical interference in St Mary's Aldermanbury is allowed. This garden is an important green space as part of a green corridor that stretches across the City.

3. Ref. 2.5 The current BAP 2016 - 2020 has an updated target species list.

**4. Ref. 4.3.2 Nesting Birds**

A pair of kestrels (*Falco tinnunculus*) have nested on the east elevation of the tower for at least two years and raised young. The pair is currently nesting (April 2017). These are the only kestrels that have been observed in the City.

The Kestrel is an Amber listed species of Conservation Concern and is protected under the Wildlife and Countryside Act 1981, which makes it an offence to damage or destroy an active nest or its contents.

It is very important that a detailed plan is agreed by a qualified ecologist, appointed by the City of London Planners (i.e. not the construction company), to ensure minimum disturbance to the nest site and to provide an additional nesting site on the new tower - facing out over the adjacent St Mary Aldermanbury garden and not overlooked by any windows. It is essential that building work is not carried out in the nesting season while the existing nest is occupied and that since the male has been observed guarding the nest site throughout the rest of the year that the nest itself is not disturbed and that during the construction phase measures are put in place to ensure there is the minimum amount of noise and disruption for this bird.

5. There is no evidence that Peregrine falcon have nested here.

6. The Police Station is within the territory of at least one pair of breeding Black Redstarts, a red list species of Conservation Concern. The City is home to between 16 and 44% of the UK breeding population of Black Redstarts, based on the RSPB/BTO estimate of 19 to 44 pairs.

7. As noted in the report it is very important that the nests and habitats of the BoCC species, Kestrel and Black Redstart, are not disturbed through the breeding season. Any opportunity to enhance the environment for these birds should be taken as part of the building works - as noted in the report - with the installation of nest boxes/ledges and provision of suitable habitat, such as perching posts and a green roof at the top of the new tower.

8. Ref 5.4.1 In addition to installing nest boxes for House sparrow, the creation of a suitable habitat in the form of a green roof for Black Redstarts would be welcome.

9. The built up nature of the surroundings to the Police Station make it a hazardous environment for swifts that often come to grief by crashing into windows and providing nest boxes on any building that is not on the Thames corridor should not be encouraged.

#### **Comments about disturbance to St Mary Aldermanbury Garden**

10. There are two specimen trees close to the east wall of the Police Station - a mature Magnolia grandiflora and a Swamp Cypress (*Taxodium distichum*). The latter is a fine specimen and one of only two of this species in the City (the other being a poor specimen in Cleary garden). Apart from general disturbance of noise and dust to the garden during building works, it is very important that these two trees are not damaged and that scaffolding or hoardings are not erected round the building in a way that damages existing planting in any way, including by preventing watering or natural watering from rainfall.

11. The St Mary Aldermanbury garden has two nest boxes, both of which were used by Great Tits in 2016 to raise young. The nest boxes in this garden have been consistently occupied for the last five years. It is important that noise and disturbance during the nesting season is kept to a minimum and that there is no direct disturbance to the nest boxes or the garden itself, which is an important area for foraging birds. Shrub species in this garden have been carefully selected to provide forage and cover for birds and the garden attracts a number of species including wrens, goldfinches, great and blue tits, blackbirds, carrion crows, magpies, dunnocks and robins, some of which are likely to have nests in the dense hedges and shrubbery.

12. The garden is also used by migratory species, such as Common White throat, Black Cap, Garden Warbler and Willow Warbler as a refuelling point and it is very important that disturbance does not rob these species of a valuable, safe refuge to rest and forage.

### **Friends of City Gardens**

[www.friendsofcitygardens.org.uk](http://www.friendsofcitygardens.org.uk)

Is a volunteer community group based in the City with over 200 members. We support the City Gardens team and our aims are to enhance biodiversity in the City and to encourage more residents, City workers and visitors to enjoy the City's green spaces. We carry out hands on biodiversity enhancements, surveys (including the summer breeding birds survey 2014, 2015, and 2016, RSPB Birdwatch 2013 - 2017 and Nest Cleaning reports (2011 to 2016) and organise volunteering opportunities for adults and activities for children. We contribute over 4,000 volunteer hours a year.

## Broughton, Helen

---

**From:** PLN - Comments  
**Subject:** FW: Comments for Planning Application 17/00130/FULMAJ

**From:** PLN - Comments  
**Sent:** 22 April 2017 09:25  
**To:** PLN - Comments  
**Subject:** Comments for Planning Application 17/00130/FULMAJ

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 9:25 AM on 22 Apr 2017 from Mr Kenneth Murray.

### Application Summary

**Address:** Wood Street Police Station 37 Wood Street London EC2P 2NQ

**Proposal:** Erection of a nine storey tower, infill of existing courtyard, internal refurbishment, conversion of basements to provide car and cycle parking; refuse and recycling storage; and associated works for police station (sui generis) use (Total new floorspace 2752sq.m GEA).

**Case Officer:** Rob Chipperfield

[Click for further information](#)

### Customer Details

**Name:** Mr Kenneth Murray

**Email:**

**Address:** 45 Newlands Rd. Woodford Green, London/Essex

### Comments Details

**Commenter Type:** Member of the Public

**Stance:** Customer objects to the Planning Application

**Reasons for comment:**

**Comments:** The proposed development could severely impact the breeding site of the 'City of London's' only breeding pair of Kestrel, as they annually occupy the top floor access to the tower between Feb/March through to Sep/Oct. Being a schedule 1 protected species, their occupancy at this site is of "real" significance, when one considers their general demise nationally over recent decades. I would urge caution with this project regarding the species wellbeing in the face of the planning application.

Regards

Ken Murray

4 02 MAY 2017

**TWENTIETH  
CENTURY  
SOCIETY**



Rob Chipperfield  
Planning Officer  
Department of the Built Environment  
City of London  
PO Box 270  
Guildhall  
London EC2P 2EJ

Sent by email: [rob.chipperfield@cityoflondon.gov.uk](mailto:rob.chipperfield@cityoflondon.gov.uk)

02 May 2017

Our ref: 98 04 29

Dear Rob Chipperfield,

**17/00131/LBC and 17/00130/FULMAJ Erection of a new 9 storey tower, infill of the courtyard, internal refurbishments and conversion of basements to provide additional office floor space; car and cycle parking; refuse and recycling storage; and associated works at Wood Street Police Station, 37 Wood Street, London EC2P 2NQ**

Thank you for consulting the Twentieth Century Society on the above listed building consent and planning applications. These were discussed at our April casework committee. Members strongly **objected** to the proposals, and the letter below sets out the views of the committee.

**Significance**

Wood Street Police Station, designed by McMorran and Whitby and completed in 1966 is a Grade II\* listed building. It was McMorran's last major project before he died in 1965 and is considered to be his masterpiece. According to Historic England, it is his 'best-known building: he specialised in police stations and this was his last and largest'. Architectural historian and writer Gavin Stamp, writing in the Spectator in 1990 called this building 'one of the most imaginative modern classical buildings in the City of London'.

It is the only listed post-war police station, and is one of only 5.8% of listed buildings nationally to achieve the high accolade of II\* listing, which categorises it as 'more than special interest'. It is largely unaltered, and when the Society undertook a site visit in 2016 we were impressed with the quality of the spaces, the original materials and the finishes.

The building has been studied in the monograph publication by Edward Denison, published by English Heritage, The Twentieth Century Society and RIBA in 2009. This book describes Wood Street Police Station as the 'greatest success of his [McMorran's] lifetime (p102)'. The author goes on to state that, "The City Police Station is an original masterpiece, a work of art that defines McMorran's philosophies succinctly. It is an Italianate composition harking back to his favourite architect, Michele Sanmicheli, yet is rooted firmly in Britain and in the 20<sup>th</sup> century" (p 107). There are also clear

The Twentieth Century Society, 70 Cowcross Street, London EC1M 6EJ

[www.c20society.org.uk](http://www.c20society.org.uk)

architectural links to their nearby work at the Central Criminal Court Extension, in the City of London also grade II\* listed, which was built in 1960-72.

## Proposals

### *Pre-application feedback*

Plans have been prompted by the desired consolidation of the entire City of London police force onto one site. The Society was consulted by the applicants at the pre-application stage. The scheme presented in 2016 involved the construction of a tower extension, the partial infill of the courtyard, the conversion of the office and residential spaces into open plan, and the replacement of the majority of the original windows, although we were unable to see detailed drawings or demolition plans for security reasons. The Society had a number of significant concerns, as follows:

1. No conservation management plan was in place which could ensure a conservation led approach.
2. Concern that the proposals would cause substantial harm.
3. Insufficient justification. We did not consider that enough information had been provided to assess whether the building could be better protected through alternative uses.

We therefore advised the applicant to re-think their approach to the proposals, and welcomed the opportunity to comment on the detail of any revisions to the scheme ahead of formal submission.

### *Current proposals*

Committee members did not consider that any of our initial concerns had been addressed. In particular, it was felt that the lack of a conservation management plan (CMP) meant that the proposals had not been informed from the outset by a robust understanding of significance, as is essential when dealing with a Grade II\* listed building. With this in mind, the main proposals will be taken in turn:

1. The tower. The committee considered that this was the most harmful of the proposals and that it would substantially harm the composition of the built ensemble, which is fundamental to the overall architectural quality of the police station. It is an ensemble defined by the presence of a single vertical element. The proposed linked addition would not only compromise the fabric and destroy the impression of tapering windows to the northern elevation of the tower, but would also impact the careful balance and legibility of the form. This would be particularly harmful when viewed from Wood Street.
2. Infilling the courtyard. A new atrium would be formed within the courtyard, with timber detailing and a glazed perimeter where the new floors abut historic fabric, and with new walkways around the perimeter, affixed to existing walls. Members found it difficult to appreciate the full impact of this proposal through plans provided, but expressed concern over the loss of the void/solid relationship and the courtyard typology.
3. Open plan offices. The committee considered that there may be potential to convert some of the spaces into open plan, but that the full impact of this could not be currently appreciated due to the lack of a CMP, and that taken in combination with the above proposals would only serve to increase the level of harm overall.

4. Replacement of all external windows. The Historic England guidance on Traditional Windows states that 'Where historic windows, whether original or later insertions, make a positive contribution to the significance of a listed building they should be retained and repaired where possible. If beyond repair they should be replaced with accurate copies.' (p. 62) There is no window condition survey to demonstrate that the windows are beyond repair. In any case, there is no obligation to bring historic buildings up to modern thermal standards, and in these terms we consider the removal of windows are unjustified.

In regards to our third area of concern, the Society urged that the potential for alternative use was fully explored. We do not consider that the applicants have properly demonstrated that the building could not be better conserved through a change of use. We agree with Historic England in their letter of the 2 December 2016 that the supporting documentation of this nature is 'little more than speculation... and certainly insufficiently robust to support the currently proposed seriously harmful intervention', although we acknowledge Historic England have retracted their judgement of 'substantial harm' since the tower has been reduced in height.

#### Policy

Paragraph 133 of the NPPF states that 'Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- the nature of the heritage asset prevents all reasonable uses of the site
- no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation
- conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible
- the harm or loss is outweighed by the benefit of bringing the site back into use

The Society considers that the proposals will cause substantial harm to a Grade II\* listed building. The committee was not convinced that it has been demonstrated that consolidating in this way on this particular site has a public benefit that can outweigh this substantial harm. Members also did not consider that any of the above tests had been met. We therefore strongly urge that the application is refused consent.

Should your Planning and Transport Committee be minded to grant consent, we will request that the Secretary of State exercise their powers under Section 77 (1) of the Town and Country Planning Act 1990 and require the application to be referred to them for determination, as we consider that this would conflict with national policies on the protection of a heritage asset of national importance. The Society therefore copies this letter to the Department of Communities and Local Government and the National Planning Casework Unit.

I trust that these comments are of use to you. Please do not hesitate to contact me if you have any further queries.

Yours sincerely,

Tess Pinto

The Twentieth Century Society, 70 Cowcross Street, London EC1M 6EJ



**Conservation Adviser  
Twentieth Century Society**

**Remit:** The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in *ODPM Circular 09/2005*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.

cc. National Planning Casework Unit, [REDACTED]

cc. Sue Lovelock, [REDACTED]

cc. Mike Dunn, [REDACTED]

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<b>Committee:</b>	<b>Date:</b>
Planning and Transportation	25 July 2017
<b>Subject:</b> Wood Street Police Station 37 Wood Street London EC2P 2NQ  Erection of a nine storey tower extension, infill of existing courtyard, internal refurbishment, conversion of basements, provision of car and cycle parking, refuse and recycling storage and associated works for police station (sui generis) use (Total new floorspace 2897sq.m GEA).	<b>Public</b>
<b>Ward:</b> Bassishaw	<b>For Decision</b>
<b>Registered No:</b> 17/00131/LBC	<b>Registered on:</b> 17 March 2017
<b>Conservation Area:</b> NO	<b>Listed Building:</b> Grade II*

## Summary

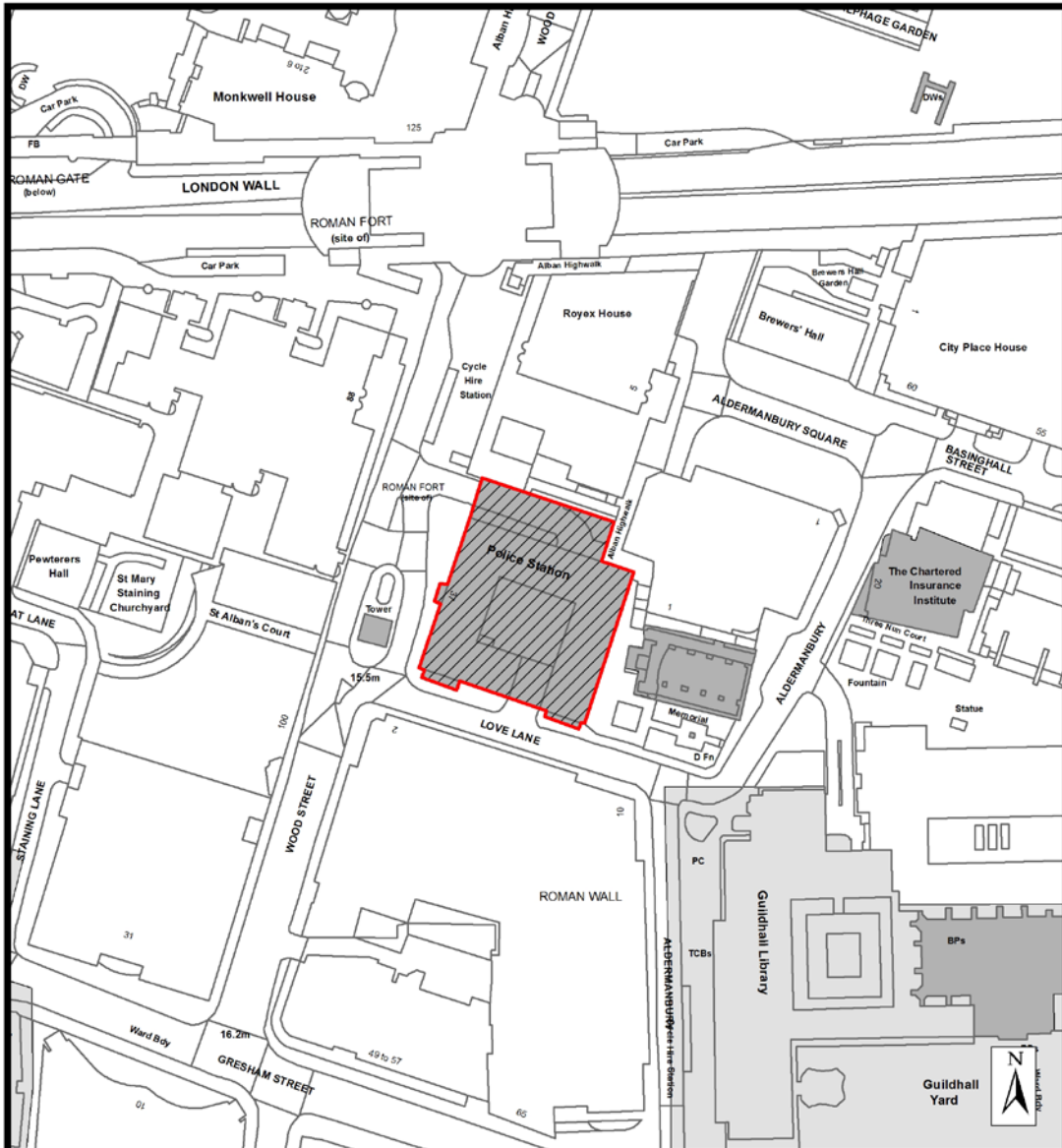
Listed building consent is sought for the 'Erection of a nine storey tower, infill of existing courtyard, internal refurbishment, conversion of basements to provide car and cycle parking; refuse and recycling storage; and associated works for police station (sui generis) use (Total new floorspace 2752sq.m GEA)'.

The National Planning Casework Unit has requested that applications sent to them for determination under Regulation 13 of the Planning (Listed Buildings and Conservation Areas) Regulations 1990 are referred to them with an indication of what the decision of the City of London, as Local Planning Authority, would have been if it were determining the application.

## Recommendation



Listed building consent be granted for the works referred to above in accordance with the details set out on the attached schedule.

# Site Location Plan



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ADDRESS:  
Police Station, Wood Street

-  SITE LOCATION
-  LISTED BUILDINGS
-  CONSERVATION AREA BOUNDARY
-  CITY OF LONDON BOUNDARY

CASE No.  
17/00130/FULL &  
17/00131/LBC



DEPARTMENT OF THE BUILT ENVIRONMENT



## **Main Report**

For full report see application: 17/00130/FULMAJ.

### Relevant Local Plan Policies

#### ***CS10 Promote high quality environment***

To promote a high standard and sustainable design of buildings, streets and spaces, having regard to their surroundings and the character of the City and creating an inclusive and attractive environment.

#### ***CS12 Conserve or enhance heritage assets***

To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors.

#### ***DM12.1 Change affecting heritage assets***

1. To sustain and enhance heritage assets, their settings and significance.
2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.
3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.
4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.
5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

#### ***DM12.3 Listed buildings***

1. To resist the demolition of listed buildings.
2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

## SCHEDULE

APPLICATION: 17/00131/LBC

**Wood Street Police Station 37 Wood Street London**

**Erection of a nine storey tower extension, infill of existing courtyard, internal refurbishment, conversion of basements, provision of car and cycle parking, refuse and recycling storage and associated works for police station (sui generis) use (Total new floorspace 2897sq.m GEA).**

### CONDITIONS

- 1 The works hereby permitted must be begun before the expiration of three years from the date of this consent.  
REASON: To ensure compliance with the terms of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
  
- 2 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all works pursuant to this consent shall be carried out in accordance with the approved details:
  - (a) particulars and samples of the materials to be used on all external faces of the building including external ground and upper level surfaces;
  - (b) details of the proposed new facades including details of typical bays and fenestration;
  - (c) details of the new glazed link structure between the existing tower and the extension;
  - (d) details of refurbishment of existing windows and details of new windows;
  - (e) details of brick detailing and stone jointing of tower extension structure;
  - (f) details of all alterations to the existing facade;
  - (g) details of the exterior and interior junctions between the existing structure and the tower and the courtyard extensions;
  - (h) details of the treatment of and finishes to external walls that would become enclosed within the new extensions;
  - (i) details of new work and works of refurbishment to the interior of the building, including Rolfe Hall, the Wakefield Mess, the staircases and lobbies, and the public reception;
  - n) details of new work and work in making good to the retained fabric of the building.REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.

- 3 All works of making good to the retained fabric shall match the existing adjacent work with regard to the methods used and to materials, colour, texture and profile unless shown otherwise on the drawings or other documentation hereby approved or required by any condition(s) attached to this consent.  
REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
- 4 The stability of the structure to remain must, throughout the period of demolition and reconstruction, be assured before any works of demolition begin, taking into account any rapid release of stress, weather protection, controlled shoring, strutting, stitching, reinforcement, ties or grouting as may occur to be necessary.  
REASON: To ensure the stability of the structure to be retained in accordance with the following policy of the Local Plan: DM12.3.
- 5 The works hereby approved are only those specifically indicated on the drawing(s) referred to in conditions to this consent.  
REASON: In order to safeguard the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
- 6 No works to the building shall take place until a record of the building in its unaltered condition has been submitted to and approved in writing by the Local Planning Authority. The record should include drawings and photographic records and focus principally on the areas subject to greatest change.  
REASON: To ensure that a record is made of the parts of the building that will be altered in order to mitigate its loss in accordance with the following policies of the Local Plan: CS12, D
- 7 The works hereby permitted shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this consent: Drawing No. 014100\_P110 proposed site plan Rev A A1 014100\_P200-3 Proposed Floor Plans Level -02 Rev B  
Drawing No.014100\_P201-3 Proposed Floor Plans Level -01 REV B  
Drawing No. 014100\_P202-3 Proposed Floor Plans Level 00 REV C  
Drawing No. 014100\_P203-3 Proposed Floor Plans Level 01 REV B  
Drawing No. 014100\_P204-3 Proposed Floor Plans Level 02 REV B  
Drawing No. 014100\_P205-3 Proposed Floor Plans Level 03 REV B  
Drawing No. 014100\_P206-3 Proposed Floor Plans Level 04 REV B  
Drawing No. 014100\_P207-3 Proposed Floor Plans Level 05 REV B  
Drawing No. 014100\_P208-3 Proposed Floor Plans Level 06 REV B  
Drawing No. 014100\_P209-3 Proposed Floor Plans Level 07 REV B  
Drawing No. 014100\_P210-3 Proposed Floor Plans Level 08 REV B  
Drawing No. 014100\_P211-3 Proposed Floor Plans Level 09 REV B  
Drawing No. 014100\_P212-3 Proposed Floor Plans Level 10 REV B



Drawing No. 014100\_P213-3 Proposed Floor Plans Level 11 REV B  
Drawing No. 014100\_P214-3 Proposed Floor Plans Level 12 REV B  
Drawing No. 014100\_P215-3 Proposed Floor Plans Level 13 REV B  
Drawing No. 014100\_P220 Servicing & Waste Management Strategy  
Rev B  
Drawing No. 014100\_P250-2 Proposed Townscape South & West Rev  
C  
Drawing No. 014100\_P251-2 Proposed Townscape North & East Rev  
C  
Drawing No. 014100\_P255-2 Proposed Streetscape Elevation South  
onto Love Lane  
Drawing No. 014100\_P256-2 Proposed Streetscape Elevation West  
onto Wood Street Rev C  
Drawing No. 014100\_P257-2 Proposed Streetscape Elevations North  
Rev C Drawing No. 014100\_P258-2 Proposed Streetscape Elevations  
East Rev C  
Drawing No. 014100\_P260-3 Proposed Elevation South onto Love  
Lane Rev  
Drawing No. 014100\_P261-3 Proposed Elevation West onto Wood  
Street Rev C  
Drawing No. 014100\_P262-3 Proposed Elevation North onto  
Aldermanbury Place Rev C  
Drawing No. 014100\_P263-3 Proposed Elevation East onto St Mary  
Aldermanbury Garden Rev C  
Drawing No. 014100\_P264-3 Proposed Courtyard Elevation Rev B  
Drawing No. 014100\_P265-3 Proposed Courtyard Elevation Rev B  
Drawing No. 014100\_P270-3 Section A-A Proposed Rev A  
Drawing No. 014100\_P271-3 Section B-B Proposed Rev A  
Drawing No. 014100\_P272-3 Section C-C Proposed Rev A  
REASON: To ensure that the development of this site is in compliance  
with details and particulars which have been approved by the Local  
Planning Authority.

## INFORMATIVES

- 1 This listed building consent is granted having regard to listed building considerations only and is without prejudice to the position of the City of London Corporation as ground landlords; and the work must not be instituted until the consent of the City of London Corporation as freeholders has been obtained.

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<b>Committee(s):</b>		<b>Date(s):</b>
Planning & Transportation Committee		For decision 25 July 2017
<b>Subject:</b> Public Comments in Planning Reports		<b>Public</b>
<b>Report of:</b> Chief Planning Officer		<b>For Decision</b>
<b>Summary</b>		
<p>Over the last few Committees, Planning application have been reported which have attracted a substantial number of public comments, both for and against the proposals at a level very unusual for the City of London.</p> <p>Some Members have queried whether it is necessary to attach the comments and expressed concern at the volume of paper that this generates.</p> <p>Officers undertook to review the position and report back.</p>		
<b>Recommendation</b>		
<p>Members are asked to:</p> <p>Recommend that the Committee maintains the current report format</p>		

## Main Report

### Background

1. Over the last few Committees, planning applications have been reported which have attracted a substantial number of public comments, both for and against the proposals at a level very unusual for the City of London Corporation.

### Current Position

2. The City Corporation's approach is to summarise the comments in the body of the report and to attach the emails/letters received.
3. The Statement of Community Involvement (July 2016) at para. 3.26 states

*When an application is referred to the Planning and Transportation Committee, a summary of all relevant comments or objections are included in the report and the comments are attached or placed in the Members' Reading Room. In the case of delegated decisions, the comments are summarised in the report and held on the planning file.*

4. The comments are included in the report itself rather than placed in the Members' Reading Room as a separate bundle, as being the better way to ensure that they are available to Members.
5. Members will be aware that one of the grounds for reporting cases to Committee is that 5 or more objections have been received. This threshold means that there maybe 5 or many hundred representations. While this may be burdensome to read, this approach makes it transparent so that if there were a judicial review of the Committee's decision it is clear that Members have had the relevant information available to them.
6. Some Members have queried whether it is necessary to attach the comments and expressed concern at the volume of paper that this generates, whilst others have appreciated that the information is readily available to them. Members may opt to receive their papers electronically only. This gives the opportunity to reduce the paper copies printed. The number of paper copies available to officers has been substantially reduced.
7. It is inevitable that both objectors and supporters will make points that repeat the points of others. Complaints are received when commentators consider that their comments have not been adequately summarised in the body of the report.
8. Comments are put in date order received and do not differentiate between supporters and objectors because not all comments are clearly for or against a recommendation and some comments may cover both positions.
9. Officers undertook to review the position, particularly in relation to practice at other London Planning Authorities and to report back.
10. A survey was undertaken of practice at other London Planning Authorities through the auspices of the Association of London Borough Planning Officers.
11. They were asked the following questions about how they reported comments to their Committee:

When you have individual comments do you:

1. Summarise them in the report only
2. Summarise them in the report and include them in the report

If you include the comments do you:

3. Summarise and integrate them within the report
4. Summarise them and have a separate bundle of comments as an appendix
5. Not summarise them but only have a separate bundle as an appendix
6. Summarise them and have a separate bundle available for your councillors in paper form elsewhere
7. Summarise them in the report and refer your councillors to a website where the comments have been recorded

8. Not summarise them but only refer them to them being available elsewhere in paper form
9. Not summarise them but only refer them being available on a website
10. Would you adopt the same approach whether there were 10 or 500 comments?

When you have a petition, do you?

11. Attach the comments only with a reference to the number of signatures
12. Attach the signatures as well

Please add any comments that you think would be useful in describing how you deal with comment

### **The results**

12. We received 11 responses which are summarised in the attached Appendix 1.
13. It is to be noted that 9 out of 11 authorities adopt the same practice as the City, except 1 which uses a separate bundle of comments and 2 summarise the comments only.

### **Proposals and recommendation**

15. It is recommended that the current report format is maintained. The current approach makes it transparent so that if there were a judicial review of the Committee's decision it is clear that Members have had the relevant information available to them.
16. However, if Members wish to adopt a different approach, the Statement of Community Involvement (SCI) would need to be altered to reflect the Committee's decision. While there is no legal requirement to consult on the proposed amendment, it is best practice and the City Corporation has always done so in the past.

### **Appendices**

- Appendix 1 -

### **Annie Hampson**

Chief Planning Officer and Development Director

T: 020 7332 1700

E: [annie.hampson@cityoflondon.gov.uk](mailto:annie.hampson@cityoflondon.gov.uk)

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**London local planning authority responses to questionnaire on how they deal with public comments on planning applications in a planning report**

Local Planning Authority	Summarise comments only	Summarise and include comments in the report	Summarise and have a separate bundle of comments	Not summarise but only have a separate bundle of comments	Summarise comments in report and have separate bundle in paper form elsewhere	Summarise comments in report and refer Members to a website	Not summarise comments in report and have a separate bundle in paper form elsewhere	Not summarise comments in report and refer Members to a website	Same approach whether 10 or 500	<b>When comments are in a petition</b> Are comments attached with reference to number of signatures only	Are signatures added as well
Brent		x							Yes	Yes	No
Wandsworth		x							Yes	Yes	No
Richmond		x							Yes	Yes	No
Westminster		x			x				Yes	Yes	No
Ealing	x								No	Yes	No
Lambeth		x							Yes	Yes	No
Newham		x							Yes	Yes	No
Barnet		x							Yes	Yes	No
London Legacy	x								Yes	Yes	No
Greenwich		x							Yes	Yes	No
Barnet	x	x							Yes	Yes	No

1991257

## **Comments from the boroughs**

### **Camden**

All comments received during the course of the application until the report is finalised are summarised in the report. Once on an agenda residents can make further written representations or a request for a deputation to committee. All written reps received are published in full on the supplementary agenda circulated ahead of the meeting.

### **Ealing**

We do get the odd complaint about the 'misrepresentation' of complaints resulting from the summary heading. However, my experience has shown that in terms of the level of risk from a complaint or challenge it is not worth the resource to reproduce the complaints (which are all on line in any case) either within the report or as an appendix

### **Greenwich**

Reps are summarised on the committee reports and the assessment then deals with them. Petitions are referred to and the issues raised also dealt with as per above. We don't include in full but summarise. If members wished to see them they could but not asked yet.

### **Lambeth**

We usually have a 'consultation section' at the start of each report, which includes a summary of all comments received followed by an officer response to these comments. Sometimes the officer response simply refers to other sections of the report where the issues raised in the comments are discussed. However, if the issues raised they are responded to in the 'consultation section'.

### **London Legacy**

For a petition we summarise the comments (objections, or representations in support), and state how many have signed it.

### **Wandsworth**

We publish all comments online prior to decision, with the exception of comments made relating to a Planning Committee report. For these we summarise on the addendum and if required we add our responses to these.

### **Westminster**

Consultee comments and comments from general public are summarised in a 'consultation' section at the beginning of the report. All responses received are listed as background papers at the end of the report, and published online (only once the committee report is published - 5 days in advance of the committee meeting) as well as Cllrs who are sitting on the committee getting paper copies (as we only have a committee made up of 4 councillors).



<b>Committee(s):</b>	<b>Date(s):</b>
Planning & Transportation Committee	25 July 2017
<b>Subject:</b> Imposition of planning conditions on planning permissions	<b>Public</b>
<b>Report of:</b> Chief Planning Officer	<b>For Information</b>
<p><b>Summary</b></p> <p>This report advises Members on planning conditions in response to a question raised by a Member. The questions posed were:</p> <ol style="list-style-type: none"> <li>1. How conditions are used</li> <li>2. The way conditions are processed</li> <li>3. Are they becoming more onerous?</li> </ol> <p><b>Recommendation</b></p> <p>Members are asked to:</p> <ul style="list-style-type: none"> <li>• To note the report</li> </ul>	

## Main Report

### Background

1. Members have requested further information in relation to:
  1. How conditions are used
  2. The way conditions are processed
  3. Are they becoming more onerous?
2. Guidance in respect of the use of planning conditions is set out in legislation and in the NPPF.
3. The NPPF states *'local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.... and 'planning conditions should only be imposed where they are:*
  - *necessary*
  - *relevant to planning and to the development to be permitted*
  - *enforceable*
  - *precise and*

- *reasonable in all other respects”*
4. More detailed government guidance on the use of planning conditions is set out in the Planning Practice Guidance prepared by the DCLG and published on the 6 March 2014 and this is attached as Appendix 1.
  5. It states *‘when used properly, conditions can enhance the quality of development and enable development proposals to proceed where it would otherwise have been necessary to refuse planning permission, by mitigating the adverse effects of the development. The objectives of planning are best served when the power to attach conditions to a planning permission is exercised in a way that is clearly seen to be fair, reasonable and practicable.’*
  6. It is correct to say that more and more matters have been added to material planning considerations over the years on the basis of the developer is required to absorb the consequences of the development. These include such matters as security, inclusive access, sustainable urban drainage systems (SUDS), and air quality and micro-climate considerations. All these and more require the imposition of conditions which does increase the burden on developers.

## **Current Position**

### **Imposing conditions**

7. Planning conditions are imposed in the City of London to ensure that development is acceptable and that any impacts of the development on the public interest are mitigated as far as is reasonable.
8. As Members will have observed the broad issues which conditions cover are:
  - Time limits
  - Design matters
  - Use and hours controls
  - Archaeology
  - Protection of trees
  - Servicing
  - Refuse collection
  - Demolition and construction
  - Noise mitigation
9. These conditions are relevant to planning and are imposed to ensure the quality of design in the City of London and to safeguard residential amenity. Whilst some of these touch on matters that are regulated through other control regimes such as licensing the imposition of the conditions can support these other controls. Examples have been the requirement for double doors on licensed premises and conditions in respect of noise attached to air conditioning units.

10. Some matters are not appropriate for control under planning conditions and in these circumstances it is necessary in addition to enter a S106 planning obligation to secure those matters as local procurement and affordable housing.
11. Where a developer is unwilling or unable to comply with a condition it can apply to the local authority to remove that condition. If that is refused it can appeal to the Secretary of State.
12. If it proceeds with the development and does not comply with the conditions then a breach of condition occurs and it is open to the LPA to take enforcement action where it is expedient. In rare circumstances where a serious breach occurs the City could apply to injunct.

### **Trigger points for compliance**

13. Timing for compliance fall into five broad categories:
  - a. Time limits which specify by when permissions need to be implemented
  - b. Those that have to be satisfied prior to works commencing
  - c. Those that have to be satisfied prior to certain elements of a scheme commencing
  - d. Those that have to be complied with at some further stated period, such as occupation
  - e. Those that run for the life of the development.
14. When the City issues a planning decision the notice sets out the relevant conditions. Within the document, the City, as has been agreed with the development community, lays out the conditions in an order making it clear which conditions have to be satisfied at which stage.
15. The Government encourages (and it is proposed that it will become mandatory) local planning authorities to share conditions with applicants prior to issuing the decision to ensure that they do not give rise to compliance issues, which we do in relation to major applications.
16. Applicants sometimes do request alterations to proposed conditions and these are taken into account if they do not conflict with the City Corporation's objectives in imposing the conditions.
17. Conditions requiring compliance with other regulatory regimes, such as licencing or environmental health will not normally meet the test of necessity unless they are relevant to planning.
18. It is important to ensure that conditions are tailored to tackle specific issues rather than standardized or used to impose broad or possibly unnecessary controls.

19. The City does utilise standard planning conditions in order to ensure consistency and quality. These are regularly reviewed and are discussed with officers in other departments so ensure that they are relevant. They are only used where they are appropriate to deal with a matter that needs to be controlled.

### **Discharge of conditions**

20. A developer is required to discharge conditions by requests for approval in writing enclosing any relevant details. There is a fee for this. The City Corporation will either write to confirm that a condition has been discharged or that one or more of the conditions imposed on the planning permission have been satisfied.
21. Local authorities are expected to discharge conditions without delay and that every effort should be made to ensure that this is within 21 days.
22. Delays can arise due to the poor quality of information supplied by the applicant and/or the proposal itself being unacceptable.
23. The City Corporation must give notice to the applicant of its decision within a period of 8 weeks from the date the request was received or any longer period agreed in writing between the applicant and ourselves. If no extension of time is agreed for discharging the condition, after 12 weeks the LPA must return the fee to the applicant along with a decision on the request.
24. A number of conditions require the input of other departments or external bodies which can lead to delays in the rapid processing of applications in relation to the discharge of conditions.
25. Conditions are almost always dealt with under delegated authority which reduces delays unless there is a formal request from committee to consider particular matters such as the external materials.

### **Proposals**

26. We keep our conditions under review and will review them with the City's key users. However when I hold regular meetings with major developers and agents who when specifically asked about the imposition of conditions in the City advise that when dealing with developments in the City they have no significant problems with the conditions we impose or the way that we discharge them.
27. We are already undertaking a review of our procedures to ensure that conditions are discharged in a timely manner. Improvements are likely to include surgery sessions with relevant consultees to expedite the signing off of conditions. A contributing factor to the timely discharge of conditions is internal resources and the resources of the external consultees. I undertake to provide a verbal report in six months on progress.

28. Some local planning authorities take the line that at the end of the 21 day consultation period if no response has been received the condition is approved. This approach would lead to a diminution of the quality and impact of development and is not an approach that is recommended.

### **Conclusion**

29. I recommend that the actions proposed above are pursued and that the Committee is kept informed as suggested.

### **Appendices**

- Appendix 1 – Planning Policy Guidance

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1. Home (<https://www.gov.uk/>)

Guidance

## Use of planning conditions

**From:** Department for Communities and Local Government  
(<https://www.gov.uk/government/organisations/department-for-communities-and-local-government>)

**Part of:** Planning practice guidance (<https://www.gov.uk/government/collections/planning-practice-guidance>) and Planning system  
(<https://www.gov.uk/government/policies/planning-system>)

**Published:** 6 March 2014

Sets out expectations on use of conditions on planning decisions.

### Contents

1. Why and how are conditions imposed?
2. Application of the 6 tests in National Planning Policy Framework policy
3. What approach should be taken to imposing conditions?
4. Conditions relating to time limits
5. Discharging and modifying conditions once planning permission is granted

### Why and how are conditions imposed?

#### Why are conditions imposed on a planning permission?

When used properly, conditions can enhance the quality of development and enable development proposals to proceed where it would otherwise have been necessary to refuse planning permission, by mitigating the adverse effects of the development. The objectives of planning are best served when the power to attach conditions to a planning permission is exercised in a way that is clearly seen to be fair, reasonable and practicable. It is important to ensure that conditions are tailored to tackle specific problems, rather than standardised or used to impose broad unnecessary controls.

Paragraph: 001 Reference ID: 21a-001-20140306

Revision date: 06 03 2014

#### What are the main legal powers relating to use of conditions?

The main powers relating to local planning authority use of conditions are in sections 70, 72, 73, 73A, and Schedule 5 of the Town and Country Planning Act 1990 (<http://www.legislation.gov.uk/ukpga/1990/8/section/70>). Powers to impose conditions on appeal are also

given to the Secretaries of State or their Inspectors by sections 77, 79, 177, and Schedule 6 of the Act (<http://www.legislation.gov.uk/ukpga/1990/8/section/77>). In some areas there may also be powers under local Acts which complement or vary the powers in the 1990 Act.

Section 70(1)(a) of the Act (<http://www.legislation.gov.uk/ukpga/1990/8/section/70>) enables the local planning authority in granting planning permission to impose "such conditions as they think fit". This power must be interpreted in light of material factors such as the National Planning Policy Framework, this supporting guidance on the use of conditions, and relevant case law.

Paragraph: 002 Reference ID: 21a-002-20140306

Revision date: 06 03 2014

## **Application of the 6 tests in National Planning Policy Framework policy**

### **What is the government's policy on the use of conditions in planning permissions?**

Paragraph 203 (<https://gov.uk/guidance/national-planning-policy-framework/decision-taking#para203>) of the National Planning Policy Framework states "Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions"

Paragraph 206 (<https://gov.uk/guidance/national-planning-policy-framework/decision-taking#para206>) of the National Planning Policy Framework states "Planning conditions should only be imposed where they are:

1. necessary;
2. relevant to planning and;
3. to the development to be permitted;
4. enforceable;
5. precise and;
6. reasonable in all other respects."

The policy requirement above is referred to in this guidance as the 6 tests.

Paragraph: 003 Reference ID: 21a-003-20140306

Revision date: 06 03 2014

### **How does the Local Planning Authority ensure that the 6 tests in paragraph 206 of the National Planning Policy Framework have been met?**

Whether it is appropriate for the Local Planning Authority to impose a condition on a grant of planning permission will depend on the specifics of the case. Conditions should help to deliver development plan policy and accord with the requirements of the National Planning Policy Framework, including satisfying the 6 tests for conditions.

The 6 tests must all be satisfied each time a decision to grant planning permission subject to conditions is made. The tests are set out in the following table, alongside key considerations:

Key questions ([https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/579424/Tests-](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/579424/Tests-)



and-key-questions.pdf) (PDF, 38.3KB, 2 pages)

Paragraph: 004 Reference ID: 21a-004-20140306

Revision date: 06 03 2014

## **What approach should be taken to imposing conditions?**

### **Are there any circumstances where planning conditions should not be used?**

Any proposed condition that fails to meet any of the 6 tests should not be used. This applies even if the applicant suggests it or agrees on its terms or it is suggested by the members of a planning committee or a third party. Every condition must always be justified by the local planning authority on its own planning merits on a case by case basis. Specific circumstances where conditions should not be used include:

- **Conditions which unreasonably impact on the deliverability of a development:**

Conditions which place unjustifiable and disproportionate financial burdens on an applicant will fail the test of reasonableness. In considering issues around viability, local planning authorities should consider policies in the National Planning Policy Framework and supporting guidance on viability (<https://www.gov.uk/guidance/viability>).

- **Conditions reserving outline application details:**

Where details have been submitted as part of an outline application, they must be treated by the local planning authority as forming part of the development for which the application is being made. Conditions cannot be used to reserve these details for subsequent approval. The exception is where the applicant has made it clear that the details have been submitted for illustration purposes only.

- **Conditions requiring the development to be carried out in its entirety:**

Conditions requiring a development to be carried out in its entirety will fail the test of necessity by requiring more than is needed to deal with the problem they are designed to solve. Such a condition is also likely to be difficult to enforce due to the range of external factors that can influence a decision whether or not to carry out and complete a development.

- **Conditions requiring compliance with other regulatory requirements (eg Building Regulations, Environmental Protection Act):**

Conditions requiring compliance with other regulatory regimes will not meet the test of necessity and may not be relevant to planning,

- **Conditions requiring land to be given up:**

Conditions cannot require that land is formally given up (or ceded) to other parties, such as the

Highway Authority.

- **Positively worded conditions requiring payment of money or other consideration:**

No payment of money or other consideration can be positively required when granting planning permission. However, where the 6 tests will be met, it may be possible use a negatively worded condition to prohibit development authorised by the planning permission until a specified action has been taken (for example, the entering into of a planning obligation requiring the payment of a financial contribution towards the provision of supporting infrastructure).

Paragraph: 005 Reference ID: 21a-005-20140306

Revision date: 06 03 2014

### **Can conditions be used to require the applicant to submit further details after permission has been granted?**

For non outline applications, other than where it will clearly assist with the efficient and effective delivery of development, it is important that the local planning authority limits the use of conditions requiring their approval of further matters after permission has been granted. Where it is justified, the ability to impose conditions requiring submission and approval of further details extends to aspects of the development that are not fully described in the application (eg provision of car parking spaces).

Where it is practicable to do so, such conditions should be discussed with the applicant before permission is granted to ensure that unreasonable burdens are not being imposed. The local planning authority should ensure that the timing of submission of any further details meets with the planned sequence for developing the site. Conditions that unnecessarily affect an applicant's ability to bring a development into use, allow a development to be occupied or otherwise impact on the proper implementation of the planning permission should not be used. A condition requiring the re-submission and approval of details that have already been submitted as part of the planning application is unlikely to pass the test of necessity.

Paragraph: 006 Reference ID: 21a-006-20140306

Revision date: 06 03 2014

### **When can conditions be used that prevent any development until the requirements of the condition have been met (conditions precedent)?**

Care should be taken when considering using conditions that prevent any development authorised by the planning permission from beginning until the condition has been complied with. This includes conditions stating that 'no development shall take place until...' or 'prior to any works starting on site...'.

Such conditions should only be used where the local planning authority is satisfied that the requirements of the condition (including the timing of compliance) are so fundamental to the development permitted that it would have been otherwise necessary to refuse the whole permission. A condition precedent that does not meet the legal and policy tests may be found to be unlawful by

the courts and therefore cannot be enforced by the local planning authority if it is breached. Development carried out without having complied with a condition precedent would be unlawful and may be the subject of enforcement action.

Paragraph: 007 Reference ID: 21a-007-20140306

Revision date: 06 03 2014 {#para008}

### **Can conditions be used to stipulate the sequence that development should be carried out in (phasing)?**

Where the circumstances of the application make this necessary and the 6 tests will be met, conditions can be imposed to ensure that development proceeds in a certain sequence. Conditions may also be used to ensure that a particular element in a scheme is provided by/at a particular stage or before the scheme is brought into use.

It is important that the local planning authority and the applicant discuss and seek to agree any such conditions before planning permission is granted. This is in order to understand how the requirements would fit into the planned sequence for developing the site, impacts on viability, and whether the tests of reasonableness and necessity will be met.

See guidance on multi-stage consents and Environmental Impact Assessment (<https://www.gov.uk/guidance/environmental-impact-assessment#subsequent-applications>).

Paragraph: 008 Reference ID: 21a-008-20140306

Revision date: 06 03 2014

### **When can conditions be used relating to land not in control of the applicant?**

Conditions requiring works on land that is not controlled by the applicant, or that requires the consent or authorisation of another person or body often fail the tests of reasonableness and enforceability. It may be possible to achieve a similar result using a condition worded in a negative form (a Grampian condition) – ie prohibiting development authorised by the planning permission or other aspects linked to the planning permission (eg occupation of premises) until a specified action has been taken (such as the provision of supporting infrastructure). Such conditions should not be used where there are no prospects at all of the action in question being performed within the time-limit imposed by the permission.

Where the land or specified action in question is within the control of the local authority determining the application (for example, as highway authority where supporting infrastructure is required) the authority should be able to present clear evidence that this test will be met before the condition is imposed.

Paragraph: 009 Reference ID: 21a-009-20140306

Revision date: 06 03 2014

### **Is it possible to use a condition to require an applicant to enter into a planning obligation or an agreement under other powers?**

Planning permission should not be granted subject to a positively worded condition that requires the applicant to enter into a planning obligation under section 106 of the Town and Country Planning Act 1990 (<http://www.legislation.gov.uk/ukpga/1990/8/section/106>) or an agreement under other powers. Such a condition is unlikely to pass the test of enforceability.

A negatively worded condition limiting the development that can take place until a planning obligation or other agreement has been entered into is unlikely to be appropriate in the majority of cases. Ensuring that any planning obligation or other agreement is entered into prior to granting planning permission is the best way to deliver sufficient certainty for all parties about what is being agreed. It encourages the parties to finalise the planning obligation or other agreement in a timely manner and is important in the interests of maintaining transparency.

However, in exceptional circumstances a negatively worded condition requiring a planning obligation or other agreement to be entered into before certain development can commence may be appropriate in the case of more complex and strategically important development where there is clear evidence that the delivery of the development would otherwise be at serious risk. In such cases the 6 tests must also be met.

Where consideration is given to using a negatively worded condition, it is important that the local planning authority discusses with the applicant before planning permission is granted the need for a planning obligation or other agreement and the appropriateness of using a condition. The heads of terms or principal terms need to be agreed prior to planning permission being granted to ensure that the test of necessity is met and in the interests of transparency.

Paragraph: 010 Reference ID: 21a-010-20140306

Revision date: 06 03 2014

### **What about cases where the same objective can be met using either a condition or a planning obligation?**

It may be possible to overcome a planning objection to a development proposal equally well by imposing a condition on the planning permission or by entering into a planning obligation under section 106 of the Town and Country Planning Act 1990 (<http://www.legislation.gov.uk/ukpga/1990/8/section/106>). In such cases the local planning authority should use a condition rather than seeking to deal with the matter by means of a planning obligation.

Paragraph: 011 Reference ID: 21a-011-20140306

Revision date: 06 03 2014

### **Can conditions be used to modify plans and other details submitted with an application?**

If a detail in a proposed development, or the lack of it, is unacceptable in planning terms the best course of action will often be for the applicant to be invited to revise the application. Where this involves significant changes this may result in the need for a fresh planning application.

Depending on the case, it may be possible for the local planning authority to impose a condition making a minor modification to the development permitted. A condition that modifies the development in such a way as to make it substantially different from that set out in the application should not be used.

Paragraph: 012 Reference ID: 21a-012-20140306

Revision date: 06 03 2014

### **Can conditions be used to limit the grant of planning permission to only part of the development proposed (a split decision)?**

Express powers to issue split decisions are given to the Secretary of State and Inspectors in section 79 of the Town and Country Planning Act 1990 (<http://www.legislation.gov.uk/ukpga/1990/8/section/79>).

In cases where the local planning authority considers part of the development to be unacceptable, it will normally be best to seek amended details from the applicant prior to a decision being made. In exceptional circumstances it may be appropriate to use a condition to grant permission for only part of the development. Such conditions should only be used where the acceptable and unacceptable parts of the proposal are clearly distinguishable and with the agreement of the applicant.

Paragraph: 013 Reference ID: 21a-013-20140306

Revision date: 06 03 2014

### **When can conditions be used to grant planning permission for a use for a temporary period only?**

Under section 72 of the Town and Country Planning Act 1990 (<http://www.legislation.gov.uk/ukpga/1990/8/section/72>) the local planning authority may grant planning permission for a specified temporary period only. A condition limiting use to a temporary period only where the proposed development complies with the development plan, or where material considerations indicate otherwise that planning permission should be granted, will rarely pass the test of necessity.

Circumstances where a temporary permission may be appropriate include where a trial run is needed in order to assess the effect of the development on the area or where it is expected that the planning circumstances will change in a particular way at the end of that period.

A temporary planning permission may also be appropriate on vacant land/buildings to enable use for a temporary period prior to any longer term regeneration plans coming forward (a meanwhile use) or more generally to encourage empty property to be brought back into use. This can benefit an area by increasing activity.

It will rarely be justifiable to grant a second temporary permission – further permissions should normally be granted permanently or refused if there is clear justification for doing so. There is no presumption that a temporary grant of planning of planning permission should be granted permanently.

A condition requiring the demolition after a stated period of a building that is clearly intended to be permanent is unlikely to pass the test of reasonableness. Conditions requiring demolition of buildings which are imposed on planning permissions for change of use are unlikely to relate fairly and reasonably to the development permitted.

Paragraph: 014 Reference ID: 21a-014-20140306

Revision date: 06 03 2014

### **Is it appropriate to use conditions to limit the benefits of the planning permission to a particular person or group of people?**

Unless the permission otherwise provides, planning permission runs with the land and it is rarely appropriate to provide otherwise. There may be exceptional occasions where granting planning permission for development that would not normally be permitted on the site could be justified on planning grounds because of who would benefit from the permission. For example, conditions limiting benefits to a particular class of people, such as new residential accommodation in the open countryside for agricultural or forestry workers, may be justified on the grounds that an applicant has successfully demonstrated an exceptional need.

A condition used to grant planning permission solely on grounds of an individual's personal circumstances will scarcely ever be justified in the case of permission for the erection of a permanent building, but might, for example, result from enforcement action which would otherwise cause individual hardship.

A condition limiting the benefit of the permission to a company is inappropriate because its shares can be transferred to other persons without affecting the legal personality of the company.

Paragraph: 015 Reference ID: 21a-015-20140306

Revision date: 06 03 2014

### **What about conditions that are requested by third parties?**

Third parties such as statutory consultees can suggest conditions to mitigate potential impacts and make a development acceptable in planning terms. The decision as to whether it is appropriate to impose such conditions rests with the local planning authority. As with any condition, the local planning authority should consider whether the 6 tests will be met. Where third parties suggest conditions it is essential for them to first consider whether the 6 tests will be met on a case by case basis with reference to the facts of the proposal under consideration. Blanket standard conditions should not be used without proper consideration of whether they are necessary, and if so, how they would apply to the case in question.

It is not appropriate to require in a condition that a development/requirement should be carried out to the satisfaction of a third party as this decision rests with the local planning authority.

Paragraph: 016 Reference ID: 21a-016-20140306

Revision date: 06 03 2014

**Is it appropriate to use conditions to restrict the future use of permitted development rights or changes of use?**

Conditions restricting the future use of permitted development rights or changes of use will rarely pass the test of necessity and should only be used in exceptional circumstances. The scope of such conditions needs to be precisely defined, by reference to the relevant provisions in the Town and Country Planning (General Permitted Development) (England) Order 2015 (<http://www.legislation.gov.uk/uksi/2015/596/contents/made>), so that it is clear exactly which rights have been limited or withdrawn. Area wide or blanket removal of freedoms to carry out small scale domestic and non-domestic alterations that would otherwise not require an application for planning permission are unlikely to meet the tests of reasonableness and necessity. The local planning authority also has powers under article 4 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (<http://www.legislation.gov.uk/uksi/2015/596/article/4/made>) to enable them to withdraw permitted development rights across a defined area.

Paragraph: 017 Reference ID: 21a-017-20140306

Revision date: 06 03 2014

**How can both the local planning authority and the applicant reduce the need for conditions?**

Rigorous application of the 6 tests can reduce the need for conditions and it is good practice to keep the number of conditions to a minimum wherever possible. Front loading and positive dialogue between the local planning authority and the applicant can also result in planning permission being granted with fewer conditions attached. Effective pre-application discussions can help to establish early in the process what may need to be the subject of conditions. An applicant may, where it is feasible to do so, seek approval at the application stage for matters which may otherwise have been the subject of conditions. This can reduce potential delays between the decision being taken and development taking place on site.

Paragraph: 018 Reference ID: 21a-018-20140306

Revision date: 06 03 2014

**Should the local planning authority agree conditions with an applicant before imposing them?**

It is best practice for a local planning authority to agree proposed conditions with an applicant before a decision is taken, and as early in the planning application process as possible. It is equally open to both the local planning authority and the applicant to initiate discussions about conditions. Agreeing conditions early is beneficial to all parties involved in the process. It can increase the certainty of what is proposed and how it is to be controlled, including highlighting any condition requirements that may impact on the implementation of the development.

A Planning Performance Agreement can also be used to set a timetable for when discussions about conditions should take place.

Paragraph: 019 Reference ID: 21a-019-20140306

Revision date: 06 03 2014

### **Is it acceptable for a local planning authority to explain in their Local Plan where conditions may be used?**

Identifying the circumstances in the Local Plan where consideration will be given to using conditions can add certainty to the process. However, it is still necessary to consider whether conditions would be justified in the particular circumstances of each proposed development, as a Local Plan policy cannot be used to justify a condition that does not meet the 6 tests.

Paragraph: 020 Reference ID: 21a-020-20140306

Revision date: 06 03 2014

### **Can a local planning authority use model conditions?**

Model conditions can improve the efficiency of the planning process. Such conditions should not be applied in a rigid way and without regard to whether the 6 tests will be met. It is recommended that local planning authorities use national model conditions where appropriate in the interests of maintaining consistency. [Note – a link to national model conditions will be provided when the present PINs/DCLG models have been updated].

Paragraph: 021 Reference ID: 21b-021-20140306

Revision date: 06 03 2014

### **Can conditions be used to specify the application drawings and other details which form part of the permission?**

Specifying the application drawings and other details which form part of the permission is best practice and creates certainty for all parties, particularly where applications have been subject to a number of revisions.

Paragraph: 022 Reference ID: 21a-022-20140306

Revision date: 06 03 2014

### **Does the local planning authority need to give reasons for imposing conditions?**

Clear and precise reasons must be given by the local planning authority for the imposition of every condition.

Paragraph: 023 Reference ID: 21a-023-20140306

Revision date: 06 03 2014

### **How should a local planning authority order conditions on decision notices?**

In addition to precise drafting, clear ordering of conditions on a decision notice is essential to ensuring that they are understood. It is good practice to list the conditions in the order that they need to be satisfied. A good structure is:



1. the standard time limit condition for commencement of development
2. the details and drawings subject to which the planning permission is granted
3. any pre-commencement conditions
4. any pre-occupancy or other stage conditions
5. any conditions relating to post occupancy monitoring and management.

Paragraph: 024 Reference ID: 21a-024-20140306

Revision date: 06 03 2014

### **Can conditions be attached to reserved matters applications relating to outline planning permissions?**

Conditions relating to anything other than the matters to be reserved can only be imposed when outline planning permission is granted. The only conditions which can be imposed when the reserved matters are approved are conditions which directly relate to those reserved matters.

Paragraph: 025 Reference ID: 21a-025-20140306

Revision date: 06 03 2014

### **What status do informative notes appended to decision notices have?**

Informative notes allow the local planning authority to draw an applicant's attention to other relevant matters – for example the requirement to seek additional consents under other regimes. Informative notes do not carry any legal weight and cannot be used in lieu of planning conditions or a legal obligation to try and ensure adequate means of control for planning purposes

Paragraph: 026 Reference ID: 21a-026-20140306

Revision date: 06 03 2014

## **Conditions relating to time limits**

### **Should conditions be used to specify the time limit within which development granted planning permission must begin?**

Under section 91 Town and Country Planning Act 1990 (<http://www.legislation.gov.uk/ukpga/1990/8/section/91>) if the local planning authority grants planning permission it is subject to a condition that specifies the time limit within which the development must begin.

The relevant time limit for beginning the development is not later than the expiration of:

- 3 years beginning with the date on which the permission is granted, or;
- such other period (whether longer or shorter) as the local planning authority may impose.

The local planning authority may wish to consider whether a variation in the time period could assist in the delivery of development. For example, a shorter time period may be appropriate where it would encourage the commencement of development and non-commencement has previously had

negative impacts. A longer time period may be justified for very complex projects where there is evidence that 3 years is not long enough to allow all the necessary preparations to be completed before development can start.

Paragraph: 027 Reference ID: 21a-027-20140306

Revision date: 06 03 2014

### **What about time limits for outline planning permissions?**

Under section 92 Town and Country Planning Act 1990

(<http://www.legislation.gov.uk/ukpga/1990/8/section/92>), outline planning permission should be made subject to conditions imposing 2 types of time-limit, one within which applications must be made for the approval of reserved matters and a second within which the development itself must be started. If the local planning authority considers it appropriate on planning grounds they may use longer or shorter periods, but must clearly give their justification for doing so.

Paragraph: 028 Reference ID: 21a-028-20140306

Revision date: 06 03 2014

### **What happens if planning permission is granted but there is no condition specifying the time limit within which development must begin?**

Where planning permission is granted and the decision notice does not include a condition stating the time limit within which development must begin, it is deemed to be granted subject to the condition that the development to which it relates must be begun not later than the expiration of:

- in the case of applications for planning permission: 3 years from the date on which permission was granted
- in the case of outline planning permission: 3 years from the date on which permission was granted to submit all reserved matters, and development to begin within 2 years of the date on which the final reserved matters are approved.

Paragraph: 029 Reference ID: 2a-029-20140306

Revision date: 06 03 2014

### **Discharging and modifying conditions once planning permission is granted**

#### **Will conditions on planning permissions affect future purchasers of the land?**

Unless the permission otherwise states, planning permission runs with the land and any conditions imposed on the permission will bind future owners.

Paragraph: 030 Reference ID: 21a-030-20140306

Revision date: 06 03 2014

## **What options are available to an owner who does not wish to comply with a condition?**

Following the decision of a local planning authority to grant planning permission subject to conditions, a developer may consider taking the following actions if they do not wish to be subject to a condition:

- Some or all of the conditions could be removed or changed by making an application to the local planning authority under section 73 of the Town and Country Planning Act 1990 (<http://www.legislation.gov.uk/ukpga/1990/8/section/73>). In deciding an application under section 73, the local planning authority must only consider the disputed condition/s that are the subject of the application – it is not a complete re-consideration of the application. A local planning authority decision to refuse an application under section 73 can be appealed to the Secretary of State, who will also only consider the condition/s in question.

It should be noted that the original planning permission will continue to exist whatever the outcome of the application under section 73. To assist with clarity, decision notices for the grant of planning permission under section 73 should also repeat the relevant conditions from the original planning permission, unless they have already been discharged. In granting permission under section 73 the local planning authority may also impose new conditions – provided the conditions do not materially alter the development that was subject to the original permission and are conditions which could have been imposed on the earlier planning permission. Further guidance on section 73 (<https://www.gov.uk/guidance/flexible-options-for-planning-permissions>).

- Appeal to the Secretary of State against the decision of the local planning authority to grant planning permission subject to conditions. An appeal must be received within 12 weeks of the date on the decision notice for householder planning applications or 6 months for other planning decision types. A Planning Inspector on behalf of the Secretary of State will re-determine the whole application (not only the decision to impose the conditions) – so there is a risk that the Inspector could refuse planning permission and therefore reverse the decision of the local planning authority. Further guidance on appeals (<https://www.gov.uk/guidance/appeals>).

Development that is taken forward in breach of the conditions may be subject to local authority enforcement action. It is also possible to apply for retrospective planning permission under section 73A of the Town and Country Planning Act 1990 (<http://www.legislation.gov.uk/ukpga/1990/8/section/73A>). Further guidance on enforcement (including section 73A) (<https://www.gov.uk/guidance/ensuring-effective-enforcement>).

Paragraph: 031 Reference ID: 21a-031-20140306

Revision date: 06 03 2014

## **How can a developer seek to discharge conditions attached to a planning permission that require local planning authority approval of further details?**

Requests for approval of further details required by conditions must be made to the local planning authority in writing, enclosing any relevant details.

Paragraph: 032 Reference ID: 21a-032-20140306

Revision date: 06 03 2014

### **Is there a fee payable to a local planning authority to discharge a planning condition?**

The local planning authority will charge an application fee for written requests for both:

- written confirmation of the discharge of conditions; and
- written confirmation that one or more of the conditions imposed on a grant of planning permission have been satisfied

More details on fees (<https://www.gov.uk/guidance/fees-for-planning-applications>). The fee must be paid when the request is made, and cannot be paid retrospectively.

Paragraph: 033 Reference ID: 21a-033-20140306

Revision date: 06 03 2014

### **How long should it take for a local planning authority to discharge a planning condition?**

Development that is ready to proceed should not be held back by delays in discharging planning conditions. In most cases where the approval is straightforward it is expected that the local planning authority should respond to requests to discharge conditions without delay, and in any event within 21 days. Where the views of a third party such as a statutory consultee are required to discharge a condition, every effort should be made to ensure that the 21 day requirement can still be met.

The local planning authority must give notice to the applicant of its decision within a period of 8 weeks from the date the request was received, or any longer period agreed in writing between the applicant and local planning authority. If no extension of time is agreed for discharging the condition after 12 weeks, the local planning authority must return the fee to the applicant without further delay along with a decision on the request.

It should be noted that this timeframe and the return of fees does not apply to prior approval procedures under Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (<http://www.legislation.gov.uk/ukSI/2015/596/schedule/2/made>), or where the request relates to a reserved matter, which should be subject to a reserved matters application.

Where an applicant has concerns about the timeliness of the local planning authority in giving notice of its decision, a deemed discharge may be available under article 28 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (<http://www.legislation.gov.uk/ukSI/2015/595/article/28/made>).

Paragraph: 034 Reference ID: 21a-034-20140306

Revision date: 06 03 2014

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From: Department for Communities and Local Government

(<https://www.gov.uk/government/organisations/department-for-communities-and-local-government>)

Part of: Planning practice guidance (<https://www.gov.uk/government/collections/planning-practice-guidance>) Planning system (<https://www.gov.uk/government/policies/planning-system>)



<b>Committee(s):</b>	<b>Date(s):</b>
Planning &Transportation - For Decision Streets & Walkways Sub - For Information	25 <sup>th</sup> July 2017 5 <sup>th</sup> September 2017
<b>Subject:</b> Cultural Hub North/South Programme: St Paul's Area Strategy	<b>Public</b>
<b>Report of:</b> Director of the Built Environment	<b>For Decision</b>

### Summary

This report sets out a proposal to develop an enhancement strategy for the St Paul's area located in the south west of the City. This plan is an identified activity within the Cultural Hub Public Realm Programme. The area includes St Paul's Cathedral at its centre and is bounded by the following strategy areas: West Smithfield to its north, Cheapside to the east, Fleet Street to the west and the riverside to the south (See indicative site map in Appendix 1).

The St Paul's area is of strategic importance both as the southern gateway into the City as a destination and with its position on London's skyline. The area is a very popular and forms part an important walking route for over 5 million visitors per year crossing the Millennium Bridge into the City. This north south connection will be essential for the development of the Cultural Hub.

The Cultural Hub aims to build upon the City's internationally acclaimed cultural offer by creating a cultural quarter from the cluster of institutions in the north west of the City, improving pedestrian access and activating the public realm. The approved Cultural Hub public realm programme identifies four different work streams, namely, the *North-South Route*, *East-West Route*, *Moorgate Quarter* and the *Cultural Hub - Look & Feel Strategy*.

The Moorgate Quarter Strategy is already initiated and the East-West Route is currently being advanced together with the Cultural Hub Look and Feel Strategy. However, the North-South Route work stream has yet to be developed and it is important that this work stream is established in parallel with others to ensure a consistency in timing and approach in support of the Hub. The north-south connection is the key pedestrian gateway into the City and will become increasingly important to the Cultural Hub as it is developed to form part of the City's wider cultural offer.

The security of the area is a major consideration. The area strategy will consider the security needs of the area which will inform and underpin the development of all enhancement proposals going forward. The changing security climate has dictated the need for short-term measures to be introduced and longer-term solutions to be reviewed. An update report on the St Paul's Security report will be put to Members separately, after the summer recess.

Other considerations of note will include arrival into the City from transport connections, pedestrian movement and air quality improvements. The key is to create a safer, more liveable environment with a greater focus on transformational improvements that encourages walking and cycling provision, road safety/road danger reduction and mode shift from private car use to public transport, walking and cycling.

In recent years the St Paul's area has gone through a number of changes with retail, residential, hotel and office developments as well as various improvement projects that have transformed the area. The area is now much more vibrant and active, especially during the weekend with the improved retail offer at Paternoster Square, Cheapside and the One New Change shopping

centre.

Major enhancements in the area include improvements to the former St Paul's Churchyard coach park, Festival Gardens and Carter Lane into accessible gardens. However, further public realm changes are needed to keep pace with development, trends in visitor numbers, smart/agile working and movement, security and servicing needs.

Change management is essential to maximise the benefits of future growth and ensure a coherent approach going forward. A strategy for the St Paul's area will aim to provide a framework for future public realm enhancements and address the needs of this area that accord with the Cultural Hub – North-South Route. This will require coordinating a number of existing/emerging projects and initiatives in the area. It will be important to consider how future change will impact on a variety of street typologies, buildings and spaces in the City's dense urban environment. St Paul's Cathedral are extremely supportive and keen to see this initiative progress and have expressed a desire to engage further.

There are a number of key issues that the strategy will cover and these are summarised as follows:

- Improved connectivity from the Thames Riverside to the Cultural Hub and from other places of interest, particularly along the Riverside, by means of public realm enhancements, way-finding and lighting, in line with the aspirations of the adopted City of London Local Plan.
- Creating a completed strategy for a high quality environment around the Cathedral and other nearby places of interest to support the development of the Cultural Hub.
- Improving the arrival experience into the Cultural Hub from the south and at local public transport nodes.
- Co-ordinating servicing needs to reduce the impact on local streets at peak times.
- Opportunities to reduce utilities and maintenance issues in any future design proposals.
- A co-ordinated approach to making public spaces secure, safer, more inclusive and less attractive to anti-social behavioural elements.
- A co-ordinated approach to making public space 'smart', connected and suitable for agile working.
- Opportunities to increase greenery including tree planting to enhance the environment and mitigate the impacts of pollution.
- Guidance for new developments in the area to ensure a clear and coordinated design approach to adjacent public realm.
- A review of footway capacity and pedestrian movement now there is a greater understanding of the implications of Crossrail.
- Improve lighting in conjunction with the emerging City Lighting Strategy to reduce the impacts of light pollution, whilst maximising the aesthetic appearance of this high profile visitor destination.
- Opportunities for: historic interpretation, sculpture and art to celebrate cultural expression and enhance the City's standing as a destination, complementing the City's wider cultural offer and the Cultural hub in particular.

The City will seek to develop the document in consultation with local businesses, occupiers, other stakeholders (including statutory bodies such as Transport for London and Historic England) and local ward members to help deliver a set objectives and aims whilst creating a strong vision. It is proposed to fund the development of the Strategy from monies ear-



marked in the existing Cultural Hub Programme funding for a total of £120,000.

### **Recommendation(s)**

Members of the Planning and Transportation Committee are asked to:

- Approve the initiation and development of the St Paul's Area Enhancement Strategy for up to £120,000, utilising funds from the Cultural Hub North-South Route Programme.

## **Main Report**

### **Background**

1. The St Paul's area has a richly historic environment and this contributes greatly to its attractiveness to residents, visitors and workers. At its centre is St Paul's Cathedral, a building of national, cultural and religious significance that lies within a close knit Conservation Area. The area has a high quality and diverse townscape with notable examples of building typologies, monuments, and public art from a range of periods. A significant number of these are heritage assets that are protected by being listed or scheduled monuments. It is important that enhancement schemes respect and enhance the local heritage.
2. The City's economic dynamism means there is a high rate of change and development, putting particular pressure on the City's streets, transportation and utility infra-structure. The four nearby Crossrail station hubs due to open in 2018 and the emerging Cultural Hub, together with projected increases in the City's residential and working population 15% and 25% respectively (2011-2026), highlight the importance of managing change and its potential impacts effectively.
3. It is clear the Cultural Hub will have a transformative effect in the north of the City and adjacent districts as the Museum of London prepares to relocate from the edge of the Barbican to Smithfield. Inevitable changes as a result of the emerging Hub are currently being established in the Cultural Hub -Look and Feel Strategy and will have a bearing on how improvement works are conceived in other cultural centres going forward, namely St Paul's.
4. Four work streams have been identified to support the development of the emerging Cultural Hub. These are North-South Route, East-West Route, Moorgate Quarter and the Cultural Hub - Look and Feel. To date the North-South Route work stream has yet to be developed and there is an opportunity to ensure that important pedestrian gateways into the City, such as the Millennium Bridge, are developed in line with existing Local Plan aspirations and the Cultural Hub governance framework. The St Paul's area is the natural driver for the North-South Route and the development of a Strategy will help to define both the extent of the area and scope to ensure there is a clear relationship to the Cultural Hub.
5. The adopted City of London Local Plan identifies a key visitor route from the Millennium Bridge to the Barbican which provides the policy framework for this

enhancement strategy. Policy CS6 refers to the need to enhance pedestrian links from the Millennium Bridge to St Paul's Cathedral and onwards to the Museum of London and the Barbican. Other policies encourage the provision of high quality public realm through enhancement strategies (policy DM10.4) and the creation of new open spaces (CS19).

6. There have been many successful improvements in the St Paul's area. The St Paul's Churchyard project transformed the environs of the Cathedral by providing much needed seating, greenery and spaces to dwell. A large coach park which dominated the area to its south was removed and relocated. This provided the opportunity to introduce a large, landscaped area tree-planting, with seating and additional greening. Where the coach park had previously impeded views of the Cathedral for visitors, the new scheme has improved desire lines and views for pedestrians approaching from Tate Modern and the Millennium Bridge.
7. The challenge is to integrate these improvements with the established visitor attraction at St Paul's Cathedral and visitor flows across the Millennium Bridge and ensure the area is equipped to accommodate and guide the pace of change to support the Hub.

### **Current Position**

8. There are currently a number of initiatives that are either within or affect the St Paul's area these include lighting and safety reviews as well as competing development opportunities. It would be beneficial to develop a co-ordinated approach identifying opportunities and prioritising schemes to ensure that the City's strategic aims for the area are delivered. Current and potential schemes include:
  - **St. Paul's External Lighting Project** – To develop new high quality, energy efficient external lighting scheme at St Paul's Cathedral and within the main curtilage. The current lighting scheme, which uses large energy consuming flood lights on and off the Cathedral, was installed in 1989 and is now approaching the end of its 25 year life span.
  - **St Paul's Churchyard skateboarding mitigation** - Measures have been reviewed and proposed solutions to improve the visitor experience in the area. A report will be put to Members in late 2017.
  - **Security, Safety and Accessibility** - There is a general wider review of safety and accessibility in the City that includes approaches to St Paul's Cathedral and environs. This is important given the proximity of public transport, through to routes from Paternoster Square, New Change, Cheapside, Newgate Street, Cannon Street, the processional route of Ludgate Hill connecting Ludgate Circus to Fleet Street. Other considerations will include wider areas of visitor interest, commerce, residents and the St Paul's Cathedral School. An update report on St Paul's Security is to be reported to Members after the summer recess.
  - **Cultural Hub** - The City of London has agreed a policy to develop an area in the north of the City into a 'Cultural Hub': a new destination for visitors that will be the creative heart of the City. St Paul's lies

immediately to the south of this area and will be an important link to the north of the City for visitors.

- **Puddle Dock Pier** - As part of the Thames tideway project the pier to the west of Blackfriars Bridge is being relocated to the eastern side with the installation of a new staircase and lift to provide access to the bridge footway. The relocation of the pier will provide the City with an opportunity to increase footfall via Puddle Dock to Queen Victoria Street with its plans to introduce a new footway to the pier. This would enhance pedestrian accessibility along the Riverside Walk and improve connectivity to destinations such as St Paul's, Cheapside, One New Change and the Barbican.

## **Proposals**

Subject to Member approval;

9. The draft strategy work will focussing on the following areas:
  - Public spaces / greening - review of existing / identifying new opportunities to either enhance or create public space and introduce new areas of greening, including trees.
  - Servicing - review existing servicing around the Cathedral and address issues in particular with damage to paving due to vehicle overrun in the public realm here.
  - Pedestrian Accessibility / Strategic Walking routes - review of existing routes and desire lines creating links from Fleet Street in the west and the Tate Modern / Millennium Bridge to other parts of city such as Cheapside, One New Change, the Barbican and into the emerging 'Cultural Hub' area via St. Paul's Cathedral.
  - Lighting - a review of the lighting enhancements in the Churchyard and identification of opportunities for the whole strategy area. These could include proposals to illuminate routes from the River Thames accentuating the approach from the Millennium Bridge whilst acknowledging this prominent gateway to the City from the south.
10. The City will consult regularly with stakeholders to develop the strategy and sound governance. Consultees will include but are not restricted to the following:
  - St Paul's Cathedral
  - Local businesses
  - Historic England
  - Friends of City Churches
  - Local Ward Members
  - Transport for London
11. The development of the strategy will establish a set of aims and priorities and a robust vision for the area that ties in with the Local Plan, The London Plan and The National Planning Policy Framework, in line with St Paul's

Conservation Area. Please see Appendix 2 for a summary of relevant policy guidance.

### **Financial Implications**

12. The cost of delivering the St Paul's Area Enhancement Strategy and associated studies/survey work is estimated at £120,000. The estimate draws on the experience of delivering enhancement strategies adjacent to our target area. Please see the table below:

**Table: Estimated cost of St. Paul's Area Enhancements Strategy**

<b>Item</b>	<b>Estimated Cost (£'s)</b>
Staff Costs	48,000
Fees	54,000
Publishing/Print costs, Marketing	18,000
<b>TOTAL</b>	<b>120,000</b>

### **Corporate & Strategic Implications**

13. A summary of relevant policy guidance is listed in Appendix 2.

### **Conclusion**

14. With over 5 million visitors visiting St Paul's Cathedral each year, the area provides a key gateway into the City to the emerging 'Cultural Hub' in the north as well as Cheapside and its prime retail offer at One New Change from the west to Fleet Street. A unified and holistic strategy is supported by The Cathedral and would build a strong identity for the wider area and provide a critical link to the work already underway on the 'Cultural Hub' and in particular the "Look and Feel" strategy, supporting the City's corporate vision.
15. The London Plan is very clear about the importance of public realm that is appropriate, of good quality, with sound management and governance in a rapidly evolving London. It is therefore recommended that Members approve the proposals set out in this report.
16. In order to ensure the proposed St Paul's Area Strategy is aligned with current guidance, it will be developed in line with the City's Cultural Hub governance and wider corporate agenda to continue to provide high quality services for business, residents, students and visitors as the City continues to evolve.

### **Appendices**

- Appendix 1: - Indicative Map of the St Paul's Area
- Appendix 2: - Summary of Policy Framework

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# Appendix 1: Indicative Site Map St Paul's Area

## KEY

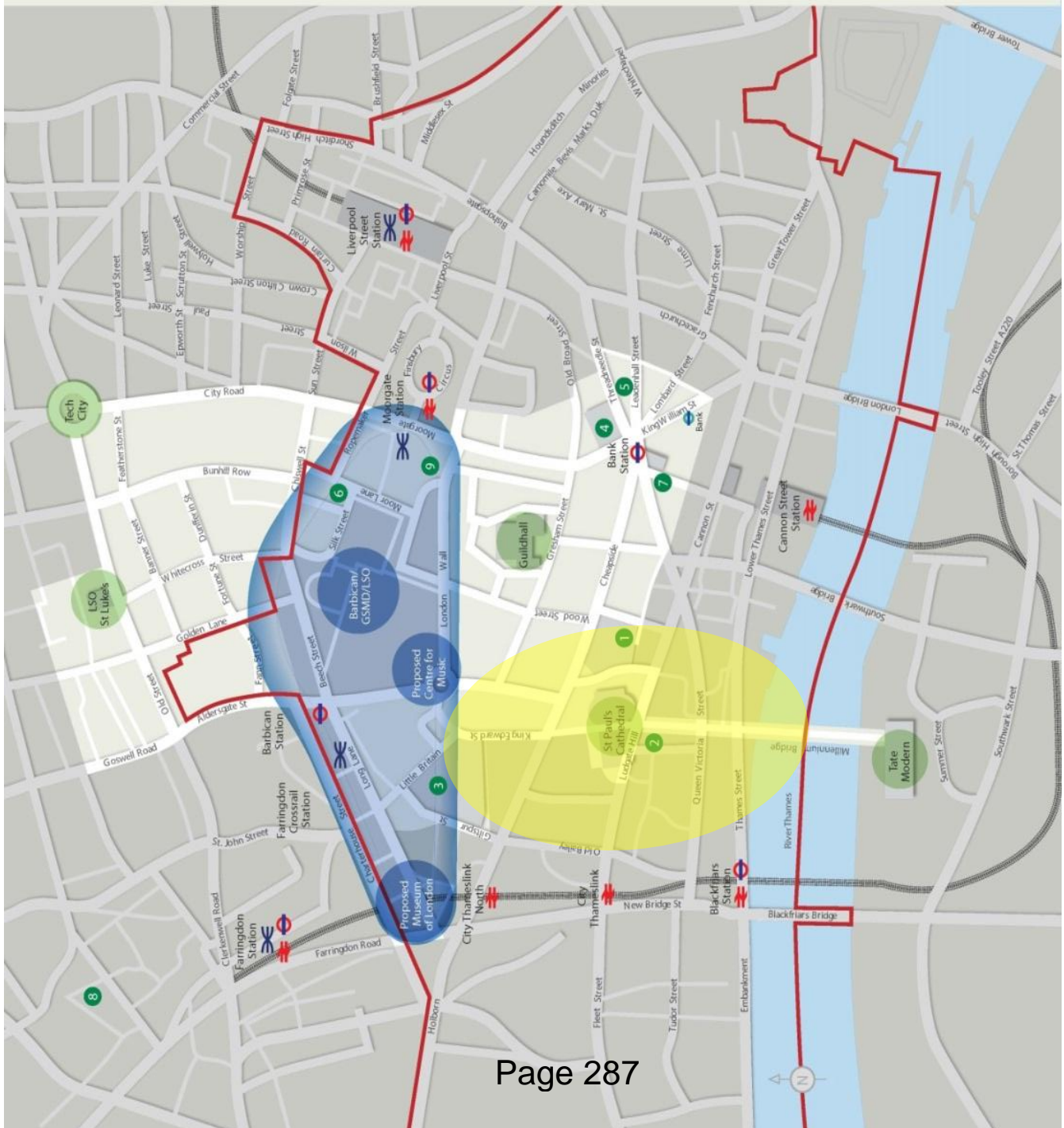
### LANDMARKS

- 1 One New Change Shopping Centre
- 2 City Information Centre
- 3 St Bartholomew's Hospital
- 4 Bank of England and Bank of England Museum
- 5 The Royal Exchange
- 6 Guildhall School of Music and Drama - Milton Court
- 7 Mansion House
- 8 London Metropolitan Archives
- 9 Moorgate Quarter

Indicative St Paul's Strategy Area



	Cultural Hub
	Cultural Hub places of interest
	Other places of interest
	Priority area for enhanced engagement
	City of London Boundary



## Appendix 2: Summary of Policy Framework

### Corporate & Strategic Policy

17. **The City of London Corporate Plan 2015-19**, states the importance of increasing the outreach and impact of the City's cultural, heritage and leisure contribution to the life in London and the nation. This is captured in Key Performance KPP5 which could be achieved by developing cultural and visitor strategies as well as delivering physical improvements around the City's key cultural attractions to provide safe, secure and accessible open spaces.
  
18. **Other corporate plans, strategies and research**

The Corporate Plan is supported by a series of other plans including:

  - City of London Corporation Departmental Business Plans, incorporating local management and service plans;
  - Themed plans such as the Local Plan, the Visitor Strategy, the Cultural Strategy, the Communications Strategy, the Climate Change Mitigation Strategy, the Capital Strategy and Corporate Property Asset Management Strategy 2012-16;
  - Existing Supplementary Planning Documentation (SPD), inclusive of: City of London's - St Paul's Cathedral Conservation Area SPD, Historic Environment Strategy, Protected Views SPD and Tree Strategy SPD.
  - **Public Realm: People, Places, Projects (2016), *Supplementary Planning Document (SPD)*** - provides design guidance. This SPD sets out the City of London Corporation's vision for the public realm including the main principles for controlling change and informing street enhancement schemes and provides general guidance for street works to ensure there is consistency of form and quality.
  - Plans developed with partner organisations such as The Safer City Partnership Plan, and the Health and Wellbeing Strategy. Each of these strategies and plans include key objectives and actions as well as detailed performance measures.
  - **Future Workstyles and Future Workplaces in the City of London (2015)** - *A joint research report by the City of London and the City Property* suggested that the City's stock of buildings has generally responded well to changing corporate requirements. However, it also revealed a growing sense that the City's public realm is rapidly becoming a critical factor in the City's future attractiveness and competitiveness:
    - a. In short, as organisations and workers grow accustomed to a high quality, well serviced and supportive workplace, they are now looking for the same in the surrounding public realm. As already stated, research recognised that the City has changed greatly in recent years, with a transformed retail and leisure offer. The City is still considered the 'place to be' – it is the symbolic centre of the markets, and as such has the

opportunity to further build on its heritage and continue to differentiate itself as a location.

- **Departmental Business Plan 2016/19** - The St Paul's Area Enhancement Strategy will seek to progress two of the key delivery themes within the Departmental Business:

*Future Key Places* – To focus on key places in the City including supporting and enabling the development of a vibrant Cultural Hub in a world class setting.

*Future Streets & Public Realm* – To deliver a distinctive, attractive, inclusive and safe public realm in the City by:

- Upgrading busy key public realm areas including the Crossrail environs.
- Transforming traffic junctions to create calmer, safer, more attractive places in the heart of the City

## 19. **The City of London Local Plan (2015)**

### Core Strategic Policy CS19: Open Spaces and Recreation

To encourage healthy lifestyles for all the City's communities through improved access to open space and facilities, increasing the amount and quality of open spaces and green infrastructure, while enhancing biodiversity, by:

1. Seeking to maintain a ratio of at least 0.06 hectares of high quality, publicly accessible open space per 1,000 weekday daytime population:

- (i) protecting existing open space, particularly that of historic interest, or ensuring that it is replaced on redevelopment by space of equal or improved quantity and quality on or near the site;
- (ii) securing public access, where possible, to existing private spaces;
- (iii) securing additional publicly accessible open space and pedestrian routes, where practical, particularly in the eastern part of the City;
- (iv) creating additional civic spaces from underused highways and other land where this would not conflict with other strategic objectives;
- (v) encouraging high quality green roofs, roof gardens and terraces, particularly those which are publicly accessible, subject to the impact on the amenity of adjacent occupiers.

2. Improving access to new and existing open spaces, including those in neighbouring boroughs, promoting public transport access to nearby open space outside the City and ensuring that open spaces meet the needs of all of the City's communities.

3. Increasing the biodiversity value of open spaces, paying particular attention to sites of importance for nature conservation such as the River Thames. Protecting the amenity value of trees and retaining and planting more trees wherever practicable.

4. Improving inclusion and access to affordable sport, play and recreation, protecting and enhancing existing facilities and encouraging the provision of further facilities within major developments.

## City Culture and Heritage

### 3.10 Design

#### Policy DM 10.4 Environmental Enhancement -

The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes for the enhancement of highways, the public realm and other spaces. Enhancement schemes should be of a high standard of design, sustainability, surface treatment and landscaping, having regard to:

- the predominant use of the space, surrounding buildings and adjacent spaces;
- connections between spaces and the provision of pleasant walking routes;
- the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
- the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
- the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;
- sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
- the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;
- the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
- the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
- the use of high quality street furniture to enhance and delineate the public realm;
- lighting which should be sensitively co-ordinated with the design of the scheme.

20. **The London Plan:** *The spatial development strategy for London consolidated with alterations since 2011* (March 2016), Policy 7.5 – Public Realm:

#### Strategic

A) London's public spaces should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces.

#### Planning Decisions

B) Development should make the public realm comprehensible at a human scale, using gateways, focal points and landmarks as appropriate to help



people find their way. Landscape treatment, street furniture and infrastructure should be of the highest quality, have a clear purpose, maintain uncluttered spaces and should contribute to the easy movement of people through the space. Opportunities for the integration of high quality public art should be considered, and opportunities for greening (such as through planting of trees and other soft landscaping wherever possible) should be maximised. Treatment of the public realm should be informed by the heritage values of the place, where appropriate.

LDF preparation

D) Boroughs should develop local objectives and programmes for enhancing the public realm, ensuring it is accessible for all, with provision for sustainable management and reflects the principles the Mayor's Public Realm Policies.

21. **Healthy Streets Healthy Streets for London** - *Prioritising walking, cycling and public transport to create a healthy city, (TfL) 2017*
22. **Mayor's Transport Strategy** – *Draft for public consultation, (TfL) 2017*

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<b>Committee(s):</b> Streets and Walkways Sub-Committee Planning and Transportation Committee	<b>Date:</b> 24 July 2017 25 July 2017
<b>Subject:</b> Eastern Cluster Area Enhancement Strategy – Update	<b>Public</b>
<b>Report of:</b> The Director of the Built Environment	<b>For Decision</b>
<b>Report author:</b> Maria Herrera - Project Manager, City Public Realm	

## Summary

This report provides an update on the work carried out to date on the preparation of an area enhancement strategy for the public realm in the Eastern City Cluster (ECC).

In 2016, Members approved a report to initiate the development of an area strategy for the ECC. A project steering group was created with senior officers from various departments to guide the development of the document. The strategy has been identified as a high priority in the DBE Programme Portfolio and is being developed alongside other key projects, including the ECC area security project, Freight and Servicing draft SPD and estate management approach.

In order to ensure the scope of the strategy is in line with corporate priorities it was agreed to develop the strategy by means of a two-stage process. The first stage (“Stage 1”) is now completed and includes the following elements:

- 1) A Literature Review and benchmarking exercise.
- 2) A detailed site analysis which identifies the main issues in the area and drivers for change. (Available in the Members’ reading room)
- 3) Targeted Consultation workshops with CoL senior officers, key stakeholders in the area and Ward members (Summary consultation report is attached in Appendix 1).

The work described above provided the platform to prepare the draft vision, aspirations and objectives for the area and these are contained in Appendix 2. These reflect the comments and issues raised by the various stakeholder groups and have been agreed by the project steering group.

The draft vision for the area is: “To provide an exceptional urban environment for a thriving world-class destination, where people feel comfortable and safe, and the quality of the user experience is paramount”.

The draft aspirations take into account the feedback from the stakeholder workshops and have been divided into three themes:

- Enable positive growth: This theme will cover aspects related to improving the pedestrian environment in order to accommodate future growth, taking into account environmental issues such as air quality, health & well-being and safety.
- Enrich the sense of place: This theme will reflect the importance of delivering high quality public spaces which respond to the various

needs of the area, supporting a wide range of activities at different times of the day.

- Create a world-class destination: This theme will reflect the need to ensure the area remains competitive and attracts businesses and visitors alike, encouraging place activation through events and cultural activities and supporting the emerging estate management approach.

The next stage (“Stage 2”) includes the following elements:

- 1) Developing site specific proposals for public realm enhancements in the area.
- 2) Identifying opportunities for cross-cutting initiatives such as culture and art, smart and digital solutions, and estate management.
- 3) Carrying out a comprehensive public consultation exercise on the strategy proposals.

In order to complete the strategy, a number of additional studies are required to inform Stage 2, these include:

- Traffic
- Culture and Art
- Smart and Digital

These studies will be developed in parallel with the Strategy, with the intention of finalising and adopting the strategy document in summer 2018.

Additional funding has been secured from Transport for London 2017-2018 LIP contribution (£100,000), and it is proposed to utilise a further £158,000 from the Section 106 Contribution from the Pinnacle development to complete the Strategy.

### **Recommendation(s)**

**It is recommended that Members:**

- i. Note the content of this update report and associated supporting information, attached in appendix 1 and 2.
- ii. Approve additional funding of £158,000 from the Section 106 contribution connected to the Pinnacle development to finalise the area strategy.

## Background

1. In April 2016, Members approved carrying out an update to the ECC Strategy with the objective of ensuring that the City's streets and public realm are able to accommodate future growth and provide an attractive, well-functioning and safe urban environment fitting for the high profile status of the area. The revised document will also integrate the key principles of other ECC current projects including:
  - Area security project
  - Freight and Servicing – draft Supplementary Planning Document.
  - Estate management approach
  - Pedestrian Model
2. To ensure that the scope and focus of the strategy is in line with corporate objectives, including the new emerging Local Plan (2019), it was decided to develop the strategy and the public consultation by means of a two-stage process. The two stages are structured as follows:

**Stage 1:** This first stage includes the following elements (See appendix 1 and 2, and Site Analysis report is available in the Members' reading room):

- 1) An urban design analysis of the area identifying main issues and drivers for change (including Crossrail, increase in daytime population and major new developments) in order to define the scope.
- 2) Information gathering to identify international trends through a benchmarking exercise to identify precedents. A detailed review of current local and national policy was carried out in order to ensure that the strategy responds to evolving trends in urban policy.
- 3) A targeted consultation with key local stakeholders, developers, building owners and occupiers to understand their issues and needs.
- 4) Defining the draft vision, aspirations and objectives for the area.

**Stage 2:** This stage includes the following elements:

- 1) Developing site specific proposals for public realm enhancements for the area, taking into account other initiatives and projects such as the area security project and Freight & Servicing draft SPD.
- 2) Identifying opportunities for cross-cutting initiatives such as culture and art, smart and digital solutions and the emerging estate management approach.
- 3) Carrying out a comprehensive public consultation exercise on the strategy proposals.

## Current Position - Progress to date: Stage 1

3. A project Steering group was created in September 2016 to inform the development of the strategy and help guide the scope of the document. The steering group is formed of Senior CoL officers representing various departments and aims to ensure all corporate objectives are integrated into the document.
4. A project brief was agreed by the Steering Group and in December 2016. Following receipt of a number of submissions via request for quotation, City officers appointed FLUID (an architecture and urban design practice) to produce Stage 1.
5. The Stage 1 report has been finalised and is available in the Members' reading room. It covers the following aspects:
  - An analysis of the current issues and key drivers for change, including the predicted increase in daytime population as a result of an increase in office floor space and the arrival of Crossrail.
  - A comprehensive urban site analysis of the area, looking at historic development, street patterns, pedestrian connectivity, available public space and key routes.
  - An assessment of the environmental aspects of this part of the City, including data from the wind and sunlight model, air quality and green spaces.
  - An analysis of the current highway infrastructure in the area and taking into account other projects currently underway such as the Freight and Servicing draft SPD.
  - An assessment of the current cultural offer in the area, main destination points and areas of interest.
6. Furthermore, as part of Stage 1, four consultation workshops were organised between March and July 2017 with local stakeholders, insurance market representatives, City officers and Ward Members. The aim of the workshops was to receive initial views on how the stakeholders would like to see the area evolve and to establish the main issues that need to be addressed in order to deliver the aspirations for the area. The workshops were structured through interactive round-table discussions, focused on various themes such as public realm and connectivity, transport infrastructure and resilience, security, health & wellbeing and arts & culture. Details of the workshops are as follows:
  - **Workshop 1:** Attendees included CoL senior officers and project officers from various departments and their respective divisions. Some of the key points and issues that were discussed at this workshop are as follows:

- Maintain and increase the provision of public spaces and pocket parks.
  - Improve footway capacity and pedestrian connectivity to accommodate a growing working population.
  - Address air and noise pollution.
  - Deliver high quality public spaces that are welcoming and inclusive.
  - Protect and enhance the historic character of the area.
  - Enhance the cultural offer and weekend activities.
  - Consider servicing demands and needs; freight consolidation.
  - Review the security measures for the area.
  - Ensure the City's infrastructure is resilient and well maintained.
- **Workshop 2:** Attendees included representatives from key stakeholders in the area, including developers, occupiers and landowners. Some of the key points and issues that were discussed at this workshop are as follows:
    - Provide more public spaces and increase greenery.
    - Consider environmental impacts and air quality.
    - Improve the pedestrian experience and provide a secure and attractive urban environment.
    - Enhance local heritage and support cultural activities.
    - Address servicing demands and needs.
    - Ensure the public spaces and amenities are of high quality, in order to reflect the status of the area.

A report with the key findings from workshops 1 and 2 is attached in **Appendix 1**. This report illustrates how users would like to see the area evolve and identifies high level aspirations.

- **Workshop 3 - Members briefing:** A briefing session with Ward Members from Lime Street, Langbourn, Bishopsgate, Aldgate Wards and Planning & Transportation committee, was organised with the purpose of providing feedback from the stakeholder workshop.
- **Workshop 4:** Lime Street Ward Insurance forum meeting, with senior representatives from the insurance market. The meeting was facilitated by Mr Henry Colthurst CC and Alderman Charles Bowman from Lime Street Ward, and hosted by the Worshipful Company of Leathersellers. The purpose of the session was to give this key stakeholder group an opportunity to record their views and aspirations for the area.

The key points and issues that were discussed at this forum were similar to those views expressed in the earlier workshop with stakeholders, these are as follows:

- Provide an improved pedestrian environment and improve connectivity and movement.
- Improve air quality and well-being, introduce more greenery and

- enhance tranquil spaces.
- Provide better security for buildings and people
- Address servicing demands/needs in the area both corporate and personal.
- Increased competitiveness through enhanced digital infrastructure and cultural offer.
- Consider the introduction of measures to provide more space for pedestrians in order to cope with the projected increase in office workers and visitors (i.e. street closures or pedestrian priority areas).
- Support out of hours, weekend and evening activities to bring dynamism into the area and attract a wide range of users and visitors.
- Provide amenable and high quality public spaces where people can spend time and that support changing work patterns and demographics.

### **Draft Vision, Aspirations and Objectives**

7. The feedback from the workshops was utilised to define a draft vision, aspirations and objectives for the area. These recognise that the ECC is not only a place for business, but also a place to visit and to spend time in.
8. The draft vision for the area is:  
 “To provide an exceptional urban environment for a thriving world-class destination, where people feel comfortable and safe, and the quality of the user experience is paramount”.
9. The draft strategy aspirations and objectives are grouped into three main themes (See **Appendix 2**) which respond to the issues and points raised by the stakeholder groups and the project Steering Group.

	<b><i>Key issues &amp; ideas</i></b>	<b><i>Draft Strategy Aspiration</i></b>	<b><i>Draft Strategy objectives</i></b>
1	Increase in daytime population.	<b>1. Enable positive growth – To make the public realm function well and be responsive to change.</b>	1.1 Ensure major routes to stations and key destinations in the Eastern Cluster are able to accommodate the projected increases in pedestrian and cyclist flows. Provide new and enhanced routes for pedestrians.  1.2 Prioritise pedestrians over vehicles whilst supporting and
2	Congested footways and lack of available public spaces.		
3	Meet servicing needs and demands and consider consolidated servicing to remove vehicles from streets.		



4	Improve road safety for all users, including pedestrians and cyclists.		<p>allowing businesses in the Eastern Cluster to flourish.</p> <p>1.3 Increase the amount of public space, and create well-serviced and secure places to support agile working and lifestyle needs.</p>
5	Accommodate changes in workforce demographics and flexible working patterns.		
6	Improve security, without creating barriers for pedestrian movement.		

	<b>Key issues &amp; ideas</b>	<b>Draft Strategy Aspiration</b>	<b>Draft Strategy objectives</b>
1	Maintain and celebrate the unique historic character of the area.	<p><b>2. Enrich the sense of place – To provide healthy and characterful spaces.</b></p>	<p>2.1 Create public places of supreme quality that provide memorable experiences and reflect the status of the area.</p> <p>2.2 Reinforce the sense of place by celebrating the area’s diverse character with its unique mix of renowned historic and contemporary architecture.</p> <p>2.3 Deliver successful public places that are welcoming, inclusive, safe and positively influence health and wellbeing</p>
2	The quality of the public spaces should match the high profile status of the area.		
3	Address lack of greenery and green spaces.		
4	Consider environmental qualities, such as sunlight and wind and mitigate impacts of climate change.		
5	Improve air quality and limit disturbance from noise and construction.		

	<b>Key issues &amp; ideas</b>	<b>Draft Strategy Aspiration</b>	<b>Draft Strategy objectives</b>
1	Provide more art and cultural events to support the status of the area and attract visitors and workers.	<p><b>3. Create a world-class destination – To create a smart and vibrant environment that strengthens the area’s unique offer.</b></p>	<p>3.1 Enhance the area’s reputation as a world-class destination and leading centre for business, enriched by an improved culture and leisure offer.</p> <p>3.2 Deliver a series of smart</p>
2	Increase competitiveness through enhanced digital infrastructure.		

3	Create a vibrant area by activating the public realm; improve weekend activities and retail offer.		initiatives that will enable the Eastern Cluster to thrive as a destination for business.
4	Build connections with the wider area to attract visitors and establish clear walking routes to/from key destinations		3.3 Establish a collaborative estate management approach to ensure a high standard of maintenance and coordination of activities and events.

### **Strategy development - Stage 2**

10. The next step is to develop “Stage 2” which will include the following elements:

- Site specific proposals for public realm enhancements for the area, including a delivery plan with timescales and cost estimates with potential funding sources.
- Identifying opportunities for cross-cutting initiatives such as culture & art, smart and digital solutions, and the emerging estate management approach.
- Carry out a comprehensive public consultation exercise on the strategy proposals.

11. As part of Stage 2, additional studies are required in order to achieve a comprehensive strategy and better reflect the identified needs and aspirations of stakeholders. The studies which have been identified as necessary to finalise the strategy are as follows:

#### 1) Traffic

Objective: To gather information on the existing situation, in order to better understand what the constraints and opportunities are for future changes. These will be developed taking into account the work currently underway for the area Security Project and the Freight and Servicing draft SPD. These studies will include the following elements:

- Traffic counts in various streets and junctions
- TfL high level model testing
- On-street activity surveys

#### 2) Culture and Art

Objective: Building on the already well-established Sculpture in the City project, this study will set out proposals to position this part of the City as a world-class destination and a venue for events and cultural activities.

### 3) Smart and Digital

Objective: To produce an analysis of the site's current digital infrastructure and smart solutions to determine the gaps and opportunities in order to develop area specific proposals with feasibility analysis and outline cost implications, taking into account other current CoL projects and programmes.

12. Once the draft Stage 2 document is produced and relevant studies are undertaken, a comprehensive public consultation exercise will be organised in spring 2018. The consultation will be targeted at a wide range of users, including visitors, office workers, landowners and developers. The consultation will involve the following:

- A public exhibition
- Drop-in sessions and meetings with high level stakeholders
- On-line and on-street surveys to capture the views of the local community
- Consultation leaflets or postcards (if required)

13. The comments received during the consultation will be analysed and integrated when appropriate, with the aim of drafting a final strategy by summer 2018

## **Corporate & Strategic Implications**

14. The strategy will support corporate objectives, policies of the Local Plan (review underway) and other City strategies. In particular, Core Strategic Policy CS7: Eastern Cluster (Key City Places). The ECC boundary has been kept in accordance with the current Local Plan, CS7: Eastern Cluster, in the interests of consistency.

15. The Strategy will support and take into account other City wide initiatives and projects currently under development, including Servicing and Freight Draft Supplementary Planning Document, Eastern Cluster Area Security Project, and the emerging estate management approach for the area.

## Implications

16. For the development of the strategy, funding of £160,000 was secured from Transport for London 2016/17 contribution (£80,000) and Section 106 contributions from the Pinnacle development (£80,000). The spend to date is £110,579 (staff costs and fees). Please refer to **Appendix 3** for further detail.

17. Additional funding of £158,000 is now required to finalise the strategy, and it proposed to utilise the funding from the Section 106 contribution connected to the Pinnacle development, (“Enhancement Works Area” contribution-Pinnacle S106 agreement (Schedule 2(2.2)), which was earmarked in 2011 for the Eastern Cluster Area projects (Phases 2-4). Such areas will be reviewed as part of the development of the strategy. Please refer to **Appendix 3** for further detail.

## Conclusion

18. The key dates are as follows:

<b>Task</b>	<b>Target date</b>
Develop briefs and appoint consultants	August – September 2017
Develop strategy and undertake studies	October 2017- March 2018
Submit draft Strategy to committees	April 2018
Public consultation	May 2018
Finalise Strategy	June 2018
Adopt Strategy	July 2018

19. The challenge for the area will be to accommodate the many demands generated by growth whilst creating a safe, efficient and attractive public realm for a world-class destination. The area strategy will ensure the needs for the area are identified and prioritised and enhancements delivered as funding becomes available.

## Appendices

1. Consultation Workshops report. – Circulated separately
  2. Draft Vision, Strategy aspirations & objectives - Circulated separately
  3. Funding tables - Circulated separately
- Stage 1 report is available in the Members’ reading room

## **Background Papers**

- Committee report: “Eastern City Cluster Area Enhancement Strategy – Proposed update of Strategy”, approved by Street Walkways Sub-Committee and Planning and Transportation Committee in April 2016.

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<b>Committee(s)</b>	<b>Dated: 25/07/17</b>
Planning & Transportation	
<b>Subject:</b> Strategic Transportation – Freight Strategy Update	<b>Public</b>
<b>Report of:</b> Steve Presland, Director of Transportation and Public Realm	<b>For Information</b>
<b>Report author:</b> Bruce McVean, Department of the Built Environment	

### Summary

This report is to update members on progress with work on actions to manage freight movement in the City. Since the last update to your committee in January 2017, work has progressed in several areas.

A significant amount of stakeholder engagement is taking place through the City Freight Forum, Facilities Managers Conference and a range of other industry forums. A quarterly newsletter has been introduced to update stakeholders on news and work to date.

The Delivery and Servicing Guidance was published in February 2017, providing information and best practice on the management of freight. This has been followed by the draft Freight and Servicing Supplementary Planning Document which is brought as a separate item to this committee.

Research into the use of freight consolidation centres has taken place, and potential trials of consolidation and ‘micro’ consolidation centres are being actively investigated.

Initial engagement with the Environmental Health team has taken place, and a request for organisations to participate in a trial of overnight deliveries has been circulated.

Work has recently been completed looking in detail at several City organisations, to identify current delivery patterns, potential areas of freight best practice, and possible improvements. In depth surveys using GPS technology and camera surveys have also taken place, and the output data highlights key patterns of movement and loading/servicing activity within the Square Mile. This analysis and data is being used to inform future strategy and initiatives.

### Recommendation(s)

Members are asked to:

- Note the contents of the report.

## 1. Introduction

1.1 Freight accounts for a significant proportion of traffic in the City of London (20% between 07.00 and 19.00) and freight vehicles compete for scarce road space with other priority road users such as buses, cyclists and pedestrians. Freight vehicles also account for a disproportionate number of collisions/casualties and are a significant source of air pollution.

1.2 In December 2015, the Planning and Transportation Committee agreed the principles for a new approach to managing freight in City with a single aim:

*“To reduce the number of freight and delivery vehicles on the City’s streets, particularly at peak times, whilst allowing the City to flourish”.*

1.3 This approach is being delivered through six works areas:

- Stakeholder Engagement
- Delivery and Service Plans
- Consolidation
- Retiming Initiatives
- Case Studies
- Data collection and analysis

1.4 This report will review progress to date across the freight strategy workstream.

## 2. Stakeholder Engagement

### *City Freight Forum*

2.1 The City Freight Forum brings together key business and industry stakeholders from across the City three times a year. The key function of the forum is to advise on and contribute to future policies and initiatives to address freight and transportation issues in the City.

2.2 To date the Forum has met twice. Feedback from members has highlighted the importance of data to inform the development of freight policy. Members have also highlighted the need to address personal deliveries, and this will be the subject of a discussion at the next meeting later this year.

2.3 The Forum also provided access to businesses who are interested in supporting initiatives on retiming and/or consolidation.

### *City Freight Conference for Facilities Managers*

2.4 On April 20<sup>th</sup> the City of London Corporation hosted a conference for facility managers in the City. Chaired by Christopher Hayward and introduced by Mark Boleat, the conference included presentations by DHL on consolidation, Duddle on personal deliveries and TfL on London-wide freight strategy.



2.5 Follow up work with several of the organisations in attendance, as well as the presenters, has found that the conference facilitated further conversations between service providers and facility managers.

2.6 Due to the success of the conference, it will be repeated next year.

#### *Newsletter*

2.7 The first City Freight Newsletter was published at the end of June, and was sent to 64 internal and external stakeholders identified through the Freight Forum and City Facilities Managers Conference. The newsletter contained updates on the freight work being undertaken by the Strategic Transportation team and news of upcoming events. The newsletter will be distributed quarterly.

#### **Next Steps**

2.8 Prepare for next City Freight Forum, which will be held in September, with a focus on personal deliveries.

### **3. Delivery and service plans**

#### *Delivery and Servicing Guidance*

3.1 The City of London Delivery and Servicing Guidance, which provides information and best practice for developers and organisations wishing to manage deliveries and servicing more effectively was approved by your Committee in February 2017. The guidance has been published on the City Corporation's website and been promoted through the City Freight Forum and Freight Newsletter.

#### *Supplementary Planning Document (SPD)*

3.2 The draft Freight and Servicing SPD, and associated Strategic Environmental Assessment (SEA) Scoping Report has been produced, and the proposed document for consultation is brought before your committee today as a separate item.

### **4. Consolidation**

4.1 Freight consolidation is the practice of managing deliveries more effectively by grouping multiple vehicle orders into fewer consolidated loads using a freight consolidation centre.

4.2 There is a significant amount of consolidation already taking place across the City. For example, retail and café units consolidate off site in distribution warehouses and construction consolidation is standardised practice for major developers. To support consolidation during construction we have distributed TfL's construction consolidation directory to relevant parties.

4.3 Planning conditions are increasingly being used to require consolidation in large developments. The example of 1 Undershaft underlines the significant

opportunity offered by consolidation. This development was expected to generate 385 deliveries a day, which will be reduced to 193 through consolidation.

- 4.4 We have been working with new developers, such as Merchant Land for their pre-application on Creechurch Lane, to ensure early consideration of consolidation and meeting with CPA members to develop planning consents for 1 Undershaft amongst other high profile developments.
- 4.5 At least two major city businesses are investigating the possibility of consolidating deliveries to their buildings and we will continue to work closely with the business community and freight industry through the CPA, City Freight Forum, Freight Conference for Facilities Managers and Case Study Work Stream to identify opportunities for and promote the benefits of consolidation.
- 4.6 Opportunities exist for consolidation of deliveries to existing and smaller office developments in the City. Consolidation in these areas may require more support and co-ordination between businesses in order to make this a reasonable proposition.

#### *Research and optioneering*

- 4.7 Whilst the concept of consolidation is straight forward, successful and sustainable consolidation has proven difficult. Once public funding ends, it can operation can struggle to continue without significant volume, as was the case with the Bristol and Bath Consolidation Centre.
- 4.8 Therefore, a major component of this workstream has been researching the requirements of a successful consolidation service. We have engaged with several businesses, freight hauliers, consolidation providers and academics as well as attending conferences to identify the best options for the City.
- 4.9 As a result of this engagement the City of London Corporation is now involved in many national and international freight working groups focussed on consolidation, including CityLab, Freight in the City and Freight Traffic Control 2050.

#### *Trialling consolidation at Guildhall*

- 4.10 The London Borough of Camden is working in partnership with DHL and TfL as part of the Last Mile Logistics (LaMiLo) European Commission project to deliver a consolidation service from Edmonton, North London.
- 4.11 As part of the case studies work, we have surveyed the loading bay at the Guildhall to understand the quantity and type of goods received. This information is currently being used in conjunction with DHL to estimate the cost of a consolidation service. City Procurement has been involved early in the process to maximise potential benefits of using the scheme.
- 4.12 Should we proceed, detailed monitoring will take capture any benefits. These, alongside details of the process and lessons learnt, will then be shared with businesses to encourage further uptake of consolidation.

### *Micro-Consolidation*

- 4.13 Micro-consolidation differs from freight consolidation as it is undertaken at a significantly smaller scale and in more central urban locations. Key benefits are that the 'last mile' journey can be undertaken using cargo bikes and electric vehicles, delivering a significant air quality benefit – research by DHL indicates that 18% of all emissions occur during the final mile
- 4.14 From the December 2015 P+T report, political authority was given to review City assets, especially car parks, as potential locations for consolidation. Unfortunately, with the headroom requirements for vehicle access, the volume of traffic and the location of our assets, there is nothing suitable for major scale freight consolidation.
- 4.15 However, London Wall car park presents a significant opportunity for micro-consolidation. With the police set to take over a significant proportion of the car park, DBE are reviewing the implications of closing the car park as a public use asset and passing ownership to the City Surveyors as a corporate asset. As London Wall car park is also within the Low Emission Neighbourhood area there is funding currently available from this project to support the delivery and implementation of a micro-consolidation centre at this site.
- 4.16 This will also improve site security for the City Police, disincentivise use of private motor vehicles and potentially improve the operational efficiencies of our other car park facilities. We are actively pursuing this with all relevant internal stakeholders
- 4.17 A report on the future use of London Wall car park will be coming to Committee in September.

### **Next steps**

- 4.18 Continue research in consolidation and return to this committee on October 24th this year with a series of options for encouraging consolidation across the Square Mile
- Work *alongside* the City Surveyors, City Police and other areas of DBE to develop plans and proposals for a micro-consolidation centre in London Wall car park that benefits all parties and strategic corporate objectives.
- 4.19 Continue to work with the Low Emission Neighbourhood teams to pilot initiatives and trials in this area that support efforts to improve air quality in the City.
- 4.20 Finalise agreements for use of the consolidation centre in conjunction with City Procurement. Should this be adjudged to require committee sign off, this will be sent to Planning and Transportation Committee on October 24<sup>th</sup>.

## **5. Retiming initiatives**

5.1 Through the Freight Forum and Facilities Managers Conference, one of the key challenges to re-timing deliveries raised by stakeholders was restrictions on overnight deliveries to limit noise disturbance.

5.2 We have engaged with the Environmental Health team, who deal with noise complaints from deliveries, to discuss how noise complaints are dealt with, and identify potential areas for trialling night time deliveries with City businesses.

### **Next steps**

5.3 Through engagement with Environmental Health, and with stakeholders through the Freight Forum and Facilities Managers Conference, organisations willing to participate on overnight delivery trials are being identified. An initial request for organisations to participate in the trial was included in the City Freight Newsletter and we are following up with individual businesses to encourage participation.

## **6. Freight Case Studies**

### **Project Background and Methodology**

6.1 In partnership with, and primarily funded by the City's Low Emission Neighbourhood (LEN) team, nine case studies were commissioned to understand the delivery and servicing patterns taking place in a range of City businesses.

6.2 The organisations involved in the project were: The City Corporation (Guildhall), Barbican, Walbrook Wharf, Linklaters, Land Securities (140 Aldersgate), Museum of London, the Cheapside Business Alliance and a major international bank. All but the Walbrook Wharf site are located in the vicinity of the Low Emission Neighbourhood.

6.3 The aims of the case studies workstream were twofold;

- a) to improve understanding of freight activities to inform future policies and activities, and
- b) to identify opportunities for similar organisations to change delivery and servicing arrangements to improve efficiency and reduce the impact on the City environment.

6.4 In each target organisation, data on delivery movements was collected. The data collection was followed up by an interview with relevant staff involved in the procurement and receipt of goods and services.

### **Key Findings**

6.5 Detailed results and identified opportunities for change in each case study organisation are shown in Appendix 1. The key findings were:

### *Personal Deliveries*

6.6 The number of personal deliveries varies significantly between different organisations, at Guildhall only one or two deliveries were recorded, whereas at Citypoint, it was estimated that up to 60% of mail received could be personal, rather than corporate. In most cases, the surveys found it difficult to distinguish between personal and corporate post, suggesting that the true scale of the issue will never be easily or accurately measured.

6.7 Directing staff to a 'click and collect' hub, where workers can collect their parcel from a drop-off point outside the City, is one potential alternative for organisations wishing to reduce the number of personal deliveries to work.

### *Catering*

6.8 In office developments where on-site catering exists, food and drink deliveries were found to be a significant proportion of freight movements. Catering accounted for 35% of all deliveries at Guildhall, 22% at Linklaters and 19% at Citypoint. 140 Aldersgate, which has no on-site catering, has just 2% of deliveries providing food and drink.

6.9 There is potential for simple consolidation to reduce the impact of catering deliveries. In many cases, especially in multi-tenanted buildings, the surveys recorded instances of similar produce being delivered by multiple providers, suggesting that simple co-ordination of suppliers could result in fewer deliveries. Where organisations have multiple sites within the City, maximising delivery co-ordination between the sites could yield benefits, with one site acting as a consolidation hub for the others. Maximising available on-site storage can help enable consolidation of non-perishable goods.

### *Re-timing*

6.10 The vast majority of organisations receive almost all their deliveries in the morning, with a large number being received during the morning peak (pre-9am). In most cases the organisation receiving the delivery does not specify a delivery time, so there may be scope for some off-peak deliveries to take place where goods have been ordered. Mail and document deliveries may not have the same flexibility with re-timing, but opportunities may exist, where an organisation has a contract with a preferred courier, to require cycle or zero emission delivery where possible.

### **Next steps**

6.11 The results of the case study work are being analysed alongside other data collection work to identify potentially effective workstreams that the City Corporation could instigate to reduce the impact of delivery and servicing trips on the City environment.

6.12 The case study documents will be made available on the City Corporation website, and made available to stakeholders particularly through the LEN networks.

6.13 A paper on the management of personal deliveries will be presented to the next City Freight Forum in September for discussion on viable ways of managing this aspect of demand.

## **7. Data collection and analysis**

7.1 Several freight surveys have been completed to provide data on freight and servicing activity within the City of London.

7.2 This includes 24hour on-street activity surveys in several areas of the City between 11<sup>th</sup> – 14<sup>th</sup> March 2017, which provide details on the type of activity undertaken, the time and duration, and the vehicle used.

7.3 A large dataset was also obtained from a GPS Traffic Company, which has provided information on freight vehicles traveling through the City during September 2016. A whole range of analysis has been completed on this dataset to understand the routing of freight traffic, its origin and destination and the day and time of trips.

7.4 Along with the Traffic Composition Surveys undertaken bi-annually by the City, these surveys have provided a wealth of information, with even further analysis to also be completed. A Freight Data report is appended to this report, however some key findings are as follows;

- Goods traffic makes up a fifth of all traffic on the City of London streets (including pedal cycles) , and nearly 30% of motorised road traffic (omitting pedal cycles)
- Goods vehicle flows in the City have fluctuated between 1999 and 2016. However, 2016 were the lowest observed flows for light and heavy goods vehicles, and follows the overall general decline since 1999
- Of the goods traffic that travels through the City, half is through traffic, whilst the other half either originate their journey in the City, end it in the City or are completely within the City
- The majority of freight traffic that's destination is within the City originates in Greater London or just beyond the M25 (62%). 34% originates within the City and just 4% is from the rest of the UK
- The weekly profile of goods traffic that ends their journey within the City shows that trips are evenly spread on a Monday- Friday. Saturday receives less than half of weekday freight vehicles and Sunday is even less
- Across the City, the specific destination of goods traffic is not evenly distributed. The area around Liverpool Street and the Eastern City Cluster receives the highest number of goods vehicles, which could be a reflection of the high density of office floorspace and level of construction activity
- Half of goods vehicle activity in the City is associated with loading or unloading, and half is servicing (engineering services, maintenance etc.).

- 70% of freight activity in the City occurs between 07:00 and 19:00

### **Next steps**

7.5 Explore the opportunity to work with the University of Westminster and University of Southampton, to further the analysis of our freight surveys and support their Freight Traffic Control 2050 Project.

## **8. Programme**

### **July**

- Draft Freight SPD and SEA Scoping Report to P&T Committee
- Freight Strategy Update to P&T Committee

### **August**

- Consultation on Draft Freight SPD starts
- Publish case studies

### **September**

- Consultation on Draft Freight SPD ends
- Third Freight Forum
- Report to P & T Committee on London Wall car park

### **October**

- Re-timing trials implemented
- Report to P & T Committee on options for encouraging consolidation

### **November**

- Final draft of Freight SPD
- Initial Draft of Local Plan to P&T and P&R Committees, including Deliveries and Servicing policy

### **December**

- Final Freight SPD to P&T Committee

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### **Appendix 1: Case Studies**

### **Appendix 2: City of London Freight Data**

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Organisation	Key survey results and notes	Opportunities
<p>Guildhall – Offices of the City of London Corporation.</p>	<ul style="list-style-type: none"> <li>• Catering deliveries make up 35% of all vehicle visits</li> <li>• Mail deliveries and collections make up a further 28%</li> <li>• Note that catering deliveries are directly affected by the number and type of events taking place at Guildhall.</li> <li>• The proportion of personal deliveries was not as high as anticipated, but tends to peak around Christmas.</li> <li>• Most deliveries and servicing trips take place in the morning. 39% of servicing/maintenance trips take place between 7am – 9am, coinciding with the morning peak.</li> <li>• Around 60% of vehicle movements are by van. A further 30% are HGVs, with the remainder by other modes.</li> </ul>	<ul style="list-style-type: none"> <li>• Opportunities exist for the use of an off-site consolidation centre, possibly the London Boroughs Consolidation Centre piloted by LB Camden. This could be linked to measures to use lower-emission vehicles.</li> <li>• Opportunities for the sorting of mail off-site may exist, with a single daily delivery to Guildhall taking place. This has the potential to remove up to 17 vehicle visits per week.</li> <li>• Shifting routine maintenance visits to off-peak hours may be possible. Changes would have to be negotiated with individual suppliers.</li> <li>• Actions at Guildhall may also be applicable for Walbrook Wharf.</li> </ul>
<p>Walbrook Wharf accommodates offices of the City of London Corporation, as well as a small number of other organisations. The building also incorporates the City's Waste Transfer Station, which is operated</p>	<ul style="list-style-type: none"> <li>• 107 movements were recorded the two week recording period, with 64 movements in the first week, and 43 in the second. These counts do not include waste vehicles in and out of the waste transfer station.</li> <li>• All deliveries were made during the standard working week (Monday to Friday) and between 07.30 and 17.30. No deliveries were recorded outside of these times</li> <li>• 73% of the total movements recorded on site were made before midday.</li> <li>• 41% of items were directly addressed to Amey (who also occupy the premises and operate City waste collections) compared to 28% addressed to various City of London</li> </ul>	<ul style="list-style-type: none"> <li>• Consider utilising the London Boroughs' Consolidation Centre based at Edmonton to consolidate deliveries into the building. This could include all tenants, irrespective of individual budgets, procurement arrangements and preferred suppliers. Co-ordination with arrangements at Guildhall would maximise the benefits for both sites.</li> <li>• Investigate further opportunities to collect or deliver to other City of London sites such as Guildhall, Mansion House or other identified City of London owned locations to act as a mini consolidation centre within</li> </ul>

Organisation	Key survey results and notes	Opportunities
by Amey.	<p>Corporation offices or workers</p> <ul style="list-style-type: none"> <li>• Personal mail - where the package was clearly identified as such - totalled 11 of the 107 movements (10.3%). This would typically increase near Christmas.</li> <li>• Outgoing mail from the City of London Corporation is collated at Walbrook Wharf and walked up to Guildhall for collection.</li> <li>• The City of London Police and Thames 21 who also occupy these premises recorded 3.7% &amp; 1.9% respectively</li> <li>• Vans were the most significant mode of transport with 80 entries identified out of the 107 made.</li> </ul>	<p>the City.</p> <ul style="list-style-type: none"> <li>• Investigate whether greater collaboration between suppliers can be created regarding replacement parts.</li> <li>• Identify whether the goods are genuinely time critical and if not so, possibly re-schedule to an alternative time outside of peak hours.</li> <li>• Carry out a staff survey to establish whether staff would use existing click and collect facilities at transport hubs outside of the City, and establish any barriers to using these facilities.</li> <li>• Develop and design internal communications to encourage staff to use the click and collect options situated outside of the City.</li> </ul>
Barbican – A multi-venue arts and culture complex containing several bars, cafes and restaurants.	<p>As individual events vary so significantly in their delivery and servicing requirements, the Barbican case study focussed on servicing the catering side of the centre, which has more regular and manageable delivery patterns.</p> <p>The study found that;</p> <ul style="list-style-type: none"> <li>• 85% of all deliveries are undertaken before 11AM</li> <li>• There are no evening peak time deliveries</li> <li>• 80% of deliveries are regularly scheduled, as opposed to</li> </ul>	<ul style="list-style-type: none"> <li>• Delivery consolidation through procurement presents the biggest opportunity for the Barbican.</li> <li>• There is scope for more co-ordination of deliveries between catering outlets – demonstrated by several suppliers delivering the same produce.</li> </ul>

Organisation	Key survey results and notes	Opportunities
	<p>ad-hoc</p> <ul style="list-style-type: none"> <li>• 56% of all delivery timings to the kitchens are controlled by the supplier or their delivery agent</li> <li>• Some produce type deliveries occur twice a day, from different suppliers</li> <li>• Many of the delivery timings are driven by the times of fresh food markets.</li> </ul>	<ul style="list-style-type: none"> <li>• To date, little co-ordination has taken place – this was the first joint data collection exercise that has taken place.</li> <li>• There are limited opportunities to easily re-time deliveries – the Barbican has a large residential population, so out of hours deliveries may not be as easy to adopt as elsewhere in the City.</li> </ul>
<p>Linklaters, a global legal company, is the sole occupier of premises on Silk Street.</p>	<ul style="list-style-type: none"> <li>• Linklaters occupy and operate two buildings, Silk St and Milton St. The buildings each have their own loading bay.</li> <li>• 581 movements were recorded during the two week data collection exercise.</li> <li>• Of the 581 movements, 51 were recorded as HGV/Lorry (3.5 tonne – 26 tonne), 281 were vans (up to 3.5 tonne).</li> <li>• 127 were recorded as ‘on foot’ of which some may have had vehicles but parked elsewhere. Cycles and motor bikes accounted for 74 and 36 respectively.</li> <li>• Deliveries are received between two loading bays. The Silk St loading bay received 91.7% of all the deliveries with Milton St receiving 8.3%.</li> <li>• Milton St deliveries were all non-food with documents and paper accounting for 23 of the 48 movements entered. Silk St received 130 catering deliveries out of 533 movements and 228 entries recorded as parcels or boxes.</li> </ul>	<p>The data captured through the freight survey will be reviewed at a future internal sustainability meeting.</p> <p>Opportunities for rationalisation exist in the procurement of catering and general office supplies.</p> <p>Catering supplies</p> <ul style="list-style-type: none"> <li>• Investigate areas of opportunity to deliver orders on agreed specific days of the week, rather than every day. This may increase order size but reduce the frequency of vehicle movements.</li> <li>• Decrease number of like for like deliveries such as drink suppliers which currently is 7 separate companies. Set a target to reduce down to 3.</li> </ul>

Organisation	Key survey results and notes	Opportunities
	<ul style="list-style-type: none"> <li>• The courier City Sprint was the highest frequency visitor with 120 entries within the Silk St diary.</li> <li>• At the Milton St loading bay, Shred First made 8 visits and City Docs were next highest with 7 visits.</li> </ul>	<ul style="list-style-type: none"> <li>• Investigate if deliveries can be moved away from peak delivery hours but utilise less congested periods of the day or evening?</li> <li>• Discuss with suppliers the options of alternative fuelled vehicles for deliveries within peak periods.</li> </ul> <p>General office supplies</p> <ul style="list-style-type: none"> <li>• As with catering above, investigate areas of opportunity to reduce order frequency by requesting orders on agreed specific days of the week, rather than every day.</li> </ul> <p>Orders such as paper and stationery could be consolidated and delivered in one vehicle, as opposed to small and frequent deliveries.</p>
Citypoint is a large multi-tenanted building near Moorgate station.	<ul style="list-style-type: none"> <li>• 1610 movements were recorded over two weeks, of which 1247 were recorded as vans (up to 3.5 tonnes). Lorries (3.5 – 26 tonnes) made 162 movements, all of which were made to the rear loading bay.</li> <li>• A small number of reception deliveries were made and were recorded as ‘on foot’.</li> <li>• 772 or 66% of the van movements were to deliver letters or parcels.</li> <li>• Food deliveries accounted for 301 of the overall 1610</li> </ul>	<p>Citypoint building management to arrange for data capture results to be an agenda item at next tenant meeting for initial feedback regarding identified problems and proposed solutions.</p> <p>Potential solutions will have the greatest impact where there is co-ordination between tenants to reduce delivery movements.</p> <p>Personal deliveries</p>

Organisation	Key survey results and notes	Opportunities
	<p>movements. 83 were made by lorry and 209 by vans. Data suggests that a fair proportion of these are bespoke food companies delivering speciality foods rather than larger corporate catering companies.</p> <ul style="list-style-type: none"> <li>Personal deliveries were also highlighted as the greater proportion of those items delivered as boxes or parcels, possibly as much as 60%.</li> </ul>	<ul style="list-style-type: none"> <li>Identify existing click and collect locations which offer locations around public transport hubs outside the City</li> <li>Carry out a staff survey to establish whether staff would use the existing click and collect facilities closer to their home and establish any barriers to using such facilities?</li> <li>Develop and design internal communications for staff to encourage the use of the click and collect options outside the City.</li> </ul> <p>Office deliveries</p> <ul style="list-style-type: none"> <li>Tenants should look to identify where like for like goods (i.e. paper) could be consolidated amongst them.</li> </ul> <p>Food Deliveries</p> <ul style="list-style-type: none"> <li>Bespoke food service orders should be investigated further, to establish whether the same volume and quality can be delivered to the different tenants but using fewer companies</li> <li>Catering deliveries could be consolidated. As an example, the building receives five different dairy companies delivering to five different tenants, whilst three different</li> </ul>

Organisation	Key survey results and notes	Opportunities
		<p>bread suppliers deliver to three different tenants.</p> <ul style="list-style-type: none"> <li>• Following potential agreement on the above, tenants should look to negotiate new service level agreements with suppliers with the possibility of alternative fuelled vehicles for deliveries, as per a CSR (Corporate Social Responsibility) vision.</li> </ul>
<p>Land Securities (140 Aldersgate) – 140 Aldersgate is a smaller multi-tenanted building.</p>	<ul style="list-style-type: none"> <li>• 149 vehicle movements were recorded over 9 working days.</li> <li>• Over 78% of the movements captured were made by vans, with the second largest, 15% arriving by bike</li> <li>• <i>Addison Lee</i> was the most frequent visitor delivering to site, attending 27 times out of the 149 (18.2%) vehicle movements</li> <li>• 7 of the most frequent 10 delivery companies were national parcel operators</li> <li>• Deliveries or collections made by the larger vehicles made up only 3 of the 149 entries or 2%. This is likely to be due to the lack of catering on-site.</li> <li>• Whilst the data collection did not disaggregate personal deliveries from corporate post, it is likely that a proportion of the 107 boxes and parcels were for individuals and not a company. It is expected that these deliveries would peak around Christmas.</li> </ul>	<ul style="list-style-type: none"> <li>• Arrange for data capture results to be an agenda item at next quarterly tenants meeting for initial feedback regarding identified problems and proposed solutions</li> <li>• Investigate possibilities for greater collaboration between tenants regarding deliveries with attention focused on two key areas: <ul style="list-style-type: none"> <li>○ <i>General office supplies</i> – Investigate areas of opportunity to deliver orders on agreed specific days of the week, rather than every day. This increases order size but reduces the frequency of vehicle movements</li> <li>○ <i>Personal deliveries</i> – Identify to what degree this may be happening. Could these movements be reduced or removed by encouraging staff to look for alternative drop-off</li> </ul> </li> </ul>

Organisation	Key survey results and notes	Opportunities
		<p>locations outside of the City and closer to their home?</p> <ul style="list-style-type: none"> <li>• Carry out a staff survey to establish whether the businesses currently have personal deliveries at work and if so, whether they would consider using click and collect facilities closer to home?</li> <li>• Develop and design internal communications for staff to encourage the use of the click and collect options</li> <li>• Explore the possibility that suppliers may have alternative-fuelled vehicles for deliveries, as per a Corporate Social Responsibility (CSR) vision</li> <li>• Investigate the possibility of negotiating a contractual clause with Addison Lee to use low –emission vehicles for deliveries and collections.</li> </ul>
<p>Cheapside Business Alliance Business Improvement District – looking at retail in the Cheapside area.</p>	<p>The lessons from this case study apply to several retail sites across Cheapside and the City. As retail operations have a much higher dependency on supply and logistics, the case study focussed on one aspect of the operation – storage.</p> <ul style="list-style-type: none"> <li>• 20% of vehicle movements in a typical week (c40 movements) are simply to collect empty storage containers which the shops cannot store themselves.</li> <li>• A lack of storage space, combined with limited waiting</li> </ul>	<ul style="list-style-type: none"> <li>• Utilising space within their other local stores to which the storage boxes could be manually moved.</li> <li>• Investigate local shared storage space for many businesses for roll-cages, pallets etc., with the costs being offset by the reduced costs in vehicle movements. This could be brokered via the CBA.</li> <li>• Introduce restocking staff super-teams,</li> </ul>

Organisation	Key survey results and notes	Opportunities
	<p>and loading times means that delivery vehicles must visit twice to be able to collect all required materials.</p>	<p>where the shelves can be restocked and the empty pallets returned on the same vehicle within a 40 minute loading space deadline.</p> <ul style="list-style-type: none"> <li>Investigate possibility of requesting longer loading restrictions to allow vehicles to wait for longer than 40 minutes.</li> </ul>
<p>Museum of London – large museum with over a million visitors a year. Also hosts meeting and conference spaces.</p>	<ul style="list-style-type: none"> <li>83% of all deliveries are before 2PM</li> <li>59% of deliveries are not regularly scheduled</li> <li>Relatively few couriers/delivery companies are used – there may be opportunity to work with these suppliers on the use of low emission vehicles.</li> <li>The on-site caterer (Benugo) received approximately half of all deliveries to the museum. Management of these deliveries could produce the greatest benefits. Most deliveries come direct from the suppliers, suggesting off-site consolidation for this and other stores may be a possibility.</li> <li>Approximately half of all deliveries to the caterer are controlled by the supplier/courier, with the other half being controlled by the caterer themselves. Deliveries arranged by the caterer are likely to be the easier ones to manage</li> </ul>	<ul style="list-style-type: none"> <li>Work with suppliers to avoid deliveries during the morning peak (7 – 10am).</li> <li>On-site caterers to explore consolidation opportunities between other restaurants in the City to reduce the numbers of vehicle movements.</li> <li>Relationships with most frequently-used courier companies to be used to explore possibilities of requesting low-emission vehicles to make deliveries.</li> </ul>
<p>A major international bank employing 7000 people in the City, spread between two sites. [Note that</p>	<ul style="list-style-type: none"> <li>There were, on average, 23 deliveries per day to building 1 and 24 deliveries per day to building number 2.</li> <li>E-Courier delivered the most parcels (193) at Building number 1, Baxter Storey (Catering) had the most deliveries (195) to building number 2 with Royal Mail following closely (192).</li> <li>Staff food deliveries far surpassed any other delivery type</li> </ul>	<ul style="list-style-type: none"> <li>The greatest opportunities to manage deliveries will come from joint management of the two sites, with one site receiving most deliveries and acting as a mini-consolidation centre for both sites.</li> <li>Further investigation of how staff food is delivered, with actions to promote foot or</li> </ul>



Organisation	Key survey results and notes	Opportunities
the organisation has been anonymised pending final approval to publish the case study.]	<p>with approximately 525 deliveries over the one month period at building number 1.</p> <ul style="list-style-type: none"> <li>• Catering deliveries approximately make up 48 out of all deliveries in the given month.</li> </ul>	cycle delivery as required.

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# CITY OF LONDON FREIGHT DATA

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Strategic Transportation  
Department of the Built Environment

May 2017

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# 1

## Introduction

# 1. Introduction

## *Introduction*

This report collates information and data provided from several sources, to provide the context for the movement, type and timing of freight vehicles and activity in the City of London.

## *Data Sources*

### City of London Traffic Composition Surveys

The City of London collects data bi-annually on traffic composition at 15 points across City Roads and Streets. They provide a record of traffic flow volumes and traffic composition between 07:00 and 19:00 on a weekday since 1999, and across 24hours for 2016. Whilst the surveys cannot give total volumes of traffic within the City, the data has been collected at the same locations for every survey and therefore can provide patterns and trends across the years.

### GPS Data

Data has also been obtained for goods and van traffic that travels through the City using GPS data from Inrix UK Ltd. The data is for the month of September 2016, and provides information on;

- The day and time of a journey
- The origin and destination of a journey

Whilst the data only provides a sample of goods traffic journeys, it allows trends to be identified for dally and weekly profiles and the distribution of destinations within the City.

### On-street Activity Surveys

During March 2017, on-street surveys were undertaken in several areas of the City (around Cheapside Retail Area, the Eastern City Cluster and the Barbican) for 24hours on a weekday, Saturday and Sunday. The surveys provide details on the type of activity, the duration, the vehicle type and the timing.

## *Uses and Limitation*

All data surveys provide a different sample of freight movements and activity,

and as such, none of the absolute numbers or volumes throughout this report should be interpreted as total numbers for the City. Instead, the data should be used for relative comparisons, identifying trends and as proportions.

## *Report Structure*

The report is structured as follows;

- Chapter 2 outlines the mode share and hourly profiles of goods traffic travelling on City streets;
- Chapter 3 sets out the origin and destination of goods vehicle trips that end in the City;
- Chapter 4 identifies the characteristics of goods vehicle activity that occurs on-street within the City; and
- Chapter 5 summarises the data provided.

## *Terminology*

### Light Goods Vehicle (HGV) Classification

Includes all goods vehicles up to 3.5 tonnes gross vehicle weight, and all car delivery vans.

### Other Goods Vehicle 1 (OGV1) Classification

Includes all rigid vehicles over 3.5 tonnes gross vehicle weight with two or three axles.

### Other Goods Vehicle 2 (OGV2) Classification

Vehicles under this category are rigid vehicles with four or more axles and all articulated vehicles.

For the purposes of this freight data report, it is not necessary to distinguish between OGV1 and OGV2 vehicles, and instead they can be combined and classified as Heavy Goods Vehicles (HGVs). However, some of the data from the three surveys provides the distinction and as such is presented under this classification.

# 2

## Goods Vehicles on City Streets

## 2. Goods Vehicles on City Streets

This section looks at the volumes and modeshare of goods vehicles on City streets in 2016, and the trends observed since 1999.

### City Streets in 2016

#### Traffic Composition

In 2016, LGVs made up 18% of road traffic on streets in the City, whilst HGVs made up 3%. Together, they make up more than a fifth of traffic on City streets. Figure 2.1 shows the daytime traffic composition of traffic within the City of London. If pedal cycles are omitted, goods vehicles make up nearly 30% of motorised road traffic.

#### Variation in Goods Traffic across the Day

The volume of goods traffic on streets within the City varies over the day. Figure 2.2 shows the volumes of HGVs and LGVs across 24 hours on a weekday.

Across the day, the number of LGVs steadily rises between 03:00 and 05:00, and remains high between 06:00 and 10:00, peaking at 10:00. The volumes then gradually decrease throughout the rest of the day. HGVs follow a similar pattern at a lower volume, however the peak is earlier at 07:00 and has a steadier drop throughout the rest of the day.

Figure 2.1 City of London Streets Daytime Composition

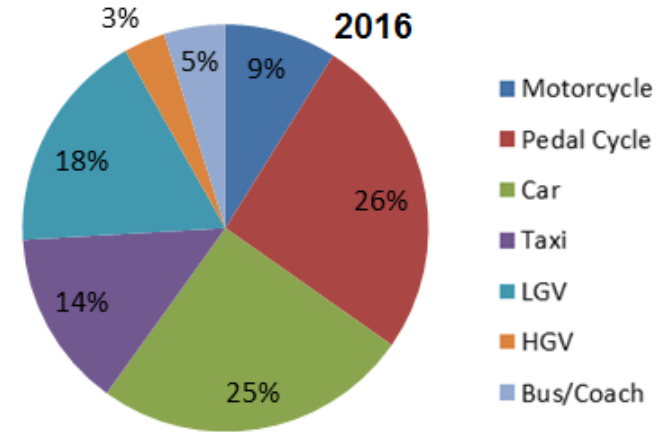
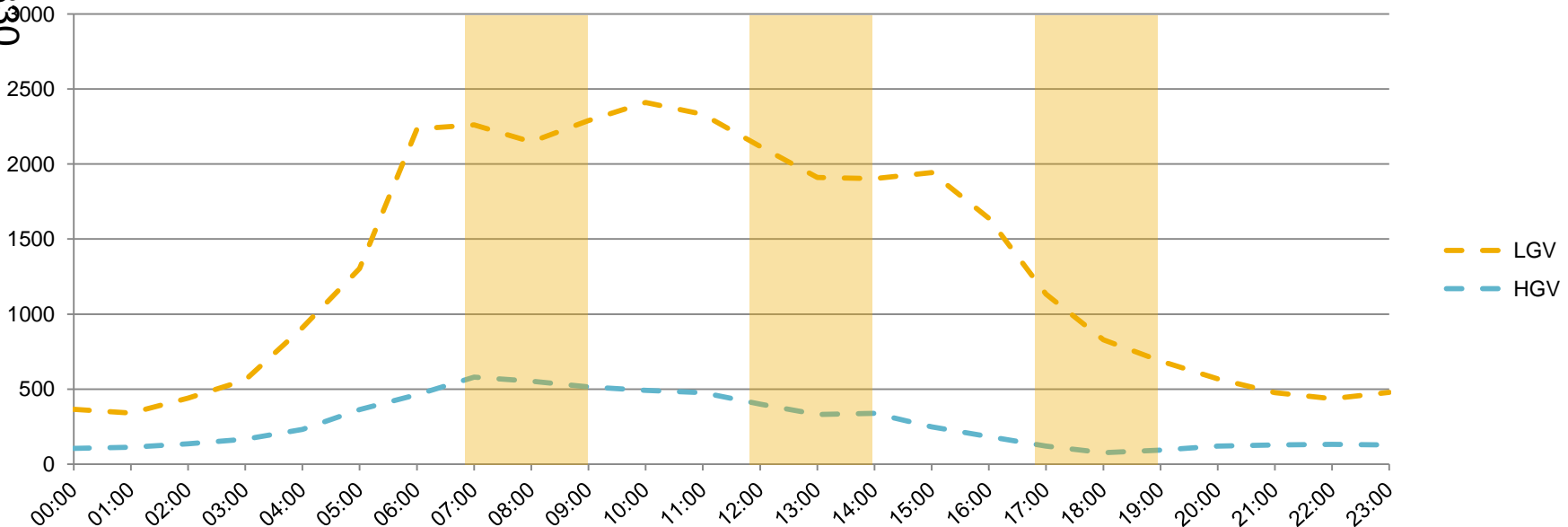


Figure 2.2 Hourly Variation of Goods Traffic on City of London Streets





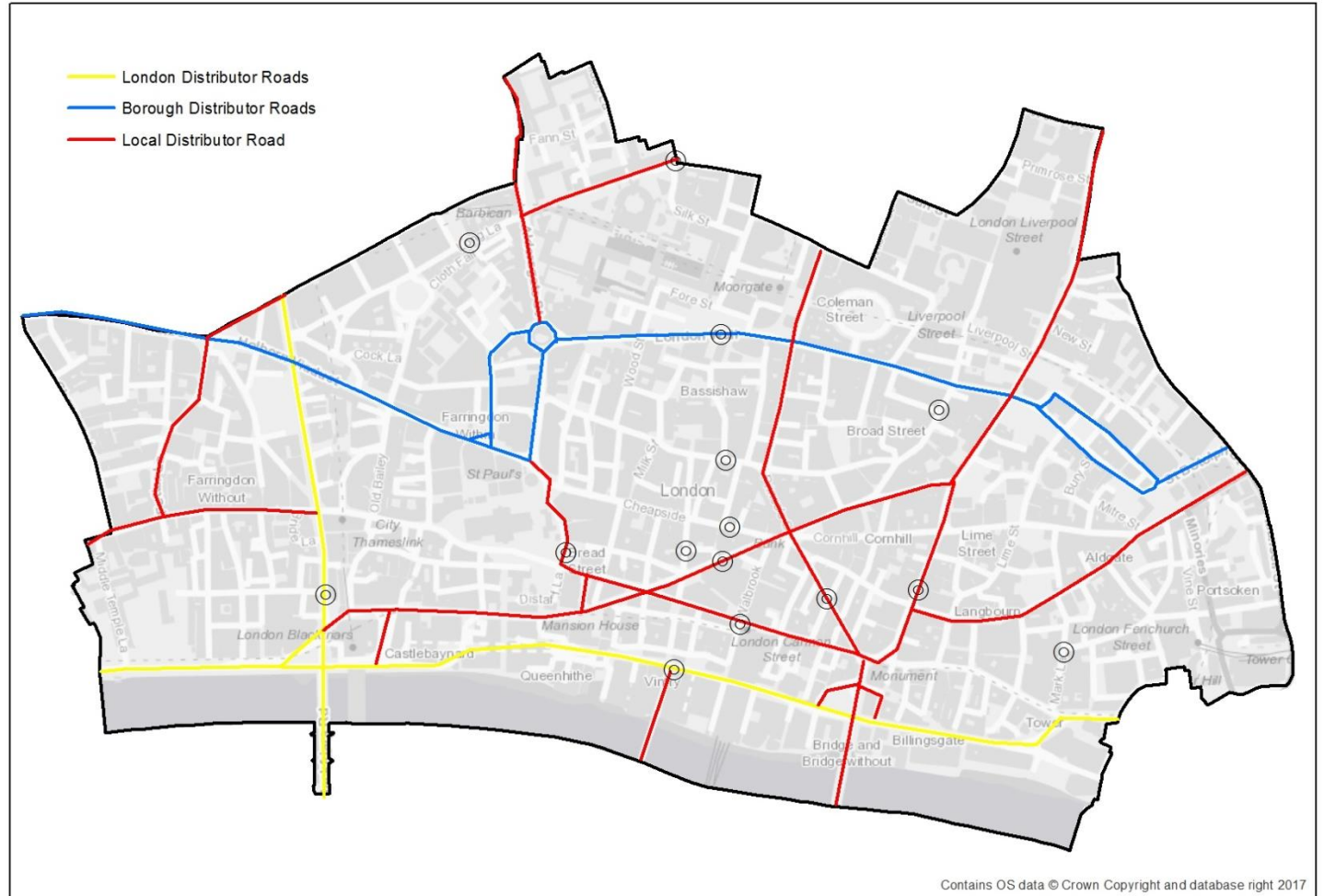
### Variation by Road Classification

The hourly variation of LGVs and OGVs are also analysed by road classification.

Figure 2.3 shows the road hierarchy within the City of London. All other roads not labelled are classed as Local Access roads. The locations of the surveys are also presented.

The charts on the following pages show the hourly variation by road type, for each type of goods vehicle. To note, it is not accurate to look at the volume of traffic as the surveys were taken at only 15 locations across the City, and is not an equal distribution on each road type. However, the variation of traffic throughout the day provides insight to the patterns of goods traffic volumes at different times of the day.

Figure 2.3 City of London Road Hierarchy

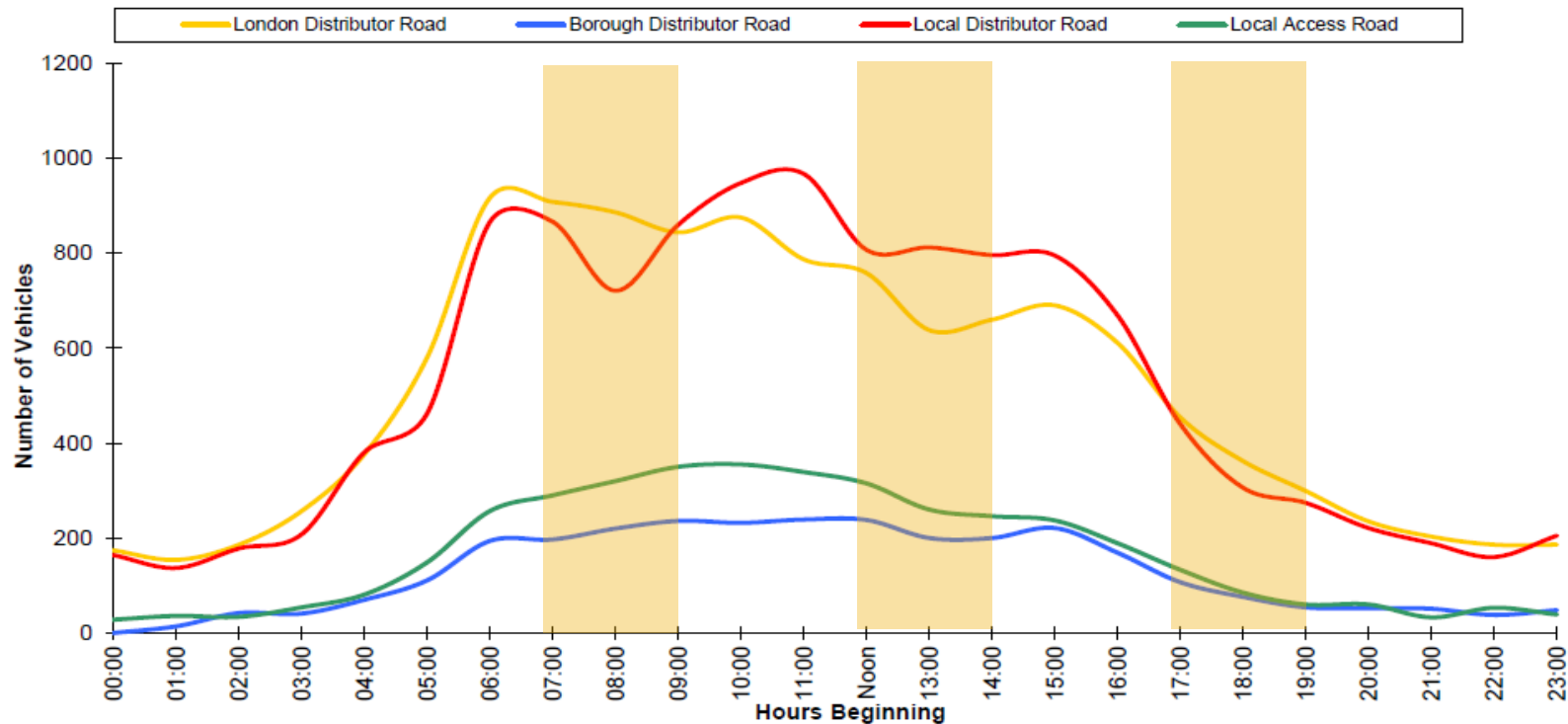


LGV

Figure 2.4 shows the daily variation of LGVs by road classification. The profile for Local and London Distribution Roads indicates that there is a fall in traffic levels after 12:00. Local Access Roads and the Borough Distributor Road show an almost identical trend, but at a lower scale. During the early hours LGV traffic rises for all road types however London Distributor Roads and Borough Distributor Roads experience more rapid growth in traffic than the other road types. The peak LGV movements were observed between: 11:00 and 12:00 on Local Distributor Roads and the Borough Distributor Road; between 06:00 and 07:00 on London Distributor Roads; and between 10:00 and 11:00 on Local Access Roads.

The lowest LGV movement across all road classifications in the evening peak period is actually observed between 18:00 and 19:00. In the late evening LGV traffic dissipates across road types until the end of the day.

Figure 2.4 LGV Numbers by Road Classification

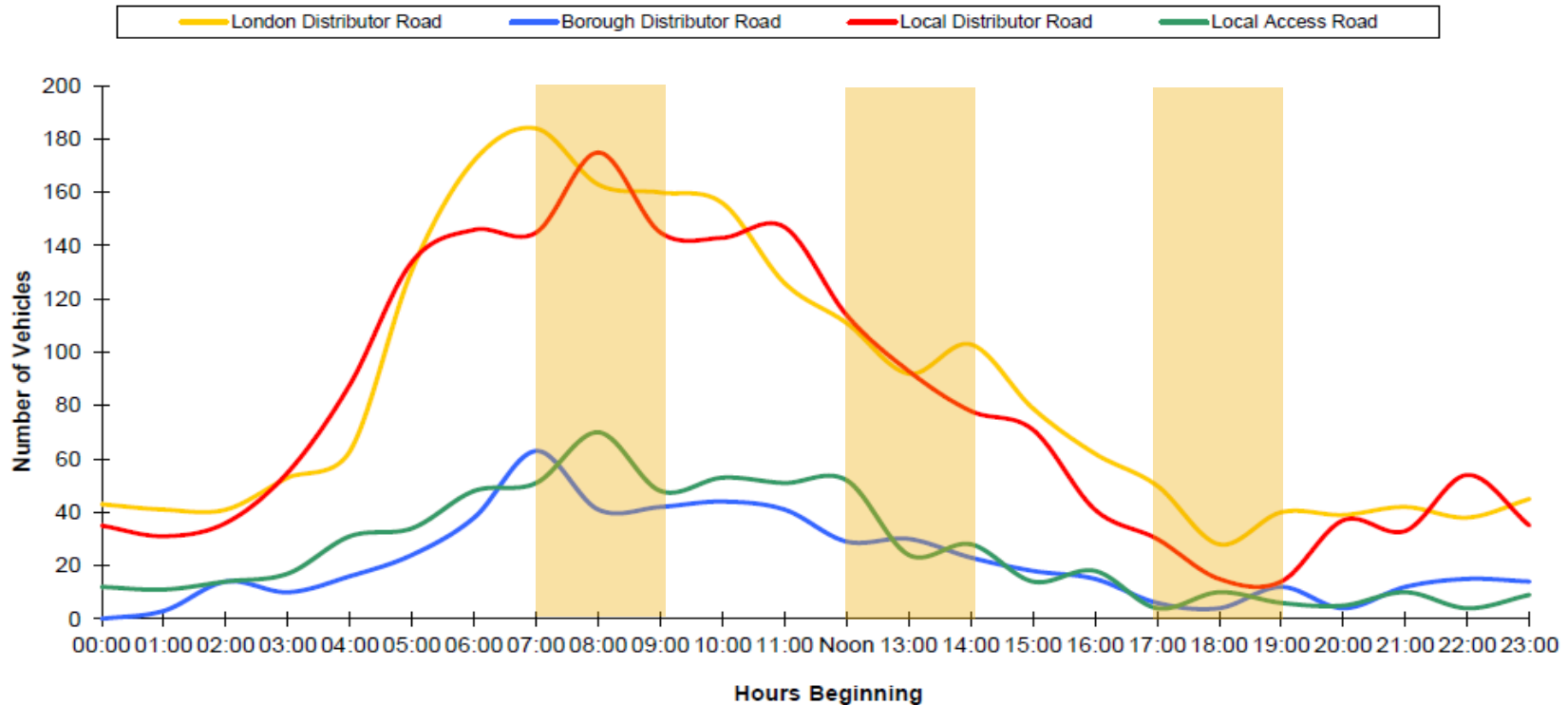


OGV1

Figure 2.5 illustrates the daily variation of OGV1 by road classification. OGV2 vehicles are not shown as traffic volumes for this vehicle type is so low that no meaningful patterns can be observed. The peak OGV1 movements were observed between 08:00 and 09:00 on Local Distributor Roads and Local Access Roads and between 07:00 and 08:00 on London Distributor Roads and the Borough Distributor Road. OGV1 levels on the Borough Distributor Road and on Local Access Roads show less hourly variation than on London and Local Distributor Roads. During the early

hours of the day, OGV1 traffic rises for all road types however London Distributor Roads and Local Distributor Roads experience more rapid growth in traffic than the other road types. After 12:00 OGV1 traffic declines steadily for all road types. For London and Local Distributor Roads this trend levels out at 18:00 and then increases slightly from 19:00 until midnight. For the other two road types, traffic flow exhibits an oscillating pattern after 12:00 but in an overall decreasing trend.

Figure 2.5 OGV1 Numbers by Road Classification



## Comparison with Previous Survey Data

### Traffic Volumes

In absolute terms, observed goods vehicle flows in the City of London have fluctuated between 1999 and 2016, as shown in Figure 2.6. However, 2016 were the lowest observed flows for all three types of goods vehicles, and follows the general decline since 1999.

### LGVs

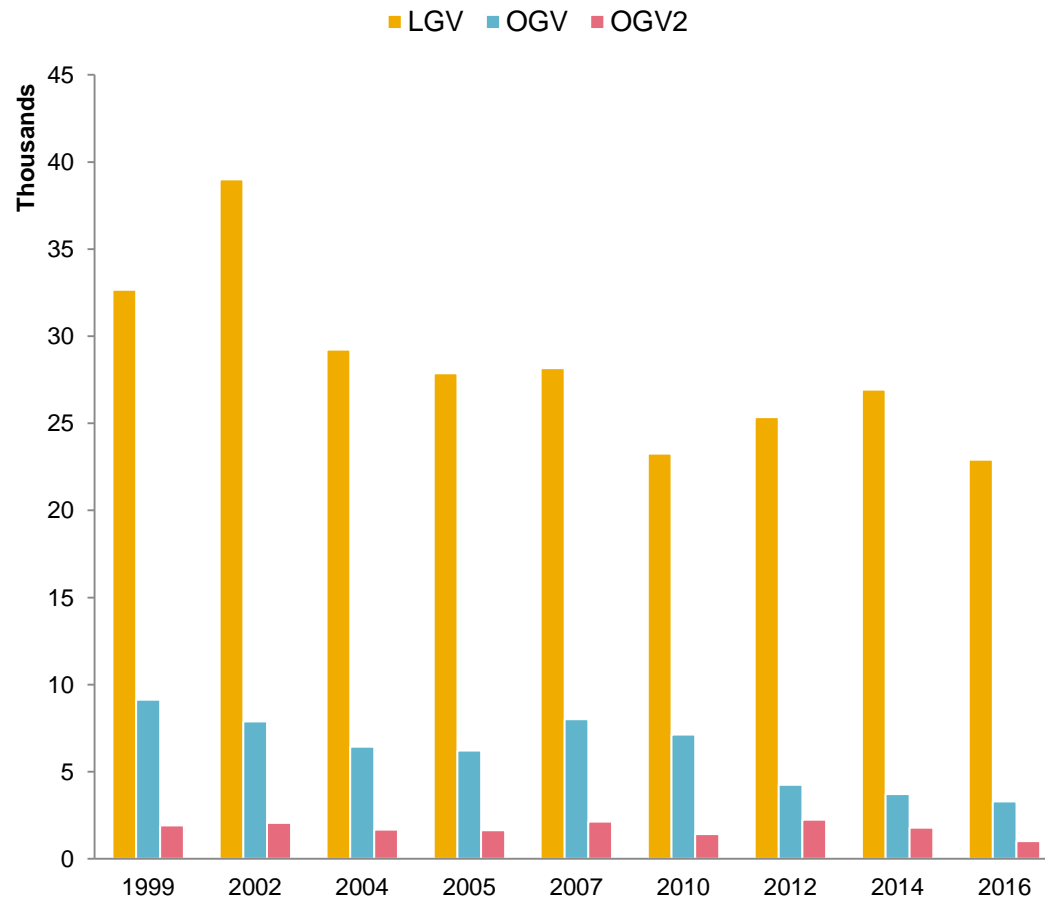
Generally, LGV volumes have decreased through the City of London. Between 1999 and 2016, this equates to a drop of 22%. However, there have been increases between 1999 and 2002 (19%) and 2010 and 2014 (15%). Such a fluctuation in trend is likely due to the changing movements of freight through the City and may also be reflective of LGV trips being undertaken before 07:00 due to loading restrictions and/or a change in delivery times.

### OGVs

OGV1 volumes have proportionately experienced significant decreases since 1999: 3,722 vehicles in 2016 compared to 9,137 vehicles in 1999, equating to a 64% drop. Similarly, OGV2 volumes have fluctuated since 1999 but ultimately are decreasing. A peak in total volume was recorded in 2012 (2,239 vehicles), but since then there has been a 54% reduction, to 1,022 vehicles.

For both classes of OGVs, there was a marked decrease in volumes after 2007. This could be due to the introduction of the London Low Emission Zone (LEZ) in February 2008.

Figure 2.6 Goods Vehicle Daytime Volumes 1999 - 2016

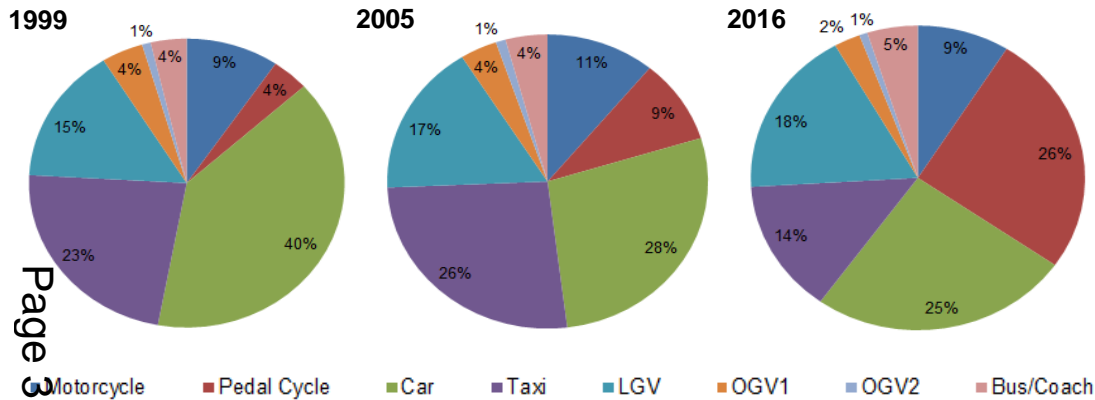


Data Source: City of London Traffic Composition Survey

### Mode share

Whilst all three vehicle types are at their lowest in 2016 since 1999, their proportion of modeshare of all vehicle types has remained stable. LGV modeshare has risen by 3% between 1999 and 2016 whilst in absolute numbers LGVs have reduced by over 20% during this period. OGVs have seen a reduction of 4% of modeshare in 1999 to 2% in 2016, but a reduction of 50% in absolute numbers. Figure 2.7 shows the modeshare of all road traffic in 1999, 2015 and 2016.

Figure 2.7 City of London Daytime Modeshare 1999, 2005 and 2016



Data Source: City of London Traffic Composition Survey

It is taxis, car and pedal cycle modeshares that have significantly changed over the period 1999 to 2016. Pedal cycle mode share has risen from being one of the lowest in 1999 to the largest in 2016. If the modeshare of goods vehicles is looked at without pedal cycles (i.e. motor vehicles only), it shows an increase in modeshare as shown in Table 2.1 for LGVs, and a static modeshare for OGVs.

Table 2.1 Goods Vehicles Daytime Modeshare of Motorised Traffic

	1999	2005	2016
LGV	16%	18%	24%
OGV1	4%	4%	3%
OGV2	1%	1%	1%

Data Source: City of London Traffic Composition Survey

**3**

## **Origin and Destination of Goods Vehicles**

### 3. Origin and Destination of Goods Traffic on City Streets

This chapter sets out the origin, destination and timing of freight vehicles that travel to and within the City.

#### Through Traffic vs City Destination Traffic

Of the goods traffic that travels through the City (both lights and heavy's), half is through traffic, whilst the other half either originate their journey in the City, end it in the City or are completely within the City. It is possible that the through traffic and City destination traffic are therefore following different trends. This is particularly apparent when looking at the daily profile of weekdays for goods through traffic and goods traffic that have their origin or destination in the City.

Figure 3.1 shows the daily profiles (as a proportion of the total day) of goods traffic that do not originate or end their journey in the City of London (through traffic) and those that do (City Destination traffic) on a weekday.

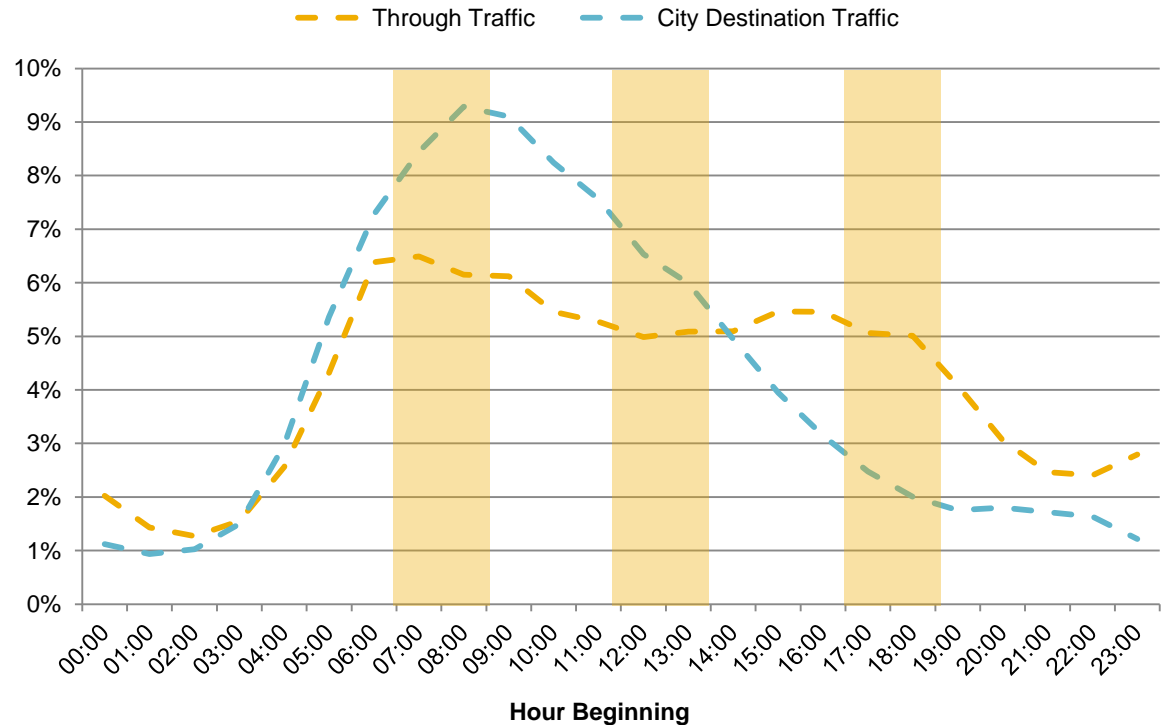
The City destination traffic shows a peak profile, that gradually rises through the early morning and peaks at 08:00, then gradually decreases through the rest of the day.

The profile of the vehicles that are through traffic however is much flatter during the day. Traffic gradually rises up to 05:00, then remains relatively stable until 19:00, where it then gradually decreases again.

Possible explanations for these variations could be;

- The majority of freight and servicing vehicles arrive in the morning peak and complete their works during the morning and/or remain in the City most of the day
- The through traffic profile represents a mixture of drivers driving to jobs/job locations, the drive back home and driving in between jobs during these two times.

Figure 3.1 Destination of Goods Traffic on City of London Streets

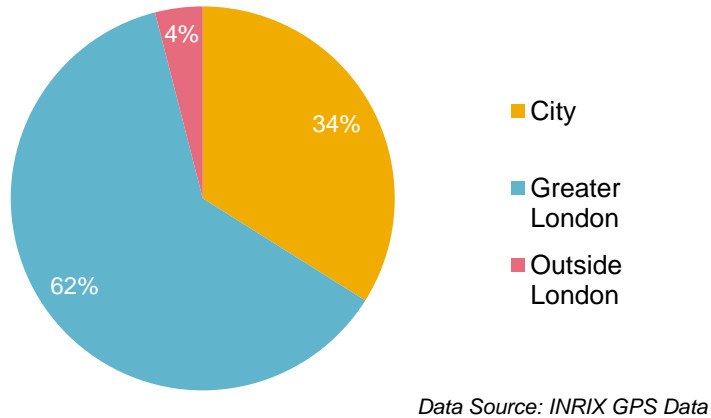


Data Source: INRIX GPS Data

### Origin of City Destination Traffic

Of the goods traffic that ends its trip within the City, 34% originates in the City, 62% originates from within Greater London area and just beyond the extents of the M25, and the remaining 4% comes from the rest of the UK. This is shown in Figure 3.2.

Figure 3.2 Origin of Goods Traffic City Destination



This includes goods vehicles that begin their trip from their 'home' address/depot and those completing a trip as part of a wider journey/trip.

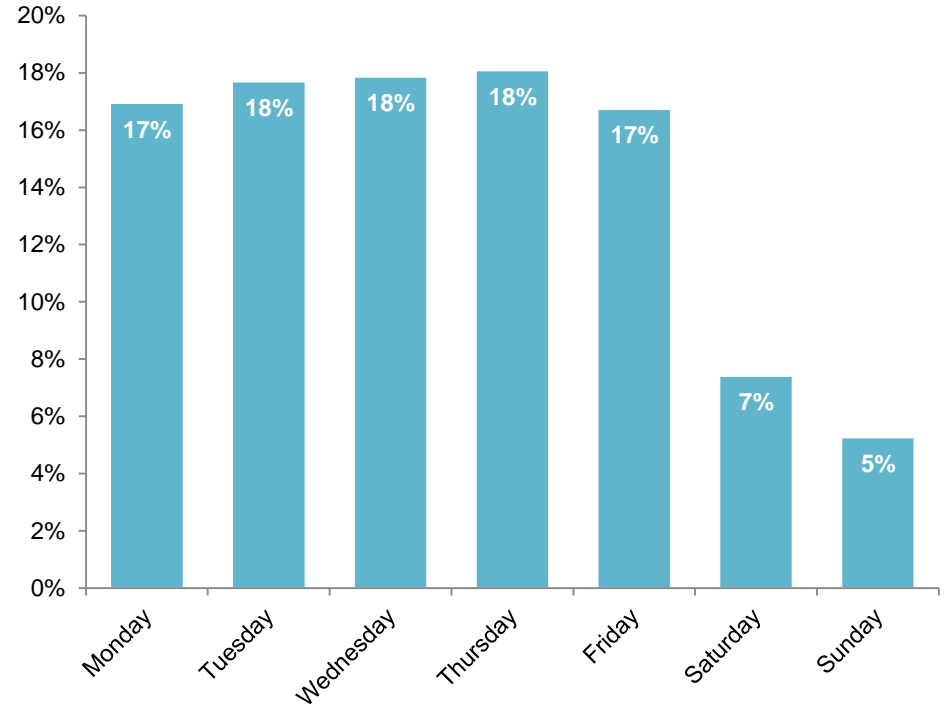
### City Destination Traffic

#### Weekly Profile

Figure 3.3 shows the weekly profile of goods traffic that have their destination within the City (as a proportion of the total week).

As expected, the weekly profile of goods traffic that end their journeys within the City shows that most freight journeys (88%) are made Monday to Friday, with 7% made on a Saturday and 5% on a Sunday.

Figure 3.3 Goods Traffic City Destination; Weekly Profile





### Daily Profile

Figure 3.4 shows the daily profiles of City destination traffic for a weekday, Saturday and Sunday.

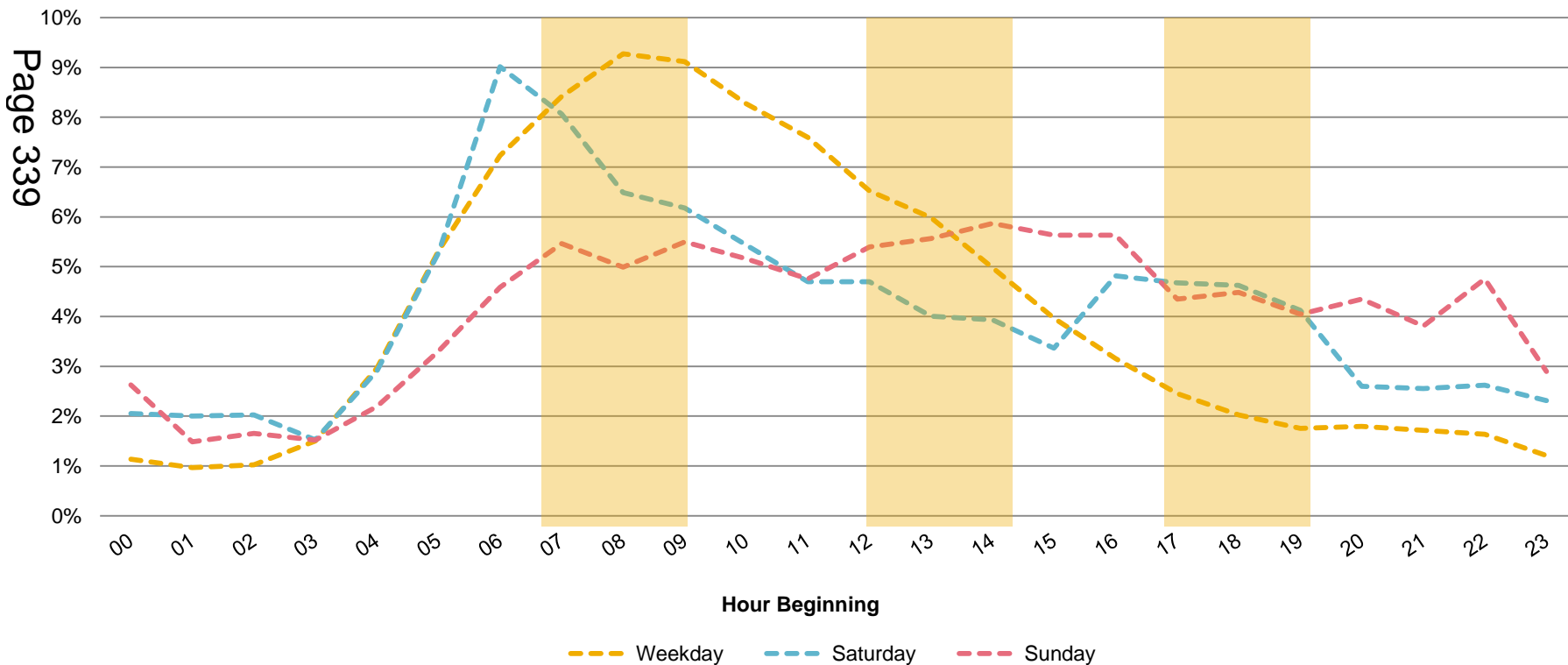
The weekday profile of freight vehicle City destination traffic shows a clear peak period during 07:00 to 09:00. Freight traffic begins to increase from 03:00, peaks between 07:00 – 09:00 and gradually decreases through the rest of the day.

The Saturday profile also sees a peak in the morning, although a little earlier between 05:00 and 07:00. The proportion of journeys then decreases until 15:00, then increases again between 15:00 and 19:00 before significantly decreasing again.

The Sunday profile is a lot flatter, there is no identified peak hour or

period, and the proportion of freight journeys to the City remains relatively stable between 06:00 and 22:00.

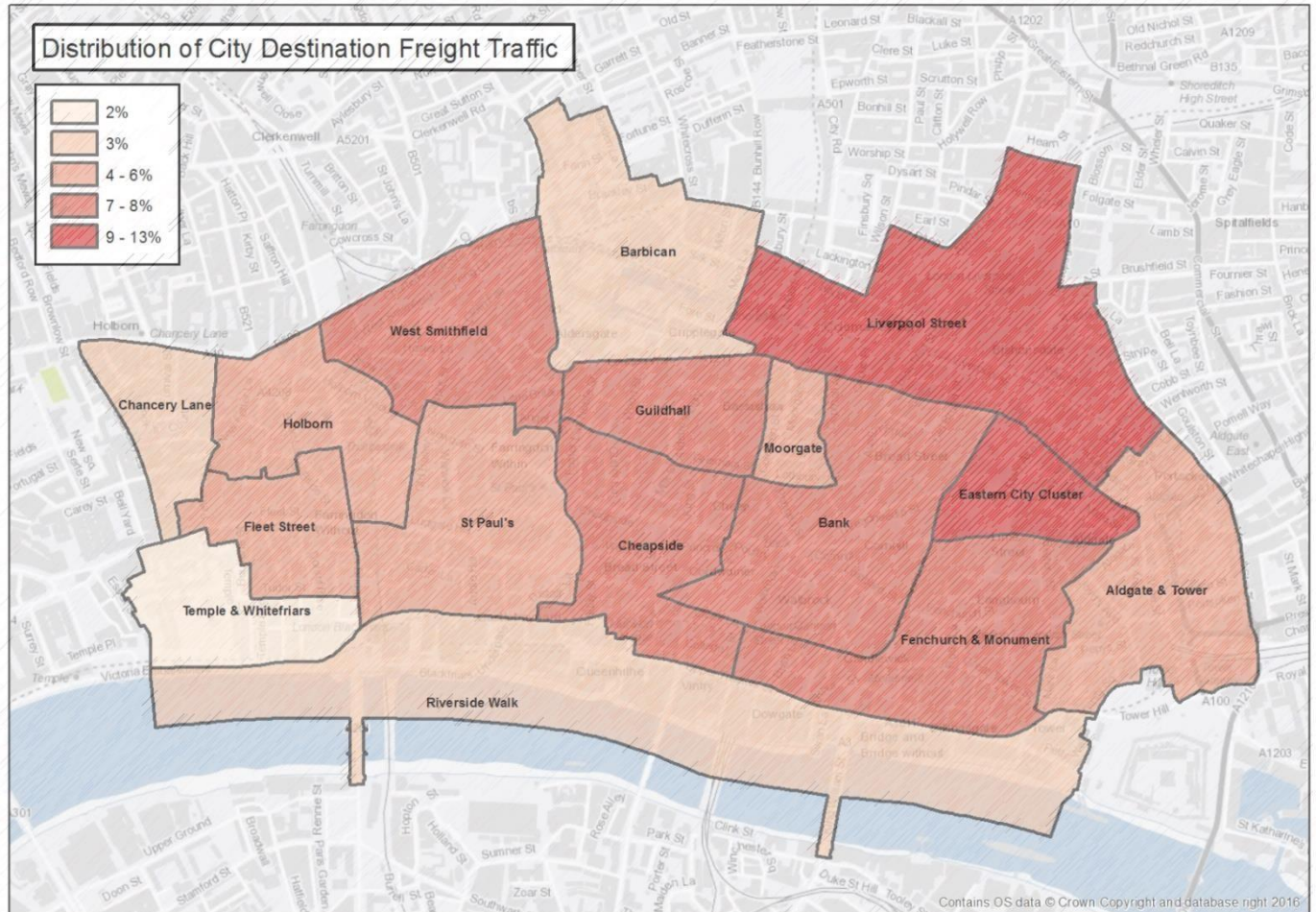
Figure 3.4 City Destination Freight Traffic - Daily Profile



### Traffic Distribution

The distribution of freight traffic ending their destination in the City is shown in the figure opposite. Whilst the areas are varying sizes, the proportions are adjusted by area density to give a clearer comparison of the different areas. Liverpool Street receives the highest proportion of freight activities across the City per area density; with 13%. The Eastern City Cluster area is the second highest. Both of these areas have high density office space and a large amount of construction activity that generate freight trips. Temple & Whitefriars generates the lowest amount of freight activity, at just 2% of the City as whole.

Figure 3.5



Data Source: INRIX GPS Data

**4**

## **Goods Vehicle On-Street Activities**

## 4. Goods Vehicle On-Street Activities

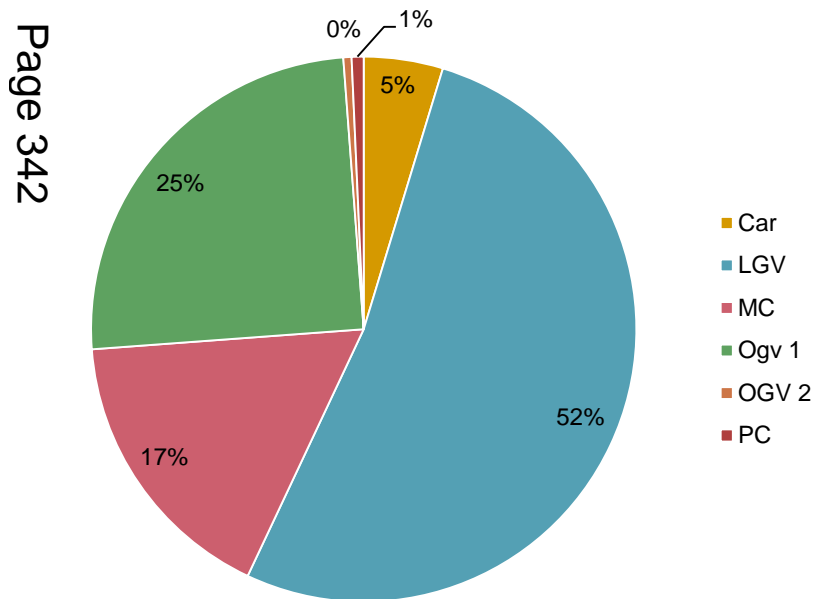
This chapter sets out the characteristics of on-street activity.

On-street activity surveys indicate that 50% of goods vehicle activity is associated with loading or unloading, and 50% is parking (and therefore most probably used for servicing).

### *Loading and Unloading*

As expected, the majority of on-street loading and unloading activities are undertaken by LGVs; they make up 52% of all vehicle types. OGV1 vehicles are second highest, with a quarter of all vehicle types. Motorcycles make up the majority of the remainder of vehicle types at 17% , followed by cars at 5%. This is shown in Figure 4.1.

Figure 4.1 Loading and Unloading Activity by Vehicle Type



Data Source: CoL On-Street Survey

The majority of on-street loading and unloading activities occur for between 5 and 30mins (50%), with the majority of the rest taking between 1 and 5 minutes (34%).

### Hourly Profiles

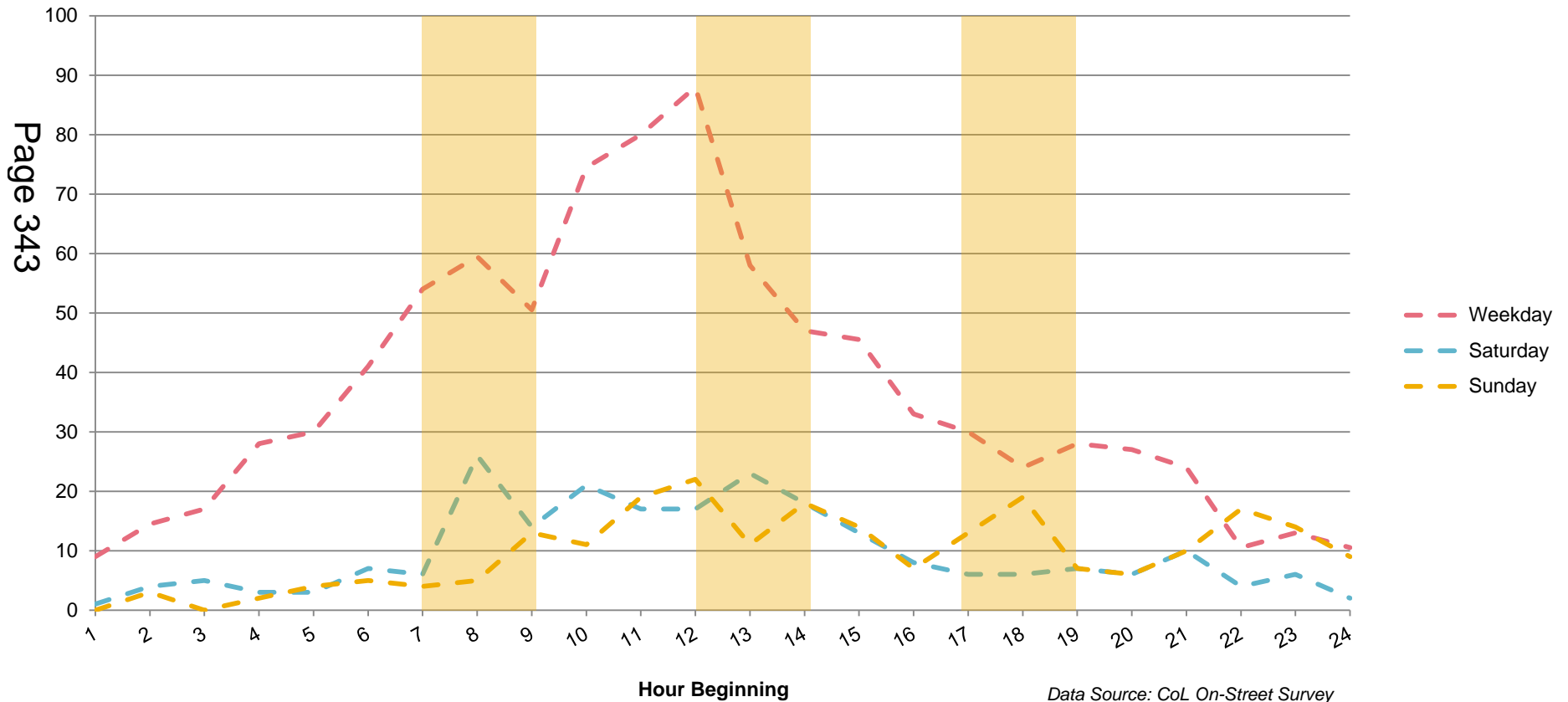
Figure 4.2 shows the hourly profiles across a weekday and weekend for the arrival of vehicles that are undergoing loading and unloading activity. On a weekday there is a peak at 8am, followed by a higher peak period at midday. The higher peak during lunchtime appears to be a specific trend to on-street activity and not to freight traffic driving within and through the City (as shown in Figure 2.2 and 3.1). It could therefore mean there is higher turnover of vehicles at on-street parking and loading bays at this time.

With regards to Saturdays and Sundays, as expected the quantity of loading and unloading activities is significantly lower than on weekdays.

There is also no clear peak period, however as the numbers are so low they may not provide a real representation.

70% of the loading and unloading activity occurs during the day (between 07:00 and 19:00).

Figure 4.2 Loading and Unloading Hourly Profile by Day of the Week

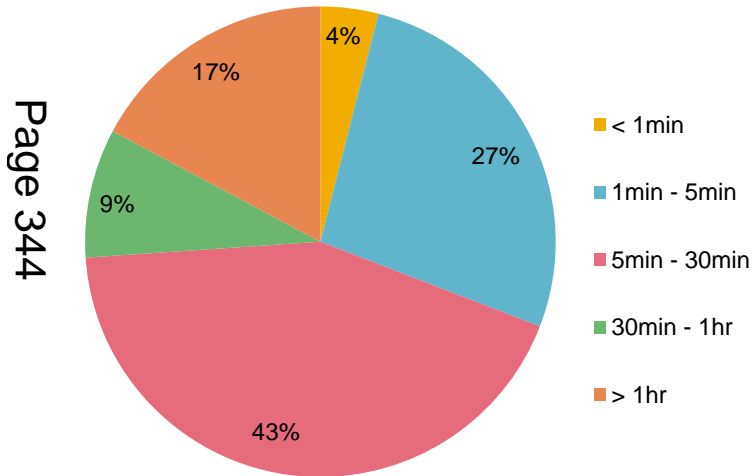


### On-Street Van Parking

To understand vans that are undertaking servicing activities, all vehicles that were light good vehicles or heavy goods vehicles, where the driver left the vehicle were considered possible servicing vehicles.

Nearly half of all parked vans were parked on-street more than five minutes but less than 30 minutes. A quarter of vans were parked for less than 5 minutes, whilst nearly a fifth were for over an hour. This is shown in Figure 4.3.

Figure 4.3 Van Parking Duration



Data Source: CoL On-Street Survey

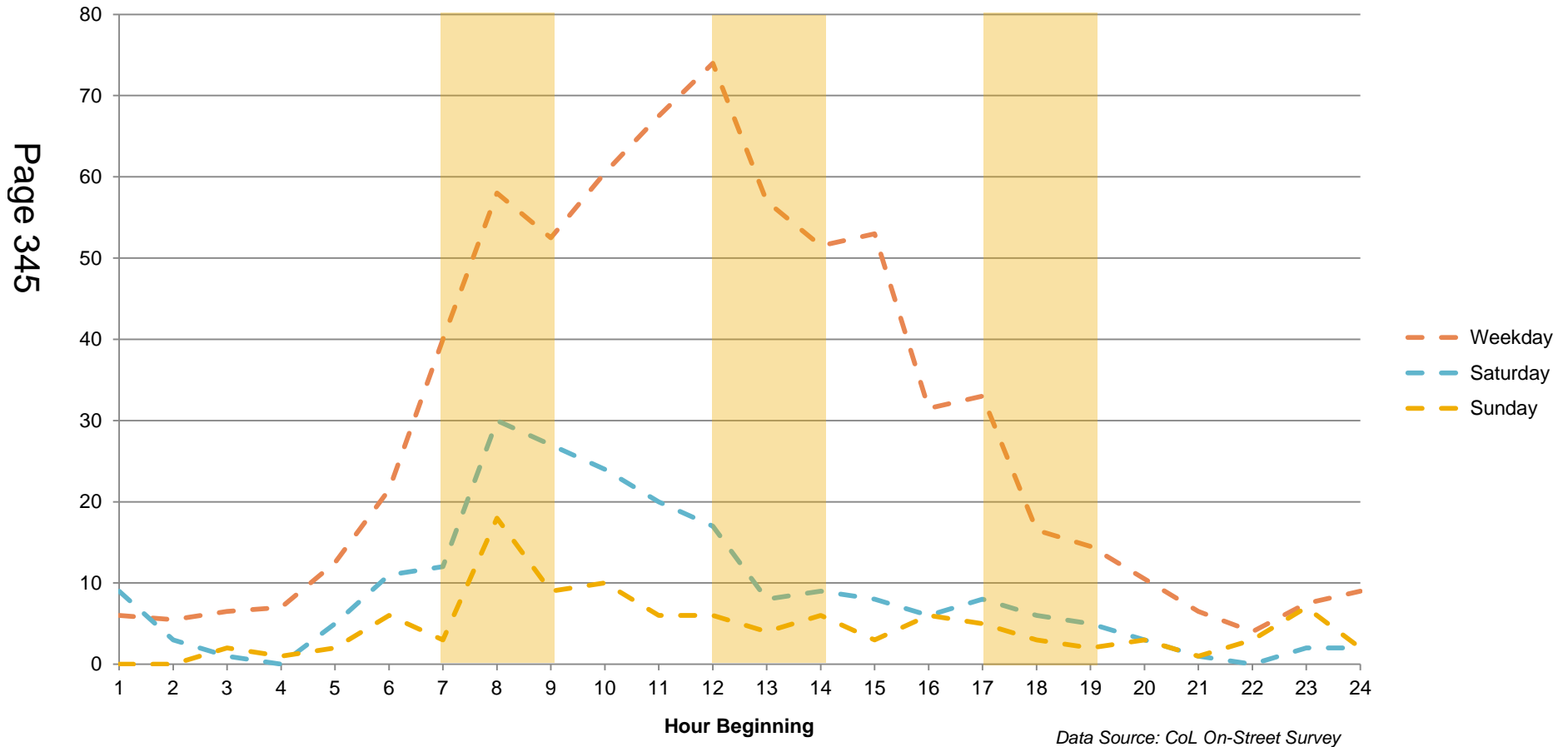
### Hourly Profiles

Figure 4.4 shows the hourly profiles across a weekday and weekend for the arrival of vehicles that are likely to be servicing vehicles. On a weekday there is a peak at 08:00, followed by a larger peak at midday, with the number of activities gradually rising in the morning, then decreasing afterwards. Similar to the loading and unloading hourly profile (Figure 4.2), the higher peak during lunchtime appears to be a specific trend to on-street activity and not to freight traffic driving within and through the City (Figure 2.2 and 3.1). It could therefore mean there is higher turnover of vehicles at on-street parking and loading bays at this time.

With regards to Saturdays and Sundays, as expected the quantity of loading and unloading activities is significantly lower than weekdays. There appears to be a peak at 08:00, however the quantity of data is relatively low and as such may not provide a real representation.

80% of van parking activity occurs during the daytime (between 07:00 and 19:00).

Figure 4.4 Van Parking Hourly Profile by Day of the Week



# 5

## Summary



## 5. Summary & Analysis

### City Streets in 2016

Goods traffic makes up a fifth of all traffic on the City of London streets, and nearly 30% of motorised road traffic.

Across a weekday on City streets, the number of LGVs steadily rises between 03:00 and 05:00, and remains high between 06:00 and 10:00, peaking at 10:00. The volumes then gradually decrease throughout the rest of the day. HGVs follow a similar pattern at a lower volume, however the peak is earlier at 07:00 and has a steadier drop throughout the rest of the day. All types of roads within the City experience a similar profile.

### Current Conditions compared to Previous Years

Goods vehicle flows in the City of London have fluctuated between 1999 and 2016. However, 2016 were the lowest observed flows for all three types of goods vehicles, and follows the overall general decline since 1999.

Whilst all three vehicle types are lowest in 2016 since 1999, their proportion of modeshare of all vehicle types has remained stable. This however is due to the significant rise in pedal cycles. The modeshare of only motorised vehicles shows that there has been an increased modeshare of Light Goods Vehicles.

### Origin and Destination of Goods Traffic

Of the goods traffic that travels through the City, half is through traffic, whilst the other half either originate their journey in the City, end it in the City or are completely within the City.

Traffic that originates and/or its destination is within the City has a clear peak profile, with the peak being observed at 09:00. The through traffic profile however is flatter, with a rise in the morning, remaining high throughout the day and then a decline in the evening.

The majority of freight traffic that's destination is within the City originates in Greater London or just beyond the M25 (62%). 34% originates within the City and just 4% is from the rest of the UK.

The weekly profile of goods traffic that end their journey within the City shows that trips are evenly spread on a Monday- Friday. Saturday receives less than

half of weekday freight vehicles and Sunday is even less.

Across the City, the specific destination of goods traffic is not evenly distributed. The area around Liverpool Street and the Eastern Cluster receive the highest number of goods vehicles, which could be a reflection of the high density of office floorspace and level of construction activity.

### Goods Vehicle Activities

Half of goods vehicle activity in the City is associated with loading or unloading, and half is parking (and therefore most probably used for servicing).

Half of all loading and unloading activity is undertaken by a LGV, and a quarter by OGVs. The majority of the remaining activity is undertaken by motorcycles.

The majority of on-street loading and unloading activities occur for between 5 and 30mins (50%), with the majority of the rest taking between 1 and 5 minutes (34%). 70% of the activity occurs between 07:00 and 19:00.

Nearly half of all parked vans park for more than five minutes but less than 30 minutes. A quarter of vans park for less than 5minutes, whilst nearly a fifth do so for over an hour. 80% of the activity occurs between 07:00 and 19:00.

### Analysis

The results show that the majority of freight activity occurs on a weekday, and in between the hours of 07:00 and 19:00. As such, there is a clear opportunity for these activities to be retimed out of peak times when the City is at it's busiest, most importantly out of the morning and lunchtime peak periods.

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<b>Committee(s)</b>	<b>Dated:</b>
Streets and Walkways Planning & Transportation	24/07/2017
<b>Subject:</b> Freight and Servicing Supplementary Planning Document – Draft for Consultation	<b>Public</b>
<b>Report of:</b> Steve Presland, Director of Transportation and Public Realm	<b>For Decision</b>
<b>Report author:</b> Eddie Jackson, Department of the Built Environment	

## Summary

This report presents the draft Freight and Servicing Supplementary Planning Document (SPD), and the associated Strategic Environmental Assessment (SEA) and Equality Analysis.

The SPD has been produced to provide additional guidance on the interpretation of policies in the City of London Local Plan in relation to freight and servicing movements. The SPD sets out potential measures for managing freight through minimising trips, matching freight demand to network capacity, and mitigating the impact of essential freight trips.

The draft SPD has been subject to the statutory SEA process, which assesses the proposals in the document against environmental criteria, and the Equality Analysis which assesses the document's impact on protected groups.

## Recommendation(s)

Members are asked to:

- Note the report.
- Subject to comments received from your committee, approve the draft SPD and SEA for public consultation.

## Main Report

### Background

1. Freight – including delivery, servicing and construction traffic - accounts for a significant proportion of traffic in the City of London (20% between 07.00 and 19.00) and freight vehicles compete for scarce road space with other priority and vulnerable road users such as buses, cyclists and pedestrians. Freight vehicles also account for a disproportionate number of collisions/casualties

and are a significant source of air pollution. In December 2015, the Planning and Transportation Committee agreed the principles for moving towards a freight strategy with a single aim;

*“To reduce the number of freight and delivery vehicles on the City’s streets, particularly at peak times, whilst allowing the City to flourish”.*

2. One of the actions identified by the Committee was to produce a Supplementary Planning Document (SPD) covering freight consolidation. This has since been broadened to provide additional guidance on all aspects the management of delivery and servicing traffic in the City.
3. In November 2016 the Policy and Resources Committee agreed that a general objective of reducing traffic in the City should be adopted, subject to establishing the extent to which the City Corporation’s communities find it acceptable.

### **Freight and Servicing SPD**

4. The volume of freight traffic on City streets is closely linked to land use. Estimates suggest that nearly 50% of freight traffic on City streets is destined for the Square Mile. Through traffic largely confined to the London Distributor Roads of Upper/Lower Thames Street, and Farringdon Street/New Bridge Street.
5. The City of London Local Plan requires delivery and servicing plans for major developments in the City, but does not specify any particular measures for managing freight movement. This SPD aims to provide additional guidance on the management of freight movements in new developments, leading to a reduction in the impact of freight traffic on the City.
6. The SPD sets out potential measures for the management of freight through three key approaches;
  - Minimising freight trips – reducing the number of freight trips generated by premises in the City. This includes personal deliveries to workplaces and waste collections. The use of freight consolidation is likely to be part of this approach for many premises.
  - Matching demand to network capacity – maximising the proportion of essential freight trips taking place outside peak times and where possible, using quiet evening and night-time deliveries.

- Mitigating the impact of essential freight trips – where the transport of goods and services by road is essential, using the safest and quietest zero emission means of transport possible – which may include the use of electric or other alternative-fuelled vehicles, foot or cycle delivery.
7. The SPD has been produced with reference to the City of London Local Plan, the London Plan, and the recently published draft Mayor’s Transport Strategy. Officers in the Department of Markets and Consumer Protection have been consulted on the draft SPD, and their comments incorporated into the document.
  8. Screening of the SPD indicated that, as the content may impact on areas outside the City of London, a full Strategic Environmental Assessment (SEA) should be produced. The SEA is a statutory assessment process which reviews the document and its expected impact on the environment within the City and outside the City boundary. The SEA process provides a high level of protection for the environment by assessing the impact of the proposed options in the SPD against standard criteria, and considering reasonable alternative options.
  9. The SEA process found that the preferred options generated broadly positive effects across all criteria, but that the potential for some uncertain significant negative impacts exist in relation to out of town consolidation centres due to the possibility of increased local traffic outside the City boundary. The impacts are summarised in table 4.4 of the SEA document.
  10. The SEA and non-technical summary are attached as appendices to this report, and, subject to approval from your committee, will be published alongside the SPD document for public consultation.
  11. An Equality Analysis (EA) has been undertaken and found that no negative impact on the protected characteristics and positive impacts on some groups due to potential improvements in air quality and road danger. The EA is attached as an appendix to this report.

## **Proposals**

12. It is proposed that, subject to comments received from your committee, the draft Freight and Servicing SPD, and associated SEA are published for public consultation.

## **Corporate & Strategic Implications**

13. The SPD provides further guidance on the implementation of policies in the City of London Local Plan. It supports other policies and SPDs adopted by the City Corporation, particularly on Air Quality.
14. The SPD aligns with the Mayor of London's position on the management of freight, supporting Key Policy Priority 3 of the Corporate Plan; "Engaging with London and national government on key issues of concern to our communities such as transport, housing and public health".

## **Health Implications**

15. The draft SPD will contribute to improved air quality and reduced road danger in the City, providing potential health benefits for the City population.

## **Conclusion**

16. The draft Freight and Servicing SPD provides additional guidance on Local Plan policies in relation to deliveries and servicing to new development in the City. The guidance aims to reduce the negative impacts of freight, while allowing the City to flourish.

## **Appendices**

- Appendix A - Freight and Servicing Draft Supplementary Planning Document
- Appendix B - Strategic Environmental Assessment
- Appendix C - Strategic Environmental Assessment – Non Technical Summary
- Appendix D - Equality Analysis Test of Relevance.

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# 1. Introduction

## 1.1. Background

- 1.1.1. The efficient movement of goods and services are fundamental requirements for a successful city. Even in the 21<sup>st</sup> Century where electronic services and communication have revolutionised working practices and removed the demand for the movement of some goods and services, other new areas of demand have grown.
- 1.1.2. Despite the small footprint of the City of London, the large working population generates significant demand for physical goods and services. Employment in the City is forecast to grow from 487,000 in 2015 to 569,000 in 2036<sup>1</sup>, so the need to manage the increasing demand for space on the transport network continues to grow.
- 1.1.3. This Supplementary Planning Document (SPD) sets out the City Corporation's requirements for new development in relation to the management of freight and servicing. The document should be read in conjunction with the Standard Highway and Servicing Requirements for Developments in the City of London, the Code of Practice for Deconstruction and Construction Sites (published by the City Corporation), and the Construction Logistics Plan Guidance (published by Transport for London). Links to these documents are provided in Appendix C.

## 1.2. What is Freight and Servicing?

- 1.2.1. All movement of goods and services by road, river or rail can be included under the umbrella term 'freight'. In the City context, freight movements are generally supporting the offices and retail that make up a majority of the employment in the Square Mile, or serving construction and demolition sites in the City. Most of these freight movements take place on the road network. Even where goods are mainly moved by river or rail, the final journey stage within the City will probably take place by road, most often by car, van or other goods vehicle. "Servicing" is a component of freight that does not involve the physical delivery of goods, and would include maintenance visits to buildings, waste collections, window cleaning and so on.
- 1.2.2. Figure 1 shows that throughout a typical weekday, around 22% of traffic in the City of London is goods vehicles, with the majority of these being Light Goods Vehicles (LGV) under 3.5 tonnes. This data does not show freight moved by car, motorcycle and pedal cycle – it is therefore reasonable to expect that freight demand makes up a slightly higher percentage of traffic than shown here.

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<sup>1</sup> <https://data.london.gov.uk/dataset/long-term-labour-market-projections>



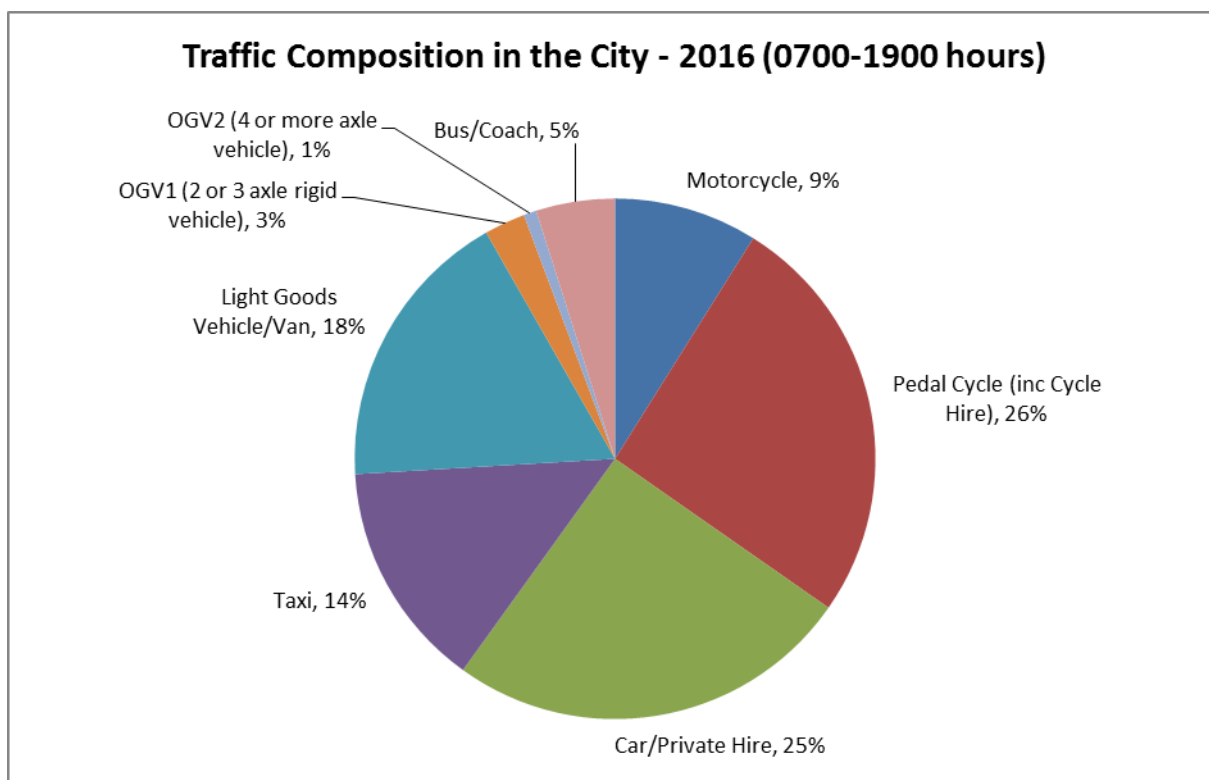


Figure 1 Traffic Composition in the City of London, Mouchel survey for the City Corporation, 2016

1.2.3. The need to manage freight demand is driven by several factors;

### *Traffic*

1.2.4. While the total number of motor vehicles in the City has been in steady decline over recent years, the proportion of goods vehicles, particularly Light Goods Vehicles (LGV) and vans, has increased. This increase, combined with policies from the City Corporation, neighbouring boroughs and Transport for London to create 'Healthy Streets', and promote active travel, has led to a reallocation of road space away from motor traffic. This reallocation has led to an increase in journey time delay. With the City continuing to flourish, the demand for goods and services transported by road will continue to increase.

### *Road Danger Reduction*

1.2.5. The City Corporation has a duty to promote road safety, and it is known that goods vehicles are disproportionately involved in collisions where vulnerable road users are injured. Reducing the number of goods vehicles serving new and existing premises in the City could therefore have a positive impact through the reduction of road danger both within the City and in neighbouring boroughs.

### *Air Quality and Carbon Emissions*

1.2.6. The City of London was designated an Air Quality Management Area (AQMA) for two pollutants – Nitrogen Dioxide (NO<sub>2</sub>) and small particles (PM10) in 2001. Exposure to these pollutants is considered to be a significant cause of ill health and premature death in London. Research by King's College London<sup>2</sup> estimated that air pollution was responsible for up to 141,000 life years lost or the equivalent of up to 9,400 deaths in London in 2010, as well as over 3,400 hospital admissions. The total economic cost

<sup>2</sup> Understanding the Health Impacts of Air Pollution in London, Walton et al, King's College London, 2015

associated with this was estimated at £3.7 billion. Poor air quality in the City is now considered to be a corporate risk.

1.2.7. Around 24% of PM10 and 33% of NOx (Oxides of Nitrogen, including NO<sub>2</sub>) emissions associated with traffic in the City is from the movement of freight<sup>3</sup>. At present there are relatively few Ultra Low Emission goods vehicles on the market, so the reduction in freight vehicle movements is a priority for addressing air quality within the City and beyond.

1.2.8. Around 5% of carbon emissions in the City are associated with transport, rising to 22% across London as a whole<sup>4</sup>.

1.2.9. Reducing vehicle miles and increasing the use of electric vehicles for remaining journeys in the City will result in a reduction in all harmful emissions but this must not be at the expense of increased emissions elsewhere in London.

### 1.3. The Future of Freight

1.3.1. The employee population of the City of London is forecast to continue to grow over the next two decades, and demand for freight is expected to grow with it. In Greater London, Transport for London (TfL) forecasts that trips made by vans will increase by 26 per cent by 2031, representing 77 per cent of the total forecast growth in vehicle trips.<sup>5</sup>

1.3.2. New and emerging technologies such as autonomous vehicles and drones may play an increasingly important part in the movement of freight over the next few decades. The impact of these technologies, particularly in a densely populated city environment is unclear at this stage, and in the short to medium term the movement of freight within cities is likely to continue to rely on drivers using the road network.

1.3.3. In the near future, increased use of smart technologies may impact on the possibilities for managing freight movements in urban environments. The efficient co-ordination of deliveries through technology and data is becoming increasingly important in the freight sector, and may present changing opportunities for managing the impacts of delivery and servicing.

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<sup>3</sup> City of London Air Quality Strategy 2015 - 2020

<sup>4</sup> Carbon Dioxide Emissions by borough, GLA Datastore

<sup>5</sup> <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/transport-committee/urban-congestion/written/46165.pdf>

## 2. The Policy Context

2.1.1. This Freight and Servicing SPD forms part of a suite of national, regional and local policy documents. Figure 2 shows how an SPD fits into the wider planning context.

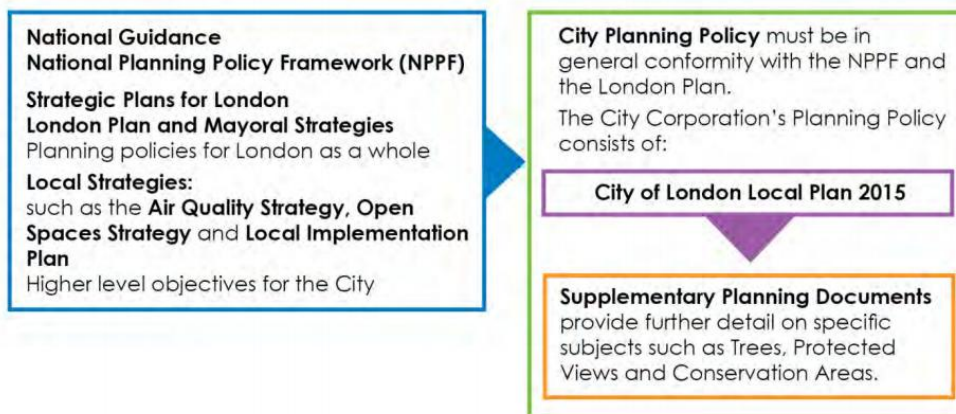


Figure 2 - Overview of Planning Policies and how they interact

2.1.2. The National Planning Policy Framework (NPPF) sets out national policy for England. Within Greater London, the London Plan sets out planning policies for the city as a whole. This document is supported by additional Mayoral strategies, in particular the Mayor's Transport Strategy (MTS). The City of London Local Plan and SPDs must be in general conformity with the London Plan.

### 2.2. National Policy

2.2.1. The National Planning Policy Framework (NPPF) states that;

*Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (NPPF, para 30)*

*Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to... ... accommodate the efficient delivery of goods and supplies (NPPF, para 35)*

### 2.3. London-wide policy

#### London Plan

2.3.1. The London Plan is the strategic planning document for the 32 London boroughs and the City of London. It sets out the framework for development in London, and the policy context for local planning policies. At the time of writing the London Plan is

under review by the new Mayor of London, but until this review is complete the most recent version from March 2016 remains in place.

2.3.2. Policies in the London Plan pertinent to this SPD are;

- Policy 2.17 – Strategic Industrial Locations
- Policy 6.1 – Strategic Approach to Transport
- Policy 6.4 – Enhancing London’s Transport Connectivity
- Policy 6.11 – Smoothing Traffic Flow and Tackling Congestion
- Policy 6.14 - Freight
- Policy 6.15 – Strategic Rail Freight Interchanges
- Policy 7.14 – Improving Air Quality
- Policy 7.15 Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and promoting appropriate soundscapes
- Policy 7.24 – Blue Ribbon Network
- Policy 7.26 – Increasing the use of the Blue Ribbon Network for Freight Transport

#### *Other London-wide policies and strategies*

2.3.3. The **Safeguarding Wharves Final Recommendation report** (2013) recommended that Walbrook Wharf – the only active wharf in the City – is retained as a waste facility, and increased use for other activities should be encouraged.

2.3.4. The **Mayor’s Transport Strategy** (MTS) sets out the Mayor’s transport policy. As with the London Plan, the current strategy dates from a previous Mayoral administration. Although a new MTS is currently in draft format, the previous strategy remains in place until the new document is formally adopted.

2.3.5. The existing MTS sets out policies to promote the use of river and rail for freight movements through safeguarding existing wharves and promoting rail freight infrastructure.

2.3.6. The MTS also addresses the safety implications of freight movements, promoting schemes such as the Fleet Operator Recognition Scheme (FORS) and improvements to vehicle and driver safety. The document also supports efficiencies through consolidation and out of hours delivery and servicing where possible, supported by quiet delivery schemes and Delivery and Servicing Plans.

2.3.7. The new **Mayor’s Transport Strategy** draft for consultation was published in June 2017. Although this is a draft document and subject to change, the document gives a strong indication of the Mayor’s transport priorities for his term of office. The draft strategy proposes a ten per cent reduction in central London lorry and van use by 2026. In particular there is a focus on the use of consolidation centres for construction and other sectors.

2.3.8. A new **London Environment Strategy** is expected to be published in draft format in summer 2017. This strategy will bring together the Mayor of London’s policies covering air quality, water, waste, green spaces and biodiversity, noise and climate change adaptation and mitigation.

2.3.9. **A City for All Londoners** was published in November 2016 and sets out the strategic direction of travel for the new Mayor of London. The document does not include specific policies, but gives an indication of the priorities of the new Mayor.

2.3.10. The movement of freight is specifically mentioned by the Mayor, in the context of an expected rise in van use associated with the changing needs and expectations of businesses and customers. The Mayor cites potential solutions such as riverside lorry consolidation centres, more deliveries being made by bike, and changing the way streets are used at different times of day.

2.3.11. The overarching 'Healthy Streets' approach to managing the street network is a key part of the Mayor's vision. In central London this means a shift towards reducing motorised traffic and fewer deliveries at peak times to create a more attractive environment for walking, cycling and using public transport.

### *Existing and Forthcoming Schemes Affecting Freight & Servicing*

2.3.12. **Low Emission Zone** – Covering most of Greater London, the Low Emission Zone requires larger vehicles and older small commercial vehicles to pay a charge if they do not achieve certain emissions standards. At present, only vehicles registered before 2006 are required to pay the charge, and compliance is very high.

2.3.13. **London Lorry Control Scheme (LLCS)** – administered by London Councils, the LLCS restricts the routes of large goods vehicles over 18 tonnes at night and at weekends. The aim of the scheme is to reduce noise pollution in residential areas. The scheme restricts large vehicles to a core network of main roads for as much of their journey as possible, with penalties issued for use of inappropriate routes. Vehicles wishing to use roads off the core network during the restricted hours must apply for a free permit to do so.

2.3.14. **Congestion Charge** – The Congestion Charge is a daily charge applying to all vehicles entering central London between 7am and 6pm Monday to Friday. The charge does not vary with the type of vehicle, so a large HGV would pay the same as a small van to enter the zone. Some discounts and exemptions do apply for Ultra Low Emission Vehicles, but in general most internal combustion engine vehicles will pay the charge.

2.3.15. **Emissions Surcharge (T-Charge)** – The Emissions Surcharge, which uses the same boundaries and time restrictions as the Congestion charge, requires older vehicles not meeting certain emissions criteria to pay a daily charge to enter the area. The Emissions Surcharge is introduced from 23<sup>rd</sup> October 2017 as an interim scheme, pending the introduction of the Ultra Low Emission Zone.

2.3.16. **Ultra Low Emission Zone** – The Ultra Low Emission Zone (ULEZ) will come into force in September 2020 and will replace the Emissions Surcharge. The ULEZ will require all vehicles within the Congestion Charge area to meet strict emissions standards, or pay a daily charge in addition to the Congestion Charge. The Mayor is carrying out a consultation on extending the area covered by the ULEZ, and bringing forward the introduction of the scheme to 2019.

## 2.4. City of London Policy

### *Local Plan*

2.4.1. The City of London Local Plan is the statutory planning document for the City. The following policies are pertinent to this SPD, and the policies in this document are in general accord with the policies in the Local Plan. The Local Plan is being reviewed, with an updated document expected to be adopted in 2019.

Policy DM 3.4 Traffic management  
Core Strategic Policy CS9: Thames and the Riverside  
Policy DM 15.6 Air quality  
Core Strategic Policy CS16: Public Transport Streets and Walkways  
Policy DM 16.1 Transport impacts of development  
Policy DM 16.5 Parking and servicing standards  
Policy DM 16.8 River transport  
Core Strategic Policy CS17: Waste  
Policy DM 17.1 Provision for waste in development schemes  
Policy DM 17.2 Designing out construction waste

More details on these policies can be found in Appendix A

### *Standard Highway and Servicing Requirements for Developments in the City of London*

2.4.2. The Standard Highway and Servicing Requirements for Developments in the City of London document sets out the guidelines for physical infrastructure associated with development-related highway and servicing arrangements. This document should be the point of reference for all matters relating to development impact on the public highway. A link to the document is provided in Appendix C.

### *City of London Delivery and Servicing Guidance*

2.4.3. The City of London Delivery and Servicing Guidance provides practical information on how to manage freight associated with an existing site or new development through a Delivery and Servicing Plan. The guidance closely supports this Supplementary Planning Document, providing details of best practice and sample quiet delivery codes of conduct. The guidance is shown in Appendix B.

### *Air Quality Strategy and SPD*

2.4.4. The City of London Air Quality Strategy 2015 - 2020 and Air Quality SPD set out the City's aims and responsibilities on managing Air Quality. The strategy aims to fulfil statutory obligations relating to air quality management, encourage measures to reduce harmful emissions in the City, and raise public awareness of air quality issues.

2.4.5. The Air Quality SPD sets out the City Corporation's requirements for reducing air pollution from new and refurbished developments within the Square Mile.

2.4.6. This SPD is in general accordance with the Air Quality Strategy Policies and Actions, particularly;

Policy 2: Political influence and commitment  
Policy 3: Working with the Mayor of London  
Policy 5: Reducing emissions from transport  
Action 29: Reducing Air Quality Impact of Freight  
Policy 6: Reducing emissions from new developments

More details on these policies can be found in Appendix A. Links to the documents can be found in Appendix C.

### *Low Emission Neighbourhood*

2.4.7. The City of London Low Emission Neighbourhood (LEN) is being introduced in the Barbican and Golden Lane areas, and is expected to be fully implemented by 2019. This project, which is part-funded by the Mayor of London, aims to trial several high-impact activities that will address local air quality issues and act as a pilot area for the rest of the City. Proposals include working with businesses to tackle emissions from delivery and servicing trips, looking at the potential for local freight consolidation, and zero emission last mile deliveries.

### *Noise Strategy*

2.4.8. The City of London Noise Strategy 2016 – 2026 sets out the City Corporation’s strategy for managing noise levels from all sources. Unwanted noise can be a nuisance to both residents and businesses, and while some noise in a working environment is inevitable, the City Corporation has a statutory responsibility to manage and minimise exposure to excessive or unnecessary noise, while ensuring that the city can function and flourish.

2.4.9. In relation to new development, policies in the Noise Strategy relevant to this SPD are as follows;

Policy Developments 1 - New noise making and noise sensitive development  
Policy Transport 12 - Night Time Servicing  
Policy Transport 13 – General  
Policy Transport 14 – General

### *Road Danger Reduction Plan*

2.4.10. The City of London Road Danger Reduction Plan 2013 sets out measures to reduce road danger at source. The plan recognises the disproportionate danger posed by goods vehicles, and proposes a combination of engineering measures and Education, Training and Publicity schemes to tackle road danger.

### *Waste Strategy*

2.4.11. The City of London Waste Strategy 2013 – 2020 set out the City Corporation’s vision “To increase reuse and recycling and reduce waste arisings and carbon impacts associated with waste management from householders, businesses and visitors within the City, to include City of London buildings and staff”.

- 2.4.12. Objective 7 of the strategy establishes the aim to reduce our negative impact on climate change and improve air quality in the City. This includes continuing to transport waste out of the City by river from the facility at Walbrook Wharf, removing an estimated 3744 HGV journeys from City streets each year.

### *Thames Strategy*

- 2.4.13. The Thames Strategy SPD sets out the City Corporation's overarching strategy for use of the river. The strategy supports the Local Plan policy CS9 Thames and the Riverside with regard to promoting the use of the river for freight as well as passenger transport. The SPD supports the safeguarding of the waste transfer site at Walbrook Wharf, and the reinstatement of the pier at Swan Lane for passenger or freight use.

### *Public Realm*

- 2.4.14. The City of London Public Realm SPD sets out 10 aims to maintain and enhance the City's built environment and provide a safe, high quality and inclusive place in which to work, live and enjoy.

- 2.4.15. Particularly relevant to the management of freight and servicing, the SPD aims to;

- Encourage simpler, more spacious and less cluttered streets and spaces (Aim 3)
- Provide more sustainable streets and spaces (Aim 6)
- Support and encourage wellbeing and healthy lifestyles (Aim 7)
- Provide better connected and more inclusive streets and spaces (Aim 9)

- 2.4.16. The SPD supports the management of out of hours deliveries, and timed closures of streets where appropriate.

### *Traffic Restrictions*

- 2.4.17. The City operates an area-wide ban on vehicles over 7.5 tonnes, covering most of the City. Vehicles over this weight are not permitted to enter the restricted area unless they are accessing premises within the area.

- 2.4.18. In May 2017, the Bank on Safety trial scheme was introduced, restricting the movement of all vehicles, except buses and cycles, through Bank Junction between 7am and 7pm. The trial will last up to 18 months.

- 2.4.19. Details of traffic restrictions are shown on the City Corporation website.



## 3. Vision and Aims

### 3.1.Vision

3.1.1.The vision for the management of freight and servicing in the City of London is to;

*“reduce the number of freight and delivery vehicles and their environmental impact on the City’s streets, particularly at peak times, whilst still allowing the City to flourish and avoiding negative impacts beyond the City’s boundaries.”*

3.1.2.This SPD will help achieve this vision by setting out guidance for new major development that will limit the impact of new and additional freight demand on the City and beyond.

### 3.2.Aims

3.2.1.The vision will be achieved via three principal aims, which are aligned with the Mayor of London’s emerging Transport Strategy;

**Minimise Freight and Servicing Trips** - Reduce the number of delivery and servicing trips generated by premises in the City – including personal deliveries and waste collections.

**Match demand to network capacity** - Maximise the proportion of essential delivery and servicing trips taking place outside peak times and where possible promote quiet evening or night-time deliveries. All essential delivery and servicing trips should be routed appropriately, using streets that are suitable for the vehicle being used, and minimising noise, emissions and road danger along the length of the route.

**Mitigate the impact of freight trips** - Where goods and services must be transported by road, including for last mile, use the safest and quietest zero emission means possible, which may mean moving goods or service personnel on foot or by cycle. The use of low emission river or rail transport for the transfer of goods and waste is encouraged, but the impact of additional noise and pollution at all stages of the journey should be considered. Loading and unloading of goods should not adversely impact on highway capacity, pedestrian, cycle or vehicle movement, road or site safety or unwanted noise levels either in the City itself, or on any stage of the journey.

## 4. Guidelines

### 4.1. Introduction

4.1.1. The single most effective way of proactively managing delivery and servicing arrangements is through a Delivery and Servicing Plan (DSP). For applications over 1000sqm or where the development is likely to have a significant impact on the transport network, the Local Plan requires a DSP as a planning condition. Where it is not required, the development of a DSP is strongly encouraged to effectively manage delivery and servicing movements associated with the site.

4.1.2. The following guidelines set out actions to effectively manage the freight and servicing impact of a development. The freight and servicing requirements of different types of development will vary. Section 5 of this document outlines the mix of measures that different types of development are expected to consider.

### 4.2. Measures to Minimise Freight and Servicing Trips

- a) A DSP should include measures that use appropriate smart or joint procurement to reduce the numbers of deliveries and servicing trips required to the premises. Joint procurement may be organised on an ad-hoc basis or through participation in a business network such as the Cheapside Business Alliance.
- b) Requiring suppliers to use consolidation centres in suitable locations within Greater London, to minimise the number of trips required to service the premises is strongly encouraged. In line with London Plan Policy 2.17 and Land for Industry and Transport Supplementary Planning Guidance Implementation Point SPG5, where use of an out of town consolidation centre is proposed, a facility in a designated Preferred Industrial Location may be most suitable. DSPs for larger developments should address the use of freight consolidation to minimise trips to the premises.
- c) A requirement to use freight consolidation should be supported by a system to ensure that the consolidation works effectively to reduce the number of vehicle movements to and from the site and results in an overall reduction in total road miles compared with traditional servicing arrangements. A system of 'micro-consolidation' within the City which enables the use of last mile deliveries by foot, cycle or zero emission van could be considered. Where any sort of consolidation centre is to be used, details of the vehicle type to be used, and the route between the consolidation centre and the site should be included in the DSP. A robust system of monitoring should be established to measure the impacts of using consolidation, with outcomes reported to the City Corporation as required by the DSP.
- d) Personal deliveries to staff or residents are considered part of the delivery and servicing of the premises, and should be managed in the same way. Agreements to prohibit personal deliveries to workplaces, especially those associated with online shopping, are strongly encouraged. Providing staff with membership of a 'click and collect' parcel drop-off service, or promoting these services can provide a good alternative, and demonstrate a commitment to minimising personal deliveries to workplaces.

- e) Use of low emission river transport for goods and waste is encouraged. The safeguarded waste transfer site at Walbrook Wharf provides a means of removing domestic and commercial waste from the City with minimal use of the road network. Agreements with waste management companies to make use of this facility are strongly encouraged. Where the river can be used, agreements with waste management companies should specify the use of low emission and Direct Vision vehicles, where feasible, for collection within the City.
- f) The provision of adequate on-site storage space for goods is encouraged to reduce the need for frequent deliveries of non-perishable items. Smaller sites where storage space is very limited are encouraged to make arrangements to share storage space with neighbouring properties to facilitate bulk deliveries. Where possible, vehicles making deliveries to a site should be loaded with waste or returns to maximise trip efficiency.
- g) In line with Local Plan policy DM17.1, on-site waste management of all possible materials should be encouraged, and the minimum possible frequency of waste and recycling collection should be specified. Where possible, occupiers of multiple-occupancy buildings should seek to co-ordinate waste contractor procurement to minimise waste collection trips. The City of London Time Banding Scheme restricts the times at which bagged waste can be left on the public highway for collection.
- h) In line with Local Plan policy DM17.2, waste generated through construction and deconstruction should be minimised through the re-use of existing structures wherever possible, and the on-site recycling of deconstruction waste where feasible.

### **4.3.Measures to Match demand to network capacity**

- i) Unless there are restrictions regarding noise or other considerations at the premises, evening, night time or weekend delivery and servicing should be the default outside residential areas. All deliveries requiring activity outside working hours, either at the site in the City or elsewhere in the delivery chain, should be subject to a quiet delivery agreement or commitment to minimise noise and pollution impacts at all stages of the delivery process, including along the delivery route and at any intermediary points such as a consolidation centre. Details of the delivery and servicing timings, and how they will be managed to minimise noise impacts at all stages of the delivery process and along the route should be included in the DSP.
- j) Where daytime deliveries and servicing are essential or out of hours deliveries are not permitted or feasible, these should occur off-peak (i.e. avoiding 7 – 10am, 12 – 2pm and 4 – 7pm). A booking system should be used and enforced to ensure that delivery and servicing visits are restricted to these times, with deliveries arriving outside of these hours turned away.
- k) Where a City business operates a fleet of vehicles, steps should be taken to ensure that appropriate routes are used by drivers both within the City and at all stages of their journey. Where possible, routes should be chosen to avoid areas of high pedestrian or cycle use both within and beyond the City. Routes should aim to avoid residential areas along the length of the route where possible, especially when movements take place outside weekday working hours. The London Lorry Control Scheme controls the movement of larger goods vehicles taking place at night and at weekends. A similar approach may be suitable for route planning of smaller goods vehicles to reduce the noise impact on residential amenity.

#### **4.4.Measures to Mitigate the impact of freight trips**

- l) Consideration should be given to the type of vehicle used to carry out deliveries or collections, including waste collections. Responsible procurement policies that prioritise suppliers that use zero or low emission vehicles are encouraged. Vehicles that meet the forthcoming Ultra Low Emission Zone standards should be a minimum requirement in any delivery or servicing contract where vehicles can be specified. Where a business operates a fleet of vehicles, consideration should be given to the use of cargo bikes, and zero or low emission vehicles. In line with Local Plan Policy 16.6, infrastructure to support the use of commercial electric vehicles should be provided in off-street loading or parking areas.
- m) Particularly where large vehicles are required, the procurement process should require high standards of vehicle and driver competency from suppliers. A requirement for suppliers to be accredited by FORS or an equivalent scheme, which promotes good working practices and vehicle management, as well as routing and scheduling that minimises noise and environmental impact, is encouraged. A requirement for the use of Direct Vision vehicles which provide the driver with an improved field of vision is encouraged. Subject to consultation from the Mayor of London, the lowest rated HGVs would be restricted or banned within Greater London from 2020. For fleets serving construction sites, adherence to the Construction Logistics and Community Safety (CLOCS) standard which aims to reduce Work Related Road Risk is strongly encouraged.
- n) The physical space in which goods are loaded and unloaded should be designed in accordance with the City of London Highways and Servicing Guidance (see Appendix C). Where on-street loading is permitted, measures should be put in place to ensure that the movement and safety of pedestrians, cyclists and other road users is not adversely affected and there is no adverse impact on the amenity of nearby residents. The promotion of a 'no engine-idling' policy is encouraged.

#### **4.5.Monitoring**

- 4.5.1.The impact of all measures taken to minimise, match and mitigate the impact of freight movement both within the City and beyond should be tracked with a robust system of monitoring. Monitoring is likely to cover air quality, noise, road safety and traffic impacts of the operation, but other areas may also be specified for particular observation to ensure positive outcomes for the City and other areas. This monitoring will usually take place through the DSP, and outcomes should be reported to the City Corporation as required by the DSP.

### **5. Types of Development**

#### **5.1.Introduction**

- 5.1.1.The types of measures taken to manage deliveries and servicing will depend largely on the activities taking place at the premises. This section outlines typical measures that developers dealing with different land uses would be expected to consider in the management of freight and servicing. Where the site has mixed uses (for example retail on the ground floor, with office and hotel space above), a combination of measures should be considered in a DSP.

## 5.2. Office Developments

- 5.2.1. Small and medium sized office developments may not generate the volume of delivery and servicing trips of larger towers, but due to the number of small offices in the City their collective impact is significant. Joint procurement agreements with neighbouring buildings can prove beneficial for small offices. Producing a joint DSP with adjacent properties and occupiers may allow efficiencies in procurement of common goods and services, including waste collection, and shared use of loading bays or servicing areas. Procurement should specify, where possible, the use of the safest, quietest and cleanest method of transport possible to transport goods and services.
- 5.2.2. The prohibition of personal deliveries to offices, combined with an offer of click and collect services to employees is one way of reducing the number of vehicles serving the office, and can significantly reduce the impact on the road network.
- 5.2.3. The re-timing of some deliveries should be possible within a small office development. If a development is not to be staffed overnight or at weekends, arrangements with nearby businesses to accommodate out of hours deliveries may be feasible in order to reduce daytime impact on the network. The potential noise impact of moving to out of hours deliveries should be assessed along any affected access routes and loading points as well as the site itself to ensure that the arrangements are acceptable.
- 5.2.4. In addition, medium-sized office developments should strongly consider a voluntary code, mandating the consolidation of inbound goods to reduce the impact of the development and demonstrate a commitment to minimising freight movements.
- 5.2.5. In addition to the measures for small and medium sized office developments, larger office developments are likely to have a requirement to consolidate deliveries of goods inward. This consolidation regime should be enforced through a robust booking and monitoring system that can demonstrate the number of vehicle trips avoided as a result of the consolidation. If it is not required as a planning condition, a voluntary cap on the number of delivery vehicles each day is encouraged.

## 5.3. Multi-tenanted buildings

- 5.3.1. In addition to the items mentioned above, buildings with multiple tenants should consider the development of an occupier forum to co-ordinate joint procurement, waste collection and collaborative working.

## 5.4. General Retail

- 5.4.1. The delivery and servicing needs of retailers are focussed around ensuring that goods are received into the store at appropriate times.
- 5.4.2. Management of freight movements in retail developments should focus on the consolidation of goods into the store and waste/returns from the store, ensuring that as few movements as possible are required in order to allow the business to operate. Developments with sufficient storage space can reduce the requirement for regular

deliveries. Ensuring that vehicles used for deliveries are also loaded with returns or waste, where appropriate, maximises efficiency and reduces empty vehicle mileage, minimising the development's impact on the network.

5.4.3. Retail can benefit significantly from out-of-hours deliveries where on-street loading restrictions may not apply, or be less stringent. Quiet delivery codes of conduct to minimise the noise impact are particularly important for retail deliveries which often involve the use of metal cages for moving goods.

## **5.5. Food and Drink Retail/Pubs & Restaurants**

5.5.1. Many of the measures appropriate for general retail are applicable to the food and drink sector, including pubs and restaurants. The needs of a large chain organisation are likely to be quite different to a small individual shop or café. An organisation with several City locations may be able to demonstrate that deliveries to the City are already efficient, and make good use of consolidation to minimise freight movements. In these instances, the focus of a DSP should be on ensuring that quiet deliveries occur outside peak hours, and with the safest, quietest and cleanest vehicles available. Particular care should be taken with regard to more noisy deliveries/servicing e.g. waste bottle collections, to avoid disturbance to nearby residents. DSPs should employ quiet delivery agreements to reduce noise and disturbance on-street. Engines should be turned off unless absolutely necessary for deliveries to reduce noise and air pollution.

5.5.2. Smaller or independent food and drink retailers not benefitting from a large procurement network may use many suppliers for different items. In these instances, joint procurement techniques to maximise co-operation between neighbouring businesses may offer the best way of reducing the number of freight movements without impacting on business operations.

5.5.3. Any delivery services associated with the food or drink retailers, whether managed by the occupier or not, should be considered and managed by a DSP. Where delivery services are made available, measures to encourage the use of foot or cycle deliveries are encouraged.

## **5.6. Hotels and Hospitality**

5.6.1. Many of the measures appropriate to reduce the impact of delivery and servicing of hotels will be similar to those for food and drink outlets. Hotels may be particularly well placed to take advantage of quiet overnight or off-peak deliveries due to round the clock staff availability, subject to the impact on nearby residential properties and hotel guests.

5.6.2. Joint procurement of common services between hotels, such as linen delivery or dry cleaning is particularly encouraged for hotels and hostels.

## **5.7. Residential and student accommodation**

5.7.1. Residential and student accommodation sites will have significantly different patterns of deliveries to most commercial properties, with the majority of deliveries being

personal. The promotion and use of central delivery points where all residents can collect goods that have been delivered is encouraged.

5.7.2. Where servicing of a building is carried out by a management agent, a commitment to carry out routine servicing out of hours where possible is encouraged, and consolidation of any required deliveries is encouraged.

5.7.3. Student accommodation providers should address servicing and deliveries within published building management plans. These plans should also address the impact of arrivals and departures at the beginning and end of terms, staggering activity using a booking system to avoid undue impact on the highway network and disturbance to adjacent occupiers. Building managers should liaise with the City Corporation Highways department and City Police prior to busy periods of movement to ensure disruption caused by loading and unloading is minimised.

## **6. Construction Logistics Plans**

6.1.1. A Construction Logistics Plan (CLP) is required for all major developments, where a development will have a significant impact on the transport network during construction.

6.1.2. The City Corporation's Code of Practice for Deconstruction and Construction Sites (CPDCS) provides guidance on environmental best practice for construction sites, and this should be considered in the development of a CLP.

6.1.3. Membership of the City of London Considerate Contractor Scheme (CCS) which promotes good practice on and about construction sites is encouraged.

6.1.4. CLPs submitted in support of an application will be assessed in line with CPDCS and the London-wide Construction Logistics Plan Guidance issued by Transport for London, see Appendix C.

## **7. Enforcement**

7.1.1. The need for effective enforcement of the measures set out in this SPD is recognised. As part of the restructure of City Transportation, resources are being made available to review and enforce the contents of DSPs. Ongoing enforcement will ensure that agreed DSP conditions are adhered to, and the benefits to the City set out in this SPD are achieved.

## 8. Glossary

**Air Quality Management Area** – an area where air quality objectives are unlikely to be achieved, requiring the local authority to produce a plan to improve air quality.

**Construction Logistics Plan** – A plan setting out how all aspects of the freight logistics of a construction site will be managed. An approved plan will be required before construction commences.

**Direct Vision Standard** - The Direct Vision Standard for heavy goods vehicles (HGVs) assesses and rates how much a HGV driver can see directly from their cab in relation to other road users.

**Delivery and Servicing Plan** – A plan setting out how all delivery and servicing to a completed site will be managed, including measures to minimise freight trips, match demand to network capacity, and mitigate the impact of essential freight trips.

**Fleet Operators Recognition Scheme (FORS)** - a voluntary accreditation scheme that promotes best practice for commercial vehicle operators.

**Light Goods Vehicles** – typically commercial vehicles up to 3.5 tonnes maximum gross weight. Includes most vans.

**National Planning Policy Framework** – the planning framework drawn up by central government, providing guidance for local planning authorities in drawing up local plans and making planning decisions.

**Peak times** - 7 – 10am, 12 – 2pm and 4 – 7pm on weekdays.

**Residential Areas** – Defined in the City of London Local Plan, figure X.

**Ultra Low Emission Vehicle (ULEV)** - the collective term for Battery electric vehicles (BEVs) Plug-in hybrid electric vehicles (PHEVs), Range-extended electric vehicles (RE-EVs), Hydrogen fuel cell electric vehicles (FCEVs)



## 9. Abbreviations

AQMA – Air Quality Management Area  
CCS – Considerate Contractor Scheme  
CLOCS - Construction Logistics and Community Safety  
CLP – Construction Logistics Plan  
CPDCS - City Corporation Code of Practice for Deconstruction and Construction Sites  
DSP – Delivery and Servicing Plan  
FORS – Fleet Operators Recognition Scheme  
HGV – Heavy Goods Vehicle  
LEN – Low Emission Neighbourhood  
LGV – Light Goods Vehicles  
LLCS – London Lorry Control Scheme  
MTS – Mayor’s Transport Strategy  
NPPF – National Planning Policy Framework  
SPD – Supplementary Planning Document  
TfL – Transport for London  
ULEZ – Ultra Low Emission Zone  
ULEV – Ultra Low Emission Vehicle

## Appendices

- A. Details of other City of London Corporation Policies
- B. City of London Delivery and Servicing Plan Guidance
- C. Details of External Guidance and Best Practice

## **Appendix A - Details of other City of London Corporation Policies**

### **Local Plan**

#### **Policy DM 3.4 Traffic management**

To require developers to reach agreement with the City Corporation and TfL on the design and implementation of traffic management and highways security measures, including addressing the management of service vehicles, by:

- consulting the City Corporation on all matters relating to servicing;
- restricting motor vehicle access, where required;
- implementing public realm enhancement and pedestrianisation schemes, where appropriate;
- using traffic calming, where feasible, to limit the opportunity for hostile vehicle approach.

#### **Core Strategic Policy CS9: Thames and the Riverside**

4. Promoting the functional uses of the River Thames and its environs for transport, navigation and recreation, particularly through:

- (i) retaining Walbrook Wharf for waterborne freight traffic;
- (ii) encouraging the use of the River Thames for the transport of construction and deconstruction materials and waste;
- (iii) retaining Blackfriars Pier, and access to Tower Pier, and encouraging the reinstatement of Swan Lane Pier and the use of these facilities for river transport. Applications to remove these facilities will be refused unless suitable replacement facilities of an equivalent or higher standard are provided;
- (iv) maintaining London Bridge, Tower Bridge, Blackfriars Bridge, Southwark Bridge and the Millennium Bridge;
- (v) refusing development on or over the River, except for structures which specifically require a waterside location for river-related uses;
- (vi) resisting the permanent mooring of vessels; if moored vessels are exceptionally permitted they must be of national importance, have a special connection with the City and the River Thames, be used for a river-related purpose and not have a detrimental impact on navigation, river regime or environment;
- (vii) maintaining access points to the River Thames foreshore, from both land and water, for public or private use as appropriate, subject to health and safety and environmental safeguards.

#### **Policy DM 15.6 Air quality**

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.
2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.
3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).
4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.
5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.

6. 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 building in the development in order to ensure maximum dispersion of pollutants.

### **Core Strategic Policy CS16: Public Transport Streets and Walkways**

To build on the City's strategic central London position and good transport infrastructure to further improve the sustainability and efficiency of travel in, to, from and through the City, by:

4. Minimising congestion and reducing vehicle emissions:

- (i) directing through motor traffic within the City onto appropriate streets in accordance with the Highway Hierarchy. Bus routes will continue to serve customer needs throughout the City and will not be subject to the Highway Hierarchy;
- (ii) continuing to facilitate intermediate modes (coaches, car clubs, taxis and private hire vehicles) and to provide for essential motor vehicle traffic, including addressing the servicing of City buildings and the needs of disabled people, whilst minimising the environmental impact of these modes;
- (iii) encouraging the provision of infrastructure for alternative-fuel vehicles, such as off-street electric vehicle recharging points;
- (iv) using traffic management measures and street works permits to improve journey time reliability on the City's roads;
- (v) requiring developers to demonstrate, through transport assessments, construction logistics plans, travel plans and delivery/servicing plans, how the environmental impacts and road danger of travel and servicing will be minimised, including through the use of river transport.

### **Policy DM 16.1 Transport impacts of development**

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:

- road dangers;
- pedestrian environment and movement;
- cycling infrastructure provision;
- public transport;
- the street network.

2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

3.16.10 Delivery and Servicing Plans will be required for all major development and any other development that will cause significant transport impacts on the local or wider area, through operational deliveries and servicing.

3.16.11 Construction Logistics Plans will be required for all major development and for any development that will cause significant transport impacts during its construction phase.

3.16.12 Where practicable, Transport Assessments, Travel Plans and other statements should be combined into a single document. Applicants should discuss the scope of the transport documentation required early in the pre-application phase to ensure that it provides an assessment relevant to the City's specific circumstances.

3.16.13 Mitigation for adverse impacts should be detailed in assessments and plans. Where flexible permissions are granted which allow a range of uses, interim assessments and plans should be prepared at application stage and updated when occupants and uses are finalised.

#### **Policy DM 16.5 Parking and servicing standards**

On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.

3.16.19 The low numbers of private motor vehicles mean that delivery and service vehicles have a relatively greater impact on traffic congestion and air quality. Efficient off-street servicing and delivery arrangements are vital to keep the City's traffic moving. In order to reduce vehicle impact on air quality, electric vehicle fast-charging infrastructure needs to be available in convenient locations. Guidance is contained in the City Corporation's 'Standard Highway and Servicing Requirements for Developments in the City of London'.

#### **Policy DM 16.8 River transport**

1. River piers, steps and stairs to the foreshore, the Walbrook Wharf safeguarded site, and other river-based transport infrastructure will be safeguarded and improvements will be supported. 143

2. Development adjacent to or over the River Thames must be supported by a Transport Assessment and a Construction Logistics Plan addressing the potential for the use of the river for the movement of construction materials and waste.

3.16.22 New river piers must be publicly accessible. The City Corporation will expect construction and waste materials from developments on or near the river to be transported by river barge.

#### **Core Strategic Policy CS17: Waste**

To support City businesses, residents and visitors in making sustainable choices regarding the minimisation, transport and management of their waste, capitalising on the City's riverside location for sustainable waste transfer and eliminating reliance on landfill for municipal solid waste (MSW) by:

1. Enabling waste minimisation and adherence to the waste hierarchy:

(i) requiring the provision of facilities for waste segregation, handling and management within new developments;

(ii) increasing the proportion of municipal solid waste recycled to at least 45% by 2015 in line with the City of London Waste Strategy;

(iii) promoting improved waste management choices for businesses and residents.

2. Enabling waste to be managed at the nearest available suitable location:

(i) identifying waste management capacity in the City, or elsewhere in London, to meet the City's London Plan waste apportionment target, including through partnership working with the London Borough of Bexley;

(ii) safeguarding Walbrook Wharf as a waste handling site and investigating the potential for waste management, alongside its waste transfer function;

(iii) co-operating with other waste planning authorities to ensure appropriate waste management facilities are available to manage waste generated in the City.

3. Enabling the sustainable transport of materials including waste and recyclables by river:

(i) safeguarding Walbrook Wharf as a wharf suitable for river transport of materials including waste;

(ii) exploring the potential for further use of waterways for the transport of waste and construction materials subject, where appropriate, to the potential impact on Natura 2000 sites.

#### **Policy DM 17.1 Provision for waste in development schemes**

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.
2. On-site waste management, through techniques such as recycle sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

#### **Policy DM 17.2 Designing out construction waste**

New development should be designed to minimise the impact of deconstruction and construction waste on the environment through:

- reuse of existing structures;
- building design which minimises wastage and makes use of recycled materials;
- recycling of deconstruction waste for reuse on site where feasible;
- transport of waste and construction materials by rail or river wherever practicable;
- application of current best practice with regard to air quality, dust, hazardous waste, waste handling and waste management.

### **Noise Strategy**

#### **2.4.1 New noise making and noise sensitive development**

**POLICY DEVELOPMENTS 1:** The City Corporation will seek to manage noise impacts as a result of new development through the introduction and application of appropriate and effective planning procedures, policies, conditions and agreements, and in particular:

c) Continue to limit and contain noise and vibration from construction and deconstruction activities through the Planning Consent process, based on the latest edition of the City of London Code of Practice for Deconstruction and Construction and other relevant standards. This includes requiring through planning conditions the approval and implementation of Environmental Management and Construction Logistics Plans where appropriate.

e) Prevent the introduction of noise sensitive uses into areas close to commercial developments with high noise levels where the achievement of acceptable standards for quiet living conditions are not technically practicable.

f) Place limits on the hours of operation of servicing and noise generating activities at developments where noise sensitive premises are likely to be adversely affected. Existing limits for hours of servicing (permitted between 07:00 – 23:00, Monday – Saturday, except Bank Holidays) to be applied; where this is not practicable a plan to minimise noise from servicing will be required to be approved and implemented.

**POLICY TRANSPORT 12:** The City Corporation will continue to support restrictions on night time and weekend commercial vehicle movements through the City and to limit operational hours of noisy servicing activities in noise sensitive locations wherever necessary. However the City Corporation will consider a more flexible approach where our normal time restrictions are proving problematical provided that other acceptable noise management measures are implemented such as use of loading bays and consolidation centres. Where appropriate, we will promote TfL's Code of Practice for Quieter Deliveries within the City. Where there is no likelihood of disturbance 24 hour servicing is

actively encouraged. We will review the implementation of this policy on an ongoing basis and will revise our approach as required.

**POLICY TRANSPORT 13:** The City Corporation will seek to identify and exploit opportunities and synergies between this Noise Strategy and other City of London Corporation policies (e.g. the City Corporation's Air Quality Strategy and Local Transportation Implementation Plan) to reduce noise and vibration and to better manage the impact of noise from road transportation, servicing and street works.

**POLICY TRANSPORT 14:** The City Corporation will where possible, support and contribute to the development of low noise methods, schemes, management techniques and technologies which could reduce noise or better manage noise impacts from road traffic, street works and servicing.

### **Air Quality Strategy**

Policy 2: Political influence and commitment

The City Corporation will seek opportunities to influence air quality policy across London to secure lower levels of air pollution in the Square Mile.

Policy 5: Reducing emissions from transport

The City Corporation will seek opportunities for a significant reduction in emissions associated with road traffic in the Square Mile.

Action 29: The City Corporation will look for opportunities to significantly reduce the impact of freight distribution on air quality across central London and specifically work with businesses and the construction and demolition industry to identify opportunities for a reduction in vehicle movements, freight consolidation, zero-emission and low emission last mile deliveries.

Policy 6: Reducing emissions from new developments The City Corporation will ensure that new developments have a minimal impact on local air quality both during the development phase and when occupied.

### **Air Quality SPD**

#### **Requirements**

Section 2: Sustainable Development and Building Design

Reduce Emissions:

- Provide for sustainable travel

Section 4: Reducing Air Quality impacts during construction / deconstruction

Scheme of Protective Works detailing:

- Details of continuous monitoring and trigger levels
- No engine idling policy
- CLP in line with TfL best practice

Section 5 Air Quality Impact Assessments

Air Quality Neutral Assessment (or Air Quality Positive as policy emerges)

required when the floor space is 1,000m<sup>2</sup> or more or 10 or more residential dwellings:

- Building emissions
- Transport emissions

**APPENDIX B - City of London Delivery and Servicing Plan Guidance**

Available online: <https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/design/Documents/City-of-London-delivery-and-service-guidance.pdf>



## APPENDIX C - Details of City of London and External Guidance and Best Practice

These documents will be updated as required.

Document	Publisher	Link
Local Plan	City of London Corporation	<a href="https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-policy/local-plan/Pages/default.aspx">https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-policy/local-plan/Pages/default.aspx</a>
Air Quality Strategy	City of London Corporation	<a href="https://www.cityoflondon.gov.uk/business/environmental-health/environmental-protection/air-quality/Pages/air-quality.aspx">https://www.cityoflondon.gov.uk/business/environmental-health/environmental-protection/air-quality/Pages/air-quality.aspx</a>
Air Quality SPD	City of London Corporation	<a href="https://www.cityoflondon.gov.uk/business/environmental-health/environmental-protection/air-quality/Pages/air-quality.aspx">https://www.cityoflondon.gov.uk/business/environmental-health/environmental-protection/air-quality/Pages/air-quality.aspx</a>
Noise Strategy	City of London Corporation	<a href="https://www.cityoflondon.gov.uk/business/environmental-health/environmental-protection/Pages/Noise-strategy-and-policy.aspx">https://www.cityoflondon.gov.uk/business/environmental-health/environmental-protection/Pages/Noise-strategy-and-policy.aspx</a>
Public Realm SPD	City of London Corporation	<a href="https://www.cityoflondon.gov.uk/services/environment-and-planning/city-public-realm/Pages/public-realm-design-guidance.aspx">https://www.cityoflondon.gov.uk/services/environment-and-planning/city-public-realm/Pages/public-realm-design-guidance.aspx</a>
Road Danger Reduction Plan	City of London Corporation	<a href="https://www.cityoflondon.gov.uk/services/transport-and-streets/road-safety/Pages/default.aspx">https://www.cityoflondon.gov.uk/services/transport-and-streets/road-safety/Pages/default.aspx</a>
Code of Practice for Deconstruction and Construction Sites	City of London Corporation	<a href="https://www.cityoflondon.gov.uk/business/environmental-health/environmental-protection/Pages/Construction-.aspx">https://www.cityoflondon.gov.uk/business/environmental-health/environmental-protection/Pages/Construction-.aspx</a>
Standard Highway and Servicing Requirements for Developments in the City of London	City of London Corporation	<a href="https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/heritage-and-design/Documents/Standard-Highway-and-Servicing-requirements-advice-note.pdf">https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/heritage-and-design/Documents/Standard-Highway-and-Servicing-requirements-advice-note.pdf</a>
Supplementary Planning Documents Directory	City of London Corporation	<a href="https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-policy/Pages/Supplementary-Planning-Documents.aspx">https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-policy/Pages/Supplementary-Planning-Documents.aspx</a>
Design Guidance Directory	City of London Corporation	<a href="https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/design/Pages/design-guidance.aspx">https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/design/Pages/design-guidance.aspx</a>
Safeguarding Wharves Final Recommendation report	GLA	<a href="https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/safeguarded-wharves">https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/safeguarded-wharves</a>
London Plan	GLA	<a href="https://www.london.gov.uk/what-we-do/planning/london-plan">https://www.london.gov.uk/what-we-do/planning/london-plan</a>
Land for Industry and Transport Supplementary Planning Guidance	GLA	<a href="https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/land-industry-and">https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/land-industry-and</a>

Mayor's Transport Strategy 2010	GLA	<a href="https://www.london.gov.uk/what-we-do/transport/transport-publications/mayors-transport-strategy">https://www.london.gov.uk/what-we-do/transport/transport-publications/mayors-transport-strategy</a>
Mayor's Transport Strategy 2017 Draft	GLA	<a href="https://www.london.gov.uk/what-we-do/transport/our-vision-transport/draft-mayors-transport-strategy-2017">https://www.london.gov.uk/what-we-do/transport/our-vision-transport/draft-mayors-transport-strategy-2017</a>
London Environment Strategy	GLA	To be published
Construction Logistics Plan Guidance	TfL	<a href="http://content.tfl.gov.uk/construction-logistics-plan-guidance-for-developers.pdf">http://content.tfl.gov.uk/construction-logistics-plan-guidance-for-developers.pdf</a>
FORS Guidance	FORS	<a href="https://www.fors-online.org.uk/cms/new-standard/">https://www.fors-online.org.uk/cms/new-standard/</a>



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# City of London Freight and Servicing SPD

## Strategic Environmental Assessment

Prepared by LUC  
July 2017

**Project Title:** Strategic Environmental Assessment of the City of London Freight and Servicing SPD

**Client:** The City of London Corporation

Version	Date	Version Details	Prepared by	Checked by	Approved by
1.0	25/06/2017	Internal Draft	Alex Martin	Alex Martin	
2.0	04/07/2017	Draft for Client Comment	Alex Martin	Sarah Smith	Jeremy Owen
3.0	07/07/17	Final Draft for Consultation	Alex Martin	Sarah Smith	Jeremy Owen



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# City of London Freight and Servicing SPD

## Strategic Environmental Assessment

Prepared by LUC  
July 2017

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# 1 Introduction

- 1.1 This Strategic Environmental Assessment (SEA) Report has been prepared by LUC on behalf The City of London for The City of London Freight and Servicing Supplementary Planning Document (SPD). This SEA report should be read in conjunction with that document.

## Context for the City of London Freight and Servicing SPD

- 1.2 The City of London ('the City') covers an area of just over one square mile, located within the central area of London. It is bordered by the London Boroughs of Islington, Hackney, Tower Hamlets, Southwark, Westminster, Camden and Lambeth.
- 1.3 The City represents the original core from which London developed and so it contains important historic buildings and areas as well as archaeological remains. There are a large number of conservation areas in the City, as well as protected vistas and views and the Tower of London World Heritage Site. There are over 600 listed buildings and several biodiversity designations, including a Site of Metropolitan Importance for Nature Conservation, The River Thames and its Tidal Tributaries.
- 1.4 The principal activity of the City is in financial and businesses services; it is a centre of global importance for these services, and as a result forms a major component of the British economy.
- 1.5 The City provides employment for approximately 450,000<sup>1</sup> people, most of whom commute to work from elsewhere in London and the surrounding regions. The extensive provision of public transport in the area makes this possible.
- 1.6 The City contains the highest density of development in Britain and its buildings are subject to a high rate of redevelopment. Offices dominate the land use, and occupy approximately three quarters of its floorspace. Other land uses include retail, recreation and cultural activities and provide important services for workers and residents of the area however, each of these only accounts for a small proportion of floorspace. Open spaces occupy a small but important proportion of the land area.
- 1.7 The residential population of the City, as defined by the 2011 census is approximately 7,400 and the number is growing. Over 29,000 students study in the City and increasing numbers of visitors need to be accommodated.

## The City of London Freight and Servicing SPD

- 1.8 Despite the small footprint of the City of London, the large working population generates significant demand for physical goods and services. The working population of the City is forecast to grow to 475,000, and the residential population to 10,250 by 2036, so the need to manage the effects of the increasing demand for space on the transport network continues to grow. The efficient movement of goods and provision of services are fundamental requirements for a successful city.
- 1.9 The City of London Freight and Servicing SPD will set out the City Corporation's requirements for new development in relation to the management of freight and servicing. The document is intended to be read in conjunction with the Standard Highway and Servicing Requirements for Development in the City of London, the Code of Practice for Deconstruction and Construction Sites (published by the City Corporation) and the Construction Logistics Plan Guidance (published by Transport for London).

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<sup>1</sup> City of London Employment Trends 2016, BRES 2016

1.10 Briefly the document will set out:

- The background to, and definition of freight and servicing and factors that drive the need to manage freight and servicing including; traffic, road danger reduction, air quality and carbon emissions.
- The policy context, including key local, national and international policy and also including existing and planned schemes and projects.
- The vision for the management of freight and servicing in the City – *'reduce the number of freight and delivery vehicles and their environmental impact on the City's streets, particularly at peak times, whilst still allowing the City to flourish and avoiding negative impacts beyond the City's boundaries.'* The SPD will help to achieve the vision by setting out guidance for new development that will limit the impact of new and additional freight demand on the City and beyond.
- The aims of the SPD – *'to minimise freight and servicing trips, to match demand to network capacity and to mitigate the impact of freight trips'*.
- Guidelines, actions and measures for achieving the above aims.
- Measures for each type of development including office, multi-tenanted buildings, general retail, food and drink, hotels and hospitality, and residential.
- The need and requirement for construction logistics plans.

1.11 The SPD will also include guidance on the use of night time servicing as well as measures that encourage the use of consolidation centres, which may be located outside of the City.

## Strategic Environmental Assessment

- 1.12 Strategic Environmental Assessment (SEA) is a statutory assessment process, required under the SEA Directive<sup>2</sup>, which was transposed into UK law by the SEA Regulations (Statutory Instrument 2004, No 1633). The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment and which set the framework for future consent of projects requiring Environmental Impact Assessment (EIA)<sup>3</sup>. A screening exercise was undertaken in February 2017<sup>4</sup>. This concluded that the SPD could give rise to significant environmental effects and therefore it was screened into the SEA process. The purpose of SEA, as defined in Article 1 of the SEA Directive is *'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans....with a view to promoting sustainable development'*.

### Structure of this report

- 1.13 This report is the SEA report for the City of London Freight and Servicing Supplementary Planning Document (SPD) **Table 1.1** below signposts how the requirements of the SEA Regulations have been met within the SEA work undertaken to date.

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<sup>2</sup> SEA Directive 2001/42/EC

<sup>3</sup> Under EU Directives 2011/92/EU and 2014/52/EC concerning EIA

<sup>4</sup> City of London Freight and Servicing SPD Screening Statement, February 2017



**Table 1.1 Requirements of the SEA Regulations and where these have been addressed**

SEA Regulations Requirements	Where covered in this SEA report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Part 3 and Schedule 2 of the SEA Regulations):	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes	<b>Chapter 3 and Appendix 2.</b>
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	<b>Chapter 3 and Appendix 3.</b>
c) The environmental characteristics of areas likely to be significantly affected	<b>Chapter 3 and Appendix 3.</b>
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	<b>Chapter 3 and Appendix 3.</b>
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation	<b>Chapter 3 and Appendix 2.</b>
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors <sup>5</sup> .	<b>Chapter 4</b>
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	<b>Chapters 4</b>
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	<b>Chapter 2 and Appendix 4.</b>
i) a description of measures envisaged concerning monitoring in accordance with Reg. 17;	<b>Chapter 5</b>
j) a non-technical summary of the information provided under the above headings	A separate <b>non-technical summary</b> document has been prepared to accompany this full SEA report.
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Reg. 12(3))	Addressed throughout this SEA report.

<sup>5</sup> These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects

SEA Regulations Requirements	Where covered in this SEA report
<p><b>Consultation:</b></p> <ul style="list-style-type: none"> <li>authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Reg. 12(5))</li> </ul>	<p>Consultation on the SEA Scoping Report for the draft SPD was undertaken between the 23<sup>rd</sup> and the 28<sup>th</sup> of June 2017. The consultee responses and our responses are included in <b>Appendix 1</b>.</p>
<ul style="list-style-type: none"> <li>authorities with environmental responsibility and the public, shall be given an effective opportunity to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Reg. 13(3), 13(4))</li> </ul>	<p>Consultation is being undertaken in relation to the draft SPD between 7<sup>th</sup> August and 30<sup>th</sup> September 2017.</p>
<ul style="list-style-type: none"> <li>other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Reg. 14).</li> </ul>	<p>N/A</p>
<p><b>Taking the environmental report and the results of the consultations into account in decision-making (Reg. 16)</b></p>	
<p><b>Provision of information on the decision:</b> When the plan or programme is adopted, the public and any countries consulted under Reg.s 13 and 14 must be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> <li>the plan or programme as adopted</li> <li>a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Reg. 12, the opinions expressed pursuant to Reg. 13(2)(d) and the results of consultations entered into pursuant to Reg. 14(4) have been taken into account, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</li> <li>the measures decided concerning monitoring (Reg. 16(4)(f))</li> </ul>	<p>To be addressed after the SPD is adopted.</p>
<p><b>Monitoring</b> of the significant environmental effects of the plan's or programme's implementation (Reg. 17)</p>	<p>To be addressed after the SPD is adopted.</p>
<p><b>Quality assurance:</b> environmental reports should be of a sufficient standard to meet the requirements of the SEA Regulations.</p>	<p>This report has been produced in line with current guidance and good practice for SEA and this table demonstrates where the requirements of the SEA Regulations have been met.</p>

1.14 This section has introduced the SEA process for the City of London Freight and Servicing SPD. The remainder of this report is structured into the following sections:

- **Chapter 2: Methodology** describes the approach that has been taken to the SEA of the Freight and Servicing SPD and introduces the SEA framework used in the appraisal.
- **Chapter 3: Environmental context for development in the City of London** summarises the relationship between the Freight and Servicing SPD and other relevant plans, policies and programmes, summarises environmental characteristics of the District and identifies the key environmental issues facing the City of London.
- **Chapter 4: SEA findings for the SPD options** sets out the SEA findings for the options, including the preferred approach, that have been considered in the SPD.
- **Chapter 5: Monitoring** describes the approach that should be taken to monitoring the likely significant effects of the SPD (both positive and negative) and proposes monitoring indicators.

- **Chapter 6: Conclusions** summarises the key findings from the SEA and describes the next steps to be undertaken in the SPD preparation process.

1.15 The main body of the report is supported by a number of appendices:

- **Appendix 1** presents the consultation comments that were received in relation to the SEA Scoping Report (June 2017) and describes how those comments have been addressed.
- **Appendix 2** presents the review of relevant plans, policies and programmes.
- **Appendix 3** contains the baseline environmental information for the City of London.
- **Appendix 4** presents an audit trail of the options considered and provides the City of London Corporation's reasons for including each one, or not, in the SPD.

## 2 Methodology

- 2.1 In addition to complying with legal requirements, the approach taken to the SEA of the Freight and Servicing SPD is based on current best practice and the guidance on SEA set out in the National Planning Practice Guidance, which involves carrying out SEA as an integral part of the planning process. **Table 2.1** below sets out the main stages of the planning process and shows how these correspond to the SEA process.

**Table 2.1 Corresponding stages in SEA**

<p><b>Step 1: Evidence Gathering and engagement</b></p> <p><b>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</b></p> <ul style="list-style-type: none"> <li>• 1: Identifying other relevant policies, plans and programmes, and environmental objectives</li> <li>• 2: Collecting baseline information</li> <li>• 3: Identifying environmental issues and problems</li> <li>• 4: Developing the SEA framework</li> <li>• 5: Consulting on the scope of the SEA</li> </ul>
<p><b>Step 2: Production</b></p> <p><b>Stage B: Developing and refining options and assessing effects</b></p> <ul style="list-style-type: none"> <li>• 1: Testing the SPD objectives against the SEA Framework</li> <li>• 2: Developing the SPD options</li> <li>• 3: Evaluating the effects of the SPD</li> <li>• 4: Considering ways of mitigating adverse effects and maximising beneficial effects</li> <li>• 5: Proposing measures to monitor the significant effects of implementing the SPD</li> </ul>
<p><b>Stage C: Preparing the Strategic Environmental Assessment Report</b></p> <ul style="list-style-type: none"> <li>• 1: Preparing the SEA Report</li> </ul>
<p><b>Stage D: Seek representations on the SPD and the Strategic Environmental Assessment Report</b></p> <ul style="list-style-type: none"> <li>• 1: Public participation on the SPD and the SEA Report</li> <li>• 2(i): Appraising significant changes</li> <li>• 2 (ii) Appraising significant changes resulting from representations</li> </ul>
<p><b>Step 3 &amp; 4: Adoption and Monitoring</b></p> <ul style="list-style-type: none"> <li>• 3: Making decisions and providing information</li> </ul>
<p><b>Stage E: Monitoring the significant effects of implementing the SPD</b></p> <ul style="list-style-type: none"> <li>• 1: Finalising aims and methods for monitoring</li> <li>• 2: Responding to adverse effects</li> </ul>

- 2.2 The following sections describe the approach that has been taken to the SEA of the Freight and Servicing SPD to date and provide information on the subsequent stages of the process.
- 2.3 The Screening Statement (February 2017)<sup>6</sup> screened the SPD into the SEA process on the basis that it is likely to have significant effects on the environment. This is due to the fact that the SPD proposes actions and land use for consolidation centres outside the City without identifying specific locations, and proposes out of hours servicing without evaluating the impacts of such servicing beyond the City's boundaries. Identified effects relate primarily to increases in carbon emissions and air pollutants, but also include amenity issues such as noise pollution and increased traffic.

<sup>6</sup> City of London Freight and Servicing SPD Screening Statement, February 2017

## Stage A: Scoping

- 2.4 The SEA process began in June 2017 with the production of a Scoping Report for the Freight and Servicing SPD, which was prepared by LUC on behalf of the City of London Corporation. During the Scoping stage of the SEA, the work that had previously been carried out during the Sustainability Appraisal of the City of London Local Plan was drawn on as appropriate, as some of that work is applicable to this SEA.
- 2.5 The scoping stage of the SEA involves collating information about the environmental baseline for the SPD area and the key environmental issues facing it, as well as information about the policy context for the preparation of the SPD. The SEA Scoping Report presented the outputs of the following tasks:
- Policies, plans and programmes of relevance to the Freight and Servicing SPD were identified and the relationships between them were considered.
  - In line with the requirements of the SEA Regulations, baseline information was collected on the following 'SEA topics': biodiversity (including flora and fauna), population, human health, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and the landscape. This baseline information provides the basis for predicting and monitoring the likely effects of the SPD and helps to identify alternative ways of dealing with any adverse effects identified.
  - Drawing on the review of relevant plans, policies and programmes and the baseline information, key environmental issues for the City were identified (including environmental problems, as required by the SEA Regulations). Consideration was given to the likely evolution of each issue if the SPD were not to be implemented. If, drawing on the baseline information and relevant plans, policies and programmes it was considered that the SPD was unlikely to have significant effects upon certain SEA topics, they were scoped out.
  - A SEA 'framework' was then presented, setting out the SEA objectives against which options would be appraised. The SEA framework provides a way in which the environmental impacts of implementing a plan and reasonable alternatives (i.e. options) can be described, analysed and compared. The SEA framework comprises a series of sustainability objectives and associated questions that can be used to 'interrogate' options during the plan-making process. These SEA objectives define the long-term aspirations of the City with regard to environmental issues. During the SEA, the performance of the options is assessed against these SEA objectives and questions.
- 2.6 The most recent versions of the policy review and baseline information can be found in **Appendices 2 and 3** of this report.
- 2.7 Public and stakeholder participation is an important element of the SEA and wider plan-making processes. It helps to ensure that the SEA report is robust and has due regard for all appropriate information that will support the SPD in making a contribution to sustainable development. The SEA Scoping Report for the Freight and Servicing SPD was published in June 2017 for a five week consultation period with the statutory consultees (Natural England, the Environment Agency and Historic England). The comments received during the consultation were then reviewed and addressed as appropriate in this SEA. **Appendix 1** of this report lists the comments that were received during the scoping consultation and describes how each one was addressed.
- 2.8 **Table 2.2** below presents the 5 SEA objectives in the City of London SEA framework and shows how the 'SEA topics' (listed in Schedule 2 of the SEA Regulations) that were scoped in to the assessment have been covered by these. Only those issues that have been scoped in to the SEA have been included in the below table. Those issues that have been scoped out are not expected to be influenced by the SPD and therefore have not been considered. Those issues that have been scoped out are listed below. The statutory consultation bodies did not raise any issues with the scoping out of these topics.
- Landscape – The effects on landscape were scoped out of the SEA as it is not envisaged that the Freight and Servicing SPD will have any significant effects on the landscape character of the City. This is because the SPD will not propose specific sites for new development or

infrastructure itself, rather its aim will be to limit the impact of additional freight and servicing trips that new development may attract.

- Biodiversity, Flora and Fauna – Issues regarding biodiversity, Flora and Fauna have been scoped out of the SEA. As the SPD will not propose any specific sites for new development or infrastructure and instead will aim to reduce the impacts of freight and servicing that new development may give rise to, it is considered that the Freight and Servicing SPD will not significantly affect the priority species or habitats in the City.
- Water – The effect of the SPD on water quality within the City has been scoped out of the SEA. It is not envisaged that any of the measures within the SPD will have a significant effect upon water quality in the area. This is because the SPD is aiming to reduce the environmental impacts of freight and servicing trips generated by new development, rather than proposing specific sites for new development or new infrastructure which may have an effect on water quality.
- Soils - Effects on soils have been scoped out of the SEA as it is not expected that the measures contained within the Freight and Servicing SPD will have any significant effects on soil quality in the City. As above this is because the SPD will not propose specific sites for new development, rather its aim will be to limit the impact of additional servicing and delivery for new developments.

**Table 2.2 SEA framework for the City of London Freight and Servicing SPD**

SEA Objectives	Appraisal Question	SEA Regulations Topic(s) covered
SEA1 Improve air quality	<ul style="list-style-type: none"> <li>• Reduce the number of vehicles on the City's roads</li> <li>• Reduce congestion on the City's roads</li> </ul>	Air Quality
SEA2 Reduce activities that exacerbate climate change	<ul style="list-style-type: none"> <li>• Reduce carbon emissions through minimising traffic movements in the City</li> <li>• Utilise low or zero carbon transport where possible</li> </ul>	Climate Change
SEA3 Adopt the 'Waste hierarchy' in all activities – reduce , reuse, recycle	<ul style="list-style-type: none"> <li>• Reduce the amount of waste requiring removal through reuse and recycling</li> <li>• Reduce the number of waste collection trips</li> </ul>	Material Assets
SEA4 Improve the health of City workers, residents and visitors	<ul style="list-style-type: none"> <li>• Improve safety for pedestrians and cyclists</li> <li>• Improve air quality (see SEA objective 1)<sup>7</sup></li> <li>• Reduce noise and light pollution</li> </ul>	Population Human Health
SEA5 Conserve and enhance the historic environment	<ul style="list-style-type: none"> <li>• Maintain the character and setting of heritage assets in the City</li> </ul>	Cultural heritage

<sup>7</sup> 'Elevated levels and / or long term exposure to air pollution can lead to serious symptoms and conditions affecting human health. This mainly affects the respiratory and inflammatory systems but can also lead to more serious conditions such as heart disease and cancer.' <https://uk-air.defra.gov.uk/air-pollution/effects>.

## SEA Stage B: Developing and refining options and assessing effects

- 2.9 Developing options for a plan is an iterative process, which can involve a number of rounds of consultation with stakeholders and the public. Consultation responses and the SEA process can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan. In terms of the Freight and Servicing SPD, options include different measures for reducing the impact of freight and servicing on the City.
- 2.10 Regulation 12 (2) of the SEA Regulations requires that:  
*'The (environmental or SA) report must identify, describe and evaluate the likely significant effects on the environment of—*  
*(a) implementing the plan or programme; and*  
*(b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme.'*
- 2.11 It should be noted that any alternatives considered need to be 'reasonable'. This implies that alternatives that are 'not reasonable' do not need to be subject to appraisal. Examples of unreasonable alternatives could include options that do not meet the objectives of the plan or that do not comply with national policy (e.g. the National Planning Policy Framework).
- 2.12 It also needs to be recognised that the SEA findings are not the only factors taken into account when determining which options to take forward in a plan. There will often be an equal number of positive or negative effects identified for each option, such that it is not possible to 'rank' them based on environmental performance in order to select a preferred option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for their plan.
- 2.13 The following section provides an overview of how the appraisal of options has fed into the development of measures that are now included in the Freight and Servicing SPD. The reasons for selecting or rejecting each reasonable alternative site option are detailed in **Appendix 4**.

### Identification and appraisal of options

- 2.14 Reasonable alternative options for the SPD were identified by the City of London prior to the preparation of the SPD and were drawn from the most up-to-date evidence, and the current operational procedures and best practice for freight and servicing in the City.
- 2.15 The alternative options that are considered include retaining business as usual, which would continue to carry out freight and servicing in line with policies set out in the Local Plan, and other specific measures that would work to reduce the environmental impact of freight and servicing.

## SEA Stage C: Preparing the Strategic Environmental Assessment Report

- 2.16 This SEA report describes the process that has been undertaken to date in carrying out the SEA of the Freight and Servicing SPD. It sets out the findings of the appraisal of options and measures set out in the SPD highlighting any likely significant effects (both positive and negative, and taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects as relevant).



## SEA Stage D: Consultation on the City of London Freight and Servicing SPD

- 2.17 The City of London is inviting comments on the draft Freight and Servicing SPD and this SEA Report. This SEA Report is being published on the City of London Corporation's website for consultation between 7<sup>th</sup> August and 30<sup>th</sup> September 2017.

## SEA Stage E: Monitoring implementation of the Freight and Servicing SPD

- 2.18 Monitoring of environmental effects identified should be carried out after adoption of the SPD, therefore recommendations for monitoring the likely significant environmental effects of implementing the SPD are presented in **Chapter 5**.

### Appraisal methodology

- 2.19 The reasonable alternative options and the selected options set out in the SPD have been appraised against the five SEA objectives in the SEA framework (see **Table 2.2** earlier in this section), with scores being attributed to each option to indicate its likely environmental effects on each SEA objective as follows:

**Figure 2.1 Key to symbols and colour coding used in the SEA of the City of London Freight and Servicing SPD**

++	The option or policy is likely to have a <b>significant positive</b> effect on the SEA objective(s).
+	The option or policy is likely to have a <b>minor positive</b> effect on the SEA objective(s).
0	The option or policy is likely to have a <b>negligible or no</b> effect on the SEA objective(s).
-	The option or policy is likely to have a <b>minor negative</b> effect on the SEA objective(s).
--	The option or policy is likely to have a <b>significant negative</b> effect on the SEA objective(s).
?	It is <b>uncertain</b> what effect the option or policy will have on the SEA objective(s), due to a lack of data.
+/-	The option or policy is likely to have a <b>mixture of positive and negative</b> effects on the SEA objective(s).

- 2.20 Note that where a potential positive or negative effect is uncertain, a question mark was added to the relevant score (e.g. +? or -?) and the score is colour coded as per the potential positive, negligible or negative score (e.g. green, yellow, orange, etc.).
- 2.21 The likely effects of the options need to be determined and their significance assessed, which inevitably requires a series of judgments to be made. This appraisal has attempted to differentiate between the most significant effects and other more minor effects and record these through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect is often quite small. Where either '++' or '--' has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option on the SEA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. However, scores are relative to the scale of proposals under consideration.

## Difficulties Encountered

- 2.22 It is a requirement of the SEA Regulations that consideration is given to any data limitations or other difficulties that are encountered during the SEA process.
- 2.23 The main difficulty encountered when assessing the Freight and Servicing SPD, was the uncertainty surrounding the measure setting out the use of out of town consolidation centres. The City Corporation have confirmed that private developers will need to identify potential suitable sites, ideally in Preferred Industrial Locations, choose to develop these, and make an application to the relevant planning authority, who will then have the final decision on whether the development is to be permitted. For this reason the City has little authority over the implementation of the consolidation centres. Because of this, very little is known about the locations of potential consolidation centres and how they may operate, and so uncertainty exists in the conclusions drawn regarding their effects.

## 3 Environmental Context for Development in the City of London

### Review of Plans, Policies and Programmes

- 3.1 The Freight and Servicing SPD is not prepared in isolation, being influenced by other plans, policies and programmes and by broader environmental objectives. It needs to be consistent with international and national guidance and planning policies and should contribute to the goals of a wide range of other programmes and strategies. The SPD must also conform to environmental protection legislation and contribute to achieving the environmental objectives established at the international and national levels.
- 3.2 A review has been undertaken of the other plans, policies and programmes that are relevant to the Freight and Servicing SPD.

Schedule 2 of the SEA Regulations requires:

*(1) 'an outline of the...relationship with other relevant plans or programmes'; and*

*(5) 'the environmental protection objectives established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation'*

- 3.3 It is necessary to identify the relationships between the Freight and Servicing SPD and other relevant plans, policies and programmes so that any potential links can be built upon and any inconsistencies or potential conflicts addressed.

#### Key international plans, policies and programmes

- 3.4 At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive') is particularly important as it sets out the requirements for SEA. SEA should be undertaken iteratively and integrated into the production of the SPD in order to ensure that any potential negative environmental effects are identified and can be mitigated.
- 3.5 Also at the international level is the Air Quality Directive, 2008/50/EC, on ambient air quality and cleaner air for Europe. The objective of this directive is to avoid, prevent and reduce harmful effects of ambient air pollution on human health and the environment.
- 3.6 There are a wide range of other EU Directives, most of which have been transposed into UK law through national-level policy; the international directives have been included in **Appendix 2** for completeness.

#### Key national plans, policies and programmes

- 3.7 There is a wide range of national level plans, policies and programmes with relevant objectives for the SEA, which are summarised in **Appendix 2**. However, the most significant policy context for the SPD is the National Planning Policy Framework (NPPF) in 2012 and the online Planning Practice Guidance (PPG)<sup>8</sup>. The City of London Freight and Servicing SPD must be consistent with the requirements of the NPPF, which sets out information about reductions in emissions and congestion and the use of sustainable transport modes. It states that:

*'Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (NPPF, para 30)'*

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<sup>8</sup> <http://planningguidance.planningportal.gov.uk/>

*'Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to... .. accommodate the efficient delivery of goods and supplies (NPPF, para 35)'*

### **Local plans, policies and programmes**

- 3.8 At the sub-regional and local levels there are a wide range of plans and programmes that are specific to the City of London and Greater London, which provide further context for the Freight and Servicing SPD.

#### *City of London Local Plan*

- 3.9 The City of London Local Plan is the statutory planning document for the City. The following policies are applicable to the Freight and Servicing SPD; the SPD must be in general conformity with the Local Plan.

- Policy DM 3.4 Traffic management
- Core Strategic Policy CS9: Thames and the Riverside
- Core Strategic Policy CS16: Public Transport Streets and Walkways
- Policy DM 15.6 Air Quality
- Policy DM 16.1 Transport impacts of development
- Policy DM 16.5 Parking and servicing standards
- Policy DM 16.8 River transport
- Core Strategic Policy CS17: Waste
- Policy DM 17.1 Provision for waste in development schemes
- Policy DM 17.2 Designing out construction waste

#### *Standard Highway and Servicing Requirements for Development in the City of London*

- 3.10 The Standard Highway and Servicing Requirements for Developments in the City of London document sets out the guidelines for physical infrastructure associated with development-related highway and servicing arrangements. This document should be the point of reference for all matters relating to development impact on the public highway.

#### *City of London Delivery and Servicing Guidance*

- 3.11 The City of London Delivery and Servicing Guidance provides practical information on how to manage freight associated with an existing site or new development through a Delivery and Servicing Plan. The guidance closely supports the SPD.

#### *Air Quality Strategy and SPD*

- 3.12 The City of London Air Quality Strategy 2015 - 2020 and emerging Air Quality SPD set out the City's aims and responsibilities on managing Air Quality. The strategy aims to fulfil statutory obligations relating to air quality management, encourage measures to reduce harmful emissions in the City, and raise public awareness of air quality issues.

- 3.13 The Freight and Servicing SPD is in accordance with the Air Quality Strategy policies, particularly;

- Policy 2: Political influence and commitment
- Policy 5: Reducing emissions from transport
- Action 29: Reducing Air Quality Impact of Freight
- Policy 6: Working with the Mayor

#### *Noise Strategy*

- 3.14 The City of London Noise Strategy 2016 – 2026 sets out the City Corporation's strategy for managing noise levels from all sources. Unwanted noise can be a nuisance to both residents and businesses and while some noise in a working environment is inevitable to the City Corporation

has a statutory responsibility to manage and minimise exposure to excessive or unnecessary noise, while ensuring that the city can function and flourish.

3.15 In relation to new development, policies in the Noise Strategy which are relevant to the SPD include:

- Policy Developments 1 - New noise making and noise sensitive development
- Policy Transport 12 - Night Time Servicing
- Policy Transport 13 – General
- Policy Transport 14 – General

#### *Road Danger Reduction Plan 2013*

3.16 The City of London Road Danger Reduction Plan sets out measures to reduce road danger at source. The Plan recognises the disproportionate danger posed by goods vehicles and proposes a combination of engineering measures and Education, Training and Publicity schemes to tackle road danger.

#### *Waste Strategy*

3.17 The City of London Waste Strategy 2013 – 2020 set out the City Corporation’s vision “To increase reuse and recycling and reduce waste arisings and carbon impacts associated with waste management from householders, businesses and visitors within the City, to include City of London buildings and staff”.

3.18 Objective 7 of the strategy establishes the aim to reduce our negative impact on climate change and improve air quality in the City. This includes continuing to transport waste out of the City by river from the facility at Walbrook Wharf, removing an estimated 3744 HGV journeys from City streets each year.

#### *Thames Strategy*

3.19 The Thames Strategy SPD sets out the City Corporation’s overarching strategy for use of the river. The strategy supports the Local Plan policy CS9 Thames and the Riverside with regard to promoting the use of the river for freight as well as passenger transport. The SPD supports the safeguarding of the waste transfer site at Walbrook Wharf, and the reinstatement of the pier at Swan Lane for passenger or freight use.

#### *Public Realm SPD*

3.20 The City of London Public Realm SPD sets out 10 aims to maintain and enhance the City’s built environment and provide a safe, high quality and inclusive place in which to work, live and enjoy.

3.21 Particularly relevant to the management of freight and servicing the SPD aims to:

- Encourage simpler, more spacious and less cluttered streets and spaces (Aim 3)
- Provide more sustainable streets and spaces (Aim 6)
- Support and encourage wellbeing and healthy lifestyles (Aim 7)
- Provide better connected and more inclusive streets and spaces (Aim 9)

3.22 The Public Realm SPD supports the management of out of hours deliveries and times closures of streets where appropriate.

#### *London Plan*

3.23 The London Plan is the strategic planning document for the 32 London boroughs and the City of London. It sets out the framework for development in London and the policy context for local planning policies. The London Plan is currently under review by the Mayor of London however, until this is complete the most recent version from March 2016 remains in place.

3.24 Policies from the London Plan relevant to the SPD include:

- Policy 2.17 Strategic Industrial Locations
- Policy 6.1 – Strategic Approach to Transport

- Policy 6.4 – Enhancing London’s Transport Connectivity
- Policy 6.11 – Smoothing Traffic Flow and Tackling Congestion
- Policy 6.14 - Freight
- Policy 6.15 – Strategic Rail Freight Interchanges
- Policy 7.14 – Improving Air Quality
- Policy 7.15 Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and promoting appropriate soundscapes
- Policy 7.24 – Blue Ribbon Network
- Policy 7.26 – Increasing the use of the Blue Ribbon Network for Freight Transport

#### *The Mayor’s Transport Strategy*

- 3.25 The Mayor’s Transport Strategy (MTS) sets out the Mayor’s Transport Policy. As with the London Plan, the current strategy dates from a previous Mayoral Administration. Although a new MTS is currently in draft format, the previous strategy remains in place until the new document is formally adopted.
- 3.26 The existing MTS sets out policies to promote the use of river and rail for freight movements through safeguarding existing wharves and promoting rail freight infrastructure.
- 3.27 The MTS also addresses the safety implications of freight movements, promoting schemes such as the Fleet Operator Recognition Scheme (FORS) and improvements to vehicle and driver safety. The document also supports efficiencies through consolidation and out of hours delivery and servicing where possible, supported by quiet delivery schemes and Delivery and Servicing Plans.
- 3.28 The new Mayor’s Transport Strategy draft for consultation was published in June 2017. Although this is a draft document and subject to change, the document gives a strong indication of the Mayor’s transport priorities for his term of office. The draft strategy proposes a 10 per cent reduction in central London lorry and van use by 2026. In particular there is a focus on the use of consolidation centres for construction and other sectors.

#### *The Safeguarding Wharfs Final Recommendation Report 2013*

- 3.29 The report recommended that Walbrook Wharf, the only active wharf in the City is retained as a waste facility and increased use for other activities should be encouraged.

#### *A City for all Londoners 2016*

- 3.30 This report sets out the strategic direction of travel for the new Mayor of London. The document does not include specific policies but gives an indication of the priorities of the new Mayor.
- 3.31 The movement of freight is specifically mentioned by the Mayor, in the context of an expected rise in van use associated with the changing needs and expectations of businesses and customers. The Mayor cites potential solutions such as riverside lorry consolidation centres, more deliveries being made by bike and changing the way streets are used at different times of the day.
- 3.32 The overarching ‘Healthy Streets’ approach to managing the street network is a key part of the Mayor’s vision. In central London this means a shift towards reducing motorised traffic and fewer deliveries in peak times.

### **Existing and Forthcoming Schemes**

#### *Low Emission Neighbourhood*

- 3.33 The City of London Low Emission Neighbourhood (LEN) is being introduced in the Barbican area by 2019. This project, which is part-funded by the Mayor of London, aims to trial several high-impact activities that will address local air quality issues and act as a pilot area for the rest of the City. Proposals include working with businesses to tackle emissions from delivery and servicing trips, looking at the potential for local freight consolidation, and zero emission last mile deliveries.

### *Low Emission Zone*

- 3.34 Covering most of Greater London, the Low Emission Zone requires larger vehicles and older small commercial vehicles to pay a charge if they do not reach certain emissions standards. At present, only vehicles registered before 2006 are required to pay the charge, and compliance is very high.

### *London Lorry Control Scheme (LLCS)*

- 3.35 Administered by London Councils, the LLCS restricts the routes of large goods vehicles over 18 tonnes at night and at weekends. The aim of the scheme is to reduce noise pollution in residential areas. The scheme restricts large vehicles to a core network of main roads for as much of their journey as possible, with penalties issued for use of inappropriate routes. Vehicles wishing to use roads off the core network during the restricted hours must apply for a free permit to do so.

### *Congestion Charge*

- 3.36 The Congestion Charge is a daily charge applying to all vehicles entering central London between 7am and 6pm Monday to Friday. The charge does not vary with the type of vehicle, so a large HGV would pay the same as a small van to enter the zone. Some discounts and exemptions do apply for Ultra Low Emission Vehicles, but in general most internal combustion engine vehicles will pay the charge.

### *Emissions Surcharge (T charge)*

- 3.37 The Emissions Surcharge, which uses the same boundaries and time restrictions as the Congestion charge, requires older vehicles not meeting certain emissions criteria to pay a daily charge to enter the area. The Emissions Surcharge is introduced from 23rd October 2017 as an interim scheme, pending the introduction of the Ultra Low Emission Zone.

### *Ultra Low Emission Zone*

- 3.38 The Ultra Low Emission Zone (ULEZ) will come into force in September 2020 and will replace the Emissions Surcharge. The ULEZ will require all vehicles within the Congestion Charge area to meet strict emissions standards, or pay a daily charge in addition to the Congestion Charge.

## Baseline Information

- 3.39 Baseline information provides the basis for predicting and monitoring the likely environmental effects of a plan and helps to identify key environmental issues and means of dealing with them.
- 3.40 Schedule 2 of the SEA Regulations requires information to be provided on:
- (2) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan.*
  - (3) The environmental characteristics of areas likely to be significantly affected.*
  - (4) Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC on the conservation of wild birds and the Habitats Directive.*
- 3.41 The baseline information for the City of London, which was originally presented in the Scoping Report, is set out in **Appendix 3**.

## Key Environmental Issues

- 3.42 An up-to-date set of key environmental issues for the City of London was identified during the Scoping stage of the SEA and was presented in the Scoping Report.
- 3.43 The SEA Regulations (Schedule 2) require that the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme are described. In order to address this requirement, **Table 3.1** overleaf describes the likely evolution of each key environmental issue if the SPD were not to be adopted.

**Table 3.1 Key Environmental Issues for the City of London and likely evolution without implementation of the SPD**

Key Environmental Issues for the City of London of relevance to the Freight and Servicing SPD	Likely Evolution without the Freight and Servicing SPD
<b>Climatic Factors</b>	
<p>Carbon emissions and climate change are of significant importance to the City. Among other sources, motorised transport is a contributor to Carbon emissions in the City.</p>	<p>The City of London Local Plan includes the following policies to tackle a reduction in carbon emissions: CS15 – Sustainable Development and Climate Change; DM15.1 – Sustainability requirements; DM15.2 – Energy and CO2 emissions assessments; DM15.3 Low and zero carbon technologies; DM15.4 Offsetting of carbon emissions and DM15.5 Climate change resilience and adaptation.</p> <p>The implementation of the SPD offers opportunities to further tackle this issue through the reduction and consolidation of freight and servicing, although localised air quality issues may arise around the proposed consolidation centres. Without the implementation of the SPD it is considered that a reduction in carbon emissions is still achievable with the support of policies in the Local Plan but this may be to a lesser extent or be achieved over a longer time scale as the issues associated with freight and servicing will not be as well addressed. However as a global issue, climate change will continue to be a key consideration, regardless of the policies and measures within both the Local Plan and the Freight and Servicing SPD.</p>
<b>Cultural Heritage</b>	
<p>The City is the historic core from which London developed. Consequently it is an area of great archaeological importance and contains many buildings and areas of historic and architectural value. Changes in vehicle movements and development of consolidation centres may affect the settings and views of city landmarks and listed buildings and can affect archaeological remains.</p>	<p>The City of London Local Plan aims for thorough protection of its cultural assets through a large number of policies that will protect and enhance the City’s heritage and archaeological assets. These policies include: DM 11.1 – Protection of visitor, arts and cultural facilities; CS12 – Historic Environment; DM12.1 Managing change affecting all heritage assets and spaces; DM 12.2 Development in conservation areas; DM 12.3 Listed buildings; DM 12.4 Ancient monuments and archaeology and DM 12.5 Historic parks and gardens.</p> <p>The implementation of the SPD may add further protection to these assets through its aims and measures, such as the reduction in road traffic however, it may also adversely affect the setting of some heritage assets in the location of consolidation centres which are not yet known. If the SPD were not to be implemented it is considered that more than adequate protection would still be afforded to the City’s heritage and archaeological assets through policies within the Local Plan as well as supporting documents such as Conservation Area Plans.</p>



Key Environmental Issues for the City of London of relevance to the Freight and Servicing SPD	Likely Evolution without the Freight and Servicing SPD
<b>Air quality</b>	
<p>The City has some of the highest levels of pollution in the country due to its location at the heart of London and the density of development. Levels of pollutants in the City such as sulphur dioxide, carbon monoxide and benzene have reduced over the past decade but levels of fine particulates (PM10) and nitrogen dioxide (NOx) remain high. For this reason the City of London is a designated AQMA. Exposure to these pollutants is considered to be a significant cause of ill health.</p> <p>Much of the air pollution in the City is associated with traffic and the movement of freight particularly, and so a reduction should be sought.</p>	<p>The City of London Local Plan sets out a policy to improve air quality in the City, Policy DM 15.6 – Air quality, as well as some of those policies set out in the climatic factors issue. There are also policies in the Local Plan which address traffic reductions and shift to more sustainable modes of transport. This includes policies CS16 – Public transport streets and walkways, DM 16.1 - Transport impacts of development, DM 16.4 – Facilities to encourage active travel, and DM 16.8 – River transport.</p> <p>The implementation of the SPD offers an opportunity to further improve air quality in the City through the reduction in traffic and congestion. As stated in the climate impacts section air quality around the proposed consolidation centres may decline as a result and so this will need to be considered. Although it is considered that the issue of air quality is addressed in the Local Plan, the SPD would lend further measures and support to this and ensure that freight and surviving does not contribute to a decline in air quality. In terms of a reduction in traffic the Local Plan sets out a number of policies to this effect and it is considered that the Freight and Servicing SPD would lend further support to these policies in the reduction in traffic and congestion and a decrease in pollution. In the absence of the SPD the policies in the Local Plan will work towards this reduction with support from forthcoming GLA policies such as the Ultra Low Emissions Zone. The SPD will further support these measures.</p>
<b>Population and human health</b>	
<p>Consideration of health for the City must take account of the health of the resident, working and visitor populations. Therefore the City must be designed to encourage healthy lifestyles through the provision of facilities for walking and cycling as well as improving safety for pedestrians and cyclists and improving air quality.</p>	<p>Policies relating to the health of the population are set out in the Local Plan and include those set out above in 'Air quality' to encourage and facilitate active travel and also: CS19 – Open spaces and recreation; DM 19.3 – Sport and recreation and CS22 – Social infrastructure and opportunities.</p> <p>The SPD has the potential to further improve the health of City residents' through the reduction in road traffic, congestion and air pollution, ensuring that the City is an attractive, healthy environment for recreation and the noise associated with servicing is minimised. However, the adverse effects of night time and weekend deliveries will also need to be considered. Without the implementation of the SPD health targets will still be in place but the effects of air quality may be more of a barrier to meeting these, along with road traffic and noise pollution.</p>

Key Environmental Issues for the City of London of relevance to the Freight and Servicing SPD	Likely Evolution without the Freight and Servicing SPD
<b>Material assets / waste</b>	
<p>The high rate of redevelopment in the City means that large quantities of demolition and construction waste are generated. The constricted nature of the City and the tight timescales involved in redevelopment mean that most of this demolition waste is transported off site for either recycling or disposal.</p>	<p>The Local Plan includes a number of policies for the reduction in demolition and construction waste and transport, these include: DM 17.1 - Provision for waste in development schemes; DM 17.2 - Designing out construction waste; DM 17.3 - New waste management sites and DM 17.4 Development affecting waste management sites.</p> <p>Although the Local Plan includes policies aimed at reducing demolition and construction waste, the implementation of the Freight and Servicing SPD will further support the high rate of redevelopment and the sustainable movement of demolition and construction waste through improvements in efficiency and consolidation. The proposed use of consolidation centres outside of the City, and the possible increase in river traffic will also have to be considered. Without the measures in the SPD to reduce the transport impacts of waste, policies are still in place but it is considered that the SPD lends further support and weight to these, making outcomes more achievable.</p>
<p>The City of London transports waste for some local authorities and companies who operate their own waste management and recycling schemes using private contractors. Also, in addition to the Municipal waste management in the city a large number of private waste contractors operate in the City collecting waste from commercial premises. The Defra Commercial and Industrial Waste Survey 2009 estimates that the City generates 206,000 tonnes of commercial waste per annum. The City has no waste management sites so all waste has to be transported elsewhere.</p>	<p>There are policies in the Local Plan that address the need to minimise waste and the transport of waste in the City, including CS17 – Waste; DM 17.3 - New waste management sites; DM 17.4 – Development affecting waste management sites and DM 17.1 Provision for waste in development schemes.</p> <p>The SPD sets out measures for a reduction in the number of delivery and servicing vehicles including waste collection vehicles through improvements in efficiency, on site waste management measures and the use of consolidation centres. It therefore would aid in the reduction of and effective and efficient removal of waste. In the absence of the SPD it is considered that waste collection and removal may continue as it is at present with large numbers of servicing vehicles on the City's roads.</p>

## 4 SEA Findings for the SPD Options

- 4.1 This chapter presents the SEA findings for the selected options and reasonable alternative options that have been considered by the City of London for inclusion in the Freight and Servicing Supplementary Planning Document.
- 4.2 A total of three selected options and nine reasonable alternative options have been subject to SEA by LUC on behalf of the City of London for the Freight and Servicing SPD.
- 4.3 The likely effects of the three selected options included in the SPD and reasonable alternative options are summarised below in relation to each SEA objective. Particular consideration has been given to the likely significant effects identified (both positive and negative), in line with the requirements of the SEA Regulations. All effects are assumed to be long term unless otherwise specified. Consideration is also given to potential mitigation measures that could reduce or offset the negative effects identified.
- 4.4 Although the assessment of likely significant effects has focussed on the measures within each of the three selected options (minimise, match and mitigate), any new measures that are contained within section 5 of the SPD, which focuses on particular types of development, have also been considered in relation to each of the SEA objectives under the relevant selected option.
- 4.5 The SEA scores for all of the measures are presented in **Table 4.4** at the end of this chapter for ease of comparison.

### Minimise Freight and Servicing Trips

- 4.6 The aim of this option is to reduce the number of delivery and servicing trips generated by premises in the City – including personal deliveries and waste collections.

#### SEA1: Improve air quality

- 4.7 The selected option includes a measure setting out the need for Delivery and Servicing Plans to include measures that use appropriate joint procurement to reduce the numbers of delivery and servicing trips required to premises. A decrease in the number of delivery and servicing trips will have a positive effect on air quality through the reduction in the number of vehicles using the roads in the City and the subsequent reduction in congestion and decrease in vehicle emissions.
- 4.8 Suppliers are encouraged to require the use of out of town consolidation centres in suitable locations within Greater London, to minimise the number of trips required to service premises within the City. In line with London Plan Policy 2.17, where an out of town consolidation centre is proposed, a facility in a designated Preferred Industrial Location (PIL) may be most suitable. It is considered that out of town consolidation centres are likely to have a positive effect on air quality in the City itself as they will work to reduce the number of delivery and servicing vehicles required to enter the City, resulting in a decrease in congestion and vehicle emissions. However, while there is likely to be a positive effect within the City, outside of the City, around the locations of the consolidation centres, the effects on air pollution are likely to be negative. It is probable that the roads in the vicinity of the consolidation centres will experience an increase in traffic as large numbers of vehicles access the site and vehicles are re-routed there. The increase in traffic is anticipated to lead to an increase in emissions and, depending on the nature of the roads in the area an increase in congestion, thereby having an adverse effect on air quality in these areas. The City Corporation have clarified that, for consolidation centres to become operational developers will need to identify potential sites outside the City (preferably in PILs) and apply to the relevant planning authority for planning permission. Therefore, responsibility for the implementation of the centres does not lie with the City. Because of this the exact location of the consolidation centres is not known, neither are any operating procedures, and therefore there is some uncertainty regarding any location / operational specific effects. However, as described

above, Policy 2.17 of the London Plan points to 'Preferred Industrial Locations'. The siting of consolidation centres in industrial locations is not likely to significantly reduce the vehicle emissions or reduce the adverse effect of air quality on the environment, but the impact of any decline in air quality may not be so significant in regards to the surrounding population compared to locating the consolidation centre in a residential area. This is discussed further with regards to SEA4: health below.

- 4.9 The option also considers a system of micro consolidation within the City which would enable the last mile of deliveries to be undertaken by foot or cycle. Using foot or cycle to transport goods would result in positive effects on air quality as it is anticipated that these will replace vehicle trips thus reducing vehicle numbers, congestion and emissions. As with the out of town consolidation centres described above, the locations of micro consolidation centres and the number of vehicle trips that they would be expected to attract is unknown at this stage and therefore there is some uncertainty around any effects that these may have on local air quality. The implementation and siting of these centres would be in the City Corporation's control. It may be that, as with the larger consolidation centres, vehicle trips around the micro consolidation centres are increased leading to a reduction in air quality in the vicinity. On the other hand the a micro consolidation centres may only attract those delivery and servicing vehicles re-routed from office buildings and would therefore result in no adverse effects.
- 4.10 The 'minimise' option also sets out the need to prohibit personal deliveries, particularly those associated with online shopping. Instead, staff could be provided with access to a click and collect parcel drop-off service. In regards to accommodation, the promotion and use of central delivery points where all residents can collect goods that have been delivered is encouraged. This measure will work to reduce the number of delivery vehicles that access the premises and therefore will result in positive effects on air quality through the reduction in the number of vehicles on the City's roads and the consequent reduction in vehicle emissions.
- 4.11 Use of the river to transport goods and waste is promoted as a measure in this option. Agreements with waste management companies to make use of the waste transfer facilities at Walbrook Wharf are encouraged. The use of the river to transport goods and waste will remove traffic from the roads within the City. However, it is anticipated that the effects on air quality will be negligible as Policies CS9 and DM16.8 of the City of London Local Plan encourage the use of the river for waterbourne freight traffic. As such increases in river traffic as a result of the SPD will be negligible.
- 4.12 The provision of on-site or shared storage is encouraged to reduce the need for frequent delivery of non-perishable items. Smaller sites where storage is limited are encouraged to make arrangements to share storage space with neighbouring properties. This measure will work to reduce the number of deliveries that are required for each premises and so it is anticipated to have a positive effect on air quality through the reduction of road traffic and therefore vehicle emissions.
- 4.13 A measure is included that encourages the on-site waste management of all possible materials, including waste generated through construction and deconstruction which should be re-used and recycled on site wherever possible. The aim of this measure is to result in the minimum possible frequency of waste and recycling collection. This measure is expected to have positive effects on air quality by reducing the number of servicing vehicles on the roads in the City, which will subsequently reduce congestion and vehicle emissions.
- 4.14 As described in paragraph 4.5, any new measures that are included in the sections of the SPD regarding particular types of development have also been assessed. A measure has been added regarding general retail, which promotes the co-ordination of goods into the store and waste / returns from the store. Ensuring that vehicles used for deliveries are also loaded with returns or waste, where appropriate, maximises efficiency and reduces the number of vehicles that are required to service a development. This measure will therefore have positive effects on air quality as the reduction in the number of vehicles will lead to a decrease in emissions.
- 4.15 Section 6 of the SPD sets out the requirement for all major developments to submit a Construction Logistics Plan (CLP). The aim of a CLP is to reduce the impact of construction traffic on the road network. The need for a CLP and what should be included is not described in detail in the SPD. However, in reducing the impact of traffic on the road network it is anticipated that the production of a CLP will have a positive effect on air quality.

4.16 The option is likely to have significant positive effects on air quality resulting from many of the measures, particularly within the City of London. However, it is also likely to result in significant negative effects on air quality in specific locations outside the City of London due to the use of out of town consolidation centres, although this is uncertain. Therefore this option has been given a score of mixed effects with potential uncertain positive and significant negative effects (++/--?) in regards to SEA1: improve air quality.

#### **SEA2: Reduce activities that exacerbate climate change**

- 4.17 The need for a Delivery and Servicing Plan (DSP) to include measures that use appropriate joint procurement to reduce the numbers of delivery and servicing trips required to premises will have a positive effect on climate change. This is through the reduction in the number of vehicles using the roads and also the subsequent reduction in congestion and decrease in vehicle emissions.
- 4.18 The measure that encourages the requirement to use consolidation centres in suitable locations within Greater London, to minimise the number of trips required to service premises within the City, is likely to have a positive effect on climate change. This is because the use of the centres will result in an overall reduction in the number of delivery and servicing vehicles on the road and consequently there will be a decrease in congestion and emissions that contribute to climate change.
- 4.19 A system of micro consolidation within the City, which would enable the last mile of deliveries to be undertaken by foot or cycle, is also considered to have positive effects on climate change. Using foot or cycle to transport goods would result in positive effects as it is anticipated that these modes will replace vehicle trips thus reducing vehicle numbers, congestion and emissions.
- 4.20 The encouragement to prohibit personal deliveries, and the use of click and collect or central delivery points will work to reduce the number of delivery vehicles that access the premises and therefore will result in positive effects on climate change through the reduction in the number of vehicles on the roads and the consequent reduction in vehicle emissions.
- 4.21 Use of the river to transport goods and waste is promoted in this selected option. Agreements with waste management companies to make use of the waste transfer facilities at Walbrook Wharf are encouraged. The use of the river to transport goods and waste will remove traffic from the roads within the City. However, it is anticipated that the effects on climate change will be negligible as Policies CS9 and DM16.8 of the City of London Local Plan already encourages the use of the river for waterborne freight traffic. As such increases in river traffic as a result of the SPD will be negligible.
- 4.22 The provision of on-site or shared storage is also encouraged within this option to reduce the need for frequent delivery of non-perishable items. Smaller sites where storage is limited are encouraged to make arrangements to share storage space with neighbouring properties. This measure will work to reduce the number of deliveries that are required for each premises and so it is anticipated to have a positive effect on climate change through the reduction of road traffic and therefore vehicle emissions.
- 4.23 This option encourages the on-site waste management of all possible materials. The aim of this measure is for premises to require the minimum possible frequency of waste and recycling collection. Therefore, this measure is expected to have positive effects on climate change by reducing the number of servicing vehicles on the roads, which will subsequently reduce congestion and vehicle emissions.
- 4.24 A further measure has been included in section 5 of the SPD regarding general retail, which encourages the co-ordination of goods into the store and waste / returns from the store. Ensuring that vehicles used for deliveries are also loaded with returns or waste, where appropriate maximises efficiency and reduces the number of vehicles that are required to service a development. This measure will therefore have positive effects on climate change as the reduction in the number of vehicles will lead to a decrease in vehicle emissions.
- 4.25 Section 6 of the SPD sets out the requirement for all major developments to submit a Construction Logistics Plan (CLP). The aim of a CLP is to reduce the impact of construction traffic on the transport network. What should be included within a CLP is not described in detail in the SPD however, in reducing the impact of traffic on the road network it is anticipated that the production of a CLP will have a positive effect on climate change.

4.26 Considering the above, this option is given a significant positive effect score (++) against SEA2: climate change.

### **SEA3: Adopt the 'Waste hierarchy' in all activities – reduce, reuse, recycle**

- 4.27 The use of a DSP to encourage joint procurement may have positive effects on waste in the City if the joint procurement is in relation to waste collection and therefore leads to a reduction in the number of waste collection trips generated by premises in the City.
- 4.28 The use of both large (out of town) and micro consolidation centres is not anticipated to significantly affect waste within the City or in the areas around the location of any out of town consolidation centre. This is because the consolidation centres are not expected to be used for the storage or collection of waste and will not affect the generation of waste. Instead the centres are expected to be used for goods going into and coming out of the City.
- 4.29 The measure that encourages the prohibition of personal deliveries is also not expected to have any significant effects on waste as this does not influence waste generation or disposal.
- 4.30 The measure that encourages the use of the river to transport goods, and specifically the use of Walbrook Wharf to provide a means of removing commercial waste from the City with minimal use of the road network, is expected to have a negligible impact on waste, as Policies CS9 and DM16.8 of the City of London Local Plan both encourage the use of the river for waterbourne freight traffic. As such, increases in the use of the river for the movement of waste as a result of the SPD will be negligible.
- 4.31 The option encourages the use of on-site or shared storage to reduce the need for frequent deliveries and servicing. If the on-site or shared storage was used for the consolidation and storage of waste which would subsequently reduce the number of waste collections that are required then this measure would be expected to have a positive effect on waste.
- 4.32 The above measures will work to reduce the number of waste collections and thus vehicle trips that are required for premises in the City. The benefits of a reduction in vehicle trips are described in more detail in the SEA1: air quality and SEA2: climate change sections above.
- 4.33 This option also encourages the on-site waste management of all possible materials, including waste generated through construction and deconstruction which should be re-used and recycled on site wherever possible. The aim of this measure is for premises to require the minimum possible frequency of waste and recycling collection through the reduction in the amount of waste produced. This measure is expected to have significant positive effects on waste in the City through the promotion or re-use and recycling and the ultimate reduction in the volume of waste produced by each premises. This will also lead to further positive effects arising from a reduction in the number of waste collection trips required.
- 4.34 A further measure has been included in section 5 of the SPD regarding general retail, which encourages the consolidation of goods into the store and waste / returns from the store. Ensuring that vehicles used for deliveries are also loaded with returns or waste, where appropriate maximises efficiency and potentially reduces the number of waste collection vehicles that are required to service a development. This measure will therefore have a positive effect on waste through a reduction in the number of waste collection trips required. As previously stated this will also benefit air quality and climate change as described in the relevant sections above.
- 4.35 The SPD also sets out the need for all major developments, that will have a significant impact on the transport network to prepare a Construction Logistics Plan, the aim of which will be to reduce the impact of the development on the transport network. Although the details of what a CLP should include are not included in the SPD the CLP may address the minimisation and transport of waste and in line with the aim of reducing impact it is anticipated that the effects of this on waste will be positive, although this is uncertain.
- 4.36 In line with the above, as a number of measures will work to reduce the amount of waste generated and ensure that the number of waste related trips is reduced, this option is given a score of significant positive score (++) in regards to SEA3: waste.

#### **SEA4: Improve the health of City workers, residents and visitors**

- 4.37 The measure within this option that promotes joint procurement to reduce the number of deliveries and servicing trips required for premises in the City is anticipated to have a positive effect on the health of the City's population. This is due to a reduction in the number of vehicles on the roads, leading to both improvements in air quality and safety for cyclists and pedestrians, and a reduction in noise pollution, improving amenity for residents and workers.
- 4.38 Similarly, it is expected that the use of out of town consolidation centres will have a positive effect on the Health of the City's population as they will lead to a reduction in vehicles numbers and subsequently improvements in safety, air quality and noise and light pollution within the City. The use of consolidation centres will reduce the total number of vehicle miles and therefore residents along the route from major roads to the City are likely to experience fewer vehicles passing through and so will also experience improvements in safety, air quality and amenity. However, it is considered that there may also be adverse effects on residents outside the City who live in close proximity to the consolidation centres themselves or potential routes to the centres. As it is likely that there will be an increase in traffic around the consolidation centres, it is anticipated that there will also be some decline in local air quality as well as increases in noise and light pollution, as well as potential safety issues associated with a high number of large delivery vehicles using roads alongside cyclists and pedestrians. As described in the 'air quality' section however, the City does not have control over the development of the consolidation centres, their location or operation and therefore, the effects are uncertain. It is likely that the centres will be located in Preferred Industrial Locations in line with London Plan policy 2.17, which would reduce health impacts as fewer people are likely to live in the vicinity of PILs.
- 4.39 The use of micro consolidation centres within the City is likely to have positive effects on health for the same reasons as for the larger consolidation centres above. Using foot or cycle for the transport of goods will both reduce traffic on the roads thus improving safety, air quality and noise pollution. It is not at this stage known whether the micro consolidation centres will attract more vehicles to a building than it would experience currently. If this is the case then there may be reductions in air quality safety issues and amenity issues in the vicinity of a micro consolidation centre.
- 4.40 The prohibition of personal deliveries to staff in offices and the promotion of central delivery points for residents, as well as the provision of adequate on site or shared storage and the on-site storage and management of waste, will work to reduce the number of delivery and servicing vehicles using the roads in the City. These measures will result in a positive effect on health through improvements in air quality, reduction in noise pollution and improvements in road safety for pedestrians and cyclists.
- 4.41 The measure that encourages the use of the river to transport goods and waste is anticipated to move some trips from the City's roads to the river. However, it is expected to have a negligible impact on health as Policies CS9 and DM16.8 of the City of London Local Plan both encourage the use of the river for waterbourne freight traffic. As such, increases in the use of the river for freight movement as a result of the SPD will be negligible.
- 4.42 Section 5 of the SPD describes measures for different types of development. A further measure has been included for general retail use which encourages the consolidation for goods into the store and returns from the store. This will maximise efficiency and minimise the number of vehicles that are required to service a store meaning, as with the above measures there will be a positive impact on human health due to a reduction in traffic, as described above.
- 4.43 It is anticipated that the use of Construction Logistics Plans, the aim of which is to reduce impact on the transport network through a reduction in the number of vehicles required, will also have positive effects on human health by reducing construction traffic within the City.
- 4.44 Based on the measures above, the selected option is given a mixed score with uncertainty (+/-?) in relation to SEA4: Health. The option has received a mixed effect score as many of the measures will have beneficial effects on health though improved safety, amenity and air quality however, there is uncertainty, and probable negative effects on health associated with the use of consolidation centres.

## SEA5: Conserve and enhance the historic environment

- 4.45 It is not anticipated that the use of joint procurement will have any significant effects on heritage assets within the City. Minor positive effects may arise as a result in the reduction of road traffic, which may work to enhance the setting of heritage assets.
- 4.46 The effect of the measure which encourages the requirement for suppliers to use out of town consolidation centres is uncertain, as it is dependent on the location of and routing to the potential centres, which is not currently known or in the control of the City as explained in the SEA1 air quality section. Historic England have flagged up a number of areas around the City with high numbers of heritage assets, these include: Shoreditch, Bethnal Green Road / Redchurch Street, Whitechapel and Aldgate. While it is unlikely that a consolidation centre will be located in these areas and in the vicinity of a heritage asset (due to policy 2.17 in the London Plan which states that *'a facility in a preferred industrial location may be most suitable'*), it is accepted that any increased traffic and pollution around a heritage asset as a result of routing to and from a consolidation centre may lead to adverse effects on its setting or character. In the City itself, however, it is anticipated that the use of consolidation centres will have a positive effect on heritage assets through a reduction in traffic and as a result an enhancement to the setting of heritage assets.
- 4.47 Similarly, the location of micro consolidation centres is not known, and the number of vehicles a micro consolidation centre may attract is also uncertain. If a micro consolidation centre were to be located near to a heritage asset and would attract more vehicles to the area than at present, then the setting or character of any nearby heritage assets may be adversely affected. However, the measure focusses on the use of foot and cycle when carrying out deliveries, which will result in a reduction in the number of vehicles using the roads in the City resulting in positive effects on the setting of heritage assets.
- 4.48 The measures to encourage a reduction in personal deliveries, the use of on-site or shared storage and on site waste management will all work to reduce the number of servicing and delivery vehicles using the roads in the City. It is not anticipated that this will lead to any significant effects on heritage assets. However, there may be some minor positive effects on the setting of heritage assets due to a decrease in vehicle movements with the City.
- 4.49 The measure that encourages the use of the river to transport goods and waste is anticipated to move some trips from the City's roads to the river. However, it is expected to have a negligible impact on the historic environment as Policies CS9 and DM16.8 of the City of London Local Plan both encourage the use of the river for waterborne freight traffic. As such, increases in the use of the river for freight movement as a result of the SPD will be negligible.
- 4.50 The measure that relates to general retail use - to consolidate goods coming into a store and returns / waste from the store - will also work to reduce the number of vehicles using the roads in the City and enhance the settings of heritage assets.
- 4.51 The implementation of a Construction Logistics Plan will reduce the impact of a major development on the transport network. It is envisaged that a CLP will not have significant effects on heritage assets in the City, but may assist in the maintenance of the character and setting of heritage assets that may otherwise be negatively affected.
- 4.52 In consideration of the above this option has been scored with uncertain mixed effects (+/-?) in regards to SEA5: conserve and enhance the historic environment. This score results from the likely reduction in traffic in the City, which would enhance the settings of heritage assets, but also the potential negative effects that may arise in the event that a consolidation centre or routing to / from a centre is located within proximity to a heritage asset. There is uncertainty in the score as the locations of and routing to and from any consolidation centres is unknown and so it is uncertain whether there would be heritage assets in the areas affected.

## Mitigation

- 4.53 It is considered that the mitigation required for this selected option will only be necessary in regards to the negative effects associated with the use of consolidation centres. This measure is the only one that is likely to result in significant negative effects.



- 4.54 It is anticipated that the below measures would help to mitigate any adverse impacts resulting from the use of consolidation centres:
- Ensuring as far as possible that, in line with Policy 2.17 of the London Plan, consolidation centres are located in preferred industrial locations and are not located in areas that would; affect the character or setting of a heritage asset, affect local residents or affect any sensitive receptors such as schools or hospitals.
  - When routing traffic to consolidation centres ensure that this is along appropriate roads, i.e. those large enough to accommodate larger delivery vehicles, those with minimal residential development and those that will not lead to an adverse effect on the setting of a heritage asset. A transport plan could be produced for the consolidation centre which sets out which routes should be used.
  - If the consolidation centre is to be located in a more residential area or an area frequently used by the public, ensure that it is screened from view, sensitive lighting is used, noise is minimised and if the area is residential then the centre is only operational during the daytime, when most residents are likely to be at work and their sleep will not be disturbed. Again this could be set out in a transport plan. However, as the centres would be outside the administration of the City Corporation this acts as a recommendation to developers when considering the design of consolidation centres.
  - As far as possible use a booking system or delivery timing system to reduce the possibility of congestion and subsequent local air quality issues. To reduce the adverse effects on air quality and climate change, the use of low or zero emission delivery vehicles should be encouraged.

### Reasonable alternatives

- 4.55 Four reasonable alternative options have been put forward by the City Corporation. While the selected option assessed above contains most of the measures that are included below as alternative options, the alternative options have been assessed as focussed measures that would be implemented in isolation.
- 4.56 *Reasonable Alternative 1 – Retain businesses as usual, whereby the number of deliveries allowed per day can be restricted to a number that will make the application operationally acceptable in planning terms.* It is considered that this alternative option will have no significant effects on the SEA objectives above as it is not proposing any changes to the current situation. The scores for this option against all SEA objectives will therefore be negligible.
- 4.57 *Reasonable Alternative 2 – Require the use of physical consolidation centres located outside the City for all deliveries to and from the site. The site will be accessed via suitable routes.* As described in the sections above the effects of consolidation centres are anticipated to be beneficial to the City itself due to a reduction in traffic. However, the effects on the areas around the consolidation centres, which are not currently known, are more uncertain and it is likely that there will be some significant negative effects resulting from an increase in traffic, noise and air pollution. The scores for this alternative option in relation to the SEA objectives can be seen in **Table 4.1**.
- 4.58 *Reasonable Alternative 3 – Require use of a micro-consolidation centre, which may be located within or outside the City boundary, for all deliveries to the site. The last mile delivery between the micro-consolidation centre and the site must be made by zero-emission means.* It is expected that this alternative option will have positive effects on the SEA objectives arising from a reduction in traffic and the promotion of zero emission transport. However, as with the option above there are also uncertain effects surrounding the location of the micro consolidation centres, which are unknown. It is not certain whether the micro consolidation centres will attract an increase in vehicles on a local level, which could result in adverse effect on the local area. The scores for this option are presented in **Table 4.1**.
- 4.59 *Reasonable Alternative 4 – Require the consolidation of all waste on-site prior to collection, with the promotion of 'reverse consolidation' whereby delivery vehicles will take away as much waste as possible.* This alternative option is anticipated to have positive effects on all SEA objectives as it will result in both a decrease in the amount of waste produced and a reduction in the number of servicing trips that a premises requires, thus reducing the number of vehicles on the roads. The

scores for this option in relation to the SEA objectives are included in the table below. It is recognised that this alternative may not be available to sites that cannot accommodate on site consolidation.

**Table 4.1 Summary of scores**

	SEA objective				
	SEA1: Air Quality	SEA2: Climate Change	SEA3: Waste	SEA4: Health	SEA5: Historic Environment
<b>Measure or reasonable alternative</b>					
<b>Minimise freight and servicing trips</b>	++/--?	++	++	+/-?	+/-?
<b>Alternative 1 Retain business as usual</b>	0	0	0	0	0
<b>Alternative 2 Require the use of consolidation centres</b>	+/--?	+	0	+/-	+/-?
<b>Alternative 3 Require use of micro consolidation and last mile zero emissions</b>	+/-?	+	0	+/-	+/-?
<b>Alternative 4 Require waste consolidation</b>	+	+	++	+	+

## Match Demand to Network Capacity

4.60 The aim of this selected option is to maximise the proportion of essential delivery and servicing trips taking place outside peak times and where possible promote quiet evening or night time deliveries. All essential delivery and servicing trips should be routed appropriately, using streets that are suitable for the vehicle being used, and minimising noise, emissions and road danger along the length of the route.

### SEA1: Improve air quality

4.61 The second selected option, 'match', sets out the need for deliveries and servicing to take place on a weekend, evening or at night time, and for these to be subject to a quiet delivery agreement or commitment to minimise noise or pollution impacts, including along delivery routes and any consolidation centres. This measure is anticipated to have a positive effect on air quality as timing delivery and servicing trips for evenings or weekends will take trips off the roads at the busiest times and will therefore reduce congestion and subsequently vehicle emissions.

- 4.62 The second measure for this option states that where daytime deliveries are essential these should take place at off peak times (i.e. avoiding 7-10am, 12-2pm and 4-7pm) with a booking system used to ensure that deliveries and servicing are restricted to these times. As with the measure described above, this will reduce the number of vehicles on the roads at peak times, thus reducing congestion and vehicle emissions. Therefore, this measure is expected to have a positive impact on air quality.
- 4.63 The need for appropriate routes to be used by drivers both within the City and at all stages of their journey is also included as a measure within this option. Where possible, routes will avoid areas of high pedestrian or cycle use and residential areas. This measure may result in improvements in air quality if the routes chosen are also those that minimise the impact of the delivery and servicing vehicles on congestion, for example. Otherwise, the measure is not anticipated to have any effects on air quality.
- 4.64 Based on the above this selected option has been scored as having minor positive (+) effects in relation to SEA1: improve air quality, as although the measures will not reduce vehicle trips, they will work to take vehicles off the roads at peak times, thus reducing the potential for congestion and resulting emissions.

### **SEA2: Reduce activities that exacerbate climate change**

- 4.65 As with SEA1: improve air quality, it is anticipated that deliveries taking place at a weekend, evening or at night time will have a positive impact on climate change. This is for the same reasons as above, namely reducing the number of vehicles on the roads in the City at the busiest times and the subsequent reduction in congestion and vehicle emissions.
- 4.66 The second measure, which requires any essential daytime deliveries to take place at off peak times and for this to be ensured through the use of a booking system, will have similar effects to the first measure in that it will result in fewer vehicles being on the roads at peak times. Therefore, this measure is also expected to have a positive impact on climate change.
- 4.67 The use of appropriate routes within the City and at all other stages of the journey which avoid areas of high pedestrian and cycle use and also residential areas could have a positive effect on climate change through the reduction in vehicle emissions if the routes are also chosen to minimise the possibility of congestion. Otherwise the measure is unlikely to have any effects.
- 4.68 This selected option has been scored minor positive (+) in relation to SEA2: climate change, as the likely reduction in daytime congestion will result in a decrease in vehicle emissions.

### **SEA3: Adopt the 'Waste hierarchy' in all activities – reduce , reuse, recycle**

- 4.69 It is not anticipated that moving the times of deliveries to off peak (be it weekend, evening, night time or daytime off peak) will have any effect on waste.
- 4.70 Similarly, the use of appropriate routes within the City and along the route, that avoid residential areas and those of high pedestrian and cycle use, is not expected to have any effect on waste.
- 4.71 This option has been given a negligible score (0) in relation to SEA3: waste, as it is not anticipated that any of the measures will have an effect on the generation or processing of waste.

### **SEA4: Improve the health of City workers, residents and visitors**

- 4.72 The measure that requires deliveries to be undertaken on a weekend, during the evening or night time and subjects these to a quiet delivery agreement or commitment to minimise noise and pollution at all stages of the delivery process, is anticipated to have positive effects on health. This is as a result of reducing the volume of traffic, and importantly large vehicles, on the roads at the busiest times, thus increasing safety for pedestrians and cyclists, and also reducing congestion and subsequently improving air quality. However, weekend, night time and evening deliveries could also adversely affect human health in regards to amenity, as this could lead to noise and light pollution at antisocial hours. While a commitment to minimise noise and pollution should mitigate some of these effects it is still considered that the effect of this measure is likely to be mixed with both positive and negative effects arising.
- 4.73 Ensuring that essential daytime deliveries occur at off peak times is also anticipated to have a positive effect on health. By reducing the number of large vehicles using the roads at peak times

safety for pedestrians and cyclists will be improved. Congestion will also be reduced leading to improved air quality and subsequent benefits to human health. This measure is not likely to lead to changes in noise or light pollution that would affect human health.

- 4.74 The use of appropriate routes within the City and at all stages of the journey is expected to have a positive impact on human health. This is because the measure states that where possible routes should be chosen to avoid areas of high pedestrian and cycle use, meaning that these areas will become safer for pedestrians and cyclists and congestion along these routes will also be minimised leading to improvements in air quality. Routes will also aim to avoid residential areas meaning that disturbance to residents by noise or light pollution will be minimised.
- 4.75 In line with the above this selected option is assessed as having mixed positive and negative effects (+/-). This is because the reduction in the number of vehicles, particularly large vehicles, along roads at peak times and along roads used by a high volume of pedestrians and cyclists is likely to have positive effects in terms of congestion and therefore air quality and safety. However, it is also recognized that a shift in deliveries and servicing to the weekend, evening and night time may have an adverse effect on amenity in terms of noise and light pollution for residents.

#### **SEA5: Conserve and enhance the historic environment**

- 4.76 Requiring deliveries to be undertaken on the weekends, in the evening or at night time, as well as requiring essential daytime deliveries to occur at off peak times (i.e. avoiding 7-10am, 12-2pm and 4-7pm) is anticipated to have minor positive effects on the historic environment. This is because these measures will work to reduce traffic on the roads at the busiest times and reduce congestion which is likely to enhance the settings of any heritage assets in the City located along frequent delivery and servicing routes.
- 4.77 The use of appropriate routes in the City and at all stages of the journey that avoid residential areas and areas of high pedestrian and cycle use is not expected to have an effect on the historic environment, unless the routes that are avoided also contain heritage assets that could benefit from improvements to setting through the reduction in traffic. If the selected routes will lead to an increase in delivery and servicing vehicles in the vicinity of heritage assets, the settings of these assets could be harmed by an increase in traffic. As the routes are unknown the effect is uncertain.
- 4.78 Based on the above this selected option is scored minor positive uncertain (+?) in regards to SEA5: historic environment. This is because of the likely positive effects a reduction in traffic on the roads in the City will have on the setting of heritage assets with some uncertainty surrounding the actual routes that would be selected.

#### **Mitigation**

- 4.79 It is considered that mitigation for this selected option may be required in terms of noise and light pollution occurring from evening, night time and weekend deliveries, leading to a loss of amenity for residents living along the route. Mitigation is already included in the SPD and is described below.
- 4.80 One of the measures in the SPD states that *'All deliveries requiring activity outside working hours, either at the site in the City or elsewhere in the delivery chain, should be subject to a quiet delivery agreement or commitment to minimise noise and pollution impacts at all stages of the delivery process, including along the delivery route and at any intermediary points such as a consolidation centre. Details of the delivery and servicing timings and how they will be managed to minimise noise impacts at all stages of the delivery process should be included in the DSP.'*
- 4.81 The selected option also contains a measure requiring the use of appropriate routes that avoid residential areas, therefore minimising the impact of servicing and delivery vehicles on residents in regards to loss of amenity through noise and light pollution.
- 4.82 In addition to measures to mitigate a loss of amenity, any selected delivery and servicing routes that avoid areas of high pedestrian and cycle use as well as residential areas, should also aim to avoid heritage assets so as not to adversely affect their setting.

### Reasonable alternatives

- 4.83 Three reasonable alternatives to the selected option were identified by the City Corporation. Whilst the selected option assessed above contains most of the measures that are included in the alternative options described below, the alternative options, which have been assessed below, are considered as focussed measures and have been considered in isolation.
- 4.84 *Reasonable Alternative 1 – Retain business as usual, whereby weekday quiet times overnight (11pm – 7am) for residents are protected, along with Sunday and Bank Holidays. Deliveries by motor vehicle (except solo motorcycle) may be restricted at peak times to make an application operationally acceptable, (typically between 6-10am, 12-2pm and 5-7pm) but delivery windows of not less than two hours each (typically 10am-12pm and 2pm-4pm) would be available for deliveries.* It is considered that this alternative option will have a negligible effect on all SEA objectives as it is not proposing any changes to the current arrangements and therefore does not represent a change to the baseline. The score therefore will be negligible (0), as recorded in **Table 4.2** below.
- 4.85 *Reasonable Alternative 2 – Move to a full daytime restriction, with no deliveries permitted between 7am and 7pm on weekdays.* It is expected that this alternative option will have a positive effect on air quality and climate change due to the reduction in the number of vehicles using the roads at the busiest times and a resultant reduction in vehicle emissions. It is also expected to have minor positive effects on the historic environment due to the reduction in traffic which is likely to enhance the settings of heritage assets. The effect on waste is considered to be negligible, while effects on health may be mixed as there is likely to be increases in safety and improvements in air quality, but off peak deliveries may lead to a loss of amenity for residents along selected routes. The scores against each objective are shown in **Table 4.2**.
- 4.86 *Reasonable Alternative 3 – Require all deliveries to take place overnight (i.e. between 11pm and 7am).* This alternative is very similar to that above, but specifies later delivery times. It is expected therefore that the scores will be the same as those for Reasonable Alternative 2.

**Table 4.2 Summary of scores**

	SEA objective				
	SEA1: Air Quality	SEA2: Climate Change	SEA3: Waste	SEA4: Health	SEA5: Historic Environment
<b>Measure or reasonable alternative</b>					
<b>Match demand to network capacity</b>	+	+	0	+/-	+?
<b>Alternative 1 Retain business as usual</b>	0	0	0	0	0
<b>Alternative 2 No deliveries between 7am-7pm</b>	+	+	0	+/-	+
<b>Alternative 3 Require night time deliveries 11pm-7am</b>	+	+	0	+/-	+

## Mitigate the Impact of Freight Trips

- 4.87 The aim of this selected option is: where goods and services must be transported by road, including for the last mile, use the safest and quietest, zero emission means possible, which may mean moving goods or service personnel on foot or by cycle. The use of river or rail transport for the transfer of goods and waste is encouraged, but the impact of additional noise and pollution at all stages of the journey should be considered. Loading and unloading of goods should not adversely impact on highway capacity, pedestrian, cycle or vehicle movement, road or site safety or unwanted noise levels either in the City itself or on any stage of the journey.

### **SEA1: Improve air quality**

- 4.88 This selected option includes a measure that encourages responsible procurement policies that prioritise suppliers that use zero or low emission vehicles, and vehicles that meet the forthcoming Ultra Low Emission Zone standards, to be a minimum requirement in any delivery or servicing contract. This measure is expected to have positive effects on air quality through the reduction in emissions the use of low emission vehicles is likely to result in.
- 4.89 The second measure requires high standards of vehicle and driver competency from suppliers. The requirement for suppliers to be accredited by FORS<sup>9</sup>, which promotes good working practices as well as routing and scheduling in a way that minimises noise and environmental impact is encouraged, as is the use of Direct Vision vehicles, which provide the driver with an improved field of vision. For fleets serving construction sites adherence to the Construction Logistics and Community Safety standard, which aims to reduce work related risk, is encouraged. This measure is likely to have positive effects on air quality though more efficient driving, routing and scheduling, which are likely to result in a reduction congestion and subsequently in vehicles emissions.
- 4.90 The third measure states that the physical space in which goods are loaded and unloaded should be designed in accordance with the City of London's Highways and Servicing Guidance. Where on street loading is permitted measures should be put in place to ensure that the movement and safety of road users is not adversely affected. It is anticipated that this measure may have some minor positive effects in relation to air quality as, if vehicles carrying out deliveries or servicing on street are required to ensure that the movement of other road users is not affected then this will not cause congestion and any resulting increase in vehicle emissions.
- 4.91 Within section 5 of the SPD, an additional measure is added for food and drink retail / pubs and restaurant use. This measure sets out the need for engines to be turned off unless absolutely necessary for deliveries in order to reduce noise and air pollution. This is expected to have a positive effect on air quality as engines that are not left idle will not produce emissions.
- 4.92 Based on the above this selected option is scored significant positive (++) in relation to SEA1: air quality, as it is considered that these combined measures will have significant positive effects through the reduction in vehicle emissions.

### **SEA2: Reduce activities that exacerbate climate change**

- 4.93 As with air quality, the use of low or zero emission vehicles is expected to have a positive effect on climate change through the reduction in vehicle emissions.
- 4.94 The measure that encourages high standards of vehicle and driver competency, as well as FORS accreditation, use of Direct Vision vehicles and adherence to the Construction Logistics and Community Safety standard, is anticipated to have positive effects on climate change through more efficient driving, routing and scheduling leading to a decrease in congestion and vehicle emissions.
- 4.95 The third measure states that the physical space in which goods are loaded and unloaded should be designed in accordance with the City of London's Highways and Servicing Guidance, and that if on street servicing is required the movement and safety of road users, and the amenity of

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<sup>9</sup> Fleet Operator Recognition Scheme, <https://www.fors-online.org.uk/cms/>

residents should not be affected. As with air quality above it is anticipated that this measure will result in some minor positive effects for the same reasons.

- 4.96 Section 5 of the SPD includes an additional measure for food and drink retail / pubs and restaurant use which sets out the need for vehicle engines to be turned off when servicing or a delivery is taking place. This will work to reduce vehicle emissions and will therefore have positive effects on climate change.
- 4.97 As with SEA 1, this selected option is anticipated to have significant positive effects in regards to climate change for the reasons described above. Therefore, it has been given a significant positive score (++).

### **SEA3: Adopt the 'Waste hierarchy' in all activities – reduce , reuse, recycle**

- 4.98 It is not expected that the measures included within this option (to encourage the use of low or zero emission vehicles, encourage high standards of vehicle or driver competency or set guidance for loading and unloading) will have any effect on waste. This is because these measures will not work to reduce the amount of waste generated and required to be transported on the roads in the City.
- 4.99 In line with the above information it is considered that this option will have a negligible effect on waste, as the measures are unlikely to affect the generation or processing of waste. Therefore this option has been given a negligible score (0) in regards to SEA 3: waste.

### **SEA4: Improve the health of City workers, residents and visitors**

- 4.100 The measure that encourages the use of low or zero emission vehicles and those that meet the standards of the forthcoming Ultra Low Emission Zone is expected to have a positive impact on human health through the reduction in vehicle emissions and the subsequent improvement in air quality.
- 4.101 The second measure which encourages high standards of vehicle and driver competency, as well as FORS accreditation, use of Direct Vision vehicles and adherence to the Construction Logistics and Community Safety standard is expected to have positive effects on health. The requirement for suppliers to be accredited by FORS, which promotes good working practices, as well as routing and scheduling that minimises noise and environmental impacts, should reduce any impact on the amenity of residents, particularly in terms of noise disturbance, as well as working to reduce vehicle emissions. The use of Direct Vision vehicles and adherence to the Construction Logistics and Community Safety standard will ensure that the safety of other road users and construction site workers is enhanced thus having a beneficial effect on health.
- 4.102 The design of loading space in accordance with the City of London Highways and Servicing Guidance, and implementation of measures for on street servicing that ensure that the movement and safety of pedestrians, cyclists and other road users is not affected, will also have positive effects on health. This is because this measure ensures that servicing will not impact upon the safety of road users, particularly pedestrians and cyclists and will also reduce any impact (though noise or light pollution) on residential amenity.
- 4.103 The additional measure included in relation to food and drink / pub and restaurant use, which sets out the requirement for delivery and servicing vehicles to turn off engines where it is not necessary to leave them on, will have a beneficial effect on human health as it will reduce both noise pollution and vehicle emissions resulting from servicing and deliveries and will therefore enhance residential amenity and air quality which will have beneficial effects on health.
- 4.104 Based on the above reasons this selected option has been scored significant positive (++) in relation to SEA4: health as the measures are likely to result in significant improvements in air quality, safety and amenity.

### **SEA5: Conserve and enhance the historic environment**

- 4.105 The measure that encourages the use of low and zero emission vehicles as well as the measure which sets out guidance for loading and unloading spaces are not expected to have any effect on the historic environment as it is not envisaged that these measures will affect the setting or the character of a heritage asset.

- 4.106 The measure regarding vehicle and driver competency, that encourages the requirement for suppliers to be accredited by FORS, as well as routing and scheduling that minimises noise and environmental impact, is likely to have positive effects on the historic environment as effective routing that minimises environmental impacts may avoid heritage assets thus enhancing their setting.
- 4.107 It is also considered that the measure included in relation to food and drink uses that encourages suppliers to switch off their engines could also positively impact the historic environment, particularly if servicing takes place in the vicinity of a heritage asset, as a reduction in noise pollution will enhance its setting and reduce the risk of erosion from pollution.
- 4.108 This selected option has been scored minor positive uncertain (+?) in relation to SEA5: historic environment due to the enhancements the measures may have on the setting of heritage assets though the reduction in the amount of traffic and noise pollution.

### Mitigation

- 4.109 As it is not anticipated that there will be any significant adverse effects on the SEA objectives as a result of this selected option, no mitigation is required.
- 4.110 However, to further lessen the environmental impacts it is recommended that the additional measure included in Section 5 of the SPD, which sets out the need for engines to be turned off unless absolutely necessary for deliveries at food and drink retail / pubs, should be expanded to include other uses, for example offices and other general retail.

### Reasonable alternatives

- 4.111 Two reasonable alternatives to the selected option have been put forward by the City Corporation. While the selected option assessed in detail above contains most of the measures that are included below in the alternative options, the two alternative options assessed should be considered as focussed measures and assessed in isolation. They will therefore score differently.
- 4.112 *Alternative 1 – Retain business as usual, whereby the environmental impact of servicing is required to be minimised with no formal restriction on the type of vehicle used. Note that mayoral policies (T charge and Ultra Low Emission Zone) will, in future, levy charges upon less clean motor vehicles entering central London.* This alternative option is expected to have a negligible impact on all of the SEA objectives as it is not proposing a change to the current situation. The option will therefore score 0 against all SEA objectives.
- 4.113 *Alternative 2 – Require the use of zero-emission vehicles to be used at the point of delivery to the site in the City.* It is anticipated that this option will have significant positive effects on both air quality (SEA1) and climate change (SEA2) through the reduction in vehicle emissions. The impact on waste (SEA3) and the historic environment (SEA5) is expected to be negligible as this option will neither effect the generation of waste or the setting or character of a heritage asset. The effect on health (SEA4) is anticipated to be positive, again due to a reduction in vehicle emissions and an associated improvement in air quality.



**Table 4.3 Summary of scores**

Measure or reasonable alternative	SEA objective				
	SEA1: Air Quality	SEA2: Climate Change	SEA3: Waste	SEA4: Health	SEA5: Historic Environment
Mitigate the impact of freight trips	++	++	0	++	+
Alternative 1 Retain business as usual	0	0	0	0	0
Alternative 2 Require use of zero emission vehicles at delivery point	++	++	0	+	0

## Cumulative Effects

### SEA1: Improve air quality

- 4.114 The selected option to minimise freight and servicing trips is anticipated to have mixed effects with significant negative effects (+/--?) on air quality. Significant negative effects arise due to the proposed use of large, out of town consolidation centres leading to increases in traffic and associated emissions around these centres. The option to match demand to network capacity is expected to have minor positive (+) effects on air quality and the option that will mitigate the impact of freight trips is anticipated to have significant positive effects on air quality (++) through decreases in traffic and resulting congestion and emissions.
- 4.115 **When the three options are considered cumulatively it is expected that the SPD will result in mixed effects, with significant positive and significant negative effects (++/--?).** It is considered that the three selected options will work together to cumulatively improve air quality as they will result in decreases in road traffic, congestion and vehicle emissions. However, uncertain significant negative effects are also identified as a result of the use of out of town consolidation centres, which could lead to increases in local congestion and increased traffic movements in the areas where these are located.

### SEA2: Reduce activities that exacerbate climate change

- 4.116 The selected option to minimise freight and servicing trips is anticipated to have significant positive effects (++) on climate change due to the likely reduction in traffic and congestion and subsequent vehicle emissions as a result of the measures. The option to match demand to network capacity is expected to have minor positive effects (+) on climate change and the option which will mitigate the impact of freight trips is also anticipated to have significant positive effects (++) on climate change for the reasons described above.
- 4.117 **Cumulatively, it is considered that the three selected options will have significant positive effects (++) on climate change.** The measures within each option will work together cumulatively to significantly reduce the contribution of freight and servicing in the City to climate change through reductions in road traffic, vehicle congestion and emissions.

### SEA3: Adopt the 'Waste hierarchy' in all activities – reduce , reuse, recycle

- 4.118 The selected option to minimise freight and servicing trips is expected to have minor positive effects (+) on waste as it encourages the minimisation and on-site recycling of waste. The option which will match demand to network capacity is anticipated to have negligible (0) effects on waste as does the option to mitigate the impact of freight trips. This is because the majority of the measures with each of the options do not impact on the generation or processing of waste.
- 4.119 **With the three options considered cumulatively it is anticipated that the SPD will result in minor positive effects (+) on the achievement of the waste hierarchy.** This is due to the measure in selected option 1 'minimise' which promotes the on-site recycling of deconstruction waste, other measures are considered to have negligible effects in terms of waste.

### SEA4: Improve the health of City workers, residents and visitors

- 4.120 The selected option, which will minimise freight and servicing trips, is anticipated to have uncertain mixed effects (+/-?) on health as the majority of the measures will result in improvements to air quality due to reductions in traffic and congestion however, out of town consolidation centres are considered likely to have adverse effects on local air quality due to local increases in traffic. The option which sets out measures to match demand to network capacity is anticipated to also have mixed effects (+/-) as the measures in this option will improve air quality and safety and in some respects residential amenity, particularly during the day however, measures promoting night time and weekend servicing are considered likely to adversely affect amenity. The third option to mitigate the impacts of freight trips is expected to have minor positive (+) effects on air quality again due to improvements in air quality, safety and amenity.
- 4.121 **Cumulatively it is anticipated that the three selected options will have uncertain mixed effects on health with significant positive effects (++/-?).** When the positive effects arising from the measures within each of the three options are considered cumulatively it is anticipated that significant benefits to human health will result due to improvements to safety, daytime amenity for residents and visitors and air quality. However, negative effects also need to be included due to losses in residential amenity as a result of weekend and night time servicing and also potential decreases in air quality and amenity in the vicinity of consolidation centres.

### SEA5: Conserve and enhance the historic environment

- 4.122 The selected option to minimise freight and servicing trips is anticipated to have mixed effects with uncertainty (+/-?) in regards to the historic environment. Positive effects will arise from a decrease in traffic enhancing the settings of heritage assets, but negative effects may arise as a result of routing to and from out of town consolidation centres - though this is not certain. The second option, to match demand to network capacity is expected to have minor positive effects with uncertainty (+?) as does the option which sets out measures to mitigate the impact of freight trips. Again this is due to the reduction in traffic which will result from the measures, with uncertainty surrounding the delivery and servicing routes that may be used.
- 4.123 When the three options are considered cumulatively, uncertain mixed effects (+/-?) on the historic environment are anticipated as a result of the SPD. Mixed effects are anticipated as many of the measures within the three options may result in enhancements to the settings of heritage assets through re-routing and also reductions in congestion. However, negative effects have been identified as possible in relation to consolidation centres. The effects overall are considered to be uncertain as they depend upon the routing of vehicles which is not known at this stage.

## Options with a Significant Negative Effect

- 4.124 Only the first selected option 'minimise freight and servicing trips' contains a measure that is likely to have significant negative effects on any of the SEA objectives. It is anticipated that the measure that sets out the need for out of town consolidation centres could have a significant adverse effect on SEA1: air quality as well as minor negative impacts on the SEA4: health, and possible minor negative effects on SEA5: historic environment.
- 4.125 The measure is anticipated to result in both positive and negative effects with regards to the SEA objectives. Positive effects are associated with a reduction in the number of delivery and servicing vehicles that are required to enter the City. Negative effects (which, as stated above are considered could be significant in relation to air quality) are more likely to occur outside of the City, in the vicinity of the consolidation centre. The negative effects likely to occur are:
- An increase in traffic and possible congestion around the consolidation centres leading to increases in vehicles emissions and subsequently localised decreases in air quality and associated impacts on human health.
  - An increase in the amount of traffic leading to increase noise pollution around the consolidation centres and a likely increase in light pollution. Increases in noise and light pollution would have adverse effects on the amenity of any nearby residents.
  - An increase in the number of large vehicles using the roads around a consolidation centre leading to a decrease in road safety for other users, particularly pedestrians and cyclists.
  - Depending on the location of the consolidation centres and routes used there is the potential for the setting of heritage assets to be negatively affected through increases in traffic and noise and light pollution.
- 4.126 It should be noted that the impact of consolidation centres has been difficult to assess due to uncertainties in the locations of the centres and how they will operate (e.g. hours, routes etc.). The City Corporation has confirmed that private developers will need to identify potential suitable sites, choose to develop these, and make an application to the relevant planning authority, who will then have the final decision on whether the development is to be permitted. For this reason the City has little authority over the implementation of the consolidation centres.
- 4.127 It is recognised that there is potential to mitigate many of the potential negative effects that may arise as a result of the use of consolidation centres (including effects assessed as uncertain), depending on the location and operation of the centres. The potential mitigation is set out in **paragraph 4.54**.
- 4.128 While they are not expected to have significant negative effects it should be noted that some of the other measures contained within the selected options and within the alternative options were deemed to have minor negative effects. This includes measures that encourage night time, weekend and evening servicing and the use of micro consolidation centres.
- 4.129 The table below shows a summary of the scores given to each of the options, both selected and reasonable alternative in regards to each of the SEA objectives.

**Table 4.4 SA Scores for Draft Local Plan policies and reasonable alternatives relating to Delivering Growth and Sustainable Development**

SEA objectives	Selected option 1 – measures to minimise freight and servicing trips	Alternative option 1 – retain business as usual	Alternative option 2 – require use of consolidation centres	Alternative option 3 – require us of micro-consolidation and last mile zero emissions	Alternative option 4 – require waste consolidation	Selected option 2 – measures to match demand to network capacity	Alternative option 1 – retain business as usual	Alternative option 2 – no deliveries 7am to 7pm	Alternative option 3 – require night time deliveries 11pm to 7am	Selected option 3 – measures to mitigate the impact of freight trips	Alternative option 1 – retain business as usual	Alternative option 2 – require use of zero emission vehicles at point of delivery
<b>1: Air Quality</b>	++/--?	0	+/--?	+/-?	+	+	0	+	+	++	0	++
<b>2: Climate Change</b>	++	0	+	+	+	+	0	+	+	++	0	++
<b>3: Waste</b>	+	0	0	0	++	0	0	0	0	0	0	0
<b>4: Health</b>	+/-?	0	+/-	+/-	+	+/-	0	+/-	+/-	++	0	+
<b>5: Historic Environment</b>	+/-?	0	+/-?	+/-?	+	+	0	0	0	+	0	0

## 5 Monitoring

- 5.1 The SEA Regulations require that *'the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action'* and that the environmental report should provide information on *'a description of the measures envisaged concerning monitoring'*. Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.
- 5.2 Monitoring should be focused on the significant environmental effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused) and the significant effects where there is uncertainty in the SEA and where monitoring would enable preventative or mitigation measures to be taken.
- 5.3 Based on this, monitoring indicators have been proposed for the SEA objectives relating to air quality (SEA1), climate change (SEA2), waste (SEA3) and health (SEA4) as these three objectives may result in significant positive or negative significant effects as a result of the selected and alternative options in the SPD. Health and the historic environment have not been included as they are unlikely to be significantly affected by the implementation of the Supplementary Planning Document.
- 5.4 **Table 5.1** sets out a number of suggested indicators for monitoring the potential significant (positive and negative) environmental effects of implementing the Freight and Servicing SPD. Indicators are proposed in relation to the SEA objectives for which potential significant positive or negative effects were identified as a result of any of the SPD measures.
- 5.5 The data used for monitoring in many cases will be provided by outside bodies. Information collected by other organisations (e.g. the Environment Agency) can also be used as a source of indicators. It is therefore recommended that the City of London Corporation continues the dialogue with statutory environmental consultees and other stakeholders that has already been commenced, and works with them to agree the relevant environmental effects to be monitored and to obtain information that is appropriate, up to date and reliable.

**Table 5.1 Proposed Monitoring Framework for the Freight and Servicing SPD**

SA objectives	Proposed monitoring indicators
SEA1: Improve air quality	<ul style="list-style-type: none"> <li>• Number of planning applications that include an air quality assessment<sup>10</sup> (source: Planning Dept Uniform query)</li> <li>• Changes in the concentration of air pollutants in the City (source: COL Environmental Health)</li> </ul>
SEA2: Reduce activities that exacerbate climate change	<ul style="list-style-type: none"> <li>• Percentage of deliveries made by zero emissions transport</li> <li>• The number of vehicles used that meet the (forthcoming) Ultra Low Emission Zone standards</li> <li>• Number of large delivery and servicing vehicles using the roads in the City<sup>11</sup></li> <li>• Changes in greenhouse gas emissions from the City (source: BEIS energy/CO<sub>2</sub> trends data)</li> </ul>
SEA3: Adopt the 'Waste hierarchy' in all activities – reduce , reuse, recycle	<ul style="list-style-type: none"> <li>• Percentage of waste sent for reuse, recycling and composting ( source: estimate from waste arisings report)</li> <li>• Quantity of waste transported by river from Walbrook Wharf (source: COL cleansing services)</li> <li>• Number of waste collection vehicles using the roads in the City<sup>12</sup></li> </ul>
SEA4: Improve the health of city workers, residents and visitors	<ul style="list-style-type: none"> <li>• Number of hospital admissions in relation to road accidents (source: COL road casualty stats)</li> <li>• Number of road accidents involving cyclists and pedestrians (source: COL road casualty stats)</li> <li>• Number of complaints regarding amenity (source: COL environmental health)</li> <li>• Proportion of residents reporting their health as 'good' or 'very good' (source: Census)</li> </ul>

<sup>10</sup> Air quality assessment should demonstrate how the development has met air quality challenges thereby avoiding refusal.

<sup>11</sup> The first three measures are likely to be undertaken through periodic surveys rather than real time monitoring.

<sup>12</sup> As there are large numbers of private waste contractors operating in the City using a range of different vehicles it is anticipated that this would be difficult to monitor.

## 6 Conclusions and Next Steps

- 6.1 The selected options and reasonable alternative options for the City of London Freight and Servicing SPD have been subject to a detailed appraisal against the SEA objectives, which were developed at the Scoping stage of the SEA process.
- 6.2 The SEA has identified the potential for likely significant effects (positive and negative) for some of the options or measures contained within the selected options and reasonable alternative options. The scores can be seen in **Table 4.4**.
- 6.3 Uncertain significant negative effects have been identified for only one measure, the use of out of town consolidation centres. It is anticipated that this measure, contained within selected option 1 'Minimise Freight and Servicing Trips', could have significant adverse effects on air quality outside the City of London in the vicinity of the consolidation centres, as well as minor negative effects on health. The reasons for this are included in **paragraphs 4.8** and **4.16** and potential mitigation measures are outlined in **paragraphs 4.53** and **4.54**.

### Next Steps

- 6.4 This SEA Report will be available for consultation alongside the Draft City of London Freight and Servicing SPD between 7<sup>th</sup> August and 30<sup>th</sup> September 2017.
- 6.5 Following this consultation, the SPD and accompanying SEA Report will be updated, if required. If there are no remaining issues, the City Corporation will adopt the SPD and an SEA Adoption Statement will be produced.

LUC  
July 2017

# Appendix 1

## Consultation Responses to the SEA Scoping Report



**Table A1. 1: Consultation comments received in relation to the Draft SEA Scoping Report for the Freight and Servicing SPD and how they have been addressed**

Consultee comment	Response/comment and how it was addressed in the final SEA report
<b>Environment Agency</b>	
The Environment Agency had no comments to make as the SPD will not impact on any environmental constraints within their remit. However, if there are plans to increase the level of boat movement within the River Thames then they will need to be notified as this may change their position.	Noted.
<b>Historic England</b>	
Historic England considered the scoping in of cultural heritage to the SEA appropriate due to the extent of heritage assets within the City and potential impacts from freight and servicing in respect of the condition, use and appreciation of these assets. The Scoping Report was considered to be thorough and comprehensive.	Noted.
Historic England noted the intention to consider a wider geographic area, and therefore suggested that it may be appropriate to assess the wider impacts affecting the City Fringe and therefore against the Mayor's City Fringe SPD (2015) which sets out guidance for delivering sustainable development while safeguarding its finely balanced range of activities and uses.	The City Fringe SPD has been reviewed. It is considered that heritage assets in the City Fringe are unlikely to be significantly negatively affected by the measures proposed in the SPD. Issues outside of the City itself are likely to be centred around the consolidation centres. While the exact locations of these centres are unknown, they are unlikely to be located in the City Fringe as, in line with London Plan policy 2.17, consolidation centres should be concentrated on the Preferred Industrial Locations, none of which are located in the City or the City Fringe. The impact of an increase in traffic along roads in the vicinity of heritage assets as a result of the measures in the SPD has been addressed in the relevant section in the main report, though this is in general terms as specific routes etc. are unknown at this stage.
The London Borough of Hackney's South Shoreditch SPD (2006) was also highlighted for consideration, alongside the range of conservation area appraisal and management guidelines referred to in the consultation.	The SPD has been reviewed. It is not anticipated that heritage assets located in South Shoreditch will be significantly adversely affected by the measures within the SPD. As above, the measure that encourages the use of consolidation centres is that most likely to have negative effects on heritage assets. The consolidation centres, in line with the London Plan are likely to be located in preferred industrial locations, none of which are in the Shoreditch area. The effects of any increase in traffic along roads in the vicinity of heritage assets has been addressed in the relevant section in the main report, in regards to heritage assets in general as specific routing at this stage is unknown.
Additionally areas such as Shoreditch, Bethnal Green Road / Redchurch	It is noted that areas around the City, including Shoreditch, Bethnal Green Road /

<b>Consultee comment</b>	<b>Response/comment and how it was addressed in the final SEA report</b>
<p>Street, Whitechapel and Aldgate were highlighted for consideration, as they contain a high proportion of heritage assets and dense confluence of arterial roads / transport networks converging on the City of London. The relationship and impact on these areas should be tested through the SEA process.</p>	<p>Redchurch Street, Whitechapel and Aldgate contain a large number of heritage assets and also contain a dense confluence of roads into / out of the City. The effect on heritage assets of an increase in traffic along roads in these areas has been included in the assessment. As particular routing and / or locations are not known at this stage the effects on specific locations remain uncertain, through it has been noted in the text that an increase in traffic in the vicinity of a heritage asset would be likely to result in negative effects. This has also then been addressed in the relevant mitigation section.</p>
<b>Natural England</b>	
<p>Natural England has no issue with the topics scoped into the full SEA report. It was the advice of Natural England, on the basis of the material supplied with the consultation, that, in so far as their strategic environmental interests are concerned (including but not limited to statutory designated sites, landscapes and protected species, geology and soils), there is unlikely to be significant environmental effects from the proposed plan.</p>	<p>Noted.</p>

# Appendix 2

## Review of International and National Plans, Policies and Programmes

**Table A2. 1 : Review of international and national plans, policies and programmes relevant to the preparation of the City of London Freight and Servicing SPD and the SEA**

Plan/ Policy/ Programme	Objectives and Requirements	Implications for the SEA
<b>International</b>		
Johannesburg Declaration on Sustainable Development (2002)	Commitment to building a humane, equitable and caring global society aware of the need for human dignity for all.  Renewable energy and energy efficiency. Accelerate shift towards sustainable consumption and production.	Consider the enhancement of the natural environment.
Aarhus Convention (1998)	Established a number of rights of the public with regard to the environment. Local authorities should provide for: <ul style="list-style-type: none"> <li>• The right of everyone to receive environmental information</li> <li>• The right to participate from an early stage in environmental decision making</li> <li>• The right to challenge in a court of law public decisions that have been made without respecting the two rights above or environmental law in general.</li> </ul>	Ensure that public are involved and consulted at all relevant stages of SEA production.  <i>Relates to the overall SEA process.</i>
<b>European</b>		
<i>SEA Directive 2001</i> Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment	Provide for a high level of protection of the environment and contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development.	Requirements of the Directive must be met in Strategic Environmental Assessment  <i>Relates to the overall SEA process.</i>
<i>The Industrial Emissions Directive 2010</i> Directive 2010/75/EU on industrial emissions (integrated pollution prevention and control)	This Directive lays down rules on integrated prevention and control of pollution arising from industrial activities. It also lays down rules designed to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment taken as a whole.	Consider reducing pollution.
<i>The Birds Directive 2009</i> Directive 2009/147/EC is a codified version of Directive	The preservation, maintenance, and re-establishment of biotopes and habitats shall include the following measures: Creation of protected areas. Upkeep and management in accordance with the ecological needs of habitats	Consider implications of the SPD for birds.  <i>This issue was scoped out.</i>

Plan/ Policy/ Programme	Objectives and Requirements	Implications for the SEA
79/409/EEC as amended	inside and outside the protected zones. Re-establishment of destroyed biotopes.  Creation of biotopes.	
<i>The Waste Framework Directive 2008</i> Directive 2008/98/EC on waste	Prevention or reduction of waste production and its harmfulness. The recovery of waste by means of recycling, re-use or reclamation. Recovery or disposal of waste without endangering human health and without using processes that could harm the environment.	Consider minimising waste production as well as promoting recycling.
<i>The Air Quality Directive 2008</i> Directive 2008/50/EC on ambient air quality and cleaner air for Europe	Avoid, prevent and reduce harmful effects of ambient air pollution on human health and the environment	Consider maintaining and enhancing air quality.
<i>The Landfill Directive 1999</i> Directive 99/31/EC on the landfill of waste	Prevent or reduce negative effects on the environment from the landfilling of waste by introducing stringent technical requirements for waste and landfills.	Consider increasing recycling and reducing the amount of waste.
<i>The Packaging and Packaging Waste Directive 1994</i> Directive 94/62/EC on packaging and packaging waste	Harmonise the packaging waste system of Member States. Reduce the environmental impact of packaging waste.	Consider minimising the environmental impact of waste and promote recycling.
<i>The Habitats Directive 1992</i> Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora	Promote the maintenance of biodiversity taking account of economic, social, cultural and regional requirements. Conservation of natural habitats and maintain landscape features of importance to wildlife and fauna.	<i>The SPD is not considered likely to affect any habitats, flora or fauna of international importance.</i>
European Spatial Development Perspective (1999)	Economic and social cohesion across the community. Conservation of natural resources and cultural heritage. Balanced competitiveness between different tiers of government.	Consider the conservation of natural resources and cultural heritage.
EU Seventh Environmental Action Plan (2002-2012)	The EU's objectives in implementing the programme are: (a) to protect, conserve and enhance the Union's natural capital; (b) to turn the Union into a resource-efficient, green and competitive low-carbon economy; (c) to safeguard the Union's citizens from environment-related pressures and risks to health and wellbeing;	Consider the protection and enhancement of the natural environment and promote energy efficiency, where relevant.

Plan/ Policy/ Programme	Objectives and Requirements	Implications for the SEA
	(d) to maximise the benefits of the Union's environment legislation; (e) to improve the evidence base for environment policy; (f) to secure investment for environment and climate policy and get the prices right; (g) to improve environmental integration and policy coherence; (h) to enhance the sustainability of the Union's cities; (i) to increase the Union's effectiveness in confronting regional and global environmental challenges.	
European Convention on the Protection of the Archaeological Heritage (Valletta, 1992)  <i>Revision of the 1985 Granada Convention</i>	Protection of the archaeological heritage, including any physical evidence of the human past that can be investigated archaeologically both on land and underwater.  Creation of archaeological reserves and conservation of excavated sites.	Consider the protection of archaeological heritage.
<b>National</b>		
Localism Act (2011)	The Localism Act introduces a number of measures to decentralise decision making process to the local level, creating space for Local Authorities to lead and innovate, and giving people the opportunity to take control of decisions that matter to them. The Localism Act includes a number of important packages. <ul style="list-style-type: none"> <li>• The new act makes it easier for local people to take over the amenities they love and keep them part of local life;</li> <li>• The act makes sure that local social enterprises, volunteers and community groups with a bright idea for improving local services get a chance to change how things are done.</li> <li>• The act places significantly more influence in the hands of local people over issues that make a big difference to their lives.</li> <li>• The act provides appropriate support and recognition to communities who welcome new development.</li> <li>• The act reduces red tape, making it easier for authorities to get on with the job of working with local people to draw up a vision for their area's future.</li> <li>• The act reinforces the democratic nature of the planning system passing power from bodies not directly to the public, to democratically accountable ministers.</li> <li>• The act enables Local Authorities to make their own decisions to adapt housing provision to local needs, and make the system fairer and more effective.</li> <li>• The act gives Local Authorities more control over the funding of social</li> </ul>	To ensure the concepts of the Localism Act are embedded within the SEA framework.  <i>Relates to the overall SEA process.</i>

Plan/ Policy/ Programme	Objectives and Requirements	Implications for the SEA
	<p>housing, helping them plan for the long- term.</p> <p>In relation to planning, the Localism Act enables the Government to abolish regional spatial strategies, introduce Neighbourhood Plans and Local Referendums.</p>	
National Planning Policy Framework (2012)	<p>Presumption in favour of sustainable development.</p> <p>Delivering sustainable development by:</p>	<p>Sustainability appraisal should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.</p>
	<p>Promoting sustainable transport</p>	<p>Consider sustainable transport.</p>
	<p>Promoting healthy communities.</p>	<p>Consider health and well-being.</p>
	<p>Meeting the challenge of climate change, flooding, and coastal change.</p>	<p>Consider climate change mitigation.</p>
	<p>Conserving and enhancing the natural environment.</p>	<p>Consider the conservation and enhancement of the natural environment.</p>
	<p>Conserving and enhancing the historic environment</p>	<p>Consider the conservation of historic features.</p>
National Planning Practice Guidance (2014)	<p>The National Planning Practice Guidance provides technical guidance on topic areas in order to support policies set out within the NPPF. It aims to allow for sustainable development as guided by the NPPF.</p>	<p>The principles and requirements of national policy will need to be embedded within the SEA framework and appraisal</p>
National Planning Policy for Waste (2014)	<p>Sets out the Government’s ambition to work towards a more sustainable and efficient approach to resource use and management. Replaces Planning Policy Statement 10.</p>	<p>Consider waste generation and management.</p>

Plan/ Policy/ Programme	Objectives and Requirements	Implications for the SEA
UK Government Sustainable Development Strategy: Securing the Future (2005)	<p>The Strategy sets out 5 principles for sustainable development:</p> <ul style="list-style-type: none"> <li>• Living within environmental limits;</li> <li>• Ensuring a strong, healthy and just society;</li> <li>• Achieving a sustainable economy;</li> <li>• Promoting good governance ; and</li> <li>• Using sound science responsibly.</li> </ul> <p>The strategy sets four priorities for action:</p> <ul style="list-style-type: none"> <li>• Sustainable consumption and production;</li> <li>• Climate change and energy;</li> <li>• Natural resource protection and environmental enhancement;</li> <li>• Sustainable communities</li> </ul> <p>The strategy commits to:</p> <ul style="list-style-type: none"> <li>• A programme of community engagement;</li> <li>• Forums to help people live sustainable lifestyles;</li> <li>• Open and innovative ways for stakeholders to influence decision; educating and training</li> </ul>	To ensure that the requirements of the Strategy are embedded within the SEA framework.
English Heritage Historic England Corporate Plan 2015 to 2018 (2015)	<p>The plan sets out its three purposes as to:</p> <ul style="list-style-type: none"> <li>• Secure the preservation of ancient monuments and historic buildings;</li> <li>• Promote the preservation and enhancement of the character and appearance of conservation areas; and</li> <li>• Promote the public's enjoyment of, and advance their knowledge of, ancient monuments and historic buildings.</li> </ul>	Consider the historic environment.
Energy White Paper: Our Energy Future (2003)	<p>There are four key aims in this document:</p> <ul style="list-style-type: none"> <li>• To put ourselves on a path to cut the United Kingdom carbon dioxide emissions- the main contributor to global warming- by some 60 % by about 2050, with real progress by 2020;</li> <li>• To maintain the reliability of energy supplies;</li> <li>• To promote competitive markets in the United Kingdom and beyond, helping to raise the rate of sustainable economic growth and to improve our productivity; and</li> <li>• To make sure that every home is adequately and affordably heated.</li> </ul>	Consider energy efficiency.
The Carbon Plan: Delivery our Local Carbon Future (2011)	<p>The Carbon Plan sets out the government's plans for achieving the emissions reductions it committed to in the first four carbon budgets.</p> <p>Emissions in the UK must, by law, be cut by at least 80% of 1990 by 2050. The UK was first to set its ambition in law and the Plan sets out progress to date.</p>	Consider greenhouse gas emissions.



Plan/ Policy/ Programme	Objectives and Requirements	Implications for the SEA
The Climate Change Act (2008)	<p>The Climate Change Act was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also strengthened the UK's leadership internationally by highlighting the role it would take in contributing to urgent collective action to tackle climate change under the Kyoto Protocol.</p> <p>The Climate Change Act includes the following:</p> <ul style="list-style-type: none"> <li>• 2050 target. The act commits the UK to reducing emissions by at least 80% in 2050 from 1990 levels. This target was based on advice from the CCC report: Building a Low- carbon Economy. The 80% target includes GHG emissions from the devolved administrations, which currently accounts for around 20% of the UK's total emissions.</li> <li>• Carbon Budgets. The Act requires the Government to set legally binding 'carbon budgets'. A carbon budget is a cap on the amount of greenhouse gases emitted in the UK over a five-year period. The first four carbon budgets have been put into legislation and run up to 2027.</li> </ul>	Consider climate change.
Heritage Protection for the 21 <sup>st</sup> Century: White Paper (2007)	<p>The proposals in this White Paper reflect the importance of the heritage protection system in preserving our heritage for people to enjoy now and in the future. They are based around three core principles:</p> <ul style="list-style-type: none"> <li>• Developing a unified approach to the historic environment;</li> <li>• Maximising opportunities for inclusion and involvement; and</li> <li>• Supporting sustainable communities by putting the historic environment at the heart of an effective planning system</li> </ul>	Consider cultural heritage.
The Air Quality Strategy for England vol. 1 (2007)	<p>The Air Quality Strategy sets out a way forward for work and planning on air quality issues by setting out the air quality standards and objectives to be achieved. It introduces a new policy framework for tackling fine particles, and identifies potential new national policy measures which modelling indicates could give further health benefits and move closer towards meeting the Strategy's objectives. The objectives of strategy are to:</p> <ul style="list-style-type: none"> <li>• Further improve air quality in the UK from today and long term.</li> <li>• Provide benefits to health, quality of life and the environment.</li> </ul>	Consider air quality.
Energy Act (2008)	<p>The Act works towards a number of policy objectives including carbon emissions reduction, security of supply, and competitive energy markets. Objectives: Electricity from Renewable Sources: changes to Renewables Obligation (RO), designed to increase renewables generation, as well as the effectiveness of the RO.</p> <p>Feed in tariffs for small scale, low carbon generators of electricity. Smart</p>	Consider energy efficiency and climate change.

Plan/ Policy/ Programme	Objectives and Requirements	Implications for the SEA
	<p>meters: the Act mandates a roll-out of smart meters to medium sized businesses over the next five years.</p> <p>Renewable heat incentives: the establishment of a financial support mechanism for those generating heat from renewable sources.</p>	
National Infrastructure Plan (2014)	The Infrastructure Plan allows for long term public funding certainty for key infrastructure areas such as: roads, rail, flood defences and science. All elements highlighted in the Plan represent firm commitment by government to supply the funding levels stipulated. The Plan also highlights what steps the government will take to ensure effective delivery of its key projects	To ensure that the SEA promoted efficient infrastructure.
Waste Management Plan for England (2013)	The Waste Management Plan follows the EU principal of waste hierarchy. This requires that prevention of waste, preparing for reuse and recycling should be given priority order in any waste legislation and policy. From this principal a key objective of The Plan is to reduce the level of waste going to landfill and to encourage recycling. The Plan also requires that larger amounts of hazardous waste should be disposed of at specially managed waste facilities.	The objectives of the national waste policy will be required to be embedded within the SEA framework.

# Appendix 3

## Baseline Information

## Introduction

Baseline information provides the basis for predicting and monitoring the likely environmental effects of a plan and helps to identify key environmental issues and means of dealing with them.

Schedule 2 of the SEA Regulations requires information to be provided on:

(2) *The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan.*

(3) *The environmental characteristics of areas likely to be significantly affected.*

(4) *Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC on the conservation of wild birds and the Habitats Directive.*

Baseline information that was collated for the SA of the City of London Local Plan has been used as the starting point. However, where necessary, it has been revised and updated to make use of the most recent available information sources. Data referred to have been chosen primarily for regularity and consistency of collection, in order to enable trends in the baseline situation to be established, and also subsequent monitoring of potential environmental effects.

As mentioned earlier in this report, the SPD encourages use of consolidation centres outside of the City. As the locations of such facilities are unknown, the baseline information below relates only to the City of London itself.

## Baseline information

### Climatic Factors

#### *Energy consumption and related emissions*

Energy consumption and the consequent emissions of carbon dioxide are of significant importance to the City of London and have a contributory impact on climate change. As can be seen from **Table A3.1** petroleum products, though not the largest source of energy consumed in the City or London as a whole, still contribute a large amount to energy consumption. Much of this will be a result of motorised transport, including delivery and servicing vehicles.

The design and construction of the built environment, including transport infrastructure, together with economic and social activities can have an effect on energy consumption and subsequent greenhouse gas emissions and this can be influenced by planning policies for both new and existing development.

It is important to consider the overall energy consumption and carbon dioxide emissions in the City to see whether the policies that are in place are having a positive effect on longer term trends. **Table A3.1** shows energy consumption figures for both the City of London (C of L) and Greater London (GL) for 2005 – 2014 and demonstrates that electricity accounts for the greatest proportion of energy consumption in the City, while for London this is Natural Gas. Overall energy consumption in the both the City and Greater London has decreased slightly during this period<sup>13</sup>.

**Table A3.1: Energy consumption on the City of London (GWh) 2005-2014**

Year	Petroleum Products		Natural Gas		Electricity		Renewables and Waste		Total	
	C of L	GL	C of L	GL	C of L	GL	C of L	GL	C of L	GL
2005	261	34,494	982	79,849	2616	41,434	2	89	3860	156,052
2006	255	34,656	925	76,950	2742	42,843	2	125	3924	154,736
2007	258	34,387	964	74,349	2555	42,197	2	288	3778	151,368

<sup>13</sup> DECC Total sub national final energy consumption 2005-2014.

Year	Petroleum Products		Natural Gas		Electricity		Renewables and Waste		Total	
2008	225	33,333	945	72,799	2584	41,814	0	154	3754	148,274
2009	208	32,352	940	67,387	2467	41,081	0	153	3615	141,131
2010	239	31,818	900	67,423	2684	41,714	0	189	3584	141,299
2011	228	30,755	831	63,915	2385	39,945	0	306	3444	135,076
2012	219	30,473	800	63,038	2482	40,807	0	288	3501	134,749
2013	213	30,045	780	61,946	2440	40,478	0	319	3433	132,960
2014	234	30,648	669	59,102	2103	40,957	0	451	3006	131,303

### Flood risk

Local Authorities are responsible for carrying out Strategic Flood Risk Assessments (SFRA) for their areas to determine the level of risk from river and coastal flooding, ground water and surface water flooding including its interaction with the sewer network. Developers must submit Flood Risk Assessments (FRA) demonstrating the mitigation of any flood risk posed by new development. The Environment Agency provides information and advice to assist in the production of FRA's and SFRAs and also produce Flood Zone maps for river and coastal flooding. The map for the City shows some risk of flooding from the River Thames, however the main flood risk is to the south of the river outside the City boundary.

Climate change is an important factor in increasing flood risk particularly through the impacts of rising sea levels and more extreme weather events.

**The effects of the SPD on climatic factors was scoped in to the SEA as emissions of Carbon Dioxide and other Greenhouse gases have the potential to be affected by the measures set out in the Freight and Servicing SPD.**

### Landscape

The City of London and its environs contain many famous landmarks which are visible both within and beyond the City's boundaries. Views of the City's skyline from the River Thames are especially notable and certain local views of St Paul's Cathedral have been protected successfully by the City Corporation's St Paul's Heights code since the 1930's. Landmarks such as St Paul's Cathedral, the Monument and the Tower of London are internationally renowned and add to the City's 'world class' status. These views are protected by an integrated range of national regional and local policies.

The Tower of London has additional view protection, implemented through the Tower of London World Heritage Site Management Plan (2016). This defines and protects a range of 'settings' of the Tower World Heritage Site which includes its relationship with historic features which are visible in the urban landscape.

**The effects on landscape was scoped out of the SEA as it was not envisaged that the Freight and Servicing SPD will have any significant effects on the landscape character of the City. This is because the SPD will not propose specific sites for new development or infrastructure itself, rather its aim will be to limit the impact of additional freight and servicing trips that new development may attract.**

### Biodiversity, Flora and Fauna

The City of London Corporation has produced a Biodiversity Action Plan (BAP) which identified the habitats and species that are under threat, important to the City and can be monitored and promoted as an indication of local biodiversity<sup>14</sup>.

A number of factors led to the City BAP being different to those of other local authority areas:

High density buildings and built infrastructure

Small size and isolated nature of existing spaces within the City

Demographic composition of the City

Intense pressure on all outdoor spaces during lunchtime periods

<sup>14</sup> City of London Biodiversity Action Plan 2016-2020

The species that have been identified as priorities are included below:

- Black Redstart
- Peregrine Falcon
- House Sparrow
- Bats
- Stag Beetles
- Swift
- Bumblebee

Possible effects of night time servicing on these species, particularly bats, in the City was considered further. However, light and noise pollution in the City at night are existing problems and it is not envisaged that the night time servicing that will occur as a result of the measures in the SPD will have further significant effects on these species.

The priority habitats identified by the London Biodiversity Partnership that are most relevant to the Square Mile are 'parks and urban green spaces' with an 'important habitat' identified as 'built structures'. Action plans have been developed to take into consideration these priority habitats. A further habitat recognised as a London biodiversity target within the City of London is the Tidal Thames, which is also the City's only Site of Metropolitan Importance for Nature Conservation (SMINC), and standing water which includes ponds.

There are several sites which have been designated as Sites of Importance for Nature Conservation SINC in the City of London. The sites were identified as a result of a survey carried out jointly by the City of London Corporation and the GLA's biodiversity strategy team using criteria and procedures which are set out in Appendix I of the Mayors Biodiversity Strategy. The table below shows the SINC sites that were identified in the survey.

**Table A3. 2: Sites of Importance for Nature Conservation**

Site Name	Designation	Area (ha)
The River Thames and tidal tributaries	Site of Metropolitan Importance	26
The Temple Gardens	Site of Borough Importance GII	2.19
The Barbican and St Alphage Gardens	Site of Borough Importance GII	3.06
Pepys Garden Seething Lane and St Olave's Churchyard	Site of Local Importance	0.12
St Pauls Cathedral Gardens	Site of Local Importance	0.71
Cleary Gardens	Site of Local Importance	0.11
St Botolph's Bishopsgate Church Grounds	Site of Local Importance	0.27
Aldermanbury Gardens	Site of Local Importance	0.10
The Roman Wall Noble Street	Site of Local Importance	0.06
Finsbury Circus	Site of Local Importance	0.74

It is concluded that the SPD will not affect the priority habitats in the City. However, the potential for adverse effects on the Thames and tidal tributaries Site of Metropolitan Importance has been considered in more detail due to the promotion of river freight within the SPD. The SPD is in line with Policy CS9 of the Local Plan – Thames and the Riverside, which sets out the need to 'promote the functional uses of the River Thames and its environs for transport, navigation and recreation', to be achieved through a number of measures including; the use of Walbrook Wharf for waterborne freight traffic and, encouraging the use of the river for the transport of construction

and deconstruction materials. As the SPD is not changing or adding or anything to the Policy that is already set out within the Local Plan it is considered that there will be no additional effects.

**Issues regarding biodiversity, Flora and Fauna were scoped out of the SEA. As the SPD will not propose any specific sites for new development or infrastructure and instead will aim to reduce the impacts of freight and servicing that new development may give rise to, it was considered that the Freight and Servicing SPD will not significantly affect the priority species or habitats in the City.**

### Cultural Heritage

The City of London, by virtue of its rich heritage and development, has a legacy of buildings of high architectural merit and areas of distinctive townscape quality and character. This includes 26 conservation areas and over 600 listed buildings and four historic parks and gardens at Finsbury Circus, Barbican and the Temples (Inner Temple and Middle Temple) and also includes the setting of a World Heritage Site – the Tower of London.

There are also a number of Scheduled Ancient Monuments and sites with Archaeological Potential present in the City, areas with archaeological remains in situ cover much of the area.

The Local Plan provides extensive protection to heritage and archaeological assets in the City through the following policies; CS12 Historic Environment, DM 12.1 Managing change affecting all heritage assets and spaces, DM 12.2 Development in conservation areas, DM 12.3 Listed buildings, DM 12.4 Ancient monuments and archaeology and DM 12.5 Historic Parks and Gardens.

**The effects of the SPD on cultural heritage was scoped in to the SEA assessment as, due to the number of listed buildings and other heritage assets in the City, there may be the potential for effects upon the settings of these assets, for example as a result of noise and light pollution. It was also considered that a decline in air quality in the vicinity of a heritage asset may have an adverse effect on the fabric of the building or structure.**

### Air Quality

The Environment Act 1995 introduced the National Air Quality Strategy and the requirement for local authorities to determine if statutory air quality objectives (AQOs) are likely to be exceeded. All local authorities now report to DEFRA on an annual basis, and have the obligation to declare Air Quality Management Areas (AQMAs) and develop action plans for improvement of air quality if objectives are likely to be exceeded.

The primary air pollutants of concern in the City historically were black smoke and sulphur dioxide caused by the burning of fossil fuels (such as coal) for industrial and domestic use. Subsequent controls successfully tackled these problems. Today, the major contributor to poor air quality is motorised vehicles. Petrol and diesel engines emit a wide range of pollutants, principally carbon monoxide, oxides of nitrogen, volatile organic compounds and fine particulate matter.

Assessment of these pollutants has been carried out in accordance with the requirements of the Air Quality (England) Regulations 2000 with the result that, in 2001, the whole of the City was declared an Air Quality Management Area for Nitrogen Dioxide and fine particulate matter (PM<sub>10</sub>). The cross boundary nature of air pollution means that, although actions can be taken at local level to combat some sources of air pollution, a high proportion of pollutants originate outside the City, so a wider approach is required.

In the City Nitrogen Dioxide is continuously monitored at six locations (Beech Street, Walbrook Wharf Senator House, Sir John Cass School, Farringdon Street and Walbrook rooftop). The air quality objective of 40 µg m<sup>-3</sup> (annual average) was exceeded at all of these sites.

Fine Particulate Matter (PM<sub>10</sub>) is monitored in the City at Beech Street, Upper Thames Street and at the Sir John Cass School. The deadline for achieving the Governments air quality objectives for PM<sub>10</sub> was the end of 2004. The 40 µg m<sup>-3</sup> objective has not been exceeded at any of the recording sites since 2008.

Exposure to PM<sub>10</sub> and Nitrogen Dioxide is considered to be a significant cause of ill health and premature death in London. Research by King's College London estimated that air pollution was responsible for up to 141,000 life years lost or the equivalent of up to 9,400 deaths in London in

2010, as well as over 3,400 hospital admissions. The total economic cost associated with this was estimated at £3.7 billion. Poor air quality in the City is now considered to be a corporate risk.

Around 24% of PM<sub>10</sub> and 33% of NO<sub>x</sub> (Oxides of Nitrogen, including NO<sub>2</sub>) emissions associated with traffic in the City is from the movement of freight.

Carbon Monoxide, sulphur dioxide, lead, 1.3 Butadiene and benzene concentrations in the City are low and continue to comply with the air quality objectives set for these pollutants.

The use of consolidation centres proposed in the SPD and the potential for adverse effects on air quality around these locations, which have not been identified, is high. However, the measures to encourage a reduction in the number of delivery and servicing trips and the promotion of non-motorised delivery modes and lower emission vehicles, will lead to reduced traffic, congestion and emissions which may positively affect air quality.

**As stated above a main contributor to poor air quality in the City is motorised vehicles. For this reason air quality was scoped into the SEA as it was considered that the Freight and Servicing SPD is likely to affect this.**

## Water

Many human activities have the potential to pollute water e.g. industrial processes, urban infrastructure, transport and accidental or deliberate pollution incidents. Pollutants from these and many other sources may enter surface or ground water directly, may move slowly within ground water and emerge eventually in surface water, may run off the land or may be deposited from the atmosphere. Pollution may be from point sources or may be more diffuse and can be exacerbated by weather conditions.

The Environment Agency is responsible for maintaining and improving the quality of fresh marine, surface and underground water in England and Wales and as part of this role carries out assessments of the water quality of all natural bodies of water. The only natural bodies of water occurring in the City are the River Thames, which is a transitional water as it flows through the City, and the ground waters that exist below the City. Transitional waters are characterised by their salinity, tidal category and size.

'Very Good' water quality of the Thames has decreased slightly in 2007/08 and Good quality water has decreased by 5.5 percentage points and as a result there has been an increase in the percentage of Fairly Good, Fair, Poor and Bad quality water.

Environment Agency water quality data for the River Thames for 2012 shows the current ecological quality as 'moderate' for the City of London stretch of the Thames and the current chemical quality is shown as failing to meet the required standard<sup>15</sup>.

**The effect of the SPD on water quality within the City was scoped out of the SEA. It was not envisaged that any of the measures within the SPD will have a significant effect upon water quality in the area. This is because the SPD is aiming to reduce the environmental impacts of freight and servicing trips generated by new development, rather than proposing specific sites for new development or new infrastructure which may have an effect on water quality.**

## Soils

Part IIA of the Environmental Protection Act 1990 and the Contaminated Land (England) Regulations 2000 provide the legal framework for the management of contaminated land. Under this legislation the City of London published its Contaminated Land Strategy in 2001. The aims of this strategy were to:

Identify and record all sensitive receptors

Identify and record all sites which have the potential to be contaminated

Assess whether a pathway exists between the potential source and receptor

If a potential pathway exists carry out a detailed inspection of the site

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<sup>15</sup> Environment Agency River Basin Management Plans Estuarine



The Contaminated Land Strategy Review (Oct 2004) outlines the results of a series of activities carried out to achieve these aims. This review concludes that 'no evidence of significant harm or pollution of controlled water is currently taking place and there is no contaminated land in the City as defined by the legislation' The City Corporation continues to monitor potential land contamination associated with development sites and no evidence to conflict with this finding has emerged.

**Effects on soils was scoped out of the SEA as it was not expected that the measures contained within the Freight and Servicing SPD will have any significant effects on soil quality in the City. As above this is because the SPD will not propose specific sites for new development, rather its aim will be to limit the impact of additional servicing and delivery for new developments.**

### Population and Human Health

The residential population of the City of London as defined by the 2011 Census of Population is 7,400, 4,100 of these being male and 3,300 being female. A significant proportion of the City's residential property is occupied as second homes – of the 6,100 residential properties on the City's council tax register, 1,400 are registered as second homes<sup>16</sup>. It should be noted that the workday population is approximately 450,000<sup>17</sup>.

The City's resident population is largely contained in within the 20 – 64 age range, with proportionately fewer old and young people<sup>18</sup>. In terms of the workday population there is a strong weighting towards males in the City, and those in the age band 20-45, people this age make up 75% of the entire workday population with the peak age being 31. This is consistent with the Greater London workforce which peaks at age 30 however, the City does have a clear weighting towards a younger working age population<sup>19</sup>.

The majority of the workforce population are employed in either professional occupations or associate professional and technical occupations. Only a small proportion is employed in process plant and machine occupations or caring, leisure and other services. Much of the workplace population of Greater London are also employed in the professional and associate professional and technical occupations however, significantly more people are employed within the caring and leisure services, process plant and machine occupations as well as sales, customer service and skilled trades<sup>20</sup>.

In terms of industrial sector the largest proportion of the City's workforce population works in the financial and insurance sector (46%), followed by professional and estate (24%). The administrative and education sector dominates in Greater London (37%) followed by professional and estate (13%), only 9% of the Greater London workforce works in financial and insurance.<sup>21</sup>

The general perception of health in the City of London is 'Very good' (56%) with 'Good' (32%) at the next level, less than 1% rated their health as 'Very Bad'<sup>22</sup>. Some 4.4% of the population stated that their day to day activities are limited a lot by their health, the majority (89%) stated that their day to day activities are not limited. More than 90% of the population is not provided with any unpaid care, just over 6% are provided with 1 to 19 hours of unpaid care per week and less than 1% receive either 20 to 49 hours or 50 or more hours of unpaid care per week. In general Health is reported better in the City than in Greater London where almost 4% of residents report that they are in very bad health and 11% are in fair health 51% report themselves to be in very good health<sup>23</sup>.

In terms of road safety in the City, large vehicles, including good vehicles and servicing vehicles are disproportionately involved in collisions with vulnerable road users, for example pedestrians

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<sup>16</sup> City of London Resident Population, Census 2011, Population

<sup>17</sup> City of London Employment Trends 2016, BRES 2016

<sup>18</sup> City of London Resident Population, Census 2011, Population

<sup>19</sup> City of London Resident Population, Census 2011, Workday Population

<sup>20</sup> City of London Workforce Census 2011, Analysis by Age and Occupation

<sup>21</sup> City of London Workforce Census 2011, Analysis by Industrial Sector

<sup>22</sup> City of London Resident Population, Census 2011, Health

<sup>23</sup> ONS Neighbourhood Statistics, City of London, Health and Provision of Unpaid Care 2011

and cyclists. A reduction in the number of these vehicles using the roads at the same time as the more vulnerable users may have a positive impact on the safety of the City's population.

**The effects of the SPD on population and human health were scoped in to the SEA. This is because it was considered that the reduction in the amount of traffic, the move to more non-motorised modes and low emission vehicles and the subsequent reduction in congestion and emissions, in addition to the change in timings of deliveries and noise and light pollution has the potential to affect the safety, health and wellbeing of the City's population and possibly those beyond the City's boundaries.**

### Material Assets

Offices are the predominant City land use. It was estimated in March 2017 that there was 8.66 million m<sup>2</sup> of gross B1 office floor-space within the City, with a further 1.4 million m<sup>2</sup> under construction<sup>24</sup>. This forms approximately three quarters of all City floor-space. Other main land uses are transport, open space, housing, retailing, utilities, public buildings, education and health.

Office stock in the City is continually updated to accommodate the City's growth projections and to accommodate businesses' technological requirements, ensuring that it remains at the competitive edge. There is increasing pressure for residential development in the City and it is important that this is managed so as not to affect the competitiveness of the business City. At the 31<sup>st</sup> March 2017 a total of 852 residential units were under construction with a further 77 units permitted but not commenced.

The City's transport infrastructure incorporates the streets, walkways and public realm which enable pedestrian movement; the shared spaces, highways and cycle parking facilities which enable safe and secure cycling; the highways, roads lanes and vehicle parking facilities which accommodate motor vehicles, essential for servicing and the delivery and operation of buses, taxis and private vehicles; the underground tube systems and overground rail networks and stations which provide public transport connections within and beyond the City nationally and internationally; and the river transport system for both freight and passenger transport to and from the City's wharf and piers.<sup>25</sup>

The City Corporation aims to ensure that people have a range of sustainable choices of transport modes which operate in a safe, secure, sustainable and efficient manner. The City's streets encompass a range of spaces from highways suitable for through traffic, to the lanes and walkways many of which accommodate pedestrian movement forming important local links within the City.<sup>26</sup>

There are a number of infrastructure types that are deemed not to be relevant to the SPD including; education, telecommunications, social and community, utilities and water.

### Waste

The quantity and composition of municipal waste has been monitored by the City of London Corporation. There are two main categories of waste produced in the City: commercial and household waste. However, many companies in the City employ independent contractors to deal with waste and recycling, therefore total waste figures for the City are difficult to establish.

Municipal Waste collected by the City of London Corporation is transported by river to the Riverside Resource Recovery Energy Waste Facility in Belvedere.

The City of London also transports waste for some local authorities and companies who operate their own waste management and recycling schemes using private contractors.

In addition to the Municipal waste management in the city a large number of private waste contractors operate in the City collecting waste from commercial premises. The commercial and industrial waste estimate for the City for 2014 was 187,000 tonnes<sup>27</sup>

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<sup>24</sup> City of London Development Information Report 2017

<sup>25</sup> City of London Infrastructure Delivery Plan, 2011

<sup>26</sup> City of London Infrastructure Delivery Plan, 2011

<sup>27</sup> Waste arisings and waste management capacity study review 2016, Anthesis

The high rate of redevelopment in the City means that large quantities of demolition and construction waste are generated. The constricted nature of the City and the tight timescales involved in redevelopment mean that most of this demolition waste is transported off site for either recycling or disposal. The historical lack of monitoring data makes it difficult to accurately determine the level of production of secondary and recycled aggregates from construction and demolition waste material.

**The effects of the SPD on material assets, in particular waste, was scoped in to the SEA. This is due to measures in the SPD that aim to reduce waste and waste collections through on site waste management.**

## Effects beyond the City of London boundaries

The City of London Freight and Servicing SPD has the potential to give rise to effects beyond the City of London boundaries, in particular through night time servicing through the promotion of consolidation centres in suitable locations within Greater London, to minimise the number of trips required to service the premises within the City of London.

Although the locations of consolidation centres outside the City of London are unlikely to be identified in The Freight and Servicing SPD, there is the potential for indirect effects on the SEA topics that have been screened into the scope of the SEA.

## **Appendix 4**

### Audit trail of options and the City Corporation's reasons for decision making

Option	Was this option selected?	Reasons for selecting/not selecting for inclusion in SPD
<p><b>Minimise Freight and Servicing Trips</b></p> <p>The aim of this option is to reduce the number of delivery and servicing trips generated by premises in the City – including personal deliveries and waste collections.</p>	Yes	<ul style="list-style-type: none"> <li>The overall reduction in the number of delivery and servicing trips generated would produce the greatest benefit in terms of reductions in traffic congestion and road danger, and the impact on air quality both in the City and beyond the City boundary.</li> </ul>
<p><b>Reasonable Alternative 1</b></p> <p>Retain businesses as usual, whereby the number of deliveries allowed per day can be restricted to a number that will make the application operationally acceptable in planning terms.</p>	No	<ul style="list-style-type: none"> <li>This option was not expected to produce a sufficient change in freight and servicing traffic to achieve the objectives of the freight and servicing SPD and is therefore not selected.</li> </ul>
<p><b>Reasonable Alternative 2</b></p> <p>Require the use of physical consolidation centres located outside the City for all deliveries to and from the site. The site will be accessed via suitable routes.</p>	No	<ul style="list-style-type: none"> <li>The use of physical consolidation centres outside the City boundary may be an appropriate management measure for some delivery and servicing trips. However, as the use of these centres outside the City would not be suitable for all trips (for example where goods are sourced locally), the option is not considered appropriate.</li> <li>At present, there is insufficient provision of consolidation facilities outside the City to make this an achievable option for consideration.</li> </ul>
<p><b>Reasonable Alternative 3</b></p> <p>Require use of a micro-consolidation centre, which may be located within or outside the City boundary, for all deliveries to the site. The last mile delivery between the micro-consolidation centre and the site must be made by zero-emission means.</p>	No	<ul style="list-style-type: none"> <li>The use of a micro-consolidation centre located within or outside the City boundary may have some impact on the numbers of freight and servicing trips into and around the City, but this type of management may not be suitable for all types of delivery trip so it may not be a reasonable option.</li> <li>At present, there is insufficient provision of micro-consolidation facilities in the area to make this an achievable option.</li> <li>At present, there is a lack of suitable zero-emission vehicle options to make this a requirement.</li> </ul>

Option	Was this option selected?	Reasons for selecting/not selecting for inclusion in SPD
<p><b>Reasonable Alternative 4</b></p> <p>Require the consolidation of all waste on-site prior to collection, with the promotion of 'reverse consolidation' whereby delivery vehicles will take away as much waste as possible</p>	No	<ul style="list-style-type: none"> <li>The consolidation of all waste on-site prior to collection may have some impact on the numbers of vehicle trips within the City and beyond. The requirement to consolidate all waste on site prior to collection may not be feasible for all sites where site space is limited.</li> <li>The requirement to consolidate on-site and use reverse consolidation may not be possible where several waste contractors operate in competition.</li> </ul>
<p><b>Match Demand to Network Capacity</b></p> <p>The aim of this selected option is to maximise the proportion of essential delivery and servicing trips taking place outside peak times and where possible promote quiet evening or night time deliveries. All essential delivery and servicing trips should be routed appropriately, using streets that are suitable for the vehicle being used, and minimising noise, emissions and road danger along the length of the route.</p>	Yes	<ul style="list-style-type: none"> <li>This option is selected to maximise the proportion of essential delivery and servicing trips taking place outside peak times takes account of the varying demands of different types of freight trips, and produces the maximum impact on the objectives of the SPD.</li> <li>Routing vehicles along suitable streets will minimise disturbance, emissions and road danger along the length of the route.</li> </ul>
<p><b>Reasonable Alternative 1</b></p> <p>Retain business as usual, whereby weekday quiet times overnight (11pm – 7am) for residents are protected, along with Sunday and Bank Holidays.</p>	No	<ul style="list-style-type: none"> <li>This option was not expected to produce a sufficient change in freight and servicing traffic to achieve the objectives of the freight and servicing SPD and is therefore not selected.</li> </ul>
<p><b>Reasonable Alternative 2</b></p> <p>Move to a full daytime restriction, with no deliveries permitted between 7am and 7pm on weekdays.</p>	No	<ul style="list-style-type: none"> <li>This option would potentially place demands on City businesses that would be significantly out of step with other parts of London, and therefore may discourage business activity in the City.</li> <li>The option may not be appropriate for all types of business within the City and therefore the requirement is not taken forward.</li> </ul>
<p><b>Reasonable Alternative 3</b></p> <p>Require all deliveries to take place overnight</p>	No	<ul style="list-style-type: none"> <li>This option may not be suitable for all areas of the City, particularly in residential areas where there is sensitivity around overnight noise.</li> </ul>

Option	Was this option selected?	Reasons for selecting/not selecting for inclusion in SPD
(i.e. between 11pm and 7am).		<ul style="list-style-type: none"> <li>The option may not be appropriate for all types of City business, particularly where buildings are not able to be staffed overnight.</li> <li>The option may not be suitable for all types of delivery and servicing trip – for example where full access to a building, or liaison with staff if required.</li> </ul>
<p><b>Mitigate the Impact of Freight Trips</b></p> <p>The aim of this selected option is; where goods and services must be transported by road, including for the last mile, use the safest and quietest zero emission means possible, which may mean moving goods or service personnel on foot or by cycle. The use of river or rail transport for the transfer of goods and waste is encouraged, but the impact of additional noise and pollution at all stages of the journey should be considered. Loading and unloading of goods should not adversely impact on highway capacity, pedestrian, cycle or vehicle movement, road or site safety or unwanted noise levels either in the City itself or on any stage of the journey.</p>	Yes	<ul style="list-style-type: none"> <li>This option is selected to mitigate of the impact of essential freight and servicing trips. The selection of appropriate means to deliver goods and services in the safest, quietest and cleanest manner possible provides the greatest impact on the objectives of the SPD while retaining the flexibility to use delivery methods suitable to the trip.</li> </ul>
<p><b>Reasonable Alternative 1</b></p> <p>Retain business as usual, whereby the environmental impact of servicing is required to be minimised with no formal restriction on the type of vehicle used.</p>	No	<ul style="list-style-type: none"> <li>This option was not expected to produce a sufficient change in freight and servicing traffic to achieve the objectives of the freight and servicing SPD and is therefore not selected.</li> </ul>
<p><b>Reasonable Alternative 2</b></p> <p>Require the use of zero-emission vehicles to be used at the point of delivery to the site in the City.</p>	No	<ul style="list-style-type: none"> <li>This option requires the use of zero-emission vehicles to be used by all deliveries to the site within the City. At present the limited availability of a full range of zero-emission vehicles and supporting infrastructure means that this could impose a disincentive to business activity in the City.</li> <li>This option may not have a significant impact on traffic congestion and road</li> </ul>

Option	Was this option selected?	Reasons for selecting/not selecting for inclusion in SPD
		danger reduction if there was a shift to Ultra Low Emission Vehicles rather than cycle or foot delivery.





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# City of London Freight and Servicing SPD

## Strategic Environmental Assessment: Non-Technical Summary

Prepared by LUC  
July 2017

**Project Title:** Strategic Environmental Assessment of the City of London Freight and Servicing SPD

**Client:** The City of London

Version	Date	Version Details	Prepared by	Checked by	Approved by
1.0	04/07/17	Draft for Client Comment	Alex Martin	Sarah Smith	Jeremy Owen
2.0	07/07/17	Final Draft for Consultation	Alex Martin	Sarah Smith	Jeremy Owen



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# City of London Freight and Servicing SPD

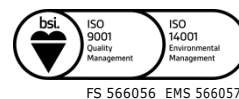
## Strategic Environmental Assessment: Non-Technical Summary

Prepared by LUC  
July 2017

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## Introduction

- 1.1 This Non-Technical Summary relates to the Strategic Environmental Assessment Report<sup>1</sup> for the draft City of London Freight and Servicing Supplementary Planning Document (SPD). The SPD is being produced by the City of London Corporation ('City Corporation') and will set out the City Corporation's requirements for new development in relation to the management of freight and servicing. The SPD is intended to be read in conjunction with the Standard Highway and Servicing Requirements for Development in the City of London, the Code of Practice for Deconstruction and Construction Sites (published by the City Corporation) and the Construction Logistics Plan Guidance (published by Transport for London).
- 1.2 Strategic Environmental Assessment (SEA) is a process that assesses the likely effects of the SPD on environmental issues. This is required for a range of plans and strategies, including SPD's that may have significant environmental effects. A Screening Report<sup>2</sup> was prepared by LUC in May 2017, which determined that the SPD may have significant effects on the environment, therefore SEA is required. The City of London Corporation has commissioned independent consultants (LUC) to carry out the Strategic Environmental Assessment of the SPD on its behalf. The Strategic Environmental Assessment (SEA) Report and this Non-Technical Summary incorporate all of the work undertaken by LUC.
- 1.3 This Non-Technical Summary relates to the full Strategic Environmental Assessment Report for the draft version of the Freight and Servicing SPD.

## The City of London Freight and Servicing SPD

- 1.4 Despite the small footprint of the City of London, the large working population generates significant demand for physical goods and services. The working population of the City is forecast to grow to 475,000, and the residential population to 10,250 by 2036, so the need to manage the effects of the increasing demand for space on the transport network continues to grow. The efficient movement of goods and provision of services are fundamental requirements for a successful city.
- 1.5 The City of London Freight and Servicing SPD will set out the City Corporation's requirements for new development in relation to the management of freight and servicing. The document will set out;
  - The background to, and definition of freight and servicing and factors that drive the need to manage freight and servicing including; traffic, road danger reduction, air quality and carbon emissions
  - The policy context, including key local, national and international policy and also including existing and planned schemes and projects
  - The vision for the management of freight and servicing in the City – *'reduce the number of freight and delivery vehicles and their environmental impact on the City's streets, particularly at peak times, whilst still allowing the City to flourish and avoiding negative impacts beyond the City's boundaries.'* The SPD will help to achieve the vision by setting out guidance for new development that will limit the impact of new and additional freight demand on the City and beyond
  - The aims of the SPD – *'to minimise freight and servicing trips, to match demand to network capacity and to mitigate the impact of freight trips'*
  - Guidelines, actions and measures for achieving the above aims
  - Measures for each type of development including; office, multi-tenanted buildings, general retail, food and drink, hotels and hospitality, and residential

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<sup>1</sup> This is referred to as the full Strategic Environmental Assessment Report (SEA).

<sup>2</sup> Screening is the process of determining whether a plan is likely to give rise to significant environmental effects, SEA is only required if significant effects are likely.

- The need and requirement for construction logistics plans
- 1.6 The SPD will also include guidance on the use of night time servicing as well as measures that encourage the use of consolidation centres, which are may be located outside of the City.

## Strategic Environmental Assessment

- 1.7 Strategic Environmental Assessment (SEA) is a statutory assessment process, required under the SEA Directive<sup>3</sup>, which was transposed into UK law by the SEA Regulations (Statutory Instrument 2004, No 1633). The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment and which set the framework for future consent of projects. A screening exercise was undertaken in February 2017<sup>4</sup>. This concluded that the SPD could give rise to significant environmental effects and therefore it was screened into the SEA process. The purpose of SEA, as defined in Article 1 of the SEA Directive is 'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans....with a view to promoting sustainable development'.
- 1.8 SEA must be carried out in accordance with Government guidance<sup>5</sup> and must meet the requirements of the European Strategic Environmental Assessment Directive<sup>6</sup>.
- 1.9 **Table 1** below signposts how the requirements of the SEA Regulations have been met within the SEA work undertaken to date (presented in the full SEA Report and this Non-Technical Summary).

**Table 1 Requirements of the SEA Regulations and where these have been addressed**

SEA Regulations Requirements	Where covered in this SEA report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Part 3 and Schedule 2 of the SEA Regulations):	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Chapter 3 and Appendix 2 of the main SEA report and summarised in this NTS.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Chapter 3 and Appendix 3 of the main SEA report and summarised in this NTS.
c) The environmental characteristics of areas likely to be significantly affected.	Chapter 3 and Appendix 3 of the main SEA report and summarised in this NTS.
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Chapter 3 and Appendix 3 of the main SEA report and summarised in this NTS.

<sup>3</sup> SEA Directive 2001/42/EC

<sup>4</sup> City of London Freight and Servicing SPD Screening Statement, February 2017

<sup>5</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/>

<sup>6</sup> European Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the environment'.



SEA Regulations Requirements	Where covered in this SEA report
e) The environmental protection, objectives, established at international, community or national levels, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	Chapter 3 and Appendix 2 of the main SEA report and summarised in this NTS.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors <sup>7</sup> .	Chapter 4 of the main SEA report and summarised in this NTS.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Chapter 4 of the main SEA report and summarised in this NTS.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapter 2 and Appendix 4 of the main SEA report and summarised in this NTS.
i) a description of measures envisaged concerning monitoring in accordance with Reg. 17;	Chapter 5 of the main SEA report and summarised in this NTS.
j) a non-technical summary of the information provided under the above headings	Addressed through this NTS.
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Reg. 12(3))	Addressed throughout the SEA report and this NTS.
<p><b>Consultation:</b></p> <ul style="list-style-type: none"> <li>authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Reg. 12(5))</li> </ul>	Consultation on the SEA Scoping Report for the draft SPD was undertaken between the 23 <sup>rd</sup> and the 28 <sup>th</sup> of June 2017. The consultee responses and our responses are included in Appendix 1 of the SEA report.
<ul style="list-style-type: none"> <li>authorities with environmental responsibility and the public, shall be given an effective opportunity to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Reg. 13(3), 13(4))</li> </ul>	Consultation is being undertaken in relation to the draft SPD between 7 <sup>th</sup> August and 30 <sup>th</sup> September 2017.
<ul style="list-style-type: none"> <li>other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Reg. 14).</li> </ul>	N/A

<sup>7</sup> These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects

SEA Regulations Requirements	Where covered in this SEA report
<b>Taking the environmental report and the results of the consultations into account in decision-making (Reg. 16)</b>	
<p><b>Provision of information on the decision:</b> When the plan or programme is adopted, the public and any countries consulted under Regs.13 and 14 must be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> <li>• the plan or programme as adopted</li> <li>• a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Reg. 12, the opinions expressed pursuant to Reg. 13(2)(d) and the results of consultations entered into pursuant to Reg. 14(4) have been taken into account, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</li> <li>• the measures decided concerning monitoring (Reg. 16(4)(f))</li> </ul>	To be addressed after the SPD is adopted.
<p><b>Monitoring</b> of the significant environmental effects of the plan's or programme's implementation (Reg. 17)</p>	To be addressed after the SPD is adopted.
<p><b>Quality assurance:</b> environmental reports should be of a sufficient standard to meet the requirements of the SEA Regulations.</p>	The SEA report and this NTS have been produced in line with current guidance and good practice for SEA and this table demonstrates where the requirements of the SEA Regulations have been met.

- 1.10 The approach taken to the SEA of the Freight and Servicing SPD is based on current best practice and the guidance on SEA, which involves carrying out SEA as an integral part of the planning process.
- 1.11 The Screening Statement screened the SPD into the SEA process on the basis that it is likely to have significant effects on the environment. This is due to the fact that the SPD proposes actions and land use for consolidation centres outside the City without identifying specific locations, and proposes out of hours servicing without evaluating the impacts of such servicing beyond the City's boundaries. Identified effects relate primarily to increases in carbon emissions and air pollutants, but also include amenity issues such as noise pollution and increased traffic.

### Stage A: Scoping

- 1.12 The SEA process began in June 2017 with the production of a Scoping Report for the Freight and Servicing SPD, which was prepared by LUC on behalf of the City of London Corporation. During the Scoping stage of the SEA, the work that had previously been carried out during the Sustainability Appraisal of the City of London Local Plan was drawn on as appropriate, as some of that work is applicable to this SEA.
- 1.13 The scoping stage of the SEA involves collating information about the environmental baseline for the SPD area and the key environmental issues facing it, as well as information about the policy context for the preparation of the SPD. The SEA Scoping Report presented the outputs of the following tasks:
- Policies, plans and programmes of relevance to the Freight and Servicing SPD were identified and the relationships between them were considered.
  - Baseline information was collected on the following topics, as required by the SEA Regulations<sup>8</sup>: biodiversity (including flora and fauna), population, human health, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and the landscape. This baseline information provides the basis for predicting and monitoring the

<sup>8</sup> Listed in Schedule 2 of the SEA Regulations

likely effects of the SPD and helps to identify alternative ways of dealing with any adverse effects identified.

- Drawing on the review of relevant plans, policies and programmes and the baseline information, key environmental issues for the City were identified (including environmental problems, as required by the SEA Regulations). Consideration was given to the likely evolution of each issue if the SPD were not to be implemented. If, drawing on the baseline information and relevant plans, policies and programmes it was considered that the SPD was unlikely to have significant effects upon certain topics (listed above), they were scoped out from further consideration in the SEA.
- An SEA 'framework' was then presented, against which options were appraised. The SEA framework provides a way in which the environmental impacts of implementing a plan and reasonable alternatives (i.e. options) can be described, analysed and compared. The SEA framework comprises a series of environmental objectives and associated questions that can be used to 'interrogate' options during the plan-making process. These SEA objectives define the long-term aspirations of the City with regard to environmental issues. During the SEA, the performance of each option for the SPD was assessed against these SEA objectives and questions.

1.14 The most recent versions of the policy review and baseline information can be found in Appendices 2 and 3 of the SEA report.

1.15 Public and stakeholder participation is an important element of the SEA and wider plan-making processes. It helps to ensure that the SEA report is robust and has due regard for all appropriate information that will support the SPD in making a contribution to sustainable development. The SEA Scoping Report for the Freight and Servicing SPD was published in June 2017 for a five week consultation period with the statutory consultees (Natural England, the Environment Agency and Historic England). The comments received during the consultation were then reviewed and addressed as appropriate in the SEA. Appendix 1 of the SEA report lists the comments that were received during the scoping consultation and describes how each one was addressed.

1.16 Table 2 presents the five SEA objectives in the City of London SEA framework and shows how the topics (see above) that were scoped in to the assessment have been covered by these. Only those issues that were scoped in to the SEA have been included in the below table. Those issues that were scoped out are not expected to be influenced by the SPD and therefore have not been considered further. Those issues that have been scoped out are:

- Landscape
- Biodiversity, Flora and Fauna
- Water
- Soils

**Table 2 SEA framework for the City of London Freight and Servicing SPD**

SEA Objectives	Appraisal Question	Topic(s) covered
SEA 1 Improve air quality	<ul style="list-style-type: none"> <li>• Reduce the number of vehicles on the City's roads</li> <li>• Reduce congestion on the City's roads</li> </ul>	Air Quality
SEA 2 Reduce activities that exacerbate climate change	<ul style="list-style-type: none"> <li>• Reduce carbon emissions through minimising traffic movements in the City</li> <li>• Utilise low or zero carbon transport where possible</li> </ul>	Climate Change
SEA 3 Adopt the 'Waste hierarchy' in all activities – reduce , reuse, recycle	<ul style="list-style-type: none"> <li>• Reduce the amount of waste requiring removal through reuse and recycling</li> <li>• Reduce the number of waste collection trips</li> </ul>	Material Assets

SEA Objectives	Appraisal Question	Topic(s) covered
SEA 4 Improve the health of City workers, residents and visitors	<ul style="list-style-type: none"> <li>• Improve safety for pedestrians and cyclists</li> <li>• Improve air quality (see SEA objective 1)<sup>9</sup></li> <li>• Reduce noise and light pollution</li> </ul>	Population Human Health
SEA 5 Conserve and enhance the historic environment	<ul style="list-style-type: none"> <li>• Maintain the character and setting of heritage assets in the City</li> </ul>	Cultural heritage

### SEA Stage B: Developing and refining options and assessing effects

- 1.17 Developing options for a plan is an iterative process, which can involve a number of rounds of consultation with stakeholders and the public. Consultation responses and the SEA process can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan. In terms of the Freight and Servicing SPD, options include different measures for reducing the impact of freight and servicing on the City.
- 1.18 Regulation 12 (2) of the SEA Regulations requires that:
- 1.19 *'The (environmental or SA) report must identify, describe and evaluate the likely significant effects on the environment of—*
- 1.20 *(a) implementing the plan or programme; and*
- 1.21 *(b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme.'*
- 1.22 It should be noted that any alternatives considered need to be 'reasonable'. This implies that alternatives that are 'not reasonable' do not need to be subject to appraisal. Examples of unreasonable alternatives could include options that do not meet the objectives of the plan or that do not comply with national policy (e.g. the National Planning Policy Framework).
- 1.23 It also needs to be recognised that the SEA findings are not the only factors taken into account when determining which options to take forward in a plan. There will often be an equal number of positive or negative effects identified for each option, such that it is not possible to 'rank' them based on environmental performance in order to select a preferred option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for their plan.

#### *Identification and appraisal of options*

- 1.24 Reasonable alternative options for the SPD were identified by the City of London Corporation and were drawn from the most up-to-date evidence, and the current operational procedures and best practice for freight and servicing in the City.
- 1.25 The alternative options that were considered include; retaining business as usual, which would continue to carry out freight and servicing in line with policies set out in the Local Plan, and other specific measures that would work to reduce the environmental impact of freight and servicing.

### SEA Stage C: Preparing the Strategic Environmental Assessment Report

- 1.26 The SEA report describes the process that has been undertaken to date in carrying out the SEA of the Freight and Servicing SPD. It sets out the findings of the appraisal of options and measures set out in the SPD highlighting any likely significant effects (both positive and negative, and taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects as relevant).

### SEA Stage D: Consultation on the Freight and Servicing SPD and the SEA Report

- 1.27 The City of London is inviting comments on the draft Freight and Servicing SPD and the SEA Report. The SEA Report is being published on the City of London Corporation's website for consultation between 7<sup>th</sup> August and 30<sup>th</sup> September 2017.

<sup>9</sup> 'Elevated levels and / or long term exposure to air pollution can lead to serious symptoms and conditions affecting human health. This mainly affects the respiratory and inflammatory systems but can also lead to more serious conditions such as heart disease and cancer.' <https://uk-air.defra.gov.uk/air-pollution/effects>.

## SEA Stage E: Monitoring implementation of the SPD

- 1.28 Monitoring of environmental effects identified should be carried out after adoption of the SPD, therefore recommendations for monitoring the likely significant environmental effects of implementing the SPD are presented in Chapter 5 of the SEA report.

## Environmental context

### Review of Plans, Policies and Programmes

- 1.29 The Freight and Servicing SPD is not prepared in isolation, being influenced by other plans, policies and programmes and by broader environmental objectives. It needs to be consistent with international and national guidance and planning policies and should contribute to the goals of a wide range of other programmes and strategies. The SPD must also conform to environmental protection legislation and contribute to achieving the environmental objectives established at the international and national levels.
- 1.30 A review has been undertaken of the other plans, policies and programmes that are relevant to the Freight and Servicing SPD.
- 1.31 Schedule 2 of the SEA Regulations requires:
- 1.32 (1) *'an outline of the...relationship with other relevant plans or programmes'; and*
- 1.33 (5) *'the environmental protection objectives established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation'*

#### *Key international plans, policies and programmes*

- 1.34 At the international level, the SEA Directive is particularly important as it sets out the requirements for SEA. SEA should be undertaken iteratively and integrated into the production of the SPD in order to ensure that any potential negative environmental effects are identified and can be mitigated.
- 1.35 Also at the international level is the Air Quality Directive<sup>10</sup>, on ambient air quality and cleaner air for Europe. The objective of this directive is to avoid, prevent and reduce harmful effects of ambient air pollution on human health and the environment.
- 1.36 There are a wide range of other EU Directives, most of which have been transposed into UK law through national-level policy; the international directives have been included in Appendix 2 of the full SEA Report for completeness.

#### *Key national plans, policies and programmes*

- 1.37 There is a wide range of national level plans, policies and programmes with relevant objectives for the SEA, which are summarised in Appendix 2 of the SEA. However, the most significant policy context for the SPD is the National Planning Policy Framework (NPPF) and the online Planning Practice Guidance (PPG)<sup>11</sup>. The City of London Freight and Servicing SPD must be consistent with the requirements of the National Planning Policy Framework, which sets out information about reductions in emissions and congestion and the use of sustainable transport modes. It states that:
- 1.38 *'Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (NPPF, para 30)'*
- 1.39 *'Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to... .. accommodate the efficient delivery of goods and supplies (NPPF, para 35)'*

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<sup>10</sup> 2008/50/EC

<sup>11</sup> <http://planningguidance.planningportal.gov.uk/>

### *Local plans, policies and programmes*

- 1.40 At the sub-regional and local levels there are a wide range of plans and programmes that are specific to the City of London and Greater London, which provide further context for the Freight and Servicing SPD. The main documents of relevance to the SPD are summarised below. All other relevant local plans, policies and programmes are included in Section 3 of the main SEA report.

#### *City of London Local Plan*

- 1.41 The City of London Local Plan is the statutory planning document for the City. A number of the Local Plan policies are applicable to the Freight and Servicing SPD; the SPD must be in general conformity with the Local Plan.

#### *London Plan*

- 1.42 The London Plan is the strategic planning document for the 32 London boroughs and the City of London. It sets out the framework for development in London and the policy context for local planning policies. The London Plan is currently under review by the Mayor of London however, until this is complete the most recent version from March 2016 remains in place.

#### *The Mayor's Transport Strategy*

- 1.43 The Mayor's Transport Strategy sets out the Mayor's Transport Policy. As with the London Plan, the current strategy dates from a previous Mayoral Administration. Although a new MTS is currently in draft format, the previous strategy remains in place until the new document is formally adopted.
- 1.44 The existing MTS sets out policies to promote the use of river and rail for freight movements through safeguarding existing wharves and promoting rail freight infrastructure.
- 1.45 The MTS also addresses the safety implications of freight movements, promoting schemes such as the Fleet Operator Recognition Scheme (FORS) and improvements to vehicle and driver safety. The document also supports efficiencies through consolidation and out of hours delivery and servicing where possible, supported by quiet delivery schemes and Delivery and Servicing Plans.
- 1.46 The new Mayor's Transport Strategy draft for consultation was published in June 2017. Although this is a draft document and subject to change, the document gives a strong indication of the Mayor's transport priorities for his term of office. The draft strategy proposes a 10 per cent reduction in central London lorry and van use by 2026. In particular there is a focus on the use of consolidation centres for construction and other sectors.

### **Baseline Information**

- 1.47 Baseline information provides the context for assessing the sustainability of proposals in the Freight and Servicing SPD and it provides the basis for identifying trends, predicting the likely effects of the SPD and monitoring its outcomes. The requirements for baseline data vary widely, but it must be relevant to environmental issues, be sensitive to change and should ideally relate to records which are sufficient to identify trends.
- 1.48 The SEA Regulations require data to be gathered on biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and landscape. The baseline information for the City of London, which was originally presented in the Scoping Report, is set out in Appendix 3 in the main SEA Report and some of the key information is summarised below.

#### *Summary of baseline information*

##### **Climatic Factors**

- 1.49 Energy consumption and the consequent emissions of carbon dioxide are of significant importance to the City of London and have a contributory impact on climate change. Petroleum products, though not the largest source of energy consumed in the City or London as a whole, contribute a large amount to energy consumption. Much of this is as a result of motorised transport, including delivery and servicing vehicles. **The effects of the SPD on climatic factors were scoped into**

**the SEA** as emissions of Carbon Dioxide and other Greenhouse gases have the potential to be affected by the measures set out in the Freight and Servicing SPD.

### **Landscape**

- 1.50 The City of London and its environs contain many famous landmarks which are visible both within and beyond the City's boundaries. Views of the City's skyline from the River Thames are especially notable and certain local views of St Paul's Cathedral have been protected successfully by the City Corporation's St Paul's Heights code since the 1930's. Landmarks such as St Paul's Cathedral, the Monument and the Tower of London are internationally renowned and add to the City's 'world class' status. These views are protected by an integrated range of national regional and local policies. **The effects on landscape were scoped out** of the SEA as it was not envisaged that the Freight and Servicing SPD will have any significant effects on the landscape character of the City. This is because the SPD will not propose specific sites for new development or infrastructure itself, rather its aim will be to limit the impact of additional freight and servicing trips that new development might attract.

### **Biodiversity, Flora and Fauna**

- 1.51 There are a number of locally and nationally important species in the City of London including; Black Redstart, Peregrine Falcon, House Sparrow, Bats, Stag Beetles, Swift and Bumblebee<sup>12</sup>. There are also a number of locally important habitats<sup>13</sup>, including 'parks and urban green spaces' with another important habitat identified as 'built structures'. A further habitat recognised as a London biodiversity target<sup>14</sup> within the City of London is the Tidal Thames, which is also the City's only Site of Metropolitan Importance for Nature Conservation. There are also ten sites which have been designated as Sites of Importance for Nature Conservation in the City. It is concluded that the SPD will not affect the priority habitats in the City. **Issues regarding biodiversity, flora and fauna were scoped out of the SEA.** As the SPD will not propose any specific sites for new development or infrastructure and instead will aim to reduce the impacts of freight and servicing that new development may give rise to, it was considered that the Freight and servicing SPD will not significantly affect priority species or habitats in the city.

### **Cultural Heritage**

- 1.52 The City of London, by virtue of its rich heritage and development, has a legacy of buildings of high architectural merit and areas of distinctive townscape quality and character. This includes 26 conservation areas and over 600 listed buildings and four historic parks and gardens at Finsbury Circus, Barbican and the Temples (Inner Temple and Middle Temple) and also includes the setting of a World Heritage Site – the Tower of London. There are also a number of scheduled ancient monuments and sites with Archaeological Potential present in the City, areas with archaeological remains in situ cover much of the area. **The effects of the SPD on cultural heritage were scoped in to the SEA** assessment as, due to the number of listed buildings and other heritage assets in the City there may be the potential for effects upon the settings of these assets.

### **Air Quality**

- 1.53 The major contributor to poor air quality in the City is motorised vehicles. Petrol and diesel engines emit a wide range of pollutants, principally Carbon Monoxide, Oxides of Nitrogen, volatile organic compounds and fine particulate matter. In 2001 the whole of the City was declared an Air Quality Management Area for Nitrogen Dioxide, and fine particulate matter. Exposure to fine particulate matter and Nitrogen Dioxide is considered to be a significant cause of ill health and premature death in London. Around 24% of fine particulate matter and 33% of Nitrogen Dioxide emissions associated with traffic in the City are from the movement of freight. For these reasons **air quality was scoped in to the SEA.**

### **Water**

- 1.54 The only natural bodies of water occurring in the City are the River Thames, and the ground waters that exist below the City. Environment Agency water quality data for the River Thames for 2012 shows the current ecological quality as 'moderate' for the City of London stretch of the

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<sup>12</sup> City of London Biodiversity Action Plan 2016 - 2020

<sup>13</sup> City of London Biodiversity Action Plan 2016 - 2020

<sup>14</sup> City of London Biodiversity Action Plan 2016 - 2020

Thames and the current chemical quality is shown as failing to meet the required standard<sup>15</sup>. **The effect of the SPD on water quality within the City was scoped out of the SEA** as it was not envisaged that any of the measures within the SPD will have a significant effect upon water quality in the area.

### Soils

- 1.55 The City of London Contaminated Land Strategy in 2001 states that there is no contaminated land in the City. The City Corporation continues to monitor potential land contamination associated with development sites and no evidence to conflict with this finding has emerged. **Effects on soils was scoped out of the SEA** as it was not expected that the measures contained within the Freight and Servicing SPD would have any significant effects on soil quality in the City. This is because the SPD will not proposed specific sites for new development, rather its aim will be to limit the impact of additional servicing and delivery for new developments.

### Population and Human Health

- 1.56 The majority of residents in the City of London rate their health as 'Very good' (56%) with 32% residents rating their health as 'Good' and less than 1% of residents rated their health as 'Very Bad'<sup>16</sup>. In general Health is reported to be better in the City than in Greater London<sup>17</sup>. In terms of road safety in the City large vehicles are disproportionately involved in collisions with vulnerable road users. **Effects on human health were scoped into the SEA.**

### Material Assets

- 1.57 Offices are the predominant land use in the City. Other main land uses are transport, open space, housing, retailing, utilities, public buildings, education and health. The City's transport infrastructure incorporates the streets, walkways and public realm, which enable pedestrian movement; the shared spaces, highways and cycle parking facilities, which enable safe and secure cycling; the highways, roads lanes and vehicle parking facilities, which accommodate motor vehicles, essential for servicing and the delivery and operation of buses, taxis and private vehicles; the underground tube systems and overground rail networks and stations, which provide public transport connections within and beyond the City nationally and internationally; and the river transport system for both freight and passenger transport to and from the City's wharf and piers.<sup>18</sup> There are two main categories of waste produced in the City - commercial and household. Municipal waste collected by the City of London Corporation is transported by river to the Riverside Resource Recovery Energy Waste Facility in Belvedere. The City of London also transports waste for some local authorities and companies who operate their own waste management and recycling schemes using private contractors. The high rate of development in the City means that large quantities of construction and demolition waste are generated. **The effects of the SPD on material assets, in particular waste, was scoped in to the SEA.** This is due to measures in the SPD that aim to reduce waste and waste collections.

### Key Environmental Issues

- 1.58 An up-to-date set of key environmental issues for the City of London was identified during the scoping stage of the SEA and was presented in the Scoping Report.
- 1.59 The SEA Regulations (Schedule 2) require that the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme are described. In order to address this requirement, **Table 3** overleaf describes the likely evolution of each key environmental issue if the SPD were not to be adopted.

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<sup>15</sup> Environment Agency River Basin Management Plans Estuarine

<sup>16</sup> City of London Resident Population, Census 2011, Health

<sup>17</sup> ONS Neighbourhood Statistics, City of London, Health and Provision of Unpaid Care 2011

<sup>18</sup> City of London Infrastructure Delivery Plan, 2011



**Table 3: Key Environmental Issues for the City of London and likely evolution without implementation of the SPD**

Key Environmental Issues for the City of London of relevance to the Freight and Servicing SPD	Likely Evolution without the Freight and Servicing SPD
<b>Climatic Factors</b>	
<p>Carbon emissions and climate change are of significant importance to the City. Among other sources, motorised transport is a contributor to Carbon emissions in the City.</p>	<p>The City of London Local Plan includes the following policies to tackle a reduction in carbon emissions: CS15 – Sustainable Development and Climate Change; DM15.1 – Sustainability requirements; DM15.2 – Energy and CO2 emissions assessments; DM15.3 Low and zero carbon technologies; DM15.4 Offsetting of carbon emissions and DM15.5 Climate change resilience and adaptation.</p> <p>The implementation of the SPD offers opportunities to further tackle this issue through the reduction and consolidation of freight and servicing, although localised air quality issues may arise around the proposed consolidation centres. Without the implementation of the SPD it is considered that a reduction in carbon emissions is still achievable with the support of policies in the Local Plan but this may be to a lesser extent or be achieved over a longer time scale as the issues associated with freight and servicing will not be as well addressed. However as a global issue, climate change will continue to be a key consideration, regardless of the policies and measures within both the Local Plan and the Freight and Servicing SPD.</p>
<b>Cultural Heritage</b>	
<p>The City is the historic core from which London developed. Consequently it is an area of great archaeological importance and contains many buildings and areas of historic and architectural value. Changes in vehicle movements and development of consolidation centres may affect the settings and views of city landmarks and listed buildings and can affect archaeological remains.</p>	<p>The City of London Local Plan aims for thorough protection of its cultural assets through a large number of policies that will protect and enhance the City’s heritage and archaeological assets. These policies include: DM 11.1 – Protection of visitor, arts and cultural facilities; CS12 – Historic Environment; DM12.1 Managing change affecting all heritage assets and spaces; DM 12.2 Development in conservation areas; DM 12.3 Listed buildings; DM 12.4 Ancient monuments and archaeology and DM 12.5 Historic parks and gardens.</p> <p>The implementation of the SPD may add further protection to these assets through its aims and measures, such as the reduction in road traffic however, it may also adversely affect the setting of some heritage assets in the location of consolidation centres which are not yet known. If the SPD were not to be implemented it is considered that more than adequate protection would still be afforded to the City’s heritage and archaeological assets through policies within the Local Plan as well as supporting documents such as Conservation Area Plans.</p>

Key Environmental Issues for the City of London of relevance to the Freight and Servicing SPD	Likely Evolution without the Freight and Servicing SPD
<b>Air quality</b>	
<p>The City has some of the highest levels of pollution in the country due to its location at the heart of London and the density of development. Levels of pollutants in the City such as sulphur dioxide, carbon monoxide and benzene have reduced over the past decade but levels of fine particulates (PM10) and nitrogen dioxide (NOx) remain high. For this reason the City of London is a designated Air Quality Management Area. Exposure to these pollutants is considered to be a significant cause of ill health.</p> <p>Much of the air pollution in the City is associated with traffic and the movement of freight particularly, and so a reduction should be sought.</p>	<p>The City of London Local Plan sets out a policy to improve air quality in the City, Policy DM 15.6 – Air quality, as well as some of those policies set out in the climatic factors issue. There are also policies in the Local Plan which address traffic reductions and shift to more sustainable modes of transport. This includes policies CS16 – Public transport streets and walkways, DM 16.1 - Transport impacts of development, DM 16.4 – Facilities to encourage active travel, and DM 16.8 – River transport.</p> <p>The implementation of the SPD offers an opportunity to further improve air quality in the City through the reduction in traffic and congestion. As stated in the climate impacts section air quality around the proposed consolidation centres may decline as a result and so this will need to be considered. Although it is considered that the issue of air quality is addressed in the Local Plan, the SPD would lend further measures and support to this and ensure that freight and surviving does not contribute to a decline in air quality. In terms of a reduction in traffic the Local Plan sets out a number of policies to this effect and it is considered that the Freight and Servicing SPD would lend further support to these policies in the reduction in traffic and congestion and a decrease in pollution. In the absence of the SPD the policies in the Local Plan will work towards this reduction with support from forthcoming GLA policies such as the Ultra Low Emissions Zone. The SPD will further support these measures.</p>
<b>Population and human health</b>	
<p>Consideration of health for the City must take account of the health of the resident, working and visitor populations. Therefore the City must be designed to encourage healthy lifestyles through the provision of facilities for walking and cycling as well as improving safety for pedestrians and cyclists and improving air quality.</p>	<p>Policies relating to the health of the population are set out in the Local Plan and include those set out above in 'Air quality' to encourage and facilitate active travel and also: CS19 – Open spaces and recreation; DM 19.3 – Sport and recreation and CS22 – Social infrastructure and opportunities.</p> <p>The SPD has the potential to further improve the health of City residents' through the reduction in road traffic, congestion and air pollution, ensuring that the City is an attractive, healthy environment for recreation and the noise associated with servicing is minimised. However, the adverse effects of night time and weekend deliveries will also need to be considered. Without the implementation of the SPD health targets will still be in place but the effects of air quality may be more of a barrier to meeting these, along with road traffic and noise pollution.</p>

Key Environmental Issues for the City of London of relevance to the Freight and Servicing SPD	Likely Evolution without the Freight and Servicing SPD
<b>Material assets / waste</b>	
<p>The high rate of redevelopment in the City means that large quantities of demolition and construction waste are generated. The constricted nature of the City and the tight timescales involved in redevelopment mean that most of this demolition waste is transported off site for either recycling or disposal.</p>	<p>The Local Plan includes a number of policies for the reduction in demolition and construction waste and transport, these include: DM 17.1 - Provision for waste in development schemes; DM 17.2 - Designing out construction waste; DM 17.3 - New waste management sites and DM 17.4 Development affecting waste management sites.</p> <p>Although the Local Plan includes policies aimed at reducing demolition and construction waste, the implementation of the Freight and Servicing SPD will further support the high rate of redevelopment and the sustainable movement of demolition and construction waste through improvements in efficiency and consolidation. The proposed use of consolidation centres outside of the City, and the possible increase in river traffic will also have to be considered. Without the measures in the SPD to reduce the transport impacts of waste, policies are still in place but it is considered that the SPD lends further support and weight to these, making outcomes more achievable.</p>
<p>The City of London transports waste for some local authorities and companies who operate their own waste management and recycling schemes using private contractors. Also, in addition to the Municipal waste management in the city a large number of private waste contractors operate in the City collecting waste from commercial premises. The Defra Commercial and Industrial Waste Survey 2009 estimates that the City generates 206,000 tonnes of commercial waste per annum. The City has no waste management sites so all waste has to be transported elsewhere.</p>	<p>There are policies in the local Plan that address the need to minimise waste and the transport of waste in the City, including CS17 – Waste; DM 17.3 - New waste management sites; DM 17.4 – Development affecting waste management sites and DM 17.1 Provision for waste in development schemes.</p> <p>The SPD sets out measures for a reduction in the number of delivery and servicing vehicles including waste collection vehicles through improvements in efficiency, on site waste management measures and the use of consolidation centres. It therefore would aid in the reduction of and effective and efficient removal of waste. In the absence of the SPD it is considered that waste collection and removal may continue as it is at present with large numbers of servicing vehicles on the City's roads.</p>

## Appraisal methodology

- 1.60 The reasonable alternative options and the selected options set out in the Supplementary Planning Document have been appraised against the five SEA objectives in the SEA framework (see **Table 2** earlier in this Non-Technical Summary), with scores being attributed to each option to indicate its likely environmental effects on each objective as shown in **Figure 1**.

**Figure 1 Key to symbols and colour coding used in the SEA of the Freight and Servicing SPD**

++	The option or policy is likely to have a <b>significant positive</b> effect on the SEA objective(s).
+	The option or policy is likely to have a <b>minor positive</b> effect on the SEA objective(s).
0	The option or policy is likely to have a <b>negligible or no</b> effect on the SEA objective(s).
-	The option or policy is likely to have a <b>minor negative</b> effect on the SEA objective(s).
--	The option or policy is likely to have a <b>significant negative</b> effect on the SEA objective(s).
?	It is <b>uncertain</b> what effect the option or policy will have on the SEA objective(s), due to a lack of data.
+/-	The option or policy is likely to have a <b>mixture of positive and negative</b> effects on the SEA objective(s).

- 1.61 Note that where a potential positive or negative effect is uncertain, a question mark was added to the relevant score (e.g. +? or -?) and the score is colour coded as per the potential positive, negligible or negative score (e.g. green, yellow, orange, etc.).
- 1.62 The likely effects of the options needed to be determined and their significance assessed, which inevitably requires a series of judgments to be made. The appraisal has attempted to differentiate between the most significant effects and other more minor effects and record these through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect is often quite small. Where either '++' or '--' has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option on the SEA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. However, scores are relative to the scale of proposals under consideration.

### Difficulties Encountered

- 1.63 It is a requirement of the SEA Regulations that consideration is given to any data limitations or other difficulties that are encountered during the SA process.
- 1.64 The main difficulty encountered when assessing the Freight and Servicing SPD, was the uncertainty surrounding the measure setting out the use of out of town consolidation centres. The City Corporation have confirmed that private developers will need to identify potential suitable sites, ideally in Preferred Industrial Locations, choose to develop these, and make an application to the relevant planning authority, who will then have the final decision on whether the development is to be permitted. For this reason the City has little authority over the implementation of the consolidation centres. Because of this, very little is known about the locations of potential consolidation centres and how they may operate, and so uncertainty exists in the conclusions drawn regarding their effects.

## SEA findings for the Freight and Servicing SPD Options

- 1.65 A total of three selected options and nine reasonable alternative options have been subject to Strategic Environmental Assessment by LUC on behalf of the City of London for the Freight and Servicing SPD. Selected options are those which have been included in the draft SPD, whereas reasonable alternative options are different approaches that were considered, but not included in the draft SPD.
- 1.66 The likely effects of the three selected options included in the SPD and reasonable alternative options are summarised below in relation to each SEA objective. Particular consideration has been given to the likely significant effects identified (both positive and negative), in line with the requirements of the SEA Regulations. All effects are assumed to be long term unless otherwise specified.
- 1.67 Although the assessment of likely significant effects has focussed on the measures within each of the three selected options (minimise, match and mitigate), any new measures that are contained within section 5 of the SPD, which focuses on particular types of development, have also been considered in relation to each of the SEA objectives under the relevant selected option.

### Minimise Freight and Servicing Trips

- 1.68 This selected option is likely to have significant positive effects on air quality resulting from many of the measures included within it, particularly within the City of London. This is because the measures will result in a reduction in traffic and congestion on the roads in the City and a subsequently will reduce vehicle emissions. However, the option may also result in significant negative effects on air quality in specific locations outside the City of London, due to the use of out of town consolidation centres, which may locally increase vehicle numbers, although this is uncertain. Therefore this option has been given a score of mixed effects with potential uncertain significant positive and negative effects (++/-?) in regards to SEA1: improve air quality.
- 1.69 This selected option is given a significant positive score (++) against SEA2: climate change. This is because the measures will work to reduce the numbers of vehicles using the roads in the City and, as with SEA1 above, will therefore reduce congestion and vehicle emissions.
- 1.70 As a number of measures within this selected option will work to reduce the amount of waste generated and ensure that the number of waste related trips is reduced, this option is given a score of significant positive score (++) in regards to SEA3: waste.
- 1.71 This selected option is given a mixed score with uncertainty (+/-?) in relation to SEA4: Health. The option has been identified as having mixed effects as many of the measures will have beneficial effects on health though improved safety, amenity and air quality as a result of fewer large vehicles using the roads. However, there is uncertainty, and probable negative effects on health, associated with the use of consolidation centres, due to possible local decreases in air quality and amenity and safety issues resulting from additional traffic around these centres.
- 1.72 This selected option has been scored with uncertain mixed effects (+/-?) in regards to SEA5: conserve and enhance the historic environment. This score results from the likely reduction in traffic in the City, which would enhance the settings of heritage assets, but also the potential negative effects that may arise in the event that a consolidation centre or routing to / from a centre is located within proximity to a heritage asset. There is uncertainty in the score as the locations of and routing to and from any consolidation centres is unknown and so it is uncertain whether there would be heritage assets in the areas affected.

### Reasonable alternatives

- 1.73 Four reasonable alternative options were identified by the City Corporation. While the selected options contain most of the measures that are included below as alternative options, the alternative options have been assessed as focussed measures that would be implemented in isolation.
- 1.74 *Reasonable Alternative 1 – Retain businesses as usual, whereby the number of deliveries allowed per day can be restricted to a number that will make the application operationally acceptable in planning terms.* It is considered that this alternative option will have no significant effects on the

SEA objectives above as it is not proposing any changes to the current situation. The scores for this option with regards to all SEA objectives will therefore be negligible.

- 1.75 *Reasonable Alternative 2 – Require the use of physical consolidation centres located outside the City for all deliveries to and from the site.* Consolidation centres are anticipated to be beneficial to the City itself due to a reduction in traffic. The effects on the areas around the consolidation centres, which are not currently known, are more uncertain and it is likely that there will be some significant negative effects resulting from an increase in traffic, noise and air pollution. The scores for this alternative option in relation to the SEA objectives can be seen in **Table 4**.
- 1.76 *Reasonable Alternative 3 – Require use of a micro-consolidation centre, which may be located within or outside the City boundary, for all deliveries to the site. The last mile delivery between the micro-consolidation centre and the site must be made by zero-emission means.* It is expected that this alternative option will have positive effects on the SEA objectives arising from a reduction in traffic and the promotion of zero emission transport. However, as with the option above there are also uncertain effects surrounding the location of the micro consolidation centres, which are unknown. It is not certain whether the micro consolidation centres will attract an increase in vehicles on a local level, which could result in adverse effect on the local area. The scores for this option are presented in **Table 4**.
- 1.77 *Reasonable Alternative 4 - Require the consolidation of all waste on-site prior to collection, with the promotion of 'reverse consolidation' whereby delivery vehicles will take away as much waste as possible.* This alternative option is anticipated to have positive effects on all SEA objectives as it will result in both a decrease in the amount of waste produced and a reduction in the number of servicing trips that a premises requires, thus reducing the number of vehicles on the roads. The scores for this option in relation to the SEA objectives are included in **Table 4** below. This alternative may not be available to sites that cannot accommodate on site consolidation.

**Table 4 Summary of scores**

	SEA objective				
	SEA1: Air Quality	SEA2: Climate Change	SEA3: Waste	SEA4: Health	SEA5: Historic Environment
<b>Minimise freight and servicing trips</b>	++/--?	++	++	+/-?	+/-?
<b>Alternative 1 Retain business as usual</b>	0	0	0	0	0
<b>Alternative 2 Require the use of consolidation centres</b>	+/--?	+	0	+/-	+/-?
<b>Alternative 3 Require micro consolidation and last mile zero emissions</b>	+/-?	+	0	+/-	+/-?
<b>Alternative 4 Waste consolidation</b>	+	+	++	+	+

### Match Demand to Network Capacity

- 1.78 This selected option has been scored as having minor positive (+) effects in relation to SEA1: improve air quality, as although the measures will not reduce vehicle trips, they will work to reduce the numbers of vehicles on the roads at peak times, thus reducing the potential for congestion and resulting vehicle emissions.
- 1.79 This selected option has been scored minor positive (+) in relation to SEA2: climate change, as the likely reduction in daytime congestion, as discussed above, will result in a decrease in vehicle emissions.
- 1.80 This option has been given a negligible score (0) in relation to SEA3: waste, as it is not anticipated that any of the measures will have an effect on the generation or processing of waste.
- 1.81 This selected option is assessed as having mixed positive and negative effects (+/-). This is because the reduction in the number of vehicles, particularly large vehicles, along roads at peak times and along roads used by a high volume of pedestrians and cyclists is likely to have positive effects in terms of congestion and therefore air quality and safety. However, it is also recognized that a shift in deliveries and servicing to the weekend, evening and night time may have an adverse effect on amenity in terms of noise and light pollution for residents.
- 1.82 This selected option is scored minor positive uncertain (+?) in regards to SEA5: historic environment. This is because of the likely positive effects a reduction in traffic on the roads in the City will have on the setting of heritage assets with some uncertainty surrounding the actual routes that would be selected.

### Reasonable alternatives

- 1.83 Three reasonable alternatives to the selected option were identified by the City Corporation. Whilst the selected option contains most of the measures that are included in the alternative options described below, the alternative options, which have been assessed below, are considered as focussed measures and have been considered in isolation.
- 1.84 *Reasonable Alternative 1 – Retain business as usual, whereby weekday quiet times overnight (11pm – 7am) for residents are protected, along with Sunday and Bank Holidays. Deliveries by motor vehicle (except solo motorcycle) may be restricted at peak times to make an application operationally acceptable, (typically between 6-10am, 12-2pm and 5-7pm) but delivery windows of not less than two hours each (typically 10am-12pm and 2pm-4pm) would be available for deliveries.* It is considered that this alternative option will have a negligible effect (0) on all SEA objectives, as recorded in **Table 5** below, as it is not proposing any changes to the current arrangements and therefore does not represent a change to the baseline.
- 1.85 *Reasonable Alternative 2 – Move to a full daytime restriction, with no deliveries permitted between 7am and 7pm on weekdays.* It is expected that this alternative option will have a positive effect on air quality and climate change due to the reduction in the number of vehicles using the roads at the busiest times and a resultant reduction in vehicle emissions. It is also expected to have minor positive effects on the historic environment due to the reduction in traffic which is likely to enhance the settings of heritage assets. The effect on waste is considered to be negligible, while effects on health may be mixed as there is likely to be increases in safety and improvements in air quality, but off peak deliveries may lead to a loss of amenity for residents along selected routes. The scores against each objective are shown in **Table 5**.
- 1.86 *Reasonable Alternative 3 – Require all deliveries to take place overnight (i.e. between 11pm and 7am).* This alternative is very similar to that above, but specifies later delivery times. It is expected therefore that the scores will be the same as those for Reasonable Alternative 2.

**Table 5 Summary of scores**

	SEA objective					
		SEA1: Air Quality	SEA2: Climate Change	SEA3: Waste	SEA4: Health	SEA5: Historic Environment
Measure or reasonable alternative	Match demand to network capacity	+	+	0	+/-	+?
	Alternative 1 Retain business as usual	0	0	0	0	0
	Alternative 2 No deliveries between 7am and 7pm	+	+	0	+/-	+
	Alternative 3 Require night time deliveries 11pm to 7am	+	+	0	+/-	+

**Mitigate the Impact of Freight Trips**

- 1.87 This selected option is scored significant positive (++) in relation to SEA1: air quality, as it is considered that the measures will reduce in vehicle emissions as a result of sustainable driving practices, reduced congestion, and the use of low or zero emission vehicles.
- 1.88 This selected option is anticipated to have significant positive effects in regards to climate change for the same reasons as described for SEA1 above. Therefore, it has been given a significant positive score (++).
- 1.89 It is considered that this option will have a negligible effect (0) on SEA 3: waste, as the measures are unlikely to affect the generation or processing of waste.
- 1.90 This selected option has been scored significant positive (++) in relation to SEA4: health as the measures, which include safer driving practices, reduced idling and use of low emission vehicles, are likely to result in significant improvements to air quality, safety and amenity.
- 1.91 This selected option has been scored minor positive uncertain (+?) in relation to SEA5: historic environment due to the enhancements the measures may have on the setting of heritage assets though the reduction in the amount of traffic and noise pollution. Effects are uncertain as any particular freight and servicing routes that may be used which avoid heritage assets are currently unknown.

**Reasonable alternatives**

- 1.92 Two reasonable alternatives to the selected option have been identified by the City Corporation. While the selected option contains most of the measures that are included below in the alternative options, the two alternative options assessed should be considered as focussed measures and assessed in isolation. They will therefore score differently.



- 1.93 *Alternative 1 – Retain business as usual, whereby the environmental impact of servicing is required to be minimised with no formal restriction on the type of vehicle used. Note that mayoral policies (T charge and Ultra Low Emission Zone) will, in future, levy charges upon less clean motor vehicles entering central London.* This alternative option is expected to have a negligible impact (0) on all of the SEA objectives as it is not proposing a change to the baseline situation.
- 1.94 *Alternative 2 – Require the use of zero-emission vehicles to be used at the point of delivery to the site in the City.* It is anticipated that this option will have significant positive effects on both air quality and climate change through the reduction in vehicle emissions. The impacts on waste and the historic environment are expected to be negligible as this option will affect neither the generation of waste or the setting or character of a heritage asset. The effect on health is anticipated to be positive, due to a reduction in vehicle emissions and an associated improvement in air quality.

**Table 6 Summary of scores**

Measure or reasonable alternative	SEA objective				
	SEA1: Air Quality	SEA2: Climate Change	SEA3: Waste	SEA4: Health	SEA5: Historic Environment
Mitigate the impact of freight trips	++	++	0	++	+?
Alternative 1 Retain business as usual	0	0	0	0	0
Alternative 2 Require use of zero emission vehicles at delivery point	++	++	0	+	0

## Mitigation

- 1.95 This section suggests measures that could be put in place to avoid or lessen the potential negative effects identified in the SEA of the SPD. Mitigation is only considered necessary in regards to the negative effects associated with the use of consolidation centres, as this measure is the only one that is likely to result in significant negative effects.
- 1.96 It is anticipated that the below mitigation would help to avoid or reduce any adverse impacts resulting from the use of consolidation centres:
- Ensuring as far as possible that, in line with Policy 2.17 of the London Plan, consolidation centres are located in preferred industrial locations and are not located in areas that would; affect the character or setting of a heritage asset, affect local residents or affect any other sensitive receptors such as schools or hospitals.
  - When routing traffic to consolidation centres ensure that this is along appropriate roads, i.e. those large enough to accommodate larger delivery vehicles, those with minimal residential development and those that will not lead to an adverse effect on the setting of a heritage

asset. A transport plan could be produced for the consolidation centre which sets out which routes should be used.

- If the consolidation centre is to be located in a more residential area or an area frequently used by the public, ensure that it is screened from view, sensitive lighting is used, noise is minimised and if the area is residential then the centre is only operational during the daytime, when most residents are likely to be at work and their sleep will not be disturbed. Again this could be set out in a transport plan. However, as the centres would be outside the administration of the City Corporation this acts as a recommendation to developers when considering the design of consolidation centres.
- As far as possible use a booking system or delivery timing system to reduce the possibility of congestion and subsequent local air quality issues. To reduce the adverse effects on air quality and climate change, the use of low or zero emission delivery vehicles should be encouraged.

- 1.97 Mitigation for the second selected option 'match demand to network capacity' may be required in terms of noise and light pollution occurring from evening, night time and weekend deliveries, leading to a loss of amenity for residents living along the route. One of the measures in the SPD states that '*All deliveries requiring activity outside working hours, either at the site in the City or elsewhere in the delivery chain, should be subject to a quiet delivery agreement or commitment to minimise noise and pollution impacts at all stages of the delivery process, including along the delivery route and at any intermediary points such as a consolidation centre. Details of the delivery and servicing timings and how they will be managed to minimise noise impacts at all stages of the delivery process should be included in the DSP.*' This is expected to help mitigate negative effects of noise and light pollution.
- 1.98 The selected option also contains a measure requiring the use of appropriate routes that avoid residential areas, therefore minimising the impact of servicing and delivery vehicles on residents in regards to loss of amenity though noise and light pollution.
- 1.99 In addition to measures to mitigate a loss of amenity, any selected delivery and servicing routes that avoid areas of high pedestrian and cycle use as well as residential areas, should also aim to avoid heritage assets so as not to adversely affect their setting.
- 1.100 It is not anticipated that there will be any significant adverse effects on the SEA objectives as a result of the third selected option 'mitigate the impact of freight trips', therefore no mitigation is required.
- 1.101 To further lessen the environmental impacts it is recommended that the additional measure included in Section 5 of the SPD, which sets out the need for engines to be turned off unless absolutely necessary for deliveries at food and drink retail / pubs, should be expanded to include other uses, for example offices and other general retail.

## Cumulative effects of the Draft Freight and Servicing SPD

- 1.102 When the three selected options are considered cumulatively it is expected that the SPD will result in **mixed effects, with significant positive and significant negative effects (++)/--?) on SEA1: air quality**. It is considered that the three selected options will work together to cumulatively improve air quality as they will result in decreases in road traffic, congestion and vehicle emissions. However, uncertain significant negative effects are also identified as a result of the use of out of town consolidation centres, which could lead to increases in local congestion and increased traffic movements in the areas where these are located.
- 1.103 Cumulatively, it is considered that the three selected options will have **significant positive effects (++) on SEA2: climate change**. The measures within each option will work together cumulatively to significantly reduce the contribution of freight and servicing in the City to climate change through reductions in road traffic, vehicle congestion and emissions.
- 1.104 With the three selected options considered cumulatively it is anticipated that the SPD will result in **minor positive effects (+) on SEA3: the waste hierarchy**. This is due to the measure in

selected option 1 'minimise' which promotes the on-site recycling of deconstruction waste, other measures are considered to have negligible effects in terms of waste.

- 1.105 Cumulatively it is anticipated that the three selected options will have **uncertain mixed effects on SEA4: health with significant positive effects (+/-?)**. When the positive effects arising from the measures within each of the three options are considered cumulatively it is anticipated that significant benefits to human health will result due to improvements to safety, daytime amenity for residents and visitors and air quality. However, negative effects also need to be included due to losses in residential amenity as a result of weekend and night time servicing and also potential decreases in air quality and amenity in the vicinity of consolidation centres.
- 1.106 When the three options are considered cumulatively, **uncertain mixed effects (+/-?) on SEA5: the historic environment are anticipated as a result of the SPD**. Mixed effects are anticipated as many of the measures within the three options may result in enhancements to the settings of heritage assets through re-routing and also reductions in congestion. However, negative effects have been identified as possible in relation to consolidation centres. The effects overall are considered to be uncertain as they depend upon the routing of vehicles which is not known at this stage.

## Monitoring

- 1.107 The SEA Regulations require that *'the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action'* and that the environmental report should provide information on *'a description of the measures envisaged concerning monitoring'*. Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.
- 1.108 Indicators are proposed in relation to the SEA objectives for which potential significant positive or negative effects were identified as a result of any of the draft SPD measures. This includes air quality (SEA1), climate change (SEA2), waste (SEA3) and health (SEA4). **Table 7** shows the proposed monitoring framework for the SPD.

**Table 7 Proposed monitoring framework for the Freight and Servicing SPD**

SA objectives	Proposed monitoring indicators
SEA1: Improve air quality	<ul style="list-style-type: none"> <li>Number of planning applications that include an air quality assessment<sup>19</sup> (source: Planning Dept Uniform query)</li> <li>Changes in the concentration of air pollutants in the City (source: City of London Environmental Health)</li> </ul>
SEA2: Reduce activities that exacerbate climate change	<ul style="list-style-type: none"> <li>Percentage of deliveries made by zero emissions transport</li> <li>The number of vehicles used that meet the (forthcoming) Ultra Low Emission Zone standards</li> <li>Number of large delivery and servicing vehicles using the roads in the City<sup>20</sup></li> <li>Changes in greenhouse gas emissions from the City (source: BEIS energy / CO<sub>2</sub> trends data)</li> </ul>
SEA3: Adopt the 'Waste hierarchy' in all activities – reduce , reuse, recycle	<ul style="list-style-type: none"> <li>Percentage of waste sent for reuse, recycling and composting (source: estimate from waste arisings report)</li> <li>Quantity of waste transported by river from Walbrook Wharf (source: City of London cleansing services)</li> <li>Number of waste collection vehicles using the roads in the City<sup>21</sup></li> </ul>

<sup>19</sup> Air quality assessment should demonstrate how the development has met air quality challenges thereby avoiding refusal.

<sup>20</sup> The first three measures are likely to be undertaken through periodic surveys rather than real time monitoring.

SA objectives	Proposed monitoring indicators
SEA4: Improve the health of city workers, residents and visitors	<ul style="list-style-type: none"> <li>• Number of hospital admissions in relation to road accidents (source: City of London road casualty statistics)</li> <li>• Number of road accidents involving cyclists and pedestrians (source: City of London road casualty statistics)</li> <li>• Number of complaints regarding amenity (source: City of London environmental health)</li> <li>• Proportion of residents reporting their health as 'Good' or 'Very good' (source: Census)</li> </ul>

## Conclusions and Next Steps

- 1.109 The selected options and reasonable alternative options for the City of London Freight and Servicing SPD have been subject to a detailed appraisal against the SEA objectives, which were developed at the scoping stage of the SEA process.
- 1.110 The SEA has identified the potential for likely significant effects (positive and negative) for some of the options and measures contained within the selected options and reasonable alternative options.
- 1.111 Potential significant negative effects have been identified for only one measure, the use of out of town consolidation centres. It is anticipated that this measure, contained within the selected option to 'Minimise Freight and Servicing Trips', could have significant adverse effects on air quality outside the City of London in the vicinity of the consolidation centres, as well as minor negative effects on health.

## Next Steps

- 1.112 The SEA Report will be available for consultation alongside the Draft City of London Freight and Servicing SPD between 7<sup>th</sup> August and 30<sup>th</sup> September 2017.
- 1.113 Following this consultation, the SPD and accompanying SEA Report will be updated, if required. If there are no remaining issues, the City Corporation will adopt the SPD and an SEA Adoption Statement will be produced.

LUC  
July 2017

<sup>21</sup> As there are large numbers of private waste contractors operating in the City using a range of different vehicles it is anticipated that this would be difficult to monitor.

# TEST OF RELEVANCE: EQUALITY ANALYSIS (EA)

## Introduction

The Public Sector Equality Duty (PSED) is set out in the Equality Act 2010 (s.149). This requires public authorities, in the exercise of their functions, to have 'due regard' to the need to:

- Eliminate discrimination, harassment and victimisation
- Advance equality of opportunity between people who share a protected characteristic and those who do not, and
- Foster good relations between people who share a protected characteristic and those who do not

The characteristics protected by the Equality Act 2010 are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership.
- Pregnancy and maternity
- Race
- Religion or belief
- Sex (gender)
- Sexual orientation

## What is due regard?

- It involves considering the aims of the duty in a way that is proportionate to the issue at hand
- Ensuring that real consideration is given to the aims and the impact of policies with rigour and with an open mind in such a way that it influences the final decision
- Due regard should be given before and during policy formation and when a decision is taken including cross cutting ones as the impact can be cumulative.

The general equality duty does not specify how public authorities should analyse the effect of their business activities on different groups of people. However, case law has established that equality analysis is an important way public authorities can demonstrate that they are meeting the requirements.

Even in cases where it is considered that there are no implications of proposed policy and decision making on the PSED it is good practice to record the reasons why and to include these in reports to committees where decisions are being taken.

It is also good practice to consider the duty in relation to current policies, services and procedures, even if there is no plan to change them.

## How to demonstrate compliance

Case law has established the following principles apply to the PSED:

- **Knowledge** – the need to be aware of the requirements of the Equality Duty with a conscious approach and state of mind.
- **Sufficient Information** – must be made available to the decision maker
- **Timeliness** – the Duty must be complied with before and at the time that a particular policy is under consideration or decision is taken not after it has been taken.
- **Real consideration** – consideration must form an integral part of the decision-making process. It is not a matter of box-ticking; it must be exercised in substance, with rigour and with an open mind in such a way that it influences the final decision.
- **Sufficient Information** – the decision maker must consider what information he or she has and what further information may be needed in order to give proper consideration to the Equality Duty
- **No delegation** - public bodies are responsible for ensuring that any third parties which exercise functions on their behalf are capable of complying with the Equality Duty, are required to comply with it, and that they do so in practice. It is a duty that cannot be delegated.
- **Review** – the duty is continuing applying when a policy is developed and decided upon, but also when it is implemented and reviewed.

However there is no requirement to:

- Produce equality analysis or an equality impact assessment
- Indiscriminately collect diversity data where equalities issues are not significant
- Publish lengthy documents to show compliance

- Treat everyone the same. Rather, it requires public bodies to think about people's different needs and how these can be met
- Make services homogeneous or to try to remove or ignore differences between people.

**The key points about demonstrating compliance with the duty are to:**

- Collate sufficient evidence to determine whether changes being considered will have a potential impact on different groups
- Ensure decision makers are aware of the analysis that has been undertaken and what conclusions have been reached on the possible implications
- Keep adequate records of the full decision making process

**Test of Relevance screening**

The Test of Relevance screening is a short exercise that involves looking at the overall proposal and deciding if it is relevant to the PSED.

**Note: If the proposal is of a significant nature and it is apparent from the outset that a full equality analysis will be required, then it is not necessary to complete the Test of Relevance screening template and the full equality analysis and be completed.**

The questions in the Test of Relevance Screening Template to help decide if the proposal is equality relevant and whether a detailed equality analysis is required. The key question is whether the proposal is likely to be relevant to any of the protected characteristics.

**What to do**

In general, the following questions all feed into whether an equality analysis is required:

- How many people is the proposal likely to affect?
- How significant is its impact?
- Does it relate to an area where there are known inequalities?

At this initial screening stage, the point is to try to assess obvious negative or positive impact.

If a negative/adverse impact has been identified (actual or potential) during completion of the screening tool, a full equality analysis must be undertaken.

If no negative / adverse impacts arising from the proposal it is not necessary to undertake a full equality analysis.

Quite often, the answer may not be so obvious and service-user or provider information will need to be considered to make a preliminary judgment. For example, in considering licensing arrangements, the location of the premises in question and the demographics of the area could affect whether section 149 considerations come into play.

There is no one size fits all approach but the screening process is designed to help fully consider the circumstances.

On completion of the Test of Relevance screening, officers should:

- Ensure they have fully completed and the Director has signed off the Test of Relevance Screening Template.
- Store the screening template safely so that it can be retrieved if for example, Members request to see it, or there is a freedom of information request or there is a legal challenge.
- If the outcome of the Test of Relevance Screening identifies no or minimal impact refer to it in the Implications section of the report and include reference to it in Background Papers when reporting to Committee or other decision making process.

**1. Proposal / Project Title: Freight and Servicing Supplementary Planning Document**

**2. Brief summary (include main aims, proposed outcomes, recommendations / decisions sought):**

The SPD provides additional guidance and direction for developers on existing policies in the City of London Local Plan in relation to the management of freight and servicing. The SPD includes possible measures to minimise the number of freight trips in the City, match the required trips to available network capacity through re-timing, and mitigate the impact of essential freight trips through the use of clean and quiet vehicles and practices. The SPD sets out the types of measures that may be appropriate for managing freight and servicing in different types of development.

**3. Considering the equality aims (eliminate unlawful discrimination; advance equality of opportunity; foster good relations), indicate for each protected group whether there may be a positive impact, negative (adverse) impact or no impact arising from the proposal:**

Protected Characteristic (Equality Group) <input checked="" type="checkbox"/>	Positive Impact	Negative Impact	No Impact	Briefly explain your answer. Consider evidence, data and any consultation.
Age	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The SPD is expected to have a slight positive impact on this protected characteristic, due to the expected positive impact on air quality, which disproportionately affects children and older people. A reduction in motor traffic as a result of the SPD would also reduce the danger from road traffic, impacting positively on younger and older people in particular.
Disability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	An improvement in air quality as a result of the SPD is likely to have a positive impact on individuals who suffer from respiratory conditions.
Gender Reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Marriage and Civil Partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Pregnancy and Maternity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	An improvement in air quality as a result of the SPD is likely to have a positive impact on the health of pregnant women.
Race	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Religion or Belief	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Sex (i.e gender)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Sexual Orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

**4. There are no negative/adverse impact(s)**  
Please briefly explain and provide evidence to support this decision:

There are no negative/adverse impacts expected as a result of the SPD. The SPD aims to reduce the negative impact of freight and servicing traffic on the City environment, particularly in relation to air quality, traffic congestion, and road danger, to the benefit of everyone living and working in the City.

**5. Are there positive impacts of the proposal on any equality groups? Please briefly explain how these are in line with the equality aims:**

There are expected to be slight positive impacts on characteristics more vulnerable to poor air quality and danger from motor traffic, as these dangers are expected to reduce as a result of the SPD.

6. As a result of this screening, is a full EA necessary? (Please check appropriate box using )

Yes

No

Briefly explain your answer:

The SPD is not expected to impact negatively on any protected characteristics. The guidance in the document is expected to have a slight positive impact on some health-related characteristics, and no impact on other characteristics.

7. Name of Lead Officer: Eddie Jackson

Job title: Strategic Transportation Officer

Date of completion: 26 June 2017

Signed off by Department Director :



Name:

S. PRESLEY

Date:

27/6/17



<b>Committee:</b> Planning and Transportation Committee	<b>Date:</b> 25 July 2017
<b>Subject:</b> Thames Court footbridge: assessment and acquisition	<b>Public</b>
<b>Report of:</b> Director of the Built Environment	<b>For decision</b>

### Summary

A temporary private footbridge across Upper Thames Street at Thames Court was erected following an agreement reached in 1997 between the City of London and the owners of Thames Court. The agreement provided that the owners make the footbridge available for use by the public throughout its operating life.

The footbridge closed at the start of this year and is in situ without the benefit of planning permission. The owners are aware that the structure no longer benefits from planning permission and were intending to have it removed as planned. Your Committee considered a report on the footbridge at your meeting on 23 May 2017 and determined that the footbridge must remain in place and be reopened for use by the public.

It was hoped that this could be via vesting of the footbridge in Transport for London but Transport for London officers have advised that they do not see any great utility in the footbridge given the location of other pedestrian crossing places over Upper Thames Street in the vicinity and that they do not wish to have it vested in Transport for London.

Retention of the Thames Court footbridge therefore involves the vesting of the structure in the City, and the securing of any requisite rights over the land that it occupies. The owners of the footbridge are willing to effect the transfer of the structure, but the land is affected by a wider land ownership dispute between the City and Transport for London. To allow the City to advance the transfer a project needs to be initiated. This project would seek agreement with Transport for London to enable the land rights to be secured, potentially strengthen the structure, and resurface the deck and stairs, in order to allow it to be reopened for public use.

Fees for an inspection for condition and assessment are estimated at £20 000 and these can be met from within the Director of the Built Environment's local risk. The resurfacing works are estimated at £15 000. Any needed structural works are not able to be estimated until the inspection for condition and assessment are completed, but are potentially major.

## **Recommendation**

I recommend that your Committee instructs the Department of the Built Environment:—

1. to undertake an inspection for condition and assessment of the Thames Court footbridge; and
2. to initiate a project through the City's project management procedure to retain, resurface and (if required) strengthen the footbridge.

## **Main Report**

### **Background**

1. A temporary private footbridge across Upper Thames Street at Thames Court (referred to in this report as "the Thames Court footbridge") was erected following an agreement reached on 30 October 1997 between the City of London and Deutsche Immobilien Fonds Aktiengesellschaft and DG Bank Deutsche Genossenschaftsbank London Branch (the owners of Thames Court). This agreement authorized the owners of Thames Court to construct a temporary private footbridge over Upper Thames Street, for which street the City was at that time the local highway authority, in order to improve pedestrian access to their property provided that the owners make the footbridge available for use by the public throughout its operating life. The agreement provided that the owners maintain the Thames Court footbridge structure but that the City would, in acknowledgement of the benefit to the public of being able to use it, light, cleanse and, as necessary, repave the surface of the footbridge.
2. Planning permission for the Thames Court footbridge was granted by the City in 1997. Permission was granted until 22 July 2006, after which time it was agreed that the footbridge would be removed. In February 2007 the City granted a further planning permission for the footbridge to be retained until 28 February 2017, after which time it was again agreed that the footbridge would be removed.
3. The footbridge closed at the start of this year and is in situ without the benefit of planning permission. The owners are aware that the structure no longer benefits from planning permission and were intending to have it removed as planned.

### **Current Position**

4. Your Committee considered a report on the footbridge at your meeting on 23 May 2017 and determined that the footbridge must remain in place and be reopened for use by the public.

5. As a result of your Committee's decision, officers have discussed the matter with CBRE Ltd, the agents for the footbridge's owners, and have reached agreement in principle that the footbridge can be transferred to Transport for London or to the City.
6. Transport for London officers have subsequently advised that they do not see any great utility in the footbridge given the location of other pedestrian crossing places over Upper Thames Street in the vicinity and that they do not wish to have it vested in Transport for London. As a result, if the footbridge is to be retained it will need to be vested in the City.

## **Proposal**

7. The structure has exceeded its design life and the surfacings of the footbridge are too worn to allow safe public use. This is because the structure was only intended to be in place for 10 years, subsequently extended by the owners to 20 years with the City's agreement, and the City's management of the surfacings has been with a view to minimizing expenditure and keeping the structure safe to use only until its scheduled closure and removal in February 2017.
8. As a result, the structure would need to be comprehensively assessed before it could be determined what works need to be undertaken before it can be safely reopened. Fees for an inspection for condition and assessment are estimated at £20 000 and these can be met from within the Director of the Built Environment's local risk. The inspection for condition and assessment would be initiated if your Committee approves this report and they are estimated as taking approximately three months to complete. The assessment report would therefore be likely to be available at the end of October.
9. Once the assessment report is available the City will know what works need to be undertaken to bring the structure back into public use. These works will involve, at a minimum, the resurfacing of the deck and stairs and may involve more major, and potentially much more major, engineering works if structural defects are detected by the assessment.
10. The resurfacing works are estimated at £15 000. Any needed structural works are not able to be estimated until the inspection for condition and assessment are completed, but are potentially major.
11. In the event that such major engineering works are needed to repair structural defects that the footbridge cannot be economically repaired, it will need to be removed and a replacement considered. The costs of removal are unknown, but are estimated at up to £100 000.
12. As the estimated costs for the proposed capital asset exceed £50 000 the retention of the footbridge and its transfer to the City must be treated as a project within the City's project management procedure and reported on through the project gateway process. This will be undertaken by the Department of the Built Environment, with responsibility sitting with the District

Surveyor, whose section contains the necessary structural engineering expertise to successfully manage the project. It also allows the project to achieve economies of scale through being appropriately coordinated with the project to assess and potentially strengthen or remove the Fye Foot Lane city walkway bridge (the Dominant House footbridge), which is about 80 m to the west of the Thames Court footbridge.

13. The potential source or sources of funding for this project are at present not known but would need to be identified as part of the project management procedure and reported on through the project gateway process. As unallocated City resources will be required for the project it will need to be approved by the Corporate Priorities Board, the Resource Allocation Sub-Committee and the Policy and Resources Committee as well as the Corporate Projects Board, the Projects Sub-Committee and your Committee.

### **Corporate and Strategic Implications**

14. This report recommends a course of action that would result in the City committing significant expenditure to acquire a new capital asset and it therefore has corporate implications. These need to be fully evaluated through the City's project management procedure, particularly through the gateway reporting and approval process.

### **Implications**

15. This report recommends a course of action that would result in the City committing significant expenditure to acquire a new capital asset and it therefore has financial and legal implications that will need to be fully evaluated through the City's project management procedure, particularly through the gateway reporting and approval process.
16. If the footbridge was to be vested in the City further planning permission for its retention would not be required as improvement of a road by a highway authority does not constitute development within the meaning of the planning legislation (cf. section 55(2)(b) and section 336(1) of the Town and Country Planning Act 1990 and section 70(1) and section 329(1) of the Highways Act 1980; in particular, within these provisions, "improvement" includes maintenance).
17. The footbridge spans both City and Transport for London highways, and part of it rises above the highways into privately owned airspace. This is believed to be City owned, but largely vested in City's Cash. City-owned airspace above Transport for London highway is currently the subject of a protracted ownership dispute with Transport for London, and separate negotiations will be needed with Transport for London to enable this project to proceed.

### **Conclusion**

18. Retention of the Thames Court footbridge involves: (1) it being vested in the City of London; and (2) the City securing any requisite rights over the land that

it occupies. The owners of the footbridge are willing to effect the transfer of the footbridge, but the City has not yet secured the required land. To allow the City to advance the transfer a project needs to be initiated. This project would seek agreement with Transport for London to enable the land rights to be secured, potentially strengthen the structure, and resurface the deck and stairs, in order to allow it to be reopened for public use.

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<b>Committee(s)</b>	<b>Dated:</b>
Planning & Transportation Committee	25/07/2017
<b>Subject:</b> City Corporation response to consultation on the Mayoral Community Infrastructure Levy 2 Preliminary Draft Charging Schedule	<b>Public</b>
<b>Report of:</b> Carolyn Dwyer, Director of the Built Environment	<b>For Decision</b>
<b>Report author:</b> Peter Shadbolt, Department of the Built Environment	

## Summary

The Mayor has published a Preliminary Draft Charging Schedule for a new Mayoral Community Infrastructure Levy (CIL), to replace the existing Mayoral CIL and s106 charges, which is intended to contribute to the cost of delivering the proposed Crossrail 2 railway from south-west to north-east London. In the event that Crossrail 2 does not proceed, the Mayoral CIL will be used to contribute towards strategic transport infrastructure across London.

The Mayor proposes an increase in Mayoral CIL charge rates across London, with the City of London along with other parts of central London being liable for increased Mayoral CIL charges of £185 per square metre for offices, £165 for retail and £140 for hotel use. Other uses will be subject to a charge of £80 per square metres with some exceptions.

The Mayor's proposals are supported by a viability appraisal which concludes that these rates would not have an adverse impact on development viability across London, even when allowance is taken of borough and City CIL rates that would also apply to fund local infrastructure.

The City Corporation supports the delivery of the Crossrail 2 railway and supports in principle the introduction of a new Mayoral CIL charge to contribute towards delivering this strategic transport infrastructure.

However, the City Corporation has concerns that the cumulative impact of the proposed Mayoral charges on development, alongside City Corporation's City CIL and City s106 charges could have an adverse impact on the viability of development in the City. The viability appraisal prepared by the Mayor does not provide sufficient information and does not contain sensitivity testing to enable the City Corporation to be satisfied at this stage that the proposed Mayoral CIL will not have an adverse impact on development in the City or the City Corporation's ability to deliver affordable housing and training and skills provision through s106 obligations. Therefore the City Corporation requests that the Mayor's viability assessment be refined to address the specific effect on City office development viability. The City Corporation looks forward to close liaison during this process to ensure that the

proposed increased Mayoral CIL contributes to the delivery of Crossrail 2 without adversely affecting local infrastructure delivery or City development viability.

### **Recommendation(s)**

Members are recommended to:

- Agree the key points of the City Corporation's proposed response set out below:  
The City Corporation:
  - Supports the delivery of the Crossrail 2 railway and supports in principle for the introduction of a new Mayoral CIL charge to contribute towards the cost of delivering this strategic transport infrastructure.
  - Concern that the cumulative impact of the proposed Mayoral CIL charge, alongside City Corporation's City CIL and City s106 charges could have an adverse impact on the viability of development in the City.
  - Requests that the Mayor's viability assessment be refined to address the specific effect on City office development viability and looks forward to close liaison during this process.
- Agree that the detailed comments set out in paragraphs 11 – 15 of this report will be forwarded to the Mayor as the City Corporation's response to the Mayor's consultation on the Mayoral CIL2 Preliminary Draft Charging Schedule.

### **Main Report**

#### **Background**

1. In April 2012, the Mayor introduced a Mayoral Community Infrastructure Levy (MCIL1) applicable across London in order to contribute to a target of £600m funding for Crossrail from developer contributions. MCIL1 is levied at a rate of £50 per square metre of new floorspace in the City of London and the rest of the Central Activities Zone (CAZ).
2. MCIL1 complements a separate developer funding regime for Crossrail delivered through Mayoral s106 planning obligations, which was introduced in April 2010 as part of the Alterations to the London Plan. Contributions are sought from office, retail and hotel development within central London at a rate per square metre of £140 for offices, £90 for retail and £61 for hotels. Contributions under s106 are subject to viability and can be amended if evidence indicates that the contribution would make the development unviable. Where a development is liable for both MCIL1 and Mayoral s106, the Mayor agreed that the total contribution would be the greater of the two charge regimes.
3. In addition to Mayoral CIL and Mayoral s106, the City Corporation levies a City CIL on development at a rate per square metre of £75 for office, hotel and retail development and £95 or £150 for residential. The City Corporation also levies



s106 obligations on commercial development of £20 per square metre for affordable housing and £3 per square metre for training, skills and education. Residential development is required to make a contribution towards affordable housing equivalent to 30% provision on site and 60% off site. In setting the City CIL and City s106 rates, a viability assessment was undertaken which considered the impact of the City and Mayoral CIL and s106 levies on development and it concluded that contributions at the agreed rates would be deliverable.

4. The process for setting and implementing a CIL requires 2 rounds of formal public consultation on a Preliminary Draft Charging Schedule and a Draft Charging Schedule, followed by a public examination. Proposed CIL rates have to be supported by viability evidence demonstrating that the CIL would not have an overall adverse impact on the viability of development across the area in which the CIL is in place.

### **Current Position**

5. The Mayor has now published for public consultation a Preliminary Draft Charging Schedule as the first stage in a review of the Mayoral CIL. The new Mayoral CIL (MCIL2) is supported by a viability analysis and evidence highlighting the need for additional funding to deliver Crossrail 2. Crossrail 2 is a proposed new railway linking the national rail networks in Surrey and Hertfordshire through a tunnel under central London. Key central London stops will include Victoria, Tottenham Court Road, Euston and St Pancras. The railway would not pass directly through the City, but would deliver increased capacity and network resilience across London. Consultation on MCIL2 runs from 26 June 2017 until 7 August 2017. Although Crossrail 2 is still at an early stage in inception and has not been confirmed by the Government, the Mayor considers that a new Mayoral CIL needs to be brought forward now to avoid a charging gap at the end of Crossrail 1 construction in 2019 and to allow for early funding of Crossrail 2. Supporting information suggests that MCIL2 is expected to meet approximately 15% of Crossrail 2's project costs. In the event that Crossrail 2 does not proceed, the Mayor has indicated his intention to use MCIL2 to contribute towards the cost of delivering other strategic transport infrastructure across London set out in the adopted London Plan.
6. The Mayor has proposed Mayoral CIL rates for different developments across London, including the City. The City would remain in Band 1 of MCIL2 along with much of central London as well as boroughs in the south west of the capital which would benefit directly from Crossrail 2. Within an area comprising principally the CAZ and the Isle of Dogs, separate Mayoral CIL rates for offices, retail and hotel would be introduced. These rates would replace the existing Mayoral s106 charge. The Mayor has indicated that he is not minded to allow relief from MCIL2 for exceptional circumstances, and that it would be better to address any problems of viability caused by the combined demands of the Mayoral CIL, any borough or City CIL and any s106 agreements by making adjustments to the latter. The Mayor considers that this approach would ensure that the administration of his Mayoral CIL does not become unduly complex and burdensome but it might also put at risk viability-based s106 contributions received by the Mayor and the City Corporation.

7. Table 1 sets out the Mayor's proposed charge rates for MCIL2 in the City of London, and compares these rates with those in the current Mayoral CIL and Mayoral s106 charges. Table 2 shows the percentage increase from current Mayoral CIL and s106 charges, taking account of indexation from the base date of the charges to the 3rd quarter of 2016.

**Table 1: Proposed and existing Mayoral CIL charge rates and Mayoral s106 charges for the City of London (£ per sq m)**

Land Use	Proposed MCIL2	Existing MCIL1	Existing Mayoral S106	Actual Increase
Offices	185	n/a	140	+45
Retail	165	n/a	90	+75
Hotel	140	n/a	61	+79
Other Development <sup>1</sup>	80	50	n/a	+30

1) excludes health and education uses, for which the Mayor has adopted a nil charge rate

**Table 2: Proposed increase from existing Mayoral CIL and Mayoral s106 charges taking account of indexation to Q3 2016 (£ per sq m)**

Land Use	Existing MCIL1/s106	Existing MCIL1/s106 with indexation	Proposed MCIL2	% increase from indexed rates
Offices	140	153.77	185	20.3
Retail	90	98.95	165	66.7
Hotel	61	67.00	140	109
Other Development	50	64.57	80	23.9

8. In setting a Mayoral CIL rate, the Mayor is required to take account of any borough CILs in place at the time. When setting their CIL rates, the boroughs and the City are required to take account of any Mayoral CIL rate. The Mayor commissioned JLL to prepare viability evidence to support his proposals for MCIL2, addressing their impact on the viability of development across the whole of Greater London. The approach taken by JLL is similar to that undertaken in relation to MCIL1 in 2011/2012, which was approved by an appointed inspector. It considers the impact of MCIL2 on the viability of development using residential house prices as a proxy for other forms of development. This reflects the fact that across London as a whole, the principal land use and type of development is residential. JLL have considered whether this approach is valid in relation to office development and have provided evidence suggesting a strong correlation between residential prices in London and office rents (areas with high residential prices also have higher levels of office rents). JLL conclude that, whilst the proposed MCIL2 rates may have an impact on some marginal development, across London as a whole the proposed London-wide MCIL2 rate of £80 per sq m would constitute between 0.51% and 1.28% of average house costs and that

movement in other costs, such as build costs, are likely to have far greater impacts on viability than MCIL2.

9. JLL have looked at the potential impact of the MCIL2 rates for offices, retail and hotel development and considered borough viability evidence from Westminster, Tower Hamlets and the City to determine whether the proposed rates would have an adverse impact on overall commercial viability. For office development, JLL consider that the proposed MCIL2 rates represent a 'consolidation' of existing MCIL1 rates and Mayoral s106 rates and should not therefore have an adverse impact on viability. However they do represent an increase of £45 on the existing baseline rate. Proposed rates for retail and hotel development have been increased substantially from the baseline (£75 for retail and £79 for hotels), but the analysis concludes that, as retail and hotel development has tended to be part of wider mixed use schemes, the proposed rates would not have an adverse impact on the viability of schemes with a retail or hotel content.
10. JLL's analysis considered the impact of the proposed MCIL2 rates on the delivery of affordable housing and concluded that this is much more likely to be impacted by housing policy, the grant regime and construction costs than the Mayoral CIL. The impact of MCIL2 on affordable housing delivery is considered to be minor. There is no assessment of the impact on s106 contributions towards affordable housing from commercial development, which are required in the City.

### **Suggested City Corporation Comments on draft Mayoral CIL Proposals**

11. The key points of the City Corporation's proposed response are that the City Corporation:
  - Supports the delivery of the Crossrail 2 railway and supports in principle for the introduction of a new Mayoral CIL charge to contribute towards the cost of delivering this strategic transport infrastructure.
  - Has concerns that the cumulative impact of the proposed Mayoral CIL charge, alongside the City Corporation's City CIL and City s106 charges could have an adverse impact on the viability of development in the City.
  - Requests that the Mayor's viability assessment be refined to address the specific effect on City office development viability and looks forward to close liaison during this process.

#### Support in principle for Crossrail 2 and for the Mayoral CIL

12. The proposed route for the Crossrail 2 railway does not run through the City of London. The City Corporation is committed to supporting and promoting the case for Crossrail 2. Crossrail 2 will result in a significant increase in rail capacity into and through London which will enhance the capital's transport links and its accessibility and network resilience. Crossrail 2 will open up opportunities for further housing growth which will be of particular significance for London as a whole. The City Corporation supports in principle the Mayor's intention to introduce a new MCIL mechanism to contribute towards the funding and delivery of Crossrail 2.

Need for greater clarity on use of Mayoral CIL funds for other strategic transport infrastructure

13. The City Corporation supports the delivery of other strategic transport proposals in the London Plan to improve accessibility and competitiveness across London. Whilst a number of these proposals would have little or only marginal impact on the City, the City Corporation accepts that central areas should make a contribution to wider London transport improvements and agrees in principle that an all development MCIL rate is appropriate and that central areas should contribute at a higher rate. However, the City considers that the higher rates proposed in MCIL2 for offices, retail and hotel development in the City of London should fund new transport infrastructure that directly benefits the central area or makes a significant contribution to improving access into the City. The City Corporation would therefore like greater clarity on how MCIL2 will be used in the event that Crossrail 2 does not proceed.

Need for further viability testing relating to City office developments

14. Table 1 sets out the proposed increases in Mayoral CIL rates from the original rates for the City of London. Table 2 shows the percentage increase in charges from existing Mayoral CIL and Mayoral s106 charges, taking account of indexation from the base date of the charges to the 3<sup>rd</sup> quarter of 2016. With indexation, the percentage increase would be lower than the apparent increase from headline rates in Table 1, but the Mayor's proposals still involve a substantive increase. The City Corporation has concerns that the increase in charge rates proposed has not been adequately tested through the viability appraisal and particularly that sufficient account has not been taken of the cumulative impact on development of MCIL2 rates, City CIL and City s106 charge rates.
15. Although the approach to viability based on residential values as a proxy was accepted at the MCIL1 public examination, the City Corporation has concerns that this approach may not be reflective of the development viability position in a predominantly commercial area. The JLL report does indicate that specific consideration was given to the rates for offices, retail and hotel in central London and account taken of borough and City CIL viability considerations. The viability analysis references City CIL viability in relation to retail and hotel development but not specifically refer to office development. There appears to be no consideration of the relationship between MCIL2 rates and office development costs and rents and no sensitivity testing of the findings presented.
16. The City Corporation does not at this stage object to the proposed MCIL2 rates for the City, but would like to be reassured that they are supported by robust evidence that takes account of City-specific viability issues. It has not been possible within the short consultation period on MCIL2 to undertake a full assessment of the implications of the rates on development in the City. This will need to be undertaken prior to the next stage in the process, the preparation of the MCIL2 Draft Charging Schedule expected later this year. The City Corporation requests that the Mayor provide further evidence in support of the MCIL2 rates as they apply to the City to demonstrate that the proposed levels are viable alongside City CIL and City s106. The City Corporation reserves its

position to comment further on MCIL2 rates at a later stage in the preparation process once further evidence and viability testing has been undertaken.

Need to consider fully the risks to planning obligation income of MCIL2 fixed rates replacing site specific viability tested Mayoral s106 contributions

17. The Mayor has indicated that he does not intend to allow relief from MCIL2 in exceptional circumstances, such as those where a combination of MCIL and s106 obligations makes a development unviable. This is a significant alteration to the approach for Crossrail 1, where these rates were contained within s106 obligations that were flexible and subject to consideration of the impact on development viability. If there is an adverse impact on viability from a combination of new MCIL2 and City CIL, it is likely that s106 obligations would be reduced on viability grounds and these currently make significant contributions to affordable housing and training, skills and education in the City.

### **Next Steps**

18. Following the Preliminary Draft Charging Schedule consultation, the Mayor will consider comments before publishing a Draft Charging Schedule for public consultation. This is likely to be before the end of 2017. The Mayor hopes to consider MCIL2 at the public examination alongside the London Plan during 2018 with a view to implementing the new Mayoral CIL from April 2019.

### **Corporate & Strategic Implications**

19. The proposed introduction of MCIL2 will assist in the delivery of Crossrail 2 required to boost network capacity and resilience, maintain transportation access to and through London, maintaining its attractiveness as a business location and encouraging further housing development, in line with the City's Vision and Key Policy Priorities in the Corporate Plan 2015-2019. Greater clarity on the impact of the proposed Mayoral CIL rates on commercial and affordable housing development and the delivery of necessary City of London infrastructure is necessary to ensure that Corporate Plan aims can be met.

### **Implications**

20. Proposals for MCIL2 are still at an early stage and further testing is needed. There is a risk that, if MCIL2 charge rates are set too high, there could be an adverse impact on development viability and delivery, and on the delivery of affordable housing and contributions to training, skills and education that are part-funded by s106 planning obligations. This will be mitigated by continuing dialogue with the Mayor and his team and testing of the impact of MCIL2 rates on City development.

### **Health Implications**

21. There are no health implications arising from this report.

## Conclusion

22. The Mayor has published a Preliminary Draft Charging Schedule for a new Mayoral CIL, to replace the existing Mayoral CIL mechanism and s106 charges, with a view to contributing to the cost of delivering the proposed Crossrail 2 railway. In the event that Crossrail 2 does not proceed, the Mayoral CIL will be used to contribute towards strategic transport infrastructure across London.
23. The Mayor's increased charges are supported by a viability appraisal which concludes that these rates would not have an adverse impact on development viability across London, including when taking account of borough and City CIL rates. Where there are issues of development viability, the Mayor considers that these should be addressed through variation in s106 planning obligations levied by boroughs and the City.
24. The City Corporation supports the development of Crossrail 2 and, in principle, supports the introduction of a new Mayoral CIL charge to contribute towards the cost of delivering this infrastructure. However, the City Corporation has concerns that the cumulative impact of the proposed charges on development in the City, alongside City CIL and s106 charges could have an impact on the viability of development. The viability appraisal prepared by the Mayor does not provide sufficient information and does not contain sensitivity testing to enable the City Corporation to be satisfied that the proposed Mayoral CIL will not have an adverse impact on development in the City or the City's ability to deliver affordable housing and training and skills provision through s106. Further information on the viability impacts is required before the City Corporation can support the proposed Mayoral CIL charge rates and the mechanisms set out in the Mayor's proposals.

## Appendices

- Appendix 1 – Mayor of London's MCIL2 Preliminary Draft Charging Schedule

## Background Papers

MCIL PDCS Supporting Information and Viability Evidence Base available on the GLA website at: <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/mayoral-community-infrastructure-levy>

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# **MCIL2 PRELIMINARY DRAFT CHARGING SCHEDULE**

Mayor of London Community Infrastructure Levy 2 Preliminary Draft Charging Schedule  
**Proposed to take effect from April 2019**

**JUNE 2017**

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**Planning Act 2008**

**Community Infrastructure Levy Regulations 2010 (as amended)**

## **Mayor of London Community Infrastructure Levy 2 (MCIL2) Preliminary Draft Charging Schedule**

**Proposed to take effect from April 2019**

The Mayor of London is a charging authority for the purposes of Part 11 of the Planning Act 2008 and may therefore charge the Community Infrastructure Levy in respect of development in Greater London.

The Mayor intends to charge the Community Infrastructure Levy 2 (MCIL2) from April 2019 in Greater London at the rates (expressed as pounds per square metre) presented below in Tables 1, 2 and 3 and the maps in Figures 1, 2 and 3.

- Table 1 and Figure 1 show the proposed charging rates for all development in Greater London (apart from the proposed rates for office, retail and hotel in Central London and the Isle of Dogs, and for health and education in all of Greater London) – in three bands comprising the administrative areas of the London boroughs and the Mayoral Development Corporations.
- Table 2 shows the proposed charging rates for office, retail and hotel in Central London and Isle of Dogs. Figures 2 and 3 show the boundaries of the Central London and the Isle of Dogs charging areas.
- Table 3 shows the proposed charging rates (zero) for health and education in all of Greater London.

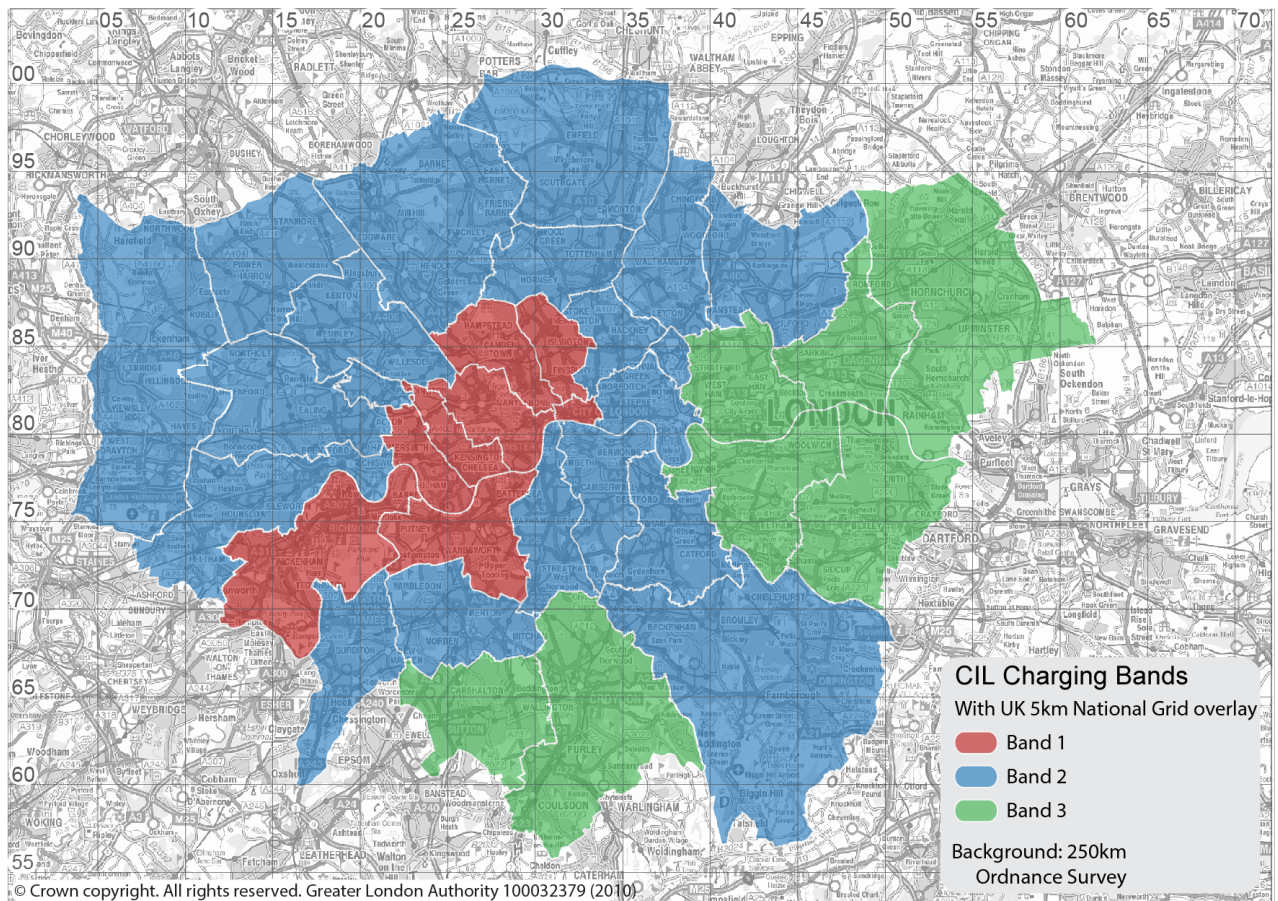
Please see Annex 1 on calculation of the chargeable amount.

Please see the Explanatory Note for further detail on reliefs and exemptions, phasing and payment by instalments, and infrastructure to be funded by MCIL2.

Table 1: Proposed MCIL2 charging rates for all development in London <sup>1</sup>		
MCIL2 charging band	London Boroughs and Mayoral Development Corporations	MCIL2 rate from April 2019 (£ per sq m)
Band 1	Camden, City of London, City of Westminster, Hammersmith & Fulham, Islington, Kensington & Chelsea, Richmond-upon-Thames, Wandsworth	80
Band 2	Barnet, Brent, Bromley, Ealing, Enfield, Hackney, Haringey, Harrow, Hillingdon, Hounslow, Kingston upon Thames, Lambeth, Lewisham, Merton, Redbridge, Southwark, Tower Hamlets, Waltham Forest, London Legacy Development Corporation (LLDC), Old Oak & Park Royal Development Corporation (OPDC)	60
Band 3	Barking & Dagenham, Bexley, Croydon, Greenwich, Havering, Newham, Sutton	25

<sup>1</sup> except for the proposed rates for office, retail and hotel in Central London and the Isle of Dogs (see Table 2), and for health and education in all of Greater London (see Table 3)

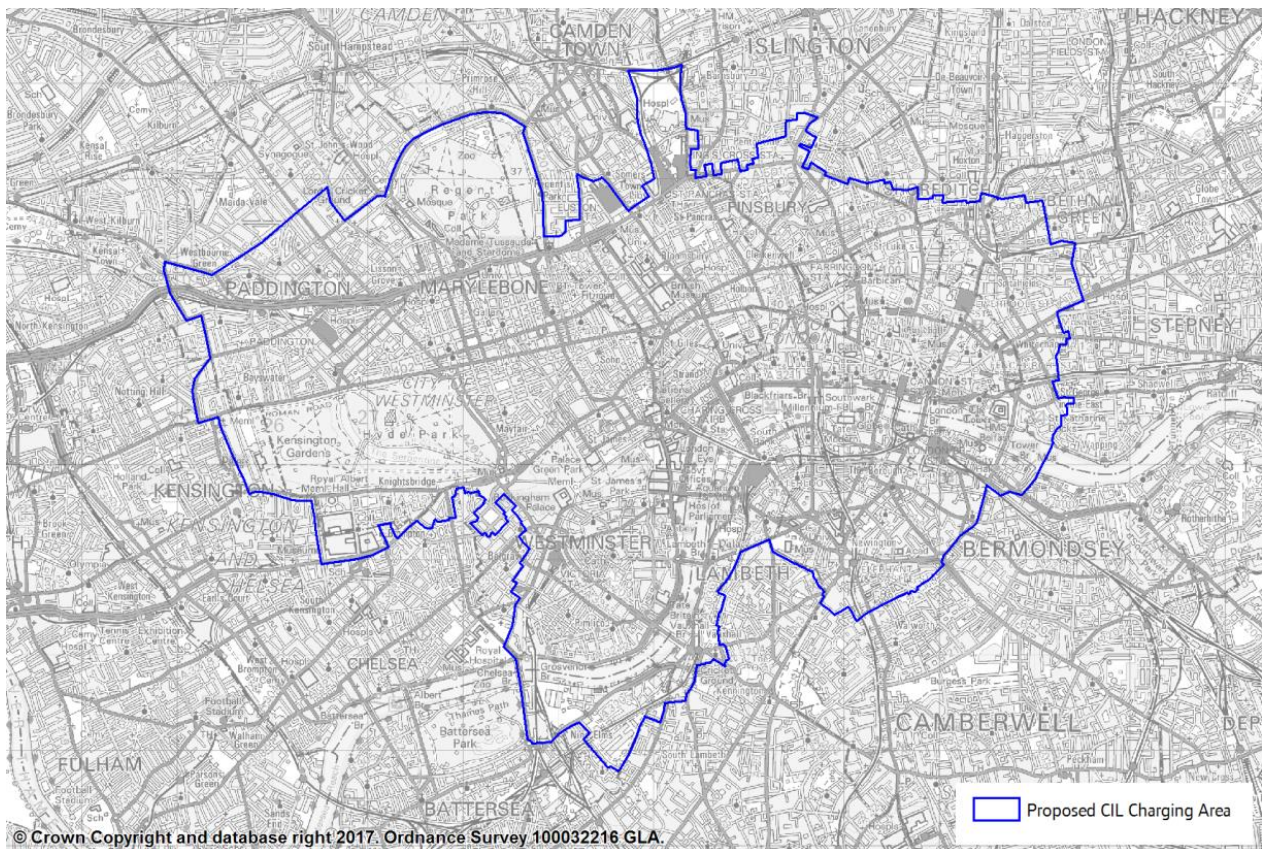
Figure 1: Proposed MCIL2 charging bands



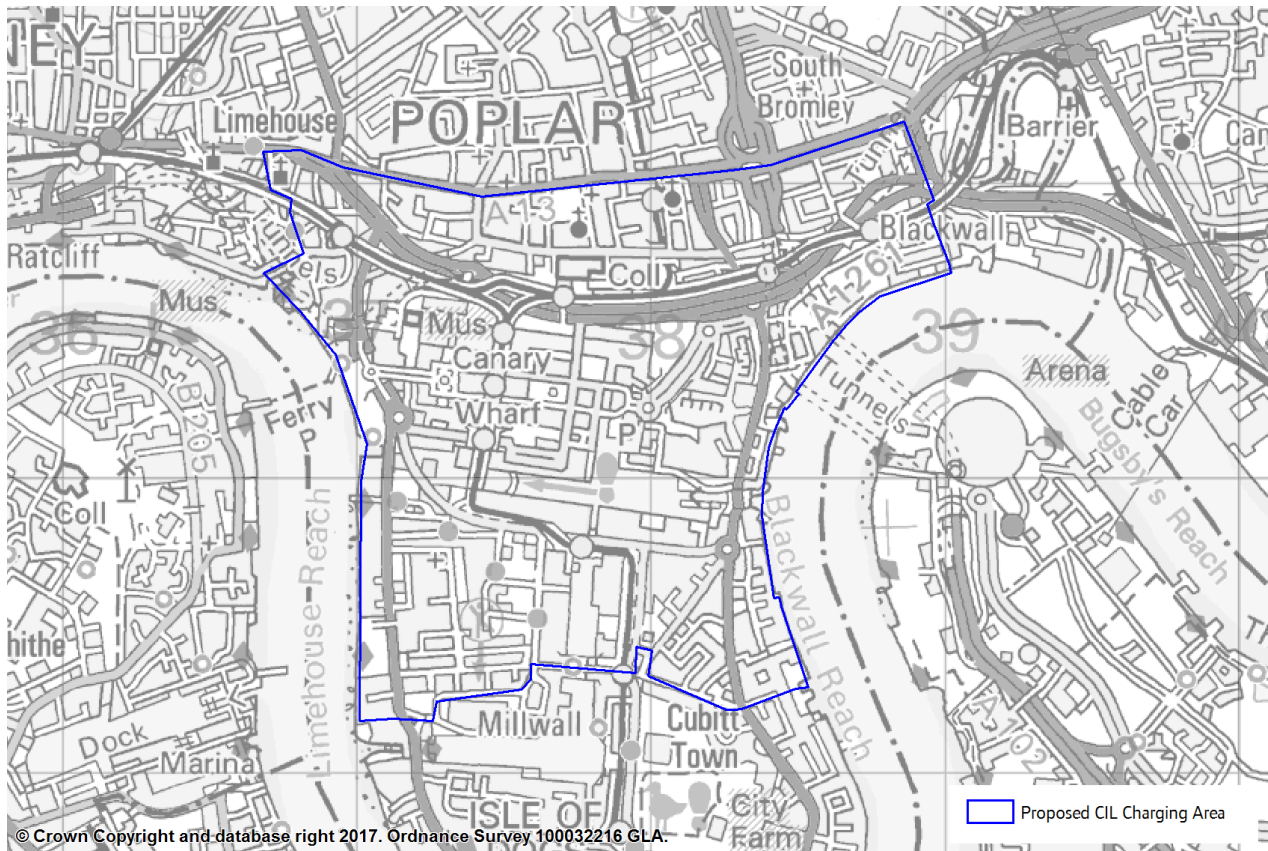
**Table 2: Proposed MCIL2 charging rates for office, retail and hotel in Central London and Isle of Dogs**

Land use	MCIL2 rate from April 2019 (£ per sq m)
Office	185
Retail	165
Hotel	140

**Figure 2: Proposed Central London MCIL2 charging area for office, retail & hotel use**



**Figure 3: Proposed Isle of Dogs MCIL2 charging area for office, retail & hotel use**



**Table 3: Proposed MCIL2 charging rates for health and education in London**

Land use	MCIL2 rate from April 2019 (£ per sq m)
Development used wholly or mainly for the provision of any medical or health services except the use of premises attached to the residence of the consultant or practitioner	Nil
Development used wholly or mainly for the provision of education as a school or college under the Education Acts or as an institution of higher education	Nil

The amount to be charged for each development will be calculated in accordance with Regulation 40 of the Community Infrastructure Levy Regulations 2010 (as amended).

For the purposes of the formulae in paragraph 5 of Regulation 40 of the Community Infrastructure Levy Regulations 2010 (as amended) (set out in Annex 1), the relevant rate (R) is the Rate for each charging zone shown in Table 1 above, other than in respect of the office, hotel and retail uses in Central London and Isle of Dogs shown in Table 2 and in respect of the intended uses shown in Table 3, for which the rates shown therein will apply.

This Schedule has been issued, approved and published in accordance with Part 11 of the Planning Act 2008 and the Community Infrastructure Regulations 2010 (as amended).

This Schedule was approved by the Mayor of London on \*\*\*

This Schedule takes effect on \*\*\*

# Annex One

to the MCIL2 Preliminary Draft Charging Schedule

## Extract from the Community Infrastructure Levy Regulations 2010 (as amended)

*(nb: this Annex is formally part of the MCIL2 Preliminary Draft Charging Schedule)*

### PART 5 – CHARGEABLE AMOUNT

#### Regulation 40 (calculation of chargeable amount)

- (1) The collecting authority must calculate the amount of CIL payable (“chargeable amount”) in respect of a chargeable development in accordance with this regulation.
- (2) The chargeable amount is an amount equal to the aggregate of the amounts of CIL chargeable at each of the relevant rates.
- (3) But where that amount is less than £50 the chargeable amount is deemed to be zero.
- (4) The relevant rates are the rates, taken from the relevant charging schedules, at which CIL is chargeable in respect of the chargeable development.
- (5) The amount of CIL chargeable at a given relevant rate (R) must be calculated by applying the following formula—

$$\frac{R \times A \times I_p}{I_c}$$

where—

A = the deemed net area chargeable at rate R, calculated in accordance with paragraph (7);

$I_p$  = the index figure for the year in which planning permission was granted; and

$I_c$  = the index figure for the year in which the charging schedule containing rate R took effect.

- (6) In this regulation the index figure for a given year is—
- (a) the figure for 1st November for the preceding year in the national All-in Tender Price Index published from time to time by the Building Cost Information Service of the Royal Institution of Chartered Surveyors<sup>1</sup>; or
  - (b) if the All-in Tender Price Index ceases to be published, the figure for 1<sup>st</sup> November for the preceding year in the retail prices index.
- (7) The value of A must be calculated by applying the following formula—

$$G_R - K_R - \frac{(G_R \times E)}{G}$$

where—

G = the gross internal area of the chargeable development;

$G_R$  = the gross internal area of the part of the chargeable development chargeable at rate R;

$K_R$  = the aggregate of the gross internal areas of the following—

- (i) retained parts of in-use buildings, and
- (ii) for other relevant buildings, retained parts where the intended use following completion of the chargeable development is a use that is able to be carried on lawfully and permanently without further planning permission in that part on the day before planning permission first permits the chargeable development;

E = the aggregate of the following—

- (i) the gross internal areas of parts of in-use buildings that are to be demolished before completion of the chargeable development, and
- (ii) for the second and subsequent phases of a phased planning permission, the value Ex (as determined under paragraph (8)), unless Ex is negative,

provided that no part of any building may be taken into account under both of paragraphs (i) and (ii) above.

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<sup>1</sup> Registered in England and Wales RC00487

(8) The value  $E_X$  must be calculated by applying the following formula—

$$E_P - (G_P - K_{PR})$$

where—

$E_P$  = the value of E for the previously commenced phase of the planning permission;

$G_P$  = the value of G for the previously commenced phase of the planning permission;  
and

$K_{PR}$  = the total of the values of  $K_R$  for the previously commenced phase of the planning permission

(9) Where a collecting authority does not have sufficient information, or information of sufficient quality, to enable it to establish that a relevant building is an in-use building, it may deem it not to be an in-use building.

(10) Where a collecting authority does not have sufficient information, or information of sufficient quality, to enable it to establish—

(a) whether part of a building falls within a description in the definitions of  $K_R$  and E in paragraph (7); or

(b) the gross internal area of any part of a building falling within such a description, it may deem the gross internal area of the part in question to be zero.

(11) In this regulation—

“building” does not include—

(i) a building into which people do not normally go,

(ii) a building into which people go only intermittently for the purpose of maintaining or inspecting machinery, or

(iii) a building for which planning permission was granted for a limited period;

“in-use building” means a building which—

(i) is a relevant building, and

(ii) contains a part that has been in lawful use for a continuous period of at least six months within the period of three years ending on the day planning permission first permits the chargeable development;

“new build” means that part of the chargeable development which will comprise new buildings and enlargements to existing buildings;



“relevant building” means a building which is situated on the relevant land on the day planning permission first permits the chargeable development;

“relevant charging schedules” means the charging schedules which are in effect—

- (i) at the time planning permission first permits the chargeable development, and
- (ii) in the area in which the chargeable development will be situated;

“retained part” means part of a building which will be—

- (i) on the relevant land on completion of the chargeable development (excluding new build),
- (ii) part of the chargeable development on completion, and
- (iii) chargeable at rate *R*.

# Explanatory Note

to the MCIL2 Preliminary Draft Charging Schedule

*(nb: this Explanatory Note is not formally part of the MCIL2 Preliminary Draft Charging Schedule)*

## **COSTS OF ADMINISTRATION**

- 1 Under Regulation 61 of the Community Infrastructure Levy Regulations 2010 (as amended) (the 'Regulations'), charging and collecting authorities (in this case the Mayor and the London boroughs) can use CIL proceeds to cover administrative expenses incurred in collecting the Levy up to specified limits – 4% of CIL collected in each year by collecting authorities, and 1% by charging authorities.

## **DIFFERENTIAL CHARGING**

- 2 The Mayor proposes to set differential charges for different boroughs of Greater London to reflect the different levels of development viability within the Greater London charging area. The Mayor considers that given the nature of the judgement he is required to draw under the CIL legislation and guidance to use an area-based approach for land uses in London – taking a broad judgement about viability across London as whole – and a specific approach to office, retail and hotel use in Central London and Isle of Dogs. The charges proposed are set out in Tables 1 and 2.
- 3 In 2011, the then Mayor took a decision to set nil charge rates for education, medical and health developments in order not to undermine the economic viability of their provision. The Mayor proposes to continue applying this policy from April 2019 and to set nil charge rates (as he is empowered to do by Regulation 13(2)) for the following two types of development (as set out in Table 3):
  - Development used wholly or mainly for the provision of any medical or health services except the use of premises attached to the residence of the consultant or practitioner.
  - Development used wholly or mainly for the provision of education as a school or college under the Education Acts or as an institution of higher education.

## RELIEFS AND EXEMPTIONS

- 4 Under Regulation 44, charging authorities may allow relief for development by charities where the whole or greater part of the development is held by the charity as an investment for charitable purposes. The Mayor does not propose to make this relief available. He considers that the better approach is to apply the Mayoral CIL on the basis of uses rather than ownership, and to keep the overall figure set low. Allowing this relief would also make administration of the Mayoral CIL across London as a whole unduly complex and burdensome.
- 5 Under Regulations 55 and 58, the Mayor may allow relief for exceptional circumstances (relating specifically to developments in respect of which there is also a section 106 agreement, where sums payable under that agreement are higher than the amount of Mayoral CIL payable). The Mayor does not intend to make this relief available. He considers that it would be better to address problems of viability caused by the combined demands of Mayoral CIL and section 106 agreements by making any necessary adjustments to the latter, in accordance with well-understood and applied planning principles. Disputes could be dealt with through the appeals procedures under the Town and Country Planning legislation. This approach would also avoid making administration of Mayoral CIL across London as a whole unduly complex and burdensome.
- 6 For the avoidance of doubt the following are exempt from MCIL under the 2008 Act and the Regulations:
  - development of social housing
  - development by charities of their own land for their charitable purposes
  - development of less than 100 sq m (unless a whole house) and residential annexes or extensions
  - residential development by Self Builders

## PHASING AND PAYMENT BY INSTALMENTS

- 7 The Mayor proposes to continue applying his current (MCIL1) instalment policy for MCIL2. The Mayor will continue to keep his instalments policy under review. Where a development attracts both the Mayoral and the local authority's CIL charge, the instalment policy of the local authority will continue to prevail. Details of the Mayor's CIL instalments policy can be found on the GLA's website.

## REPORTING

- 8** As required by the Regulations, the Mayor will publish annual reports showing, for each financial year:
- how much has been collected in MCIL by the boroughs on his behalf;
  - how much of that money has been spent;
  - the items of infrastructure on which it has been spent;
  - any amount used to repay money borrowed;
  - the amount of MCIL used to cover administrative expenses; and
  - the amount of MCIL retained at the end of the reported year.
- 9** In addition to the annual reports, the Mayor will continue to publish his MCIL biennial reviews.

## INFRASTRUCTURE TO BE FUNDED UNDER MCIL2 (REGULATION 123 LIST)

- 10** Regulation 59(2) restricts CIL spending by the Mayor to funding roads or other transport facilities, including Crossrail.
- 11** For the purposes of CIL Regulation 123(4)(a), the Mayor intends that the proceeds of MCIL2 will be put towards the funding of Crossrail 2.
- 12** The Mayor will keep the operation of MCIL2 and the position regarding the funding and implementation of Crossrail 2 under review. At the appropriate time he will make announcements about future uses of Mayoral CIL powers.

## Responding to this document

### HOW TO GIVE YOUR VIEWS

This MCIL2 Preliminary Draft Charging Schedule and supporting documents are open to public consultation from 26 June to 7 August 2017.

The supporting documents are:

- MCIL2 Preliminary Draft Charging Schedule Supporting Information
- MCIL2 Viability Evidence Base for Preliminary Draft Charging Schedule – JLL for the Mayor of London and TfL

You can view these documents online and download them from:

<https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/mayoral-community-infrastructure-levy>

Please respond in writing, referencing your comments to the relevant section of the MCIL2 Preliminary Draft Charging Schedule or its supporting documents:

- by email to [mcil2@london.gov.uk](mailto:mcil2@london.gov.uk) with “MCIL2 PDCS” in the email subject title. If you send in a response by email it is not necessary to also send us a hard copy.
- by post (no stamp required) to:

MCIL2 Preliminary Draft Charging Schedule  
FREEPOST LON15799  
GLA City Hall post point 18  
The Queen’s Walk  
London SE1 2BR

Please respond by **6pm on Monday 7 August 2017**.

Please note that all responses will be made available for public inspection.

### **Other formats and languages**

For a large print, Braille, disc, sign language video or audio-tape version of this document, please contact us at the address below:

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You will need to supply your name, your postal address and state the format and title of the publication you require.

If you would like a summary of this document in your language, please phone the number or contact us at the address above.

<b>Committee(s)</b>	<b>Dated:</b>
Planning & Transportation Committee	25/07/2017
<b>Subject:</b> Viability Appraisals	<b>Public</b>
<b>Report of:</b> Carolyn Dwyer, Director of the Built Environment	<b>For Information</b>
<b>Report author:</b> Peter Shadbolt, Department of the Built Environment	

## Summary

At Planning & Transportation Committee on 13 June, Members raised concerns about the approach taken to the assessment of development viability appraisals and asked that a report be brought back to a future meeting addressing:

- the approach to the confidentiality of submitted viability appraisals and Member access to documentation prior to and at Committee.
- The process of selecting consultants to undertake reviews of submitted viability appraisals to ensure that the City Corporation is receiving the best independent advice.

Officers have reviewed the approach taken to confidentiality and arrangements have been updated including on the planning applications website to reinforce the presumption of transparency. The report also clarifies that confidential information is available to Committee members.

Officers are also reviewing the process for selecting and appointing consultants to undertake reviews of viability appraisals and are examining the potential to use the District Valuation Service or seek support from the Mayor of London. A report will be brought back to a future Committee for consideration.

The report also advises on Local Plan policies pertaining to viability, including their review, and seeks guidance from the Committee regarding the preferred scope of future training/workshop arrangements.

## Recommendation

Members are asked to:

- Note this report and provide guidance on the format of the requested viability workshop.

## Main Report

### Background

1. At Planning & Transportation Committee on 13 June, Members raised concerns about the approach taken to the assessment of development viability appraisals and asked that a report be brought back to a future meeting addressing:

- the approach to the confidentiality of submitted viability appraisals and Member access to documentation prior to and at Committee.
  - The process of selecting consultants to undertake reviews of submitted viability appraisals to ensure that the City Corporation is receiving the best independent advice.
2. This report provides a brief outline of the current adopted procedures and progress in reviewing these procedures to address Member concerns.

### **Transparency of Planning Applications**

3. The planning regime requires a public register of planning applications to be kept available<sup>1</sup>. This is not required to include an applicant's viability appraisal, but policy and guidance encourages transparency and public involvement in the planning process.<sup>2</sup> The normal practise is for planning applications and supporting information submitted by the applicant to be kept available for inspection and uploaded onto the City's planning applications website. Applicants are advised at pre-application stage, in notes annexed to the Pre-Application Meeting Request Form, that related information will not normally be treated as confidential, but if they consider any information should be confidential they should explain this in a covering letter which will be considered. The notes also explain to applicants that once a planning application is submitted, the case is treated as "in the public domain".<sup>3</sup>

### **Restrictions on Transparency**

4. In considering requests to maintain the confidentiality of viability appraisals submitted by applicants, the City will consider whether disclosure will leave it at risk of action for breach of confidence, and whether disclosure would be required by the Environmental Information Regulations 2004 ("EIR") (A requirement to disclose under EIR would provide a defence to a breach of confidence claim). EIR's require a public body to make environmental information available on request. Financial viability appraisals are generally considered to fall within the definition of environmental information. The Regulations allow exceptions to disclosure requirement, including where disclosure would adversely affect the confidentiality of commercial or industrial information necessary to protect a legitimate economic interest. Regulations also require the public body to be satisfied that the public interest in maintaining the exception outweighs the public interest in disclosing the information.
5. When viability appraisals are submitted with planning applications, applicants are expected to indicate if they consider all or part of the appraisals should remain confidential and the reasons for this (see Pre-Application Meeting Request Notes, paragraph 3, above). Where the reasons given are considered to meet the requirements for exclusion from the EIR regulations, all or part of

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<sup>1</sup> S.69 Town and Country Planning Act 1990 and Article 40 Development Management Procedure Order 2015

<sup>2</sup> Planning Practise Guidance paras 004 and 063 and NPPF para 69

<sup>3</sup> Link to Pre-Application Meeting Request Form: <https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-applications/Documents/City-of-London-pre-planning-application-meeting-request-form.pdf>



the appraisal will remain confidential and any subsequent review of that information undertaken on behalf of the City Corporation is also considered to be commercially confidential, to the extent that it would disclose the confidential information submitted by the applicant. Applicants are expected to make a summary of their appraisal available for disclosure and inclusion alongside the Committee report, or redact the viability appraisal so that unredacted parts can be disclosed.

6. Where there is no indication regarding confidentiality (or if the reasons given are not accepted by the City as raising a valid exemption to EIR) the viability information is made available on the public planning register, uploaded to the planning application website and will be included in the information reported in the public agenda to Planning & Transportation Committee (either as an appendix in full or in summary, and/or as a background document).
7. In light of concern expressed by Members, officers have reviewed whether current practise should be updated and considered whether further efforts could be made to ensure the public availability of viability reports. It has been reiterated to developers raising viability issues that the expectation is that such information should be made publicly available unless there is a clear EIR exemptions agreed by the City. It is also proposed to give this greater emphasis on the City's planning application website. In addition, officers have kept recent cases and ICO Guidance under review to assist them in evaluating, on a case by case basis, requests regarding confidentiality (in particular, to help test whether details such as sales values and construction costs are genuinely commercially sensitive, and whether they remain so as they fall out of date, and to help apply the public interest test). Officers have considered whether it would be possible to require all viability appraisals to be made public. Such absolute disclosure would be a change in policy and require stakeholder engagement. There are issues which would need to be considered prior to a policy change, such as potential breach of confidence claims and whether full disclosure might limit the scope of information provided and the potential to challenge figures and pursue an increased contribution. Absolute disclosure of viability could be an issue for further exploration through a workshop and/or the Local Plan review, both of which are addressed later in this report.
8. Where it is accepted that some or all of the viability information should remain confidential, the information will still be available to Planning & Transportation Committee Members under Standing Order 45.1 (and Standing Order 45.6 which requires the Member to preserve the confidentiality of any such information). The format in which the information will be made available will be determined on a case by case basis, having regard to the potential for a Member to have a discloseable pecuniary interest or to be acting for an interested party. Subject to this specific consideration, Committee Members will have electronic or other access to submitted viability reports prior to Committee. Officers will provide a briefing on viability considerations to any Member of the Planning & Transportation Committee prior to the Committee, on request.

## Process for Review of Viability Appraisals

9. Members have also requested a review of the process under which submitted viability appraisals are reviewed, to ensure that the City Corporation receives the best and independent advice upon which to make planning decisions.
10. The Planning Obligations and Office Use Supplementary Planning Documents provide for the review of viability appraisals by an independent and suitably qualified consultant, with the costs of this review being met by the applicant.
11. On receipt of a viability appraisal, officers will undertake an initial review to ensure that all the required information and viability inputs have been provided. Where a less than policy compliant level of s106 contributions or a significant loss of office floorspace is proposed, an external consultant will be appointed to review the viability information and provide advice to the City Corporation.
12. Fee quotes will be requested from a minimum of 3 consultants who have experience and expertise in the City residential or office markets. Consultants are asked to advise of any conflict of interest and to undertake the review in accordance with RICS Codes of Conduct. Fee quotations are required to specify timescale for reporting, the methodology to be used, and cost including identifying any additional costs that might be incurred, such as review of the proposed cost programme. As the applicant is expected to meet the cost of the review, fee quotations are forwarded to the applicant for information, but it is made clear that the appointment will be made by, and the report provided to, the City Corporation.
13. Although the use of consultants who work for both developers and the City Corporation may give rise to the potential for a conflict of interest, consultants are required to abide by the RICS code of conduct and to provide impartial and expert advice. Firms generally have their own internal processes to manage any conflicts, and the City's terms of engagement can also impose requirements to address this risk.
14. Recognising that Members have some concerns over conflicts of interest where consultants work for both the Corporation and private City clients, officers have undertaken an initial review of the approach taken by other local authorities and the Mayor of London and considered the potential to widen the range of consultants used. This review is still in progress and it is too early to make firm recommendations to the Committee, but the following are being considered:
  - a. The possibility of inviting the District Valuation Service (DVS) to submit fee quotations to review viability appraisals provided by developers. The DVS is part of the Valuation Office Agency, which falls under the remit of HMRC. The DVS provides valuation and viability advice principally to public sector bodies and has provided advice to a number of local authorities on development viability, including in Southwark, Islington and for the Mayor of London. Further information is being sought.
  - b. The possible availability of the Mayor's Viability Team to provide advice and support. The Mayor has established a small team of viability advisors at City Hall to advise him on affordable housing contributions arising from

planning applications referred to him for his consideration. The Team is small and is currently unable to provide wider viability review services to the London Boroughs, but has an aspiration to expand the scope of their work.

15. Officers will continue to explore these options. Officers will also consider the experience in other local authorities. In reporting back to you on the range of service providers and options, officers will also need to ensure that arrangements for the appointment of consultants (including criteria for their appointment) are compliant with procurement requirements, are not anti-competitive, and ensure that the City can obtain best value in securing the consultancy services it requires. A report will be brought back to this Committee in the autumn recommending a proposed way forward. In the meantime, as part of its exploration of the full range of service providers, the City may consider inviting DVS to bid should the need arise to seek viability advice, subject to further discussion with them and clarification of the range of services that can be offered. Pending this further exploration, the use of consultants on the Corporation's existing list of viability advisers will continue to ensure that advice is available in a timely fashion when considering planning applications.

## **Policy**

16. Viability considerations arise both in the context of affordable housing provision/contributions (Local Plan Policy CS21), and in the context of change of use from offices, where retention of offices is considered unviable (Local Plan Policy DM 1.1). During debate on viability issues Members have expressed concerns that in allowing for consideration of viability constraints, Local Plan policy may encourage unjustified reduction of affordable housing provision/contributions or loss of offices. Opportunities for securing on-site affordable housing have also been queried. These issues are most appropriately addressed in the context of the Local Plan Review, and the concerns expressed, including about ensuring the maximum affordable housing provision/contributions are achieved, will inform the review process.
17. The Local Plan review would provide an appropriate mechanism to consider whether the City Corporation should adopt a policy of absolute disclosure of viability information. It would allow for stakeholder engagement and a full exploration of the pros and cons of such an approach.

## **Possible Member Training/Workshop**

18. Members have also indicated interest in a training session or workshop looking at viability issues to help inform future decisions. This could be in the form of training on the mechanics of viability appraisals and how they should be interpreted, and/or a more participative workshop of wider scope which also explores the procedures for undertaking reviews of such appraisals, and issues of confidentiality and interpretation of Environmental Information Regulations, including absolute disclosure of information. Members may also be interested in guidance on the relevant policies (CS21 and DM 1.1) and their application, or early discussion on potential updates to inform future work on the Local Plan

Review. Members are asked to indicate their preferred options. A training or workshop session can then be arranged to reflect the Committee's preferences, which would most likely take place in the autumn, possibly timed to accord with the proposed update report on review processes outlined above.

## **Corporate & Strategic Implications**

19. Ensuring that the City Corporation's mechanisms for dealing with viability appraisals are robust will help ensure that the City Corporation continues to provide high quality services and retain the City's role as a world leading financial and business services centre.

## **Implications**

This report is for information and there are no financial or other implications arising from the report.

## **Health Implications**

20. There are no health implications arising from this report.

## **Conclusion**

21. Viability appraisals are regularly submitted with planning applications to justify proposed levels of affordable housing and the loss of existing office accommodation, in line with requirements in the Local Plan and adopted Supplementary Planning Documents.
22. Members have asked questions about the confidentiality of viability appraisals and the process used by the City Corporation to appoint consultants to undertake reviews of submitted appraisals. As a result of these questions, officers have reviewed the current arrangements and have adjusted them to clarify to developers that the City's presumption is that viability information reports should be placed into the public arena. Knowledge of EIR's exemptions and the criteria relevant to considering confidentiality requests has been more widely shared and updated. Where it is agreed that reports should remain confidential, Committee Members have access to them.
23. In relation to the process for review of viability appraisals, officers will report back once they have explored the full range of expertise available and any appropriate adjustments to the process for appointing relevant experts. This work is still at an early stage and recommendations will be brought before a future Committee for consideration.

## **Appendices**

- None

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<b>Committee(s)</b>	<b>Dated:</b>
Planning and Transportation Committee	25 July 2017
<b>Subject:</b> Microclimate Advice Notes 2017	<b>Public</b>
<b>Report of:</b> Carolyn Dwyer, Director of the Built Environment	<b>For Information</b>
<b>Report author:</b> Annie Hampson, Chief Planning Officer and Development Director, Department of the Built Environment	

## Summary

Four Planning Advice Notes have been prepared to provide clarity of advice on potential microclimatic impacts arising from development in the City of London, and how these issues should be considered as part of the planning process. This will provide clarity to approved experts of the matters that need to be covered in their appraisals thus reducing the opportunity for uncertainty in the process and outcomes.

There are four Notes; 1.Sunlight, 2.Solar Glare, 3.Solar Convergence and 4.Wind effects and Tall Buildings. The Notes are appended to this report.

## Recommendations

Members are recommended to:

- Acknowledge the receipt of the four Advice Notes for information and that they will now be available on the website, and be used in relation to all relevant development proposals, and the potential need for further notes in the future.

## Main Report

### Background

1. The City of London Local Plan 2015 sets out the City Corporation's policies for planning the City. The Local Plan is accompanied by a number of other planning documents that provide guidance, to enable a greater understanding to users of the Plan when applying Local Plan policies. The Advice Notes on the City's microclimate fulfil this role and clarify what is required to deal with these issues in relation to individual proposals.
2. The Advice Notes contain guidance which expands on current policy on microclimate issues in the City of London Local Plan 2015, in particular CS3: Safety and Security, CS10:Design, CS14 Tall Buildings, CS15:Sustainable

Development and Climate Change, DM 10.1 New Development, DM 10.4 Environmental Enhancement and DM 10.7 Daylight and Sunlight.

3. The Advice Notes also reflect guidance in the National Planning Policy Framework (NPPF) and London Plan policy.

## **Proposals**

4. The Advice Notes will be published on the City Corporation's website and drawn to the attention of developers of proposed projects. Any future major changes to the Advice Notes will be brought back to this Committee for consideration.

## **Corporate & Strategic Implications**

5. The Advice Notes on the City's microclimate will be revised as necessary with regard to all the City Corporation's other plans and strategies, including the Corporate Plan.
6. The production of any further Advice Notes on the City's microclimate will be delivered with existing staff resources and the existing Local Risk budget. Any requirements for additional budget allocation, will be brought back to this Committee for consideration.

## **Conclusion**

7. The Members are recommended to acknowledge the four Advice Notes for information and agree the production of further notes, where appropriate.

## **Appendices**

- Appendix 1 – Advice Notes 2017

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**CITY OF LONDON**

# **Planning Advice Note**

## **Solar Convergence**

**Guidelines and best practice for assessing solar convergence in the City of London**

**July 2017**



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Carolyn Dwyer, BEng (Hons), DMS, CMILT, FCIHT

Director of the Built Environment

The City of London Corporation is the Local Authority for the financial and commercial heart of Britain, the City of London.

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## **1.0 Introduction**

This Planning Advice Note is one of a series of Advice Notes being prepared by the City Corporation covering microclimatic issues in the City of London. The Notes will provide clarity of advice on potential microclimatic impacts arising from development and how they need to be considered as part of the planning process.

Solar convergence occurs when a building, or other reflective structure such as a sculpture, focuses the sun's rays. This can cause localised areas of concentrated solar radiation which can sometimes result in safety hazards and damage. The potential for a structure to cause solar convergence should be assessed as part of development proposals at the early planning stage; this will enable applicants and architects to address any potential impact at an early phase of design and will avoid the need to retrospectively address unforeseen impacts.

This Planning Advice Note contributes to the City's key objectives to protect amenity, maintain a high quality public realm and ensure safety on the highways.

## **2.0 Policy Context**

The planning policy framework, which comprises the context for the development of the advice note, is set out below. The framework includes the documents below as well as other documents produced by the City Corporation e.g. the Public Realm Supplementary Planning Document which gives guidance on the City's street scene and public realm.

### City Corporation Corporate Plan

The overall vision seeks to support, promote and enhance the City of London as the world leader in international finance and business services. The relevant Key Policy Priority aims to support and promote the UK financial based services sector by encouraging quality developments in the built environment.

### National Planning Policy

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how they are to be applied. The NPPF establishes a presumption in favour of sustainable development and seeks to establish a strong sense of place using streetscapes and buildings to create attractive and comfortable places to live, work and visit.

### London Plan

The London Plan is the Mayor's spatial development strategy which forms part of the development plan for Greater London. The Mayor's vision is that London should excel among global cities, achieving the highest environmental standards and quality of life, and leading the world in its approach to tackling the urban challenges of the 21<sup>st</sup> century, particularly that of climate change. (Relevant London Plan policies are listed on Page 6).

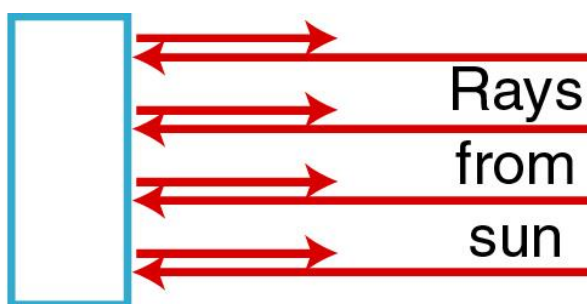
## City of London Local Plan

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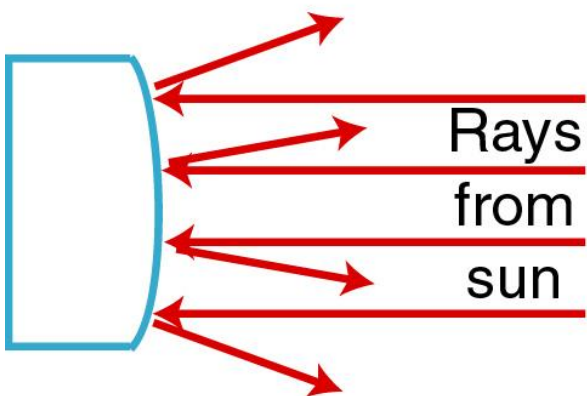
### **3.0 Guidance**

#### Causes of solar convergence

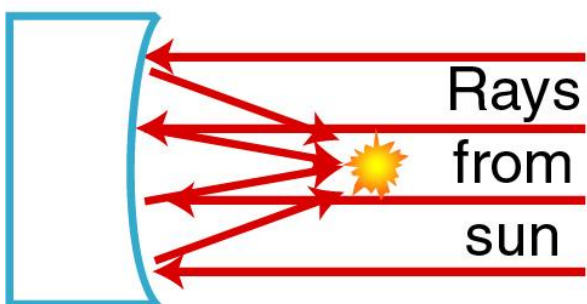
Solar convergence is very rare. Outdoors, it only happens when a reflective structure has a concave arrangement of elements which focus the sun's rays. The structure can be concave on plan, in section, or both. Flat and convex facades can still cause glare or dazzle which can be hazardous and disturbing (see the separate Planning Advice Note 'Solar glare'). But they do not concentrate the sun.



A flat face of a building or other structure reflects the sun but does not focus or concentrate it.



A convex face reflects the sun, but the reflected rays diverge; they are not concentrated and solar convergence cannot happen.



Only a concave face can focus and concentrate the sun.

The photograph shows a concave mirror focussing the sun's rays. Focussing of the sun can also happen when there are lenses. In buildings, this can sometimes happen with the old-fashioned 'bullseye' types of glass. However in this case the sun is focused inside the building, not outside.



When incorporated in a concave façade, glass and shiny metals can reflect the sun's rays towards each other, and provide a sharp focus. The amount of solar radiation reflected depends on the specular (mirror-like) reflectance of the material. Some glass types, particularly those used in highly glazed commercial buildings, reflect a lot of infra-red heat radiation to keep the building cool. Matt surfaces like brick and concrete, and non-shiny cladding, give a diffuse reflection which does not cause solar convergence issues.

### Effects of solar convergence

Solar convergence gives a relatively small area of concentrated solar radiation. Within this area, various adverse effects could occur:

- damage to people's eyes (particularly the retina), from looking at the reflected sunlight
- burns to people's skin, either directly from the radiation or from touching hot objects like metal railings or door handles
- local overheating, for example if someone is in a parked car
- damage to materials (including melting and deformation). These could include plastics, rubber, bitumen and asphalt. Plastic items can include waste bins and other street furniture, signs and parts of vehicles.
- in extreme circumstances, materials could smoulder or catch fire.

### Predicting solar convergence

If a concave reflective façade or other building element is proposed, a detailed study should be carried out to predict whether solar convergence can happen, where it occurs, and the maximum solar radiation levels. This is a specialist type of assessment and expert advice should be sought. Modelling of reflection should be carried out for the full range of days and times of year when the sun can shine on the façade.

The intensity and location of the concentrated solar radiation will depend on the curvature of the façade and its size. A smaller, heavily curved building element will concentrate solar radiation over a limited area which will be close by. A large, gradually curved façade will concentrate solar radiation over a wider area which may be some distance away. This is potentially more difficult to control.

## Recommendations of concentrated solar radiation

The amount of solar radiation is given by the irradiance, measured in kilowatts per square metre ( $\text{kW/m}^2$ ). On a sunny summer day in London, irradiances of  $0.5\text{kW/m}^2$  are common, but they never exceed  $1\text{kW/m}^2$ .

Damage to the eyes can occur at irradiances as low as  $1\text{--}1.5\text{kW/m}^2$  if people are looking at the reflecting building. These irradiances can also soften low melting point materials like plastics, bitumen and asphalt, if they are exposed for long enough. Irradiances above  $2.5\text{kW/m}^2$  can give rise to skin damage and burns, within 30 seconds of exposure. Much higher irradiances, above  $10\text{kW/m}^2$ , are needed for common materials like timber, plastic, fabrics and paper to catch fire.

Overall, it is recommended that no area, even at roof level, should receive a solar irradiance of  $10\text{kW/m}^2$  or above. Areas where people are likely to be present (including windows to occupied rooms) should not receive a solar irradiance of more than  $2.5\text{kW/m}^2$  for more than 30 seconds. For areas at street level where people are present, areas with reflected irradiances above  $1.5\text{kW/m}^2$ , and preferably those above  $1\text{kW/m}^2$ , should be minimised.

## Avoiding solar convergence

At the design stage, it is possible to avoid solar convergence by reconfiguring the building or structure. For example, the problem can be avoided entirely by replacing a concave reflecting element with a flat or convex one.

If a concave element is still required, it may be possible to redesign it so that the convergence occurs in mid-air, or in an inaccessible location; or to limit the amount of concentrated solar radiation by reconfiguring individual façade components so that a sharp focus is avoided. Careful modelling of the reflected solar radiation is needed to check that the solution works.

Another way to avoid solar convergence is to use matt or diffusing materials instead of mirror-like ones like glass and shiny metal. It is also possible to use low reflectance glazings; these should have a low reflectance in the infra-red as well as the visible spectrum.

Once the building or structure is up, solar convergence is more difficult to control. If it occurs over a limited area, it may be possible to control access to this area, at least during the days and times when sunlight is predicted to be reflected there. Another solution is the installation of external shading like louvres and fins, or motorised external blinds, to intercept the sunlight and stop it being reflected. These measures can provide additional benefits such as reducing overheating in buildings.



## 4.0 Contacts

Please phone the General Planning Enquiries desk for information on solar convergence issues.

Phone: 020 7332 1710

Email: [plans@cityoflondon.gov.uk](mailto:plans@cityoflondon.gov.uk)

Contact Address:

Department of the Built Environment

Guildhall

PO Box 270

London

EC2P 2EJ

## 5.0 Policies

### Relevant London Plan policies relating to the microclimate

5.3 Sustainable Design and Construction

7.5 Public Realm

7.6 Architecture

7.7 Location and Design of Tall and Large Buildings

### Relevant City of London Local Plan policies relating to the microclimate

CS 3 Safety and Security

CS 10 Design

CS 14 Tall Buildings

CS 15 Sustainable Development and Climate Change

DM 10.1 New Development

DM 10.4 Environmental Enhancement

DM 10.7 Daylight and Sunlight

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**CITY OF LONDON**

# **Planning Advice Note**

## **Solar Glare**

**Guidelines and best practice for assessing solar glare in the City of London**

**July 2017**



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Carolyn Dwyer, BEng (Hons), DMS, CMILT, FCIHT  
Director of the Built Environment  
The City of London Corporation is the Local Authority for the financial and commercial heart of  
Britain, the City of London.

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should not be reproduced without permission.**



## **1.0 Introduction**

This Planning Advice Note is one of a series of Advice Notes being prepared by the City Corporation covering microclimatic issues in the City of London. The Notes will provide clarity of advice on potential microclimatic impacts arising from development and how they need to be considered as part of the planning process.

Solar glare or dazzle can occur when sunlight is reflected from a glazed façade or area of metal cladding. This can affect road users and train drivers, and the occupants of nearby buildings. When drivers are blinded, even momentarily, by dazzle from a reflective building this is a serious safety issue.

Solar glare impact should be assessed as part of development proposals at the planning stage; this will enable applicants and architects to address the potential for solar glare at an early phase of design and will avoid the need to retrospectively address unforeseen impacts.

This Planning Advice Note contributes to the City's key objectives to protect amenity, maintain a high quality public realm and ensure safety on the highways.

## **2.0 Policy Context**

The planning policy framework, which comprises the context for the development of the advice note, is set out below. The framework includes the documents below as well as other documents produced by the City Corporation e.g. the Public Realm Supplementary Planning Document which gives guidance on the City's street scene and public realm.

### City Corporation Corporate Plan

The overall vision seeks to support, promote and enhance the City of London as the world leader in international finance and business services. The relevant Key Policy Priority aims to support and promote the UK financial based services sector by encouraging quality developments in the built environment.

### National Planning Policy

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how they are to be applied. The NPPF establishes a presumption in favour of sustainable development and seeks to establish a strong sense of place using streetscapes and buildings to create attractive and comfortable places to live, work and visit.

### London Plan

The London Plan is the Mayor's spatial development strategy which forms part of the development plan for Greater London. The Mayor's vision is that London should excel among global cities, achieving the highest environmental standards and quality of life, and leading the world in its approach to tackling the urban challenges of the 21<sup>st</sup> century, particularly that of climate change. (Relevant London Plan policies are listed on Page 8).

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### **3.0 Guidance**

#### Types of solar glare

There are two types of reflected glare problem that can occur. Discomfort glare causes visual discomfort without necessarily affecting the ability to see. Disability glare happens when a bright source of light (such as the reflected sun) impairs the vision of other objects. The bright light is scattered in the eye, making it harder to see everything else.

Outdoors, disability glare is easily the more serious problem, as it can affect motorists' ability to drive safely. It is especially important at locations where a driver has to make a key decision, for example approaching a road junction, traffic signal or pedestrian crossing. It can also affect train drivers, particularly if they are looking at illuminated signals.

In principle, disability glare can also cause problems for pedestrians, especially if they are looking along a road before crossing it, and fail to see an oncoming vehicle because of the glare of the sun in their direct line of sight. In general, though, disability glare to pedestrians is less likely to cause accidents, because they have more time to react and can more easily take avoiding action such as shielding their eyes from the reflection, or moving backwards out of the path of the reflected beam.

Discomfort glare is a less dangerous problem because it does not impair the ability to see. It can be important where work involves continuous viewing of the outdoor space from a fixed vantage point, for example in security surveillance. Inside a building where glare could be an issue, shading devices such as blinds or curtains are generally provided, and occasional discomfort glare can easily be controlled using them. In such spaces, discomfort glare due to reflected sun would be a significant issue if it happened so often that people needed to use blinds and curtains over long periods.

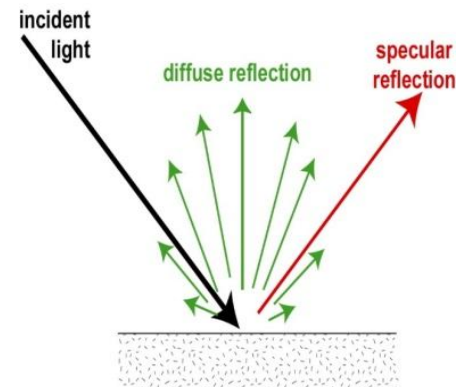


## Causes of solar glare

Solar glare can occur either when there are large areas of reflective glass or cladding on the façade, or when there are areas of glass or cladding which slope back so that high altitude sunlight can be reflected along the ground. Photovoltaic panels tend to cause less glare because they are designed to absorb light.

The severity of glare depends on the type of glazing or cladding. The glare caused depends on the specular reflectance of the glazing. This is the mirror-like direct reflection of sunlight. For glasses, the reflection is nearly all specular. Metals often combine specular reflection with diffuse reflection (where the reflected light is scattered in all directions). Surfaces like brick or matt cladding give mainly diffuse reflection, which is unlikely to cause disability glare.

It is therefore possible to reduce reflected glare by choosing glazing or cladding with a low specular reflectance. For glare, the visible light reflectance is important, rather than the total solar reflectance. Glass manufacturers quote the reflectance at normal incidence, with the sun assumed to be directly opposite the façade. Under these circumstances, standard low emissivity double glazing has a specular reflectance of around 13%, which can be enough to cause glare. Solar control glasses used to reduce overheating in buildings can have higher reflectances, typically in the 15-40% range.

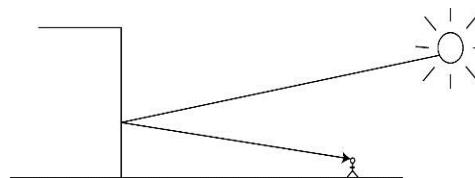


When the sun reaches the building at a glancing angle, more of it is reflected. For clear double glazing, the reflectance rises to 15% if the sun is at 45 degrees to the glazing, 22% at 60 degrees, and 49% at 75 degrees. Glare also depends on the angle of the sun and the angle at which the building is viewed.

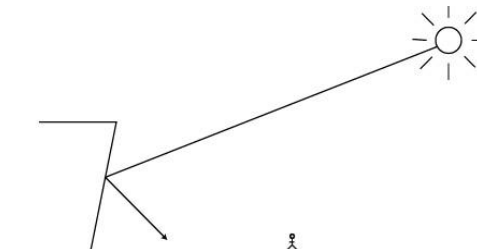
For motorists in particular, disability glare is most likely when the reflected sun is directly in the field of view and close to their direction of vision. Glare sources off to one side, or above the observer, are less likely to cause disability glare. Usually, glare sources at more than 25 degrees to the line of sight can be discounted. The worst problems occur when drivers are travelling directly towards the building, and sunlight can reflect off surfaces in the driver's direct line of sight. Usually this will be off the lower parts of the building.

If the glazing is flat and well maintained, the intensity of solar glare does not decrease substantially with distance unless the window is small. If the window is small and viewed from a long way away, it will not reflect the whole of the sun's disk, which will reduce the intensity of glare. The duration of time for which glare can occur generally decreases with distance, but even a short duration might be enough to cause an accident.

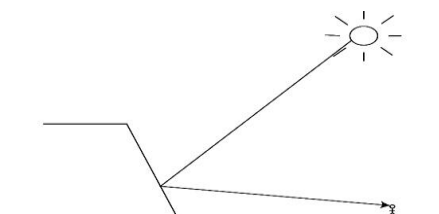
The slope of the glass is important. With a vertical façade, the worst disability glare normally occurs when the sun is low in the sky.



A façade that slopes forward, so that the top of the building forms an effective overhang, is unlikely to cause significant reflected solar glare.



A façade or canopy that slopes back from the vertical can reflect high angle sun along the ground. This is of particular concern as motorists will not be expecting it, the high angle sun is brighter, and the sun is less likely to be intercepted by other buildings before it reaches the glass.



The photo to the left shows reflection of sunlight at the bottom of a sloping façade. The sun was high in the sky when the picture was taken. Flat facades reflect the sun without concentrating it. Facades which are concave can focus the sunlight and create areas of concentrated solar radiation. A separate Planning Advice Note 'Solar Convergence' gives advice on this issue.

### Assessment of solar glare

New buildings with extensive areas of glazing, highly reflective glass or metal cladding, or areas of sloping glass may present a risk of solar glare if they are visible from roads or railways. The exact scale of the problem should be evaluated at the planning stage. Solar glare is a specialist issue and expert advice should be sought.

The first stage in the assessment is to identify key locations from which the building could be seen and where solar glare could be an issue. These could include road junctions, traffic lights, pedestrian crossings and railway lines at the approach to signals. The most important locations are those where drivers will be travelling directly towards the building; glare is much less likely

if the building is well to one side of the field of view. Normally, one way streets where traffic is going away from the building need not be analysed, unless there are side roads joining them where drivers will have to look up the street to check if it is safe to proceed.

The choice of viewpoints should take into account potential future developments near to the proposed reflective façade. In most cases, future buildings would be expected to block the sun's rays and reduce the potential for glare from a specific proposed development. However, if nearby buildings are to be demolished prior to new ones being constructed, there could be a period of time when the proposed development would be visible over the demolition site, and reflected glare might result.

The next stage is to work out whether sunlight can be reflected to these viewpoints, and if so at which times of year. A BRE Information Paper IP 3/87 '*Solar dazzle reflected from sloping glazed facades*' (IHS BRE Press, Bracknell, 1987) gives details on how to carry out the calculations. Sometimes a façade, especially a north facing one, may only reflect the sky or other buildings, and not direct sunlight.

Where solar reflection can happen, the next step is to calculate the angle between the driver's line of view and the reflected sun. For vertically mounted clear double glazing facing the driver, solar dazzle could be a significant issue if this angle is less than 10 degrees. With a sloping façade (reflecting bright sun from high in the sky), or high reflectance glazing or cladding, solar dazzle might be a problem at higher angles of view as well. Sunlight that reflects off the façade at a glancing angle might also be bright enough to cause problems at higher angles of view.

If the reflected sun would be visible close to the driver's line of sight, then either a more detailed calculation of solar glare is required, or measures should be taken to reduce the glare (see below).

The assessment method above covers disability glare to motorists or train drivers. Discomfort glare is less important, but should be considered if there are locations nearby for which glare could be an issue, and sunlight could be reflected there for a significant duration. These could include offices, schools, hospitals and security posts. Reflected glare is likely to be more of a concern for north facing windows which may be unshaded, and less important for windows which already receive direct sunlight for much of the year and where blinds may be lowered most of the time.

For discomfort glare, the key issue is the total duration of time for which the sun can be reflected to the sensitive location. Durations of less than 50 hours per year are unlikely to cause serious problems, except in very sensitive locations. Longer durations of reflection could result in significant discomfort glare issues depending on the type of space, the height of the reflected sun (low angle sun usually presents the most problems), whether shading devices are already in use, and the way the space is used. If people have fixed workstations facing the window (for example, receptionists or security staff) they will be more susceptible to glare.

## Mitigation measures

At the design stage, solar glare can be remedied in various ways:

- By reducing areas of glazing, using matt cladding instead.
- Reorienting elements of the building to avoid reflection.
- Replacing areas of tilted glass by either vertical or nearly horizontal glazing.
- Changing the glazing or cladding to a less reflective type. Special low reflectance glass is available.
- Using low reflectance film or fritting (a ceramic coating on the glass).
- Using sandblasted or other diffusing glass, for example for balustrades.
- External shading such as louvers or motorised blinds. Vertical fins may be effective in situations where the sun is reflected off a building at a glancing angle.
- Some form of opaque screening at street level, though this will usually need to be large.
- Planting trees, though the type of tree will depend on the times of year when glare occurs. Glare may occur in the winter when deciduous trees will not be in leaf.
- Where discomfort glare is an issue, providing shading devices in the affected building or other location (such as a canopy above a security post).

These mitigation measures can provide additional benefits such as reducing overheating in buildings, improved carbon reduction and resilience to climate change.



## 4.0 Contacts

Please phone the General Planning Enquiries desk for information on solar glare issues.

Phone: 020 7332 1710

Email: [plans@cityoflondon.gov.uk](mailto:plans@cityoflondon.gov.uk)

Contact Address:

Department of the Built Environment

Guildhall

PO Box 270

London

EC2P 2EJ

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7.5 Public Realm

7.6 Architecture

7.7 Location and Design of Tall and Large Buildings

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DM 10.4 Environmental Enhancement

DM 10.7 Daylight and Sunlight

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**CITY OF LONDON**

# **Planning Advice Note**

## **Sunlight**

**Guidelines and best practice for assessing  
sunlight in the City of London**

**July 2017**



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Carolyn Dwyer, BEng (Hons), DMS, CMILT, FCIHT

Director of the Built Environment

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## **1.0 Introduction**

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In the City of London, sunlit open spaces are at a premium, but are highly valued by workers, residents and visitors to the City. Many of the City's open spaces are small, so are especially vulnerable to overshadowing by buildings. In the UK climate, the warmth of the sun increases the duration of time for which it is comfortable to sit outside and the bright light improves the visual appeal of outdoor spaces. These factors encourage people to spend more time outdoors which in turn makes the City a more vibrant and popular place to be.

Providing and safeguarding sunlight to open spaces should be incorporated into design proposals at the earliest stage and the impact on sunlight should be assessed as part of the development planning process.

This Planning Advice Note contributes to the City's key objectives to protect amenity and maintain a high quality public realm.

## **2.0 Policy Context**

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## **3.0 Guidance**

### Context

In the City of London, sunlit open spaces are at a premium due to the dense urban fabric, but they are highly valued by urban dwellers. Many of the City's open spaces are small, so they are especially vulnerable to overshadowing by buildings. This planning advice note should be read in conjunction with The City of London Open Space Strategy Supplementary Planning Document.

Recent research has highlighted the health benefits of sunlight. Bright light during the day helps synchronise the body clock, improving sleep patterns. The UV rays in outdoor sunlight generate Vitamin D, essential for healthy bones. Exposure to bright light as children grow helps avoid the risk of them developing short-sightedness.

Sunlight also has an important effect on mood. Sunlit spaces are perceived as more attractive and pleasant to spend time in. In the UK climate, the warmth of the sun increases the duration of time for which it is comfortable to sit outside. The bright light from the sun also improves the visual appeal of outdoor spaces and the city as a whole. All these factors encourage people to spend more time outdoors, which in turn makes the City a more vibrant and popular place to be.

Sunlight has important practical benefits, too. It can dry out the ground, reducing moss and slime, and melt frost, ice and snow. It enables a much wider range of plants, especially flowering plants, to grow.



### Types of open space

Sunlight availability should be assessed for all of the following types of space (existing or proposed):

- gardens (this need not include small front garden areas if the dwelling or block of dwellings has another, larger garden)
- roof terraces used for sitting outside and for growing plants
- public gardens and parks
- children's playgrounds, including school playgrounds
- sitting out areas such as those between non-domestic buildings and in public squares
- outdoor seating areas for cafes and bars
- focal points for views such as a group of monuments or fountains.



Each of these spaces will have different sunlighting requirements depending on the time of day and the time of year they are used. A sunlit balcony is an attractive amenity, but it may not be possible to have well sunlit balconies everywhere, especially if dwellings are north facing or there are tall buildings to the south.

Although it is often good to walk in the sunshine, sunlight is less essential in circulation areas like streets and pedestrian footpaths. In a heavily built up area like the City of London a typical street will only receive sunlight at certain times of day, depending on its orientation.

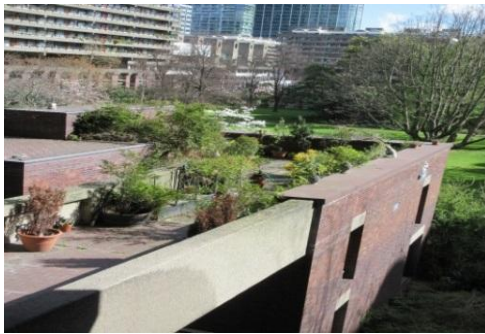
### Providing sunlit open spaces

Various techniques can be used to improve sunlight to proposed open spaces, and retain as much as possible in existing spaces. The sunlit nature of a site can be enhanced by siting low rise buildings to the south, with taller, higher density buildings to the north, although this may not be desirable if there is housing or an existing open space to the north. Special care needs to be taken in the design of courtyards as often they can turn out to be sunless and unappealing. Opening out courtyards to the southern half of the sky will improve sunlight within them.



However, open spaces will be more peaceful and less polluted if they are protected from busy roads. On hot days in summer, some shade is welcome. Deciduous trees are a good way to provide this, as they will not be in leaf in winter, when sunlight is at a premium.

Where sunlight is restricted at ground level, a roof garden or terrace can provide an attractively sunlit amenity space. Sometimes these gardens have high walls or opaque screens around them for safety and privacy reasons. A clear screen or railings give better sunlight access, especially if the rooftop amenity space is small.



In mixed use developments, gardens and public and private open spaces can be provided on top of the commercial elements of the development. In or near developments with tall buildings, it is important to consider the wind environment in open spaces.

### Amount of sunlight

Guidance on sunlight provision is given in the BRE Report 'Site layout planning for daylight and sunlight: a guide to good practice'. It recommends that a space where sunlight is required should receive at least two hours of sun over at least half its area on 21 March. Where there are individual private gardens for each dwelling in a block, they should be considered separately. Sunlight at an altitude of 10 degrees or less does not count, because it is likely to be blocked by planting or other obstructions anyway.

BRE publish sun on ground indicators that can be used to predict the areas which can and cannot receive two or more hours of sunlight on 21 March. Computer software is also available which can do this. The computer generated plan example (right) shows four open spaces in an urban area with tall buildings. The areas with less than two hours sunlight on March 21 are shown in blue and areas with more than two hours sunlight are shown in yellow.

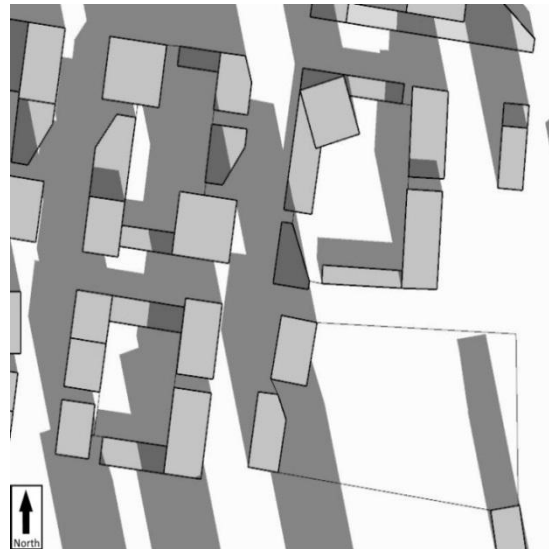


Normally trees and shrubs need not be included in the calculation, partly because the dappled shade of a tree is more pleasant than the deep shadow of a building. However locations for tree planting should be chosen with care. The aim should normally be to have some areas of partial shade under trees while leaving other parts of the garden or amenity area in full sun. This will become more important as we experience warmer summers and more frequent heat-waves in future as our climate changes. Walls or solid fences more than 1.5 metres high should be included in the calculation.

The BRE guidance applies both to new gardens and amenity areas and to existing ones which are affected by new developments. If an existing garden or outdoor space is already heavily obstructed then any further loss of sunlight should be kept to a minimum. If less than half the space receives two or more hours of direct sunlight on 21 March, and a new development reduces that area to less than 0.8 times its former size, then this loss of sunlight is significant. The garden or amenity area will tend to look more heavily overshadowed.

### Shadow plotting

For critical areas, particularly in public open spaces or for large developments, it is suggested that a more detailed study of sunlighting potential be carried out. This involves producing plans showing the location of shadows at different times of day and year. Computer software may be used to plot the shadows. Where there are existing open spaces, 'before' and 'after' shadow plots showing the difference that the proposed building makes may be helpful. In interpreting the impact of such differences, it must be borne in mind that nearly all structures will create areas of new shadow, and some degree of transient overshadowing of a space is to be expected.



If a space is used all year round, the equinox (21 March) is the best date for which to prepare shadow plots as it gives an average level of shadowing. Lengths of shadows at the autumn equinox (September 21) will be the same as those for March 21, so a separate set of plots for September is not required. However clock times of the September shadows will be one hour later, because British Summer Time (BST) will be in force. Shadow plots should state clearly whether the time of the plot is in Greenwich Mean Time (GMT) or BST. BST is currently in force from April to October inclusive.

As an optional addition, plots for summertime (for example 21 June) may be helpful as they will show the reduced shadowing then, although it should be borne in mind that June 21 represents the best case of minimum shadow, and that shadows for the rest of the year will be longer. Conversely if winter shadows (for example December 21) are plotted, even low buildings will cast long shadows. In a built up area like the City, it is common for large areas of the ground to be in shadow in December.

If a particular space is only used at certain times of day or year (for example a café, outdoor performance area or school playground) it is instructive to plot shadows for those specific times.

### Heavily shadowed spaces

Where sunlight is limited, the use of open spaces within the development can be planned with sunlight in mind. The sunniest areas can be earmarked for gardens and playgrounds, while areas with little sun can be used for cycle parking or circulation. For example, if a long face of a building faces close to due north then there will be an area adjoining the building which is permanently in shade for much of the year. Such areas could be reserved for uses like circulation or cycle parking.

If areas within a space can only receive sunlight for limited periods, it is better if different parts of the space can receive sunlight at different parts of the day (rather than the entire space being in shade for a large proportion of the time). Under these circumstances seating and other facilities could be spread over the different areas, so that people can sit in those areas that are temporarily in the sun.



Where possible, playgrounds should be situated in well sunlit areas, with some shade available for protection from the sun on very hot days. If only a shady space is available, the play equipment must be well maintained, and it is better to use AstroTurf or other artificial ground materials instead of grass. Even then, the playground may end up being underused compared to similar facilities in sunny locations.

In shady areas planting needs to be chosen with care. The Royal Horticultural Society defines areas with less than two hours sun per day as 'deep shade' where only a limited number of shade tolerant plant species will go. Paving and other hard surfaces will be more durable than grass, especially in areas with pedestrian traffic, though suitable drainage is needed.

Where a space is almost completely sunless, consider roofing it over to provide a sheltered atrium type space.



## 4.0 Contacts

Please phone the General Planning Enquiries desk for information on sunlight issues.

Phone: 020 7332 1710

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## 5.0 Policies

### Relevant London Plan policies relating to the microclimate

5.3 Sustainable Design and Construction

7.5 Public Realm

7.6 Architecture

7.7 Location and Design of Tall and Large Buildings

### Relevant City of London Local Plan policies relating to the microclimate

CS 3 Safety and Security

CS 10 Design

CS 14 Tall Buildings

CS 15 Sustainable Development and Climate Change

DM 10.1 New Development

DM 10.4 Environmental Enhancement

DM 10.7 Daylight and Sunlight

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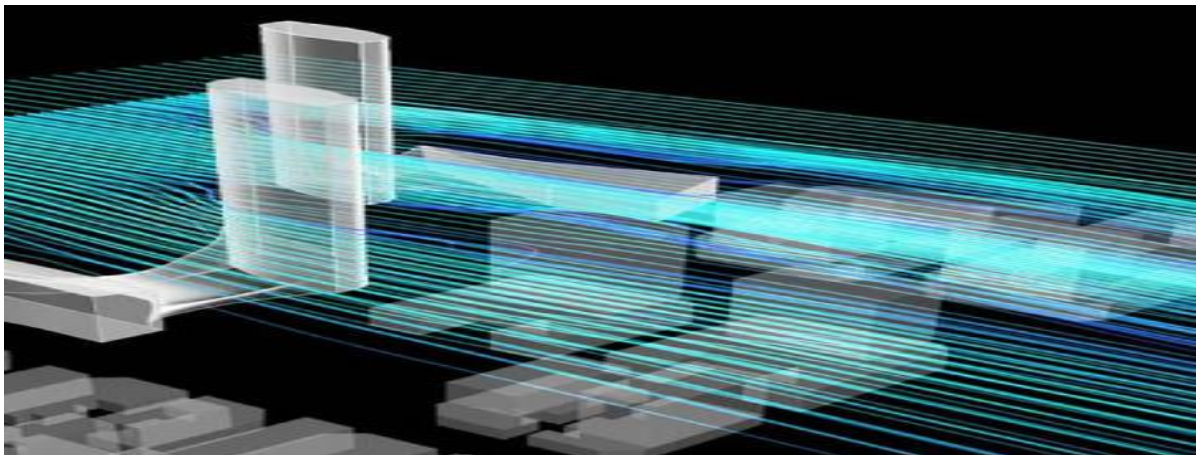
**CITY OF LONDON**

# **Planning Advice Note**

## **Wind effects and tall buildings**

**Guidelines and best practice for assessing  
wind effects and tall buildings in the City of  
London**

July 2017



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Director of the Built Environment

The City of London Corporation is the Local Authority for the financial and commercial heart of Britain, the City of London.



Prepared by RWDI exclusively for the City of London

## **1.0 Introduction**

This Planning Advice Note is one of a series of Advice Notes being prepared by the City Corporation covering microclimatic issues in the City of London. The Notes will provide clarity of advice on potential microclimatic impacts arising from development and how they need to be considered as part of the planning process.

The wind tunnel effect can occur where there are a cluster of tall buildings. Narrow areas or proximity between buildings creates low pressure causing the wind to accelerate at the base of buildings and around corners of buildings. Buildings with large frontages tend to be ones that are most sensitive to wind issues. This can cause localised wind issues and can sometimes result in safety hazards and uncomfortable wind conditions for pedestrians and cyclists. The potential for new buildings to create hazardous wind conditions should be assessed as part of the development proposal at the early planning stage; this will enable architects to address any potential impact at an early phase of design and will avoid the need to retrospectively mitigate adverse wind impacts.

This Planning Advice Note contributes to the City's key objectives to protect amenity, maintain a high quality public realm and ensure safety on the highways.

## **2.0 Policy Context**

The planning policy framework, which comprises the context for the development of the advice note, is set out below. The framework includes the documents below as well as other documents produced by the City Corporation e.g. the Public Realm Supplementary Planning Document which gives guidance on the City's street scene and public realm.

### City Corporation Corporate Plan

The overall vision seeks to support, promote and enhance the City of London as the world leader in international finance and business services. The relevant Key Policy Priority aims to support and promote the UK financial based services sector by encouraging quality developments in the built environment.

### National Planning Policy

The National Planning Policy Framework (NPPF) sets out the Governments planning policies for England and how they are to be applied. The NPPF establishes a presumption in favour of sustainable development and seeks to establish a strong sense of place using streetscapes and buildings to create attractive and comfortable places to live, work and visit.

## London Plan

The London Plan is the Mayor's spatial development strategy which forms part of the development plan for Greater London. The Mayor's vision is that London should excel among global cities, achieving the highest environmental standards and quality of life, and leading the world in its approach to tackling the urban challenges of the 21<sup>st</sup> century, particularly that of climate change. (Relevant London Plan policies are listed on Page 7).

## City of London Local Plan

The Local Plan was adopted in 2015, and provides a spatial framework that brings together and co-ordinates a range of strategies prepared by the City Corporation, its partners and other agencies and authorities. The strategic objectives of the Plan include maintaining the City's position as the world's leading international financial and business centre, and seeking to promote a high quality of architecture and street scene appropriate to the City's position at the historic core of London. (Relevant Local Plan policies are listed on Page 7).

### **3.0 Guidance**

#### When to carry out wind assessments

Buildings proposed on exposed sites with large frontages to southwest or northeast tend to be the ones that are most sensitive to wind issues. Also, building near frequently used areas (e.g. train stations) or those that may be used by vulnerable pedestrians (e.g. hospitals and schools) require careful attention. Therefore a degree of judgement has to be exercised, but the following general advice can provide a guideline for typical office or residential buildings. At the early stage of developing a scheme, bulk, height and massing options for the site need to be thoroughly assessed to avoid the need for retrospective mitigation measures.

<b>10 to 14 Storeys</b>	<b>Desk-Based Assessment</b> <b>(see Appendix 1)</b>
<b>14 to 20 Storeys</b>	<b>Desk-Based Assessment + Computational (CFD) Simulations*</b> <b>(see Appendix 2)</b>
<b>Above 20 Storeys</b>	<b>Early Stage Wind Tunnel Testing + More Detailed CFD and/or Testing in Detailed Design</b> <b>(see Appendix 3)</b>

(\*) If the Computational Fluid Dynamics (CFD) study indicates the possibility of safety conditions, wind tunnel tests should be carried out to quantify and confirm the effectiveness of mitigation measures.

These guidelines have been prepared with the understanding that the average height of buildings in the City of London is approximately 6-8 storeys except in the eastern cluster where tall buildings are prevalent. Public spaces at high levels (e.g. terraces) fall into the same guidelines as above. Intelligent parapet and landscape design could be used to improve wind conditions on terraces.

### Requirements of microclimate studies

The following items are the basic minimum requirements for any type of wind microclimate study;

- 1) Use of Lawson Criteria (LDDC version) to present the results, as shown in Table 1 below,
- 2) Consideration of minimum of 16 wind directions, and not just the prevailing south-westerly components,
- 3) Combination of long-term London weather statistics (ideally through processing at least 10 years of good quality weather data) with local wind flows obtained from wind tunnel tests or CFD,
- 4) Consideration of mean AND gust speeds, and reporting of both winter and summer conditions,
- 5) On a major scheme where it is anticipated there will be major issues, a separate wind tunnel and CFD analysis should be commissioned from two separate consultants. This is to ensure there is a robust assessment as possible. Every part of the public realm should be tested including roadways and open spaces.
- 6) Careful assessment and description of expected pedestrian uses (sitting, standing, walking, etc.) in different parts of the site,
- 7) Clear indication of mitigation requirements (size, location, porosity, etc.) with photos of wind tunnel models, sketches of proposed measures with dimensions and location plans.

The first five items relate to the technical quality and robustness of the study. Items 6 to 7 allow clear understanding of the impacts by planners, and are therefore as critical as the technical aspects.

**Table 1. Lawson’s LDDC criteria.**

Comfort Category	Threshold *	Description
Sitting	0-4 m/s	Light breezes desired for outdoor restaurants and seating areas where one can read a paper or sit for long periods.
Standing	4-6 m/s	Gentle breezes acceptable for main building entrances, pick-up/drop-off points and bus stops.
Strolling	6-8 m/s	Breezes that would be appropriate for window shopping and strolling along a city/town centre street, plaza or park.
Business Walking	8-10 m/s	High speeds that can be tolerated if one’s only objective is to walk, run or cycle without lingering.
Uncomfortable	>10 m/s	Winds of this magnitude are considered a nuisance for most activities, and wind mitigation is required.

Safety Category	Threshold **	Description
Unsafe	>15 m/s	Winds above this threshold will pose safety risks, particularly for more vulnerable pedestrians (elderly, cyclists, etc.).

(\*) Comfort threshold is set for the wind speed that is exceeded 5% of the time from all wind directions.

(\*\*) Safety threshold is set for the wind speed exceeded once a year (0.022% of the time) from any wind direction.

**Mitigation Options**

A cluster of tall buildings can offer shelter to one another and push the windy areas to the edge of the cluster. This is not unlike a group of penguins sheltering one another in winter.



Therefore the tall exposed buildings at the edge of a cluster will be most problematic from a microclimate perspective. Buildings proposed on the southwest edge of the cluster will be particularly exposed to the prevailing south-west winds, and those on the northeast edge will be exposed to the cold north-easterly winds.

For very tall towers, it is necessary to require wind studies at a very early stage of design to ensure that the adverse wind effects can be mitigated through positive massing adjustments.

- **Massing Modifications:** Most effective form of mitigation for wind effects, but requires very early-stage input from a qualified wind engineer. The City requires that any wind mitigation measures should be incorporated on the building as opposed to on the public realm.



The following building appendages can be effective forms of mitigation, but can also have substantial architectural and planning impacts;



- **Canopies:** Solid canopies are effective against down drafted winds, porous canopies tend to be effective against funnelled or skew winds. They require projection rights. Canopies of over 5m cantilever size may also require substantial structural support.
- **Porous Screens Attached to Buildings:** These are most effective when placed near buildings corners or near entrances, to reduce local flow speeds. Also used on the soffit of passageways. Size of screen needs to be comparable to the size of the area to be sheltered, and hence typically applied for small localized problems.
- **Fins:** Regular pattern of fins/sunshades on an entire facade will be ineffective, as the main flow skips over the fins, with small-scale circulations created between each fin.



Therefore they are most effective at ground-level, to offer localized reduction in surface-level wind speeds. They can create pockets where rubbish gather, or cause security concerns. It is preferable to mitigate wind problems through good architectural design, but in some instances the resulting architectural or financial impacts can be substantial. In rare cases, where there are no alternatives, mitigation measures may be acceptable on the ground, as follows;

- **Trees and hedges:** Much like the penguin effect described previously, trees and hedges are most effective when grouped together to create a meaningful obstacle to wind. They can be highly effective in reducing wind speeds on the ground, but need to be semi-mature when planted and continuously maintained. **Height and crown size of trees need to be stated in any microclimate assessment, and the planted trees should be sized accordingly.** Evergreen trees are more effective than deciduous counterparts, but London's climate tends to be more suited to deciduous tree types.
- **Public Art/Porous Screens On the Ground:** Often taking the form of art features, porous screens can serve a similar purpose to trees, but require minimal maintenance.



## 4.0 Contacts

Please phone the General Planning Enquiries desk for information on wind effects and tall building issues.

Phone: 020 7332 1710

Email: [plans@cityoflondon.gov.uk](mailto:plans@cityoflondon.gov.uk)

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## 5.0 Policies

### Relevant London Plan policies relating to the microclimate

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7.7 Location and Design of Tall and Large Buildings

### Relevant City of London Local Plan policies relating to the microclimate

CS 3 Safety and Security

CS 10 Design

CS 14 Tall Buildings

CS 15 Sustainable Development and Climate Change

DM 10.1 New Development

DM 10.4 Environmental Enhancement

DM 10.7 Daylight and Sunlight

## Appendix 1 – Desk Studies

A qualified wind engineer with over 5 years of wind tunnel experience will be able to identify the key wind-related problems in an early-stage desk study. These studies involve the following;

- Knowledge of the prevailing wind climate in London,
- Evaluation of proposed building massing with respect to the neighbouring buildings and prevailing wind directions,
- Consideration of intended pedestrian uses at the site.

This information will be used by the wind engineer to predict the general flow pressure fields around the site, based on his/her experience of testing similar schemes using the wind tunnel or CFD. Downdrafts, funnelling, wise effect, horse-shoe vortices and other critical flow features can often be predicted. Flow features and windy areas should be graphically represented (as illustrated below) and suggestions for mitigation options or further wind studies should be clearly stated in the desk study report.

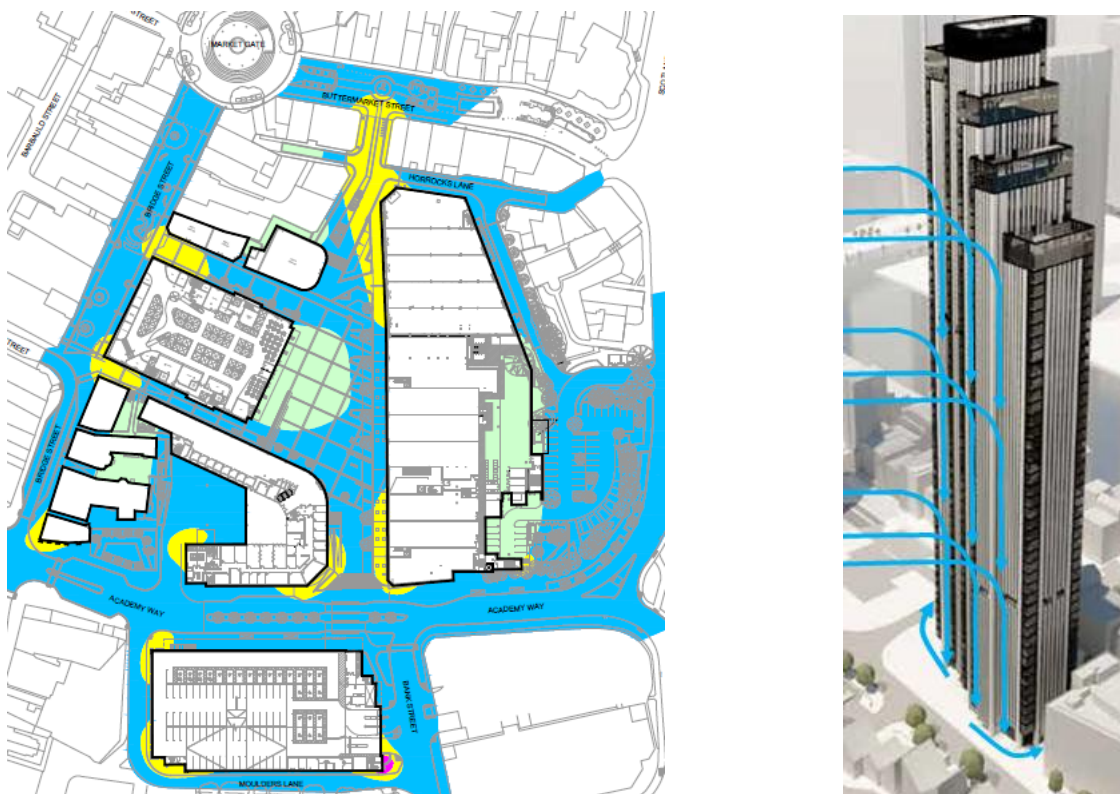


Figure 1.1

- (a) Typical contour plot from a desk study indicating the comfort levels using Lawson LDDC criteria.  
(b) Main flow features expected around a tower, simplified in a desk study.

## Appendix 2 –Desk Studies Enhanced With CFD

Computational Fluid Dynamics (CFD) is an emerging tool that can provide a good understanding of wind flows around a development. While CFD can reliably predict mean flows, it does not always provide a good prediction of gusts which can be important for pedestrian safety.

When the capabilities of CFD are used by an experienced wind engineer, it is possible to highlight critical wind issues, provide initial predictions of comfort conditions, and also spot areas where CFD simulations may not fully represent the reality. CFD results can either be used to provide visual representations of the predominant flow patterns, or be combined with long-term weather statistics in the same way as wind tunnel data to provide Lawson comfort ratings.

Ideally CFD studies would include direct representation of gusts, but this is often very costly and time consuming to achieve. So in areas where turbulence may be important (e.g. in the wake regions behind buildings, or areas with funnelling) care should be taken when interpreting CFD results. For buildings above 25 storeys it is preferable to carry out unsteady (transient) CFD simulations.

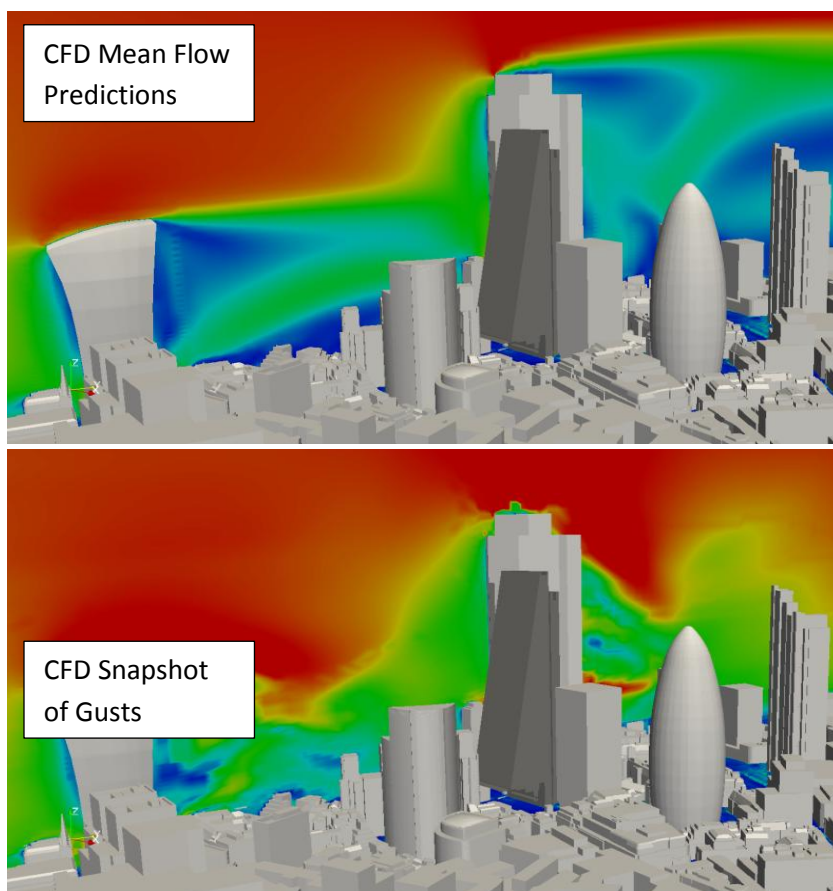


Figure 2.1

- (a) Typical mean-flow prediction by CFD (RANS analysis).
- (b) Prediction of gusts using CFD (LES analysis, snapshot in time).

### Appendix 3 – Wind Tunnel Studies

Wind tunnel studies are the most established tool for evaluating wind effects, as they have been in use for over 50 years. It can also be the most effective tool if multiple configurations need to be tested for a full range of wind directions, or if multiple tests are required to develop mitigation options. Nevertheless, there are certain aspects of wind tunnel testing which require careful attention in order to ensure that the results are fully representative.

The wind tunnel test involves the use of discrete sensors to measure local wind speeds. The placement of these sensors should be done with care, to capture the windiest parts of the site, as well the most frequently used (e.g. entrances, main walking routes, etc.). Around building corners it is advised to place a minimum of two to three sensors to adequately capture the accelerated flow effects for all wind directions.

The data from the wind tunnel provides an understanding of local building-induced effects, but to obtain Lawson comfort ratings the wind tunnel data needs to be combined with weather statistics. This is not a trivial task, as 10 or more years of data from reliable sources (generally airports) need to be carefully filtered, and statistically analysed to provide the necessary information (typically probability functions, using Weibull coefficients) for a robust analysis. Amalgamated sample-year data from sources such as CIBSE – which are not calibrated for wind effects – should not be used.

Finally, whether a wind tunnel study is used or not, the true effects of wind on the development need to be very clearly provided in the wind engineering reports. This includes the details of any wind mitigation, such as size, location, porosity, etc. Assuming that wind mitigations form part of the design is not a good excuse to avoid describing these details.

There are other test details, such as blockage, boundary-layer development, instrumentation, etc., which will not be described herein, but can be found in published resources. Most established wind tunnel facilities will ensure that the test procedures meet or exceed those described in BS6399, Eurocode, ASCE and other codified sources.



**Figure 3.1**  
**(a) Typical wind tunnel test setup.**  
**(b) Irwin probe sensors typically used to measure the pedestrian-level wind speeds.**

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<b>Committee(s)</b>	<b>Dated:</b>
Port Health and Environmental Services Planning and Transportation	4 <sup>th</sup> July 2017 25 <sup>th</sup> July 2017
<b>Subject:</b> Publication of the City of London Corporation's Air Quality Supplementary Planning Document	<b>Public</b>
<b>Report of:</b> Director of Markets and Consumer Protection	<b>For Decision</b>
<b>Report Author:</b> Kelly Wilson, Air Quality Officer – Air Quality Team	

## Summary

This report presents the City of London Corporation's Air Quality Supplementary Planning Document (SPD) for publication. The document is attached in Appendix 1.

The SPD provides guidance for developers on the implementation of air quality policies in the City Corporation's Local Plan 2015. With reference to the SPD, developers can minimise the negative impact of developments on local air quality and therefore on the health of residents, workers and visitors in the Square Mile. The SPD also supports the City Corporation's statutory obligations to assist the Government in meeting air quality Limit Values for nitrogen dioxide and fine particles, together with responsibilities for improving public health.

This is the City Corporation's first SPD for air quality and it has been written with reference to Greater London Authority (GLA) guidance. Following Port Health and Environmental Services and Planning and Transportation Committee approval, the SPD has undergone an 8-week public consultation period. Consultation changes are incorporated into the attached SPD and are detailed in the proposed 'Consultation Statement' and 'Adoption Statement', which are presented in appendices 2 and 3 respectively.

## Recommendation(s)

Port Health and Environmental Services Committee Members are asked to:

- approve the amended SPD and new supporting SPD Consultation and Adoption Statements, subject to any comments received, and
- recommend to the Planning and Transportation Committee that the SPD is adopted.

Planning and Transportation Committee Members are asked to:

- approve the amended SPD and new supporting SPD Consultation and Adoption Statements, subject to any comments received, and
- approve the adoption of the SPD.

## Main Report

### Background

1. The City Corporation has a statutory obligation to improve air quality and to minimise the impact of air pollution on the health of residents and workers. The City Corporation's Air Quality Strategy 2015-2020 details action that will be taken to fulfil this obligation. It contains 60 actions that are divided into ten policy areas. Policy 6 contains actions to: 'Reduce emissions from new developments'. The production of the SPD is a key action within this policy area.

## **Supplementary Planning Document for Air Quality**

2. Although air pollution in London is generally associated with road traffic, it is estimated that 38% of nitrogen oxide emissions in the City come from combustion plant, which also contributes to particulate levels. New and refurbished developments can therefore reduce their impact on air quality emissions through the choice of combustion plant and the amount of energy the development requires.
3. The SPD provides guidance for developers so they can minimise the production of pollution through appropriate design, construction site management and low emission technology. In addition, the SPD recommends that exposure to pollution can be reduced through appropriate design.
4. Major developments must be at least 'Air Quality Neutral', so the SPD provides guidance for developers in relation to calculating their building and transport emissions, so they can be compared to air quality neutral 'benchmarks' produced by the GLA. The SPD also details the City Corporation's requirements for Air Quality Impact Assessments.
5. The SPD has been created based on GLA suggested content and following consultation with officers in the following departments and consultees as detailed in the 'Consultation Statement' (Appendix 2):
  - Department of Built Environment
  - Department of Children and Community Services
  - Open Spaces Department
  - City Surveyor's Department
6. The consultation period triggered 48 comments from 12 respondents. All representations were reviewed and appropriate changes made to SPD. Table 1 within the Consultation Statement shows the comments received and whether the comments have been included in the revised SPD.
7. This Consultation Statement should be read in conjunction with the Statement of Adoption (Appendix 3) which states the amendments to the document following the public consultation.

## **Proposals**

8. It is proposed that, subject to comments received from the Port Health and Environmental Services and Planning and Transportation Committees that the supporting SPD documents are approved and the attached SPD is adopted.

## **Corporate & Strategic Implications**

9. The work on air quality sits within key policy priority 3 of the Corporate Plan: 'Engaging with London and national government on key issues of concern to our communities....' Working with the Mayor of London on air quality is specifically mentioned as an example.
10. The SPD provides further guidance on the implementation of the policies in the City of London Local Plan 2015. It fully accords with the policy requirements in the Local Plan and is complementary to other SPDs adopted by the City Corporation.



## **Conclusion**

11. The City Corporation has produced an SPD for Air Quality designed to reduce a development's negative impact on air quality and on the health of City residents, workers and visitors. It provides guidance on the implementation of the City Corporation's adopted planning policies for improving air quality in the City.
12. Subject to comments received, the Port Health and Environmental Services Committee Members are asked to recommend the adoption of the SPD, and the Planning and Transportation Committee Members are asked to approve the adoption of the SPD.

## **Appendices**

1. City of London Corporation Air Quality Supplementary Planning Document
2. City of London Air Quality Supplementary Planning Document - Consultation Statement
3. City of London Air Quality Supplementary Planning Document - Adoption Statement

## **Background Papers**

[City of London Corporation Air Quality Strategy 2015-2020](#)

[City of London Local Plan 2015](#)

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# CITY OF LONDON CORPORATION

## Department of Markets and Consumer Protection

### City of London Air Quality Supplementary Planning Document



**July 2017**

This document has been prepared by the Air Quality Team of  
the City of London Corporation, Department of  
Markets and Consumer Protection.

The team can be contacted on 020 7606 3030 or by email:  
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**City of London Air Quality  
Supplementary Planning Document**

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# **1 Introduction**

## **1.1 Background**

1.1.1 This Supplementary Planning Document (SPD) sets out the City Corporation's requirements for reducing air pollution from new and refurbished developments within the Square Mile. Together with other City Corporation SPD's, it provides detailed guidance on policies within the City Corporation's Local Plan and the Mayor of London's London Plan.

1.1.2 This is the City Corporation's first SPD for Air Quality which has been written with reference to GLA Guidance and supports actions in the City Corporation's Air Quality Strategy.

## **1.2 City of London Planning Framework**

1.2.1 The London Plan and the City Corporation's Local Plan together form the statutory planning framework used to determine applications for planning permission.

1.2.2 The Local Plan was adopted in 2015. It is comprised of 22 Core Strategic Policies (CS) and, where applicable, supporting Development Management Policies (DM). The main air quality policy is DM 15.6 and forms part of CS15: Sustainable Development and Climate Change (see Appendix D for this and supporting policies). The Local Plan is currently being reviewed to provide guidance up to 2036 and an updated version will be available in 2019.

## **1.3 Relationship of this SPD to Policy**

1.3.1 Appendix E sets out the SPD's relationship to the national, regional and local policy and guidance affecting air quality in the City of London, as well as its relationship to the City of London Air Quality Action Plan (AQAP). The AQAP is incorporated in the City Corporation's Air Quality Strategy 2015-2020, which is summarised in Appendix C, together with other relevant City Corporation Strategies.

## **1.4 Overarching Aim of this SPD**

1.4.1 The overall aim of this document is to provide further guidance on the City Corporation's Local Plan in relation to minimising the impact of developments on air quality in the Square Mile.

## **1.5 Objectives and SPD format overview**

- 1.5.1 Although not the objective of this SPD, this SPD highlights the importance of air quality as a material planning consideration and seeks to ensure that all possible measures to reduce the impact of developments on air quality are considered and, where possible, adopted in a consistent way within the City of London.
- 1.5.2 The objectives of this SPD on air quality are:
- (a) to highlight the existing policy framework in London and the City of London (see [Appendix E](#))
  - (b) to provide guidance on measures that can be implemented to mitigate the potentially harmful impacts of new and upgraded developments on air quality in the City of London through:
    - Development and Building Design (including sustainable travel) (see [section 2](#))
    - Heating and Energy Supply (see [section 3](#))
    - Deconstruction and construction (including sustainable travel) (see [section 4](#))
  - (c) to provide guidance on the requirements of air quality impact assessments and the circumstances under which these will be required (see [section 5](#)) and
  - (d) to provide guidance on the use of CIL, planning conditions and Section 106 obligations to improve air quality (see [section 6](#))

## **1.6 Compliance with this SPD and Air Quality Condition(s)**

- 1.6.1 To ensure all air quality factors have been considered, planning applications will be assessed in accordance with the checklist in [Appendix A](#). It is understood that not all relevant information may be available at the time of application. Planning permission may therefore be granted subject to a planning condition which requires the developer to provide a 'pre-occupation' Air Quality Report signposting and demonstrating compliance with this SPD. The Air Quality Report may take the form of a summary statement which references other documents. [Appendix B](#) will provide best practice examples as they become available.

## **1.7 Changes in technology and opinion**

- 1.7.1 In order to reflect changing technology and opinion, [Appendix B](#) provides links to the City of London webpages which contain advances in technology, guidance and case studies which are considered best practice. These pages will be updated to reflect efforts to improve air quality. Updated best practice guidance will not be applied retrospectively once planning permission has been granted. Notwithstanding this, as changes to guidance will be to improve air quality, the developer is requested to have due regard to the new content where possible.

## 1.8 Overview of considerations and requirements

1.8.1 Figure 1 overleaf summarises the considerations which address the air quality requirements of this SPD and includes reference to the relevant section. It also shows whether the information should be provided at application stage and/or pre-occupation stage. Overall the measures:

- **Minimise the production of pollution** through design, construction site management and low NO<sub>x</sub> technology. Low NO<sub>x</sub> technology is considered to be technology where NO<sub>x</sub> emissions are less than 40mg/kWh (dry gas and 0% O<sub>2</sub>). The City Corporation is aware of developments where ultra-low NO<sub>x</sub> appliances (less than 15mg/kWh NO<sub>x</sub> emissions) have been installed. The use of ultra-low NO<sub>x</sub> technology is therefore actively encouraged.
- **Reduce exposure** through appropriate building and open space location and design as well as the appropriate location of combustion emission points.



**Figure 1: Summary of SPD Requirements**

SPD Requirements	Planning Application Requirements	Pre-Commencement/ Occupation details (where conditioned)
<b><u>Section 2: Sustainable Development and Building Design</u></b>		
<p><b>Reduce Emissions:</b></p> <ul style="list-style-type: none"> <li>✓ Reduce energy consumption through building design</li> <li>✓ Provide for remaining energy needs through low emission technologies</li> <li>✓ Provide for sustainable travel</li> </ul> <p style="text-align: right;"><b>See section: 2.2</b></p>	<p>Incorporate into design. Provide Delivery and Service Plans (DSP), transport assessments and travel plans as required. See energy and heating requirements below.</p>	<p>Include a brief statement with regard to how the building design and sustainable travel measures reduce emissions and therefore minimise impact on air quality.</p>
<p><b>Reduce Exposure Through Design:</b></p> <ul style="list-style-type: none"> <li>✓ Ventilation inlets: <ul style="list-style-type: none"> <li>– away from sources of pollution e.g. opening windows at height and away from plant</li> <li>– consider installation of filtration</li> </ul> </li> <li>✓ Private and communal outdoor space positioned away from sources of pollution</li> <li>✓ Well-designed public realm providing access to areas away from pollution</li> <li>✓ Greening to trap fine particulates</li> <li>✓ Combustion exhausts away from receptors</li> </ul> <p style="text-align: right;"><b>See section: 2.3</b></p>	<p>Incorporate into design.</p> <p>Where the <u>Clean Air Act</u> applies, include a plan showing combustion emission points relative to general access areas e.g. roof terraces.</p>	<p>Where the Clean Air Act applies, include an 'as installed plan' showing combustion emission points relative to general access areas e.g. roof terraces.</p>
<b><u>Section 3: Heating and Energy Supply</u></b>		
<p><b>Energy demand:</b></p> <ul style="list-style-type: none"> <li>✓ Energy efficient buildings to reduce heating/power demands, with efficient, renewable, low and zero emission sources for remaining needs e.g. use of air and ground source heat pumps</li> <li>✓ Compliance with Energy Hierarchy</li> </ul> <p style="text-align: right;"><b>See sections: 3.1 / 3.2</b></p>	<p>Demonstrate a commitment within the planning application to:</p> <ul style="list-style-type: none"> <li>• install low NO<sub>x</sub> technology.</li> <li>• submit a commissioning report demonstrating compliance with Mayor's emission limits.</li> </ul>	<p>Submit details and use of combustion plant installed, including:</p> <ul style="list-style-type: none"> <li>• low /ultra-Low NO<sub>x</sub> technology</li> <li>• latest Euro standard generators</li> </ul> <p>Submit commissioning reports demonstrating compliance with SDC SPG and plans to maintain compliance.</p>
<p><b>Combustion plant:</b></p> <ul style="list-style-type: none"> <li>✓ Install low/ultra-low NO<sub>x</sub> boilers</li> <li>✓ Biomass/biofuel plant discouraged</li> <li>✓ Meet NO<sub>x</sub> and PM emission standards</li> <li>✓ Minimise use of generators and newest Euro standard only</li> </ul> <p style="text-align: right;"><b>See sections 3.3 / 3.4 / 3.5</b></p>		

<p><b>Combustion Flues:</b></p> <ul style="list-style-type: none"> <li>✓ at least 1m above roof level</li> <li>✓ 3m above general access areas / amenity space (where the Clean Air Act applies)</li> <li>✓ In accordance with approved Air Quality Impact Assessment</li> </ul> <p style="text-align: right;"><b>See section 3.6</b></p>	<p>Incorporated into design.</p> <p>Where Clean Air Act applies, submit plans showing emission points.</p>	<p>Clean Air Act application to be submitted (where applicable).</p>
<b><u>Section 4: Reducing Air Quality impacts during construction / deconstruction</u></b>		
<p><b>Scheme of Protective Works detailing:</b></p> <ul style="list-style-type: none"> <li>✓ Dust Control measures to be adopted</li> <li>✓ Details of continuous monitoring and trigger levels</li> <li>✓ NRMM compliance commitment</li> <li>✓ Commitment to sourcing an alternate power source to diesel generators</li> <li>✓ No engine idling policy</li> <li>✓ CLP in line with TfL best practice</li> </ul> <p style="text-align: right;"><b>See section 4.4</b></p>	<p>Where an Air Quality Impact Assessment is submitted at application stage, include a risk assessment and sensitive receptors and methods to minimise air quality impact.</p>	<p>Submit Scheme of Protective works in accordance with the latest version of the City Corporation's <u>Code or Practice for Deconstruction and Construction</u> prior to commencement of works.</p>
<b><u>Section 5 Air Quality Impact Assessments</u></b>		
<p><b>Air Quality Neutral Assessment</b> (or Air Quality Positive as policy emerges) required when the floor space is 1,000m<sup>2</sup> or more or 10 or more residential dwellings:</p> <ul style="list-style-type: none"> <li>✓ Building emissions</li> <li>✓ Transport emissions</li> </ul> <p style="text-align: right;"><b>See section 5.2</b></p>	<p>Submit relevant assessments with planning application</p>	<p>Demonstrate compliance with Air Quality Neutral Assessment (as installed). Where not air quality neutral, include details of Local Planning Authority approved mitigation adopted.</p>
<p><b>Detailed Air Quality Impact Assessment</b> for major developments when it:</p> <ul style="list-style-type: none"> <li>✓ is within 50m of sensitive use (see figure 4)</li> <li>✓ creates a significant change in traffic (see explanation)</li> <li>✓ requires an EIA</li> <li>✓ involves the Environmental Permitting Regulations</li> </ul> <p>For <b>all</b> developments which:</p> <ul style="list-style-type: none"> <li>✓ exposes sensitive or a high number of people to air pollution (schools hospitals and &gt;75 residential properties)</li> <li>✓ creates exposure for long periods of the day (e.g. adjacent to busy roads)</li> <li>✓ include CHP, biomass or biofuel plant.</li> </ul> <p style="text-align: right;"><b>See Section 5.3</b></p>		

## 2 Development and Building Design

**Overall Objective:** to ensure:

a) that the development design minimises the generation of pollution by being energy efficient, reducing emissions associated with the operation of the building and facilitating a reduction in vehicle movements and

b) reducing exposure by maximising the distance between users and sources of pollution (such as flues and busy roads).

To fulfil the requirements of Local Plan Policy CS15.4(i), 15.6 (2), (3) & (6) and London Plan Policies 5.3 and 7.14

### 2.1 Background

2.1.1 The design and layout of the development and building will have an impact on the amount and location of pollution it produces. Suitable design can also reduce the exposure of occupants to existing poor air quality. The City Corporation therefore requires that the design principles described below and detailed in the Mayor's Sustainable Design and Construction SPG (SDC) are incorporated into the design and are available for discussion at the pre-application stage and presented within planning applications.



### 2.2 Reducing Emissions through Building Design

2.2.1 **Energy Efficiency and Low Emission Technology:** Appropriate building design reduces energy use and therefore the development's air quality footprint. The sustainable design principles of energy efficient design, retro-fitting measures, pollution control and urban greening, in accordance with London and Local Plan policies achieve this. See City of London sustainable design case studies within Appendix B. The remaining energy demand must be supplied through the use of technologies which do not add to emissions of particulates or nitrogen dioxide (ultra-low/low NOx technology). See Section 3 for further guidance on this.

2.2.2 **Sustainable Travel:** Emissions from road traffic are the dominant source of elevated pollutant concentrations in London. The planning process is just one way in which the City Corporation seeks to improve air quality through sustainable travel.

2.2.3 The Local Plan Core Strategic Policy CS16 (4) V requires developers to demonstrate how the environmental impacts (together with road danger and servicing) will be minimised by submitting the following plans and assessments as part of the planning application process (where applicable); there should also be a consideration of using low emission river transport (where applicable). See Appendix B for guidance relating to:

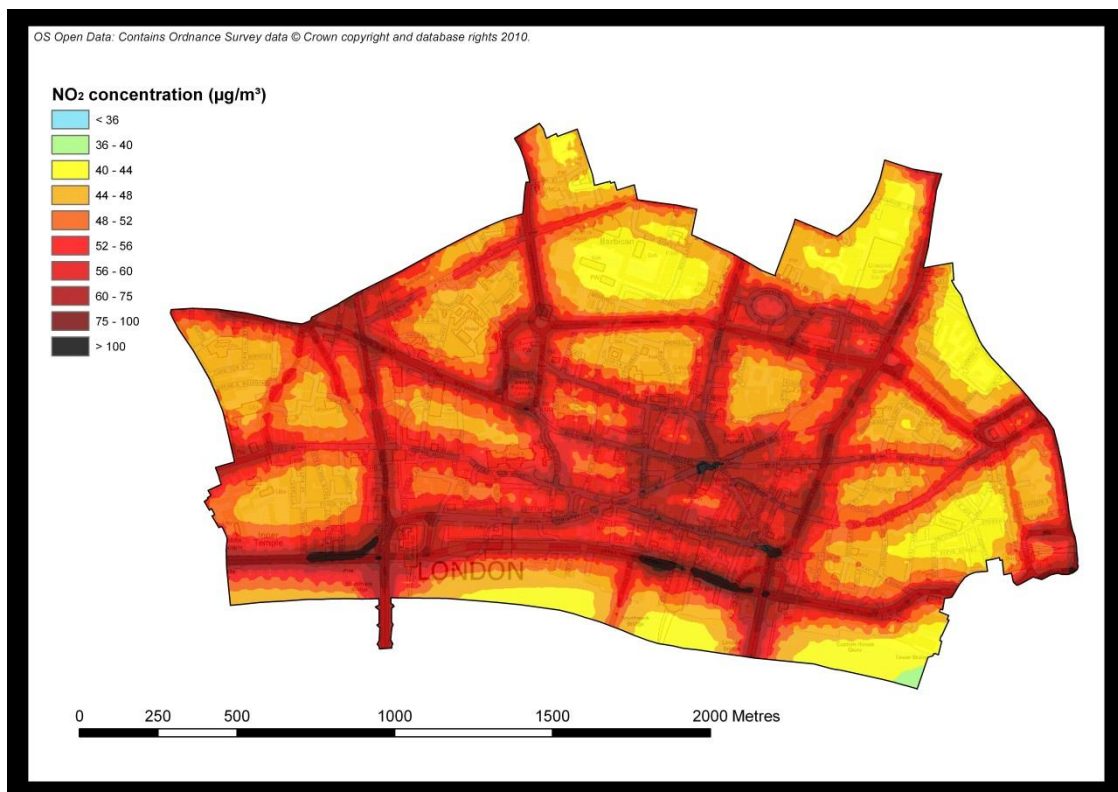
- delivery / servicing plans (DSP)
- construction logistic plans (CLP)
- transport assessments
- travel plans

2.2.4 The City Corporation promotes infrastructure for modes of transport with low impacts on air quality through the Local Plan and the development management process, which incorporates:

- car free design
- provision of cycling facilities such as secure cycle storage; and
- provision of infrastructure for low emission vehicles such as electric vehicle recharging points (per parking bay), including rapid chargers

## 2.3 Reducing Exposure through Development and Building Design

2.3.1 The annual level of nitrogen dioxide (NO<sub>2</sub>) exceeds the air quality objective of **40µgm<sup>3</sup>** across much of the City. The whole of the City of London is therefore an Air Quality Management Area and development and building design should ensure that exposure to higher levels of pollution are mitigated against.



**Figure 2: Modelled NO<sub>2</sub> levels for 2015**

2.3.2 Figure 2 demonstrates that the main source of air pollution in the City is road vehicles and concentrations of pollution are highest adjacent to busy roads, such as Upper Thames Street. Nitrogen dioxide levels decrease with increasing distance from the edge of the road and with height. Please contact the Air Quality Team for the latest concentration information via [cityair@cityoflondon.gov.uk](mailto:cityair@cityoflondon.gov.uk)

2.3.3 Suitable development and building design can further increase distances between sources of air pollution and human receptors thereby reducing the

pollution exposure of building occupants and outside space users. This is particularly relevant where developments include sensitive uses such as medical centres, hospitals, residential units, schools and children's playgrounds. Reducing exposure through development and building design can be achieved through appropriate:

- building ventilation
- outdoor private and communal space
- public realm design
- green roofs, walls and planting

2.3.4 **Building Ventilation:** The City Corporation requires the impact of outdoor air pollution on indoor air quality in new developments be taken into account at the earliest stages of building design. This includes ensuring:

- ventilation inlets and the location of opening windows are on higher floors away from sources of air pollution at the ground level, but also away from stationary sources such as combustion plant (see [section 3.6](#))
- air conditioning systems can be fitted with filters which filter particulates and NO<sub>2</sub>; the appropriate standard filter should be maintained following installation. See case study links in [Appendix B](#).

2.3.5 **Outdoor Private and Communal Space:** Roof gardens and terraces are a common feature in City developments. The location of outdoor space in relation to sources of air pollution (for example busy roads and boiler flues) is an important consideration. Exposure should be minimised through appropriate positioning and orientation of the space away from busy roads and combustion sources, where this also meets the requirements of the Local Plan to protect the amenity of neighbouring building occupiers.

2.3.6 **Public Realm:** Where public realm forms part of the development this provides an opportunity to encourage low pollution areas where people can spend time away from busy roads. The development should therefore incorporate design (where possible) that provides low pollution routes through the development, so that these routes are taken instead of along busy roads. The Public realm should ensure that recreational, seating and exercise areas are away from or screened from sources of pollution, for example by greening. Further details can be found in guidelines 9.1 and 14.2 of the [Public Realm SPD](#), and are presented in [Appendix C](#).

2.3.7 **Green Roofs, Walls and Planting:** As well as increasing biodiversity, plants can play a role in trapping fine particles (PM<sub>10</sub> and PM<sub>2.5</sub>) found in the air we breathe. Research indicates that plants with small leaves (which disrupt the flow of air) and fine hairs on their surface work best; however, leaves which cover a large surface or are grooved also provide surfaces upon which particles can be trapped. See [Appendix B](#) for more information and the types of plants which may be beneficial. To help improve air quality, developers are encouraged to source trees and plants which have these characteristics to include in open spaces, and on green walls and roofs. The selection of

species should also have regard to future climate conditions and reference needs to be made to the [City of London Tree Strategy SPD](#). See [Appendix B](#) for links to additional research, guidance and green roofs and walls case studies.

- 2.3.8 **Combustion Exhaust:** Care should be taken to locate flues and exhaust vents away from recreational areas such as open spaces, roof terraces or gardens. Consideration also needs to be given to emission points associated with neighbouring roofs. See [section 3.6](#) for a consideration of flue and exhaust position.

### 3 Heating and Energy Supply

**Overall Objective:** to minimise the use and emissions from combustion plant within the building.

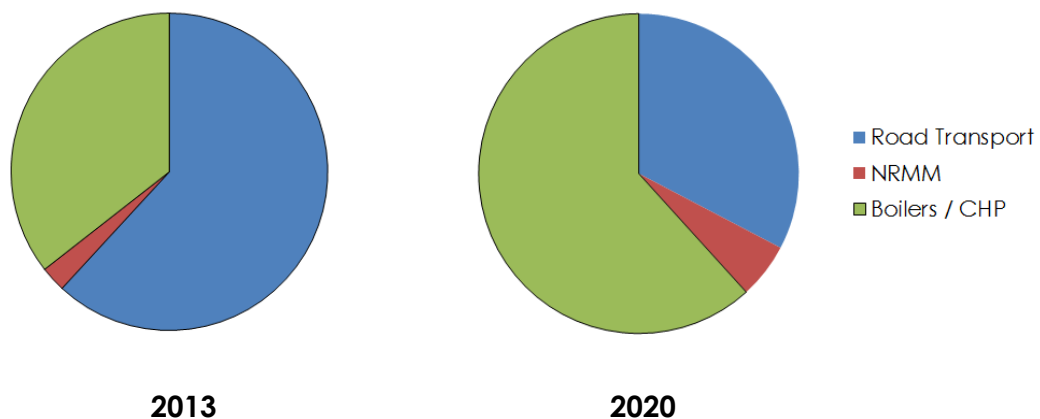
To fulfil the requirements of Local Plan Policy 15.6 (2), (3), (4) & (6) and London Plan Policies 5.3 and 7.14

#### 3.1 Background

3.1.1 The sustainable design principles require that developments make the fullest contribution to the mitigation of, and adaptation to, climate change and minimise emissions of carbon dioxide. The adoption of technologies to generate heat and energy from efficient and/or renewable sources, such as solar water heating, district heating, air and ground source heat pumps and/or photovoltaic panels in major developments can minimise air pollution emissions. This is due to the technologies either not requiring combustion or, in the case of district heating, being more efficient at heating than individual boilers.

3.1.2 It should be noted that the main source of NO<sub>x</sub> in the City is currently road transport. However, there is a predicted shift by 2020 to boilers and CHP generating a greater proportion of NO<sub>x</sub> (see figure 3). Zero and low NO<sub>x</sub> technology is therefore strongly encouraged.

**Figure 3 Anticipated changes in the source of NO<sub>x</sub> in the City of London (source: London Atmospheric Emission's Inventory 2013)**



#### 3.2 Energy Hierarchy

3.2.1 In accordance with the City Corporation's Local Plan:

- Buildings should be designed to be energy efficient to reduce the need and size of heating plant, which overall minimises the buildings air quality footprint.
- Where required, energy should be provided through low and zero emission technology.

- With regard to Policy 5.6 of the London Plan, decentralised energy in development proposals:
  - a** should evaluate the feasibility of Combined Heat and Power (CHP) systems, and where a new CHP system is appropriate also examine opportunities to extend the system beyond the site boundary to adjacent sites.
  - b** should select energy systems in major developments in accordance with the following hierarchy:
    - connection to existing heating or cooling networks;
    - site wide CHP network;
    - communal heating and cooling;
  - c** should consider potential opportunities to meet the first priority in this hierarchy as outlined in the London Heat Map tool. Where future network opportunities are identified, proposals should be designed to connect to these networks.

3.2.3 It is acknowledged that the GLA energy hierarchy policies may change with the development of London Environment Strategy and the new London Plan. Developers should have regard to the emerging policies at the time of application.

### **3.3 Gas Boilers**

3.3.1 Wherever possible, operators should design the building so that there is no need for combustion plant. If gas boilers are installed in developments they must be low NO<sub>x</sub> boilers<sup>1</sup>, this includes where the installation is part of a refurbishment. The City Corporation would prefer that the lowest possible NO<sub>x</sub> emission technology is sourced and installed. As a MINIMUM, the dry NO<sub>x</sub> level must be less than 40mg/kWh. The City Corporation is aware of developments where ultra-low NO<sub>x</sub> appliances (less than 15mg/kWh NO<sub>x</sub> emissions) have been installed. The use of ultra-low NO<sub>x</sub> technology is therefore actively encouraged.

3.3.2 It should be noted that Maximum BREEAM credits can be gained for low NO<sub>x</sub> technology.

### **3.4 Biomass or Biofuel Boilers and CHP**

3.4.1 When sited and specified appropriately in accordance with the energy demands of the building, CHP systems and biomass or biofuel boilers can have benefits in terms of carbon emissions. However, they can give rise to significantly higher emissions of NO<sub>x</sub> and/or PM<sub>10</sub> emissions than regular gas boilers, and developers should ensure that the emission standards set in the Mayor's SDC SPG are not exceeded<sup>1</sup>. The SDC SPG does not currently provide guidance where plant is <50kWth input. The City would expect such plant to meet a NO<sub>x</sub> emission limit of <50mgNm<sup>3</sup> at 5% O<sub>2</sub> (dry gas) as a minimum.

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<sup>1</sup> Following the publication of the government's Housing Standards Review in March 2015, the requirement for low NO<sub>x</sub> boilers and the on-site energy generation limits referenced cannot be required for developments that are only residential. However, the Mayor of London and national government have obligations regarding compliance with the EU limits for ambient concentrations. In order to address those obligations, in particular with respect to NO<sub>2</sub>, developers are strongly encouraged to implement this guidance.



- 3.4.2 When considering how to achieve, or work towards the achievement of, the renewable energy targets, the City Corporation would prefer developers not to consider installing a biomass burner due to the City's status as an Air Quality Management Area for fine particles and nitrogen dioxide. Research indicates that the widespread use of these appliances has the potential to increase particulate levels in London to an unacceptable level.
- 3.4.3 As the CHP kWth input requirement increases, opportunities to achieve the required low NO<sub>x</sub> technology are more complex, for example the need for single catalytic reduction (SCR), which has a similar space requirement to the CHP and has on-going costs. Where the CHP requirement would require the use of SCR to meet the NO<sub>x</sub> emission standard, opportunities should be investigated to install smaller units with NO<sub>x</sub> abatement to meet the demand.
- 3.4.4 Where CHP, biomass or biofuel boilers are proposed, plant emissions must be evaluated as part of a detailed Air Quality Impact Assessment (see [Section 5](#)). Where permitted, the appliance will be required to meet high standards of air pollution control, with particular emphasis on:
- plant design and operation;
  - pollution abatement equipment;
  - the servicing and maintenance regime;
  - fuel quality, storage and delivery; and
  - exhaust stack height, to reduce the risk of increasing exposure.
- 3.4.5 Prior to CHP, biomass or biofuel plant coming into operation the following details must be submitted to and approved in writing by the Local Planning Authority; this will be conditioned within the planning permission:
- The results of an emissions test demonstrating compliance with the emission and efflux velocity requirements of the SDC SPG.
  - An equipment maintenance schedule demonstrating that the emission standard would always be met.

### **3.5 Generators**

- 3.5.1 Diesel generators have high emissions of NO<sub>x</sub> and PM<sub>10</sub> and their use in the City is discouraged due to their negative impact on air quality. Where a secondary electrical power supply cannot be assured, where possible, alternate technology generators should be sourced for the building (e.g. gas fired or battery backup). For construction sites, a temporary building supply should be secured prior to the commencement of works in order to avoid the use of diesel generators on site (in line with Policy DM2.1.2).
- 3.5.2 Where permanent standby diesel generators are installed, they should be the newest Euro standard available and where possible, their use should be limited to life saving and emergency situations and testing only. Where generators are supplied for business continuity, abatement to reduce emissions should be investigated. The type, siting and use of the generator should be carefully considered at the planning stage in relation to up to date guidance (see [Appendix B](#)).

3.5.3 Due to the air quality impact of generators and their potential to cause a statutory nuisance, the use of generators to supply the national grid at times of supply restriction and limitation is discouraged.

3.5.4 Generator hierarchy overview:

- Source a secondary supply
- Alternate technology e.g. battery reserve / gas generators
- Diesel fuelled generators (newest Euro standard only)
  - Life-saving and testing only
  - Business continuity with abatement

### **3.6 Combustion Flues and Efflux Velocity**

3.6.1 A consideration of combustion flue location and emission discharge velocity is required at the planning stage to ensure appropriate provision has been made. All combustion plant (boilers, generators, CHP etc.) must terminate as a minimum at least 1 metre above the highest point of the building of which the plant serves, or as specified by the approved Air Quality Impact Assessment, unless agreed with the City Corporation. With regard to this requirement, consideration needs to be paid to the location of outside amenity space associated within the development and its neighbours.

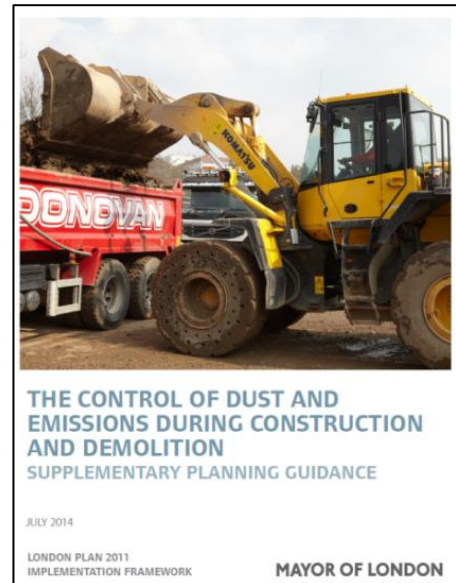
3.6.2 A Clean Air Act 1993 Chimney height approval needs to be sought where a furnace is burning liquid or gaseous matter at a rate of 366.4 kilowatts or more or burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour. Flues associated with this plant should therefore be at the recommended heights above nearby buildings and installed at least 3m above any general access areas and should meet discharge velocities above the recommended minimum. With regard to CHP and biomass boilers, discharge velocity requirements are provided in Appendix 7 of SDC SPG, or any updates thereof.

## 4 Reducing Dust and Air Quality Impacts during Construction

**Overall Objective:** to reduce NO<sub>2</sub> and PM<sub>10</sub> and PM<sub>2.5</sub> emission during the deconstruction and construction phase through the use of zero and low emission technology and good site management. To fulfil the requirements of Local Plan Policy 15.6 (5) and London Plan Policies 5.3 and 7.14.

### 4.1 Background

- 4.1.1 Dust and other emissions from the construction and demolition of buildings have the potential to significantly impact local air quality. Appropriate emission and dust control mitigation measures are outlined in the Mayor's *The Control of Dust and Emissions During Construction and Demolition SPG* (CDECD) and have been incorporated into Chapter 4 of the City Corporation's *Code of Practice for Deconstruction and Construction*.
- 4.1.2 The Scheme of Protective Works (see section 4.4) submitted once planning permission is granted should include an Air Quality and Dust Management Plan (AQDMP) to ensure best practice mitigation measures are implemented during the deconstruction and construction phases of a development.



### 4.2 Risk Categorisation in the City Environment

- 4.2.1 The Mayor's CDECD SPG (2014) provides guidance with regard to which construction sites are considered high risk. Due to the building density in the City and un-predictable wind directions associated with high buildings, all sites are considered high risk, therefore maximum control measures in line with the City's Code of Practice and Mayor's SPG should be employed, to mitigate against dust and emission releases.

### 4.3 Continuous Monitoring

- 4.3.1 The CDECD SPG suggests that continuous monitoring for particulate matter is required at high risk sites. However, reliance on the results of continuous monitoring as an indicator that the site is doing all it can to reduce emissions is not sufficient due to the density and wind direction factors in the City mentioned above. As such, a greater emphasis should be placed on control measures such as damping down and site management (e.g. no-idling policy and NRMM compliance, see section 4.5 below).

4.3.2 Continuous monitoring positioned between construction sites and sensitive land users, such as buildings with opening windows, outside amenity and residential developments, is beneficial with regard to providing assurance to neighbours; however, its reliance as an indicator of good site management is limited due to the above.

#### **4.4 Scheme of Protective Works**

4.4.1 As all developments in the City of London are considered high risk with regard to air quality impacts, an Air Quality and Dust Risk Assessment (AQDRA) as stated in the CDECD SPG is not required during the application phase; however, an Air Quality and Dust Management Plan (AQDMP) must be included in the **Scheme of Protective Works** submitted to, and approved by the City Corporation prior to works commencing on-site,

4.4.2 The AQDMP in the Scheme of Protective Works should contain the information detailed in the most recent version of the City Corporation's Code of Practice for Deconstruction and Construction.

#### **4.5 Non-Road Mobile Machinery (NRMM)**

4.5.1 The NRMM policy is set out in the Mayor's Dust and Emissions SPG. Since 1 September 2015, NRMM with a net power between 37kW and 560kW used in the Central Activity Zone or Canary Wharf are required to meet the standards set out below. This applies to both variable and constant speed engines for both NO<sub>x</sub> and PM. These standards are based upon engine emissions standards set in EU Directive 97/68/EC and its subsequent amendments.

4.5.2 NRMM (within the above kW range) used on any site within the City will be required to meet Stage IIIB of the Directive as a minimum. From September 2018, this requirement changes to Stage IV. Any amendments of the policy and guidance must also be adhered to.

4.5.3 Prior to the commencement of any works, all developments within the City must register relevant NRMM online at [www.nrmm.london/register](http://www.nrmm.london/register). There are a small number of permitted exemptions to the above, and more details can be found at the website: [www.nrmm.london](http://www.nrmm.london)

4.5.4 The AQDMP submitted should provide a commitment to adhering to this policy, or any update thereof.

## 5 Assessing Air Quality Impacts in the City of London

**Overall Objective:** *to ensure that new and changes to development do not adversely affect air quality in the Square Mile.  
To fulfil the requirements of Local Plan Policy 15.6(1) & (4) and London Plan Policies 5.3 and 7.14*

### 5.1 Background

5.1.1 The City Corporation assesses the impact of development on air quality to ensure that proposals will not impact negatively on the air quality in the Square Mile. In line with the policy context in London, the City Corporation requires all new major developments to be at least '**air quality neutral**', and if necessary, to be accompanied by an **Air Quality Impact Assessment**. This approach will manage and prevent further deterioration of existing poor air quality. The sections below set out the City Corporation's requirements.

### 5.2 Air Quality Neutral Assessments

5.2.1 As part of the application process, for major developments (a floor space of 1000m<sup>2</sup> or more or 10 or more residential units), the development's building and transport emissions must be calculated and compared to the Air Quality Neutral Benchmarks. As required by London Plan Policy 7.14, all major developments must be air quality neutral or better. See Appendices 5 and 6 in the SDC SPG and [Air Quality Neutral Planning Support Update: GLA 80371](#), April 2014, or updated subsequent guidance<sup>2</sup>.

5.2.2 It is acknowledged that there is an emerging policy relating to developments being air quality 'positive' rather than air quality 'neutral' and Developers should have regard to this new guidance if it is available at the time of application.

5.2.3 The air quality neutral assessment should be submitted with the planning application. There are two elements to the air quality neutral assessment that developers are required to take into account:

- determine the relevant emission benchmark for **buildings** for NO<sub>2</sub> and PM<sub>10</sub> at the site, based on its land use class and location; then, calculate the site's NO<sub>2</sub> and PM<sub>10</sub> emissions from buildings and compare them with the buildings benchmark. The report should present the data used in the calculation, including the plant emission data; and

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<sup>2</sup> Note: Following the publication of the government's Housing Standards Review in March 2015, the Air Quality Neutral benchmarks and on-site energy generation limits referenced cannot be required for developments that are residential only. However, the Mayor of London and national government have obligations regarding compliance with the EU limits for ambient concentrations. In order to address those obligations, in particular with respect to NO<sub>2</sub>, developers are strongly encouraged to implement the guidance detailed.

- determine the relevant emission benchmark for **transport** for NO<sub>2</sub> and PM<sub>10</sub> at the site; then, calculate the site's NO<sub>2</sub> and PM<sub>10</sub> emissions from transport and compare them with the transport benchmark. The report should present the data used in the calculation.

5.2.4 Both building and transport emission benchmarks should be met in order to achieve air quality neutral requirements. The calculation should be submitted with the planning application. Where the benchmarks cannot be met developers must undertake mitigation in discussion with the City Corporation and/or make a contribution to off-setting their emissions as described in Section 6.

### 5.3 Air Quality Impact Assessments

5.3.1 An Air Quality Impact Assessment will be required in the circumstances detailed in section 5.3.2 below. The sections which follow provide advice on carrying out the impact assessment, which should be submitted with the planning application.

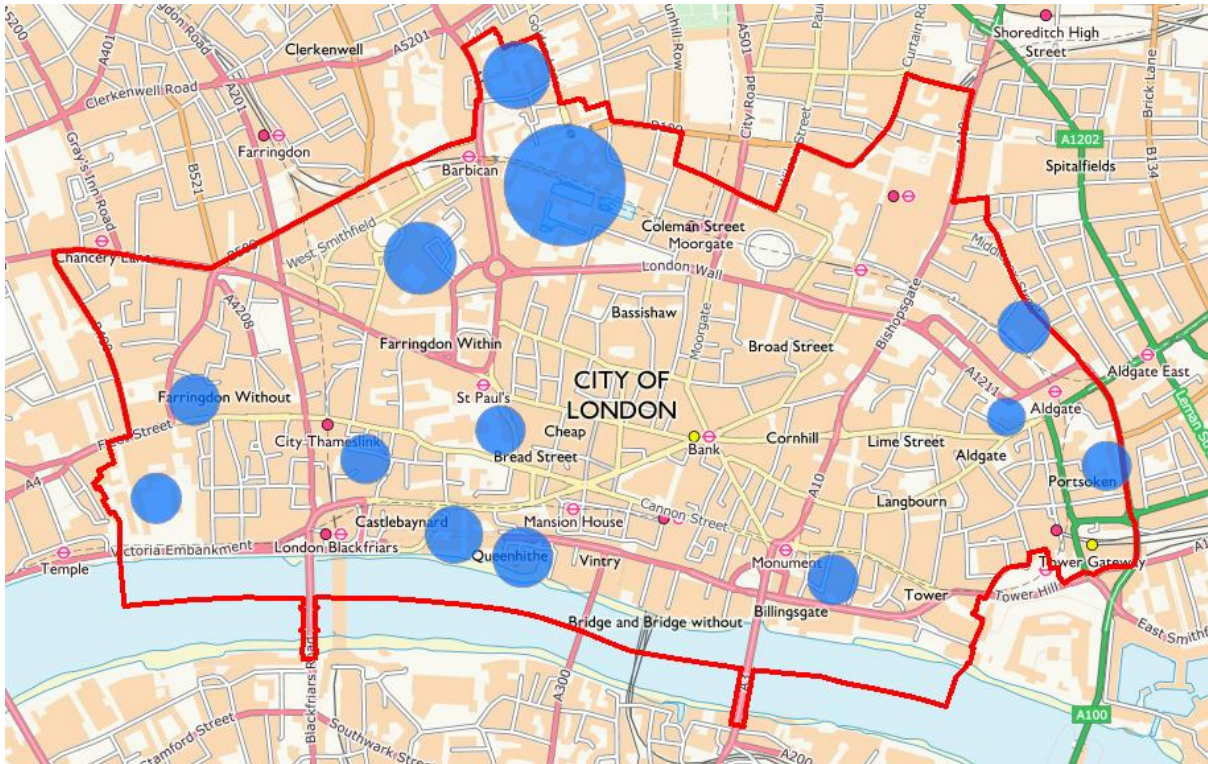
#### Criteria to conduct an Air Quality Impact Assessment

5.3.2 A detailed Air Quality Impact Assessment must be submitted at the application stage for **major developments** which:

- are in close proximity to a sensitive land use.** This includes developments within 50m of the locations shown in figure 4 overleaf (*including large residential areas - as detailed in the Local Plan, schools, nurseries and St Bartholomew's Hospital*)
- create a significant change in traffic.** In developments that introduce, or increase car parking facilities by 100 spaces or more, or with the potential to significantly change road traffic on any road exceeding 10,000 vehicles per day. Significant changes include:
  - increase in traffic volumes > 5% (Annual Average Daily Traffic (AADT) – or peak);
  - lower average vehicle speed or significant increase in congestion;
  - significant increase in the percentage of HGVs;
- are associated with the **Environmental Permitting Regulations**
- require an **Environmental Impact Assessment**

For **all** developments which:

- expose sensitive or a high number of people to air pollution:** This includes schools, hospitals and developments with more than 75 homes; or where people will be exposed to poor air quality for significant periods of the day, in particular developments located on busy roads where exceedences of the air quality objectives are seen (see figure 2 in Section 2).
- involve the following energy generation:** CHP, biomass or biofuel plant.



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 (see <https://www.cityoflondon.gov.uk/maps/Pages/interactive-maps.aspx>)

**Figure 4**  
**Location of Sensitive Land Use**

**Requirements of an Air Quality Impact Assessment**

- 5.3.3 The scope of an air quality impact assessment is:
- To assess local air quality pollutants and dust
  - To assess the current baseline situation in the vicinity of the proposed development;
  - To predict the future impact in the first year of operation, both with and without the proposed development, but including all consented development, by calculating statistics that can be compared with the air quality objectives.

This information should be provided in the assessment report.

- 5.3.4 The following advice should be followed when conducting the Air Quality Impact Assessment:

- (a) **Emissions:** Create an inventory of the PM<sub>10</sub>, PM<sub>2.5</sub> and NO<sub>x</sub> emissions associated with the proposed development, including the type and quantity of emission concentrations, during the construction and operational phase. This shall cover transport, stationary and mobile emission sources. Sources of data include Defra's Emissions Factor Toolkit for emissions from traffic and the London Atmospheric Emissions Inventory (LAEI). The assessment shall include a commitment to low NO<sub>x</sub> technology for boilers and CHP where applicable.

- (b) **Sensitive receptors:** Sensitive receptors, at relevant heights, that could be affected by the development must be identified as part of the assessment (and shown on a map).
- (c) **Exposure:** An indication of the number of new occupiers and users of the site who will be exposed to poor air quality as a result of the development (the occupiers/users should also be shown on a map).
- (d) **Cumulative impacts:** Consider the potential cumulative impacts on air quality which may arise during the construction or operational phases as a result of emissions arising from other developments which are planned within a 100m radius of the development.
- (e) **Impact and Significance:** Standard impact descriptors (for example as detailed in the Institute of Air Quality Management Guidance) should be used to describe the air quality impact of the development on relevant receptors. A professional judgement with regard to the significance of the impact should be provided. However, as detailed in the Association of London Government (ALG) 2006 guidance, the City Corporation will ultimately decide the air quality significance of the development.
- (f) **Mitigation:** As detailed in section 4.2 all sites in the City are deemed to be high risk with regard to the demolition and construction phases. Mitigation to reduce emissions during these phases should be detailed in the assessment. An outline of, and justification for, mitigation measures associated with the design, location and operation of the development in order to reduce air pollution and exposure to poor air quality should also be included.

### **Modelling Requirements:**

- 5.3.5 Modelling shall be carried out in accordance with appropriate guidance see Appendix B. Due to the complex nature of the City's environment, the type of model selected must be appropriate for a complex urban environment with tall buildings and street canyons.
- 5.3.6 The assessment must specify the model inputs and verification (where appropriate), assumptions made (for example plant operating hours and conditions) and technical details related to the proposed appliance, fuel type, emission concentrations, and maintenance and exhaust stack details.
- 5.3.7 The assessment must include a prediction of the current baseline and future PM<sub>10</sub>, PM<sub>2.5</sub> and NO<sub>x</sub> concentrations. Predictions of future concentrations should be both with and without the proposed development.
- 5.3.6 Where proposed plant uses biomass or biofuel, the detailed Air Quality Impact Assessment shall also compare the impact of emissions from the proposed biomass boiler/CHP and a gas boiler/CHP of identical thermal rating.



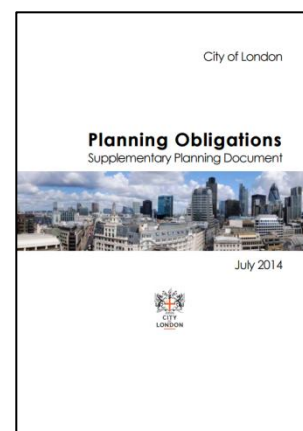
## Overarching Principles of Assessment

- 5.3.9 When conducting the assessment, developers must assess the **cumulative impact** of multiple sources from the new development e.g. the combined impact of vehicles and energy sources. The developer must also assess the cumulative impact of the proposed development with all consented developments nearby. Consideration of proposed but not yet consented development may be required and developers should check with the Air Quality Team before commencing a study.
- 5.3.10 Where applicable, assessments should be carried out using a **worst-case approach**. For example, if certain parameters are unknown, worst case assumptions should be used to ensure that assessment results are conservative in nature.

## 6 Planning Conditions and Section 106 Obligations in the City of London

### 6.1 Background

6.1.1 Planning permission can be granted subject to planning conditions. Conditions are a useful tool to enhance the quality of a development and to ameliorate any adverse impacts that might otherwise arise. A planning obligation (under Section 106 of the Town and Country Planning Act 1990 (as amended)) can also be used as a site specific mitigation mechanism. The Community Infrastructure Levy (CIL) and Planning Obligations ensure that a development contributes to the improvement of the City's environment and facilities. See the [City Corporation's website](#) for more information.



6.1.2 The Mayor of London also operates a CIL and planning obligations to raise funds towards meeting the cost of Crossrail. These measures apply across Greater London, including the City. [Visit the Mayor's website for further information](#). These measures do not directly address air quality, although the opening of Crossrail might result in a reduction in the need to use motorised transport in and into the City.

### 6.2 Community Infrastructure Levy (CIL)

6.2.1 The CIL is a charge on new development that is used to help fund the provision of infrastructure necessary to support development in the City of London. The CIL operates through a charging schedule and is supported by a 'Regulation 123 list' which outlines the broad types of infrastructure that will be funded. The amount of CIL received and expended is monitored and reported on an annual basis. See the website for more details.

6.2.2 Most developments where there is an increase in floorspace of at least 100m<sup>2</sup> will be required to pay the CIL. There is no specific air quality component to the CIL within the City of London, but the Regulation 123 list identifies a range of infrastructure investment which could mitigate the impacts of airborne pollution in the City (e.g. through the provision and improvement of open spaces), reduce the potential for emissions (e.g. through decentralised energy facilities or transport and public realm improvements leading to a reduction in vehicular traffic in specific areas).

### 6.3 Planning obligations – S106

6.3.1 Within the City of London, planning obligations (often called s106 agreements) are agreements with developers for the provision of site-specific mitigation measures necessary to ensure a development meets the requirements of the Local Plan and for affordable housing, local training, skills and job brokerage. The City Corporation's Supplementary Planning Document (SPD) explains how obligations are operated.

6.3.2 The City of London Local Plan Policy CS4 indicates that s106 planning obligations will be used to address site specific mitigation. The National Planning Practice Guidance indicates that planning conditions and obligations can be used to secure air quality mitigation where the relevant tests are met (Paragraph: 008 Reference ID: 32-008-20140306).

**Core Strategic Policy CS4: Planning Contributions**

To manage the impact of development, seeking appropriate developer contributions:

1. Requiring contributions through the Community Infrastructure Levy to assist in the delivery of the infrastructure necessary to support implementation of the Local Plan.
2. Requiring s106 planning obligations, having regard to the impact of the obligation on the viability of development, for:
  - (i) site specific mitigation meeting statutory tests;
  - (ii) affordable housing;
  - (iii) local training, skills and job brokerage;
  - (iv) local procurement in the City and City Fringe.
3. Requiring qualifying development to make an additional contribution to meeting the costs of Crossrail construction in accordance with the provisions of the London Plan.

6.3.3 Paragraph 62 of the City Corporation's Planning Obligations SPD indicates that the City Corporation may seek additional or alternative s106 planning obligations to those listed in the SPD where justified by local circumstances or to deliver other priorities in the Local Plan and where such planning obligations meet statutory tests.

6.3.4 Section 106 planning obligations may be used to ensure that construction sites meet various requirements for the control of dust and emissions from construction and demolition, and to ensure that monitoring is put in place on High Risk Sites.

### 6.4 Conditions

6.4.1 Conditions seeking to improve air quality may take a number of forms with the aim of reducing impacts on air quality and reducing exposure. Planning conditions will meet government requirements set out in the National Planning Practice Guidance.

## Appendix A: Air Quality Planning Checklist

SPD Section	What	Summary of requirement	Required/ submitted (Y/N)	Detail / Doc Ref
<b>Application</b>				
5	Air Quality Neutral Assessment	Major developments (1,000m <sup>2</sup> or more or 10 Residential dwellings or more)		
5	Detailed Air Quality Impact Assessment	<p><b>major developments</b> when it:</p> <ul style="list-style-type: none"> <li>• is within 50m of sensitive use</li> <li>• creates a significant change in traffic (see explanation)</li> <li>• creates exposure for long periods of the day</li> <li>• requires an EIA or involves EPR</li> </ul> <p>For <b>all</b> developments which:</p> <ul style="list-style-type: none"> <li>• exposes sensitive or a high number of people to air pollution (schools, hospitals and &gt;75 residential properties)</li> <li>• include CHP, biomass or biofuel plant</li> </ul>		
2	Sustainable Travel	As per requirements in Local Plan Core Strategy CS16 (4) V		
2/3	Energy Efficiency	Energy Statement (where applicable)		
<b>Application Consideration</b>				
2	Ventilation inlets	<ul style="list-style-type: none"> <li>• inlets away from source of pollution</li> <li>• Filtration for particles and NO<sub>2</sub></li> </ul>		
2	Private Outdoor space	<ul style="list-style-type: none"> <li>• Away from combustion sources e.g. roads</li> </ul>		
2	Public Realm	<ul style="list-style-type: none"> <li>• Low pollution routes through development</li> <li>• Away from pollution sources</li> </ul>		
2	Greening	<ul style="list-style-type: none"> <li>• Air quality plants</li> <li>• Screening from pollution source</li> </ul>		
2/3	Combustion Flues	<ul style="list-style-type: none"> <li>• 1m above highest roof.</li> <li>• 3m above general access areas.</li> <li>• Away from air intakes</li> <li>• Location plan</li> </ul>		
3	Combustion Plant	<p>Submit intention for:</p> <ul style="list-style-type: none"> <li>• Low NO<sub>x</sub> boilers and low NO<sub>x</sub> CHP</li> <li>• Exclusion of biomass / biofuel</li> <li>• Minimised generator use</li> </ul>		

## Appendix B: Research, Good Practice and Guidance

In order to reflect changing technology and opinion, the links below contain guidance and case studies which are considered best practice. These pages will be updated to reflect efforts to improve air quality. Updated best practice guidance will not be applied retrospectively once planning permission has been granted. Notwithstanding this, as changes to guidance will be to improve air quality, the developer is requested to have due regard to the new content where possible.

<p><b>Section 2:</b> Development and Building Design</p>	<p><b>Case Studies / Research</b> Sustainable Design Case Studies – <a href="#">City of London Website</a> Building Ventilation (particulates) - <a href="#">Camfil</a> Building Ventilation (nitrogen dioxide) – to follow Green Roofs Case Studies - <a href="#">City of London Website</a> Green Walls Case Studies – <a href="#">City of London Website</a> Delivery and Servicing Case Studies – to follow Air Quality and Planting Research – <a href="#">Kings College 2015</a> Air Quality Planting – <a href="#">Friends of City Gardens Website</a></p> <p><b>Guidance</b> <a href="#">GLA: Sustainable Design and Construction SPG</a> Sustainable Development Planning Requirements – <a href="#">City of London Website</a> Delivery &amp; Servicing Plans (DSP) – <a href="#">City Guidance 2017</a> Construction Logistic Plans (CLP) – <a href="#">TFL Guidance 2013</a> Transport Assessments – <a href="#">TFL Guidance – May 2006</a> Travel Plans – <a href="#">City of London Advice Notes</a> City of London Air Quality Planting Guide – to follow</p>
<p><b>Section 3:</b> Heating and Energy Supply</p>	<p><b>Case Studies / Research</b> To follow</p> <p><b>Guidance</b> Minimising Emissions from Generators – <a href="#">City Guide 2012</a> City of London CHP Guide – to follow Alternatives to Diesel Generators – to follow EPUK Guidance - <a href="#">CHP and Biomass</a></p>
<p><b>Section 4:</b> Reducing dust and Air Quality impacts during construction</p>	<p><b>Case Studies / Research</b> To follow</p> <p><b>Guidance</b> <a href="#">GLA: The Control of Dust and Emissions During Construction and Demolition SPG</a> <a href="#">City of London Code of Practice for Deconstruction and Construction</a></p>

<p><b>Section 5:</b> Assessing Air Quality Impacts in the City of London</p>	<p><b>Case Studies / Research</b> To follow</p> <p><b>Guidance:</b> <a href="#">LLAQM TG016 - 2016</a> <a href="#">Institute of Air Quality Management Guidance - Planning for Air Quality 2017</a> <a href="#">Association of London Government Guidance 2006</a> City of London Air Quality Assessment Guide – to follow</p>
<p><b>Section 6:</b> Planning Obligations</p>	<p><b>Case Studies / Research</b> to follow</p> <p><b>Guidance:</b> <a href="#">Community Infrastructure Levy and Planning Obligations - City of London Website</a></p>

**Appendix B Amendment Log:**

Date	Action

## Appendix C: Supporting Strategies and SPD's

### C1: Air Quality Strategy

There are ten policy areas in the City Corporation's Air Quality Strategy and all policy areas detail a number of actions, Policy 6 relates to reducing emission from new developments. The air quality strategy can be found at: [www.cityoflondon.gov.uk/air](http://www.cityoflondon.gov.uk/air)

1. Air quality monitoring
2. Political influence and commitment
3. Working with the Mayor of London
4. Working with other external organisations
5. Reducing emissions from transport
6. Reducing emissions from new developments
7. Leading by example
8. Recognising and rewarding good practice
9. Raising awareness
10. Air quality and public health

### C2: Supporting Strategies and SPD's

The City Corporation has a number of strategies and SPDs which support the implementation of the Local Plan and Air Quality Strategy. These documents can be found on the City of London website; it should be noted that a Freight SPD is being developed at the time of this SPD's publication. The following are the main strategies that support air quality improvements.

**Health and Wellbeing Strategy:** The air quality strategy also supports the Health and Wellbeing Strategy's overarching aims to promote the health and wellbeing of residents and workers in the City.

**Open Spaces Strategy (adopted as an SPD):** Seeks to promote the contribution of open spaces to the health and wellbeing of City and wider communities through use of trees and shrubs and other vegetation to counter air pollution, designs that encourage people to stay away from the busiest routes & designs that protect those most vulnerable to the effects of air pollution. See the excerpt overleaf:

**9. Promote the potential contribution open spaces can make to the improved health and well-being of City and wider communities.**

- 4.2.33 There are several ways in which open spaces can help improve the health of the City's communities. These include allowing people to relax and exercise, enabling cultural events where space and funding are available and providing opportunities for community cohesion through volunteering activities.
- 4.2.34 Equipment in open spaces that can be used for play and/or exercise can encourage people to improve their health and fitness. Such equipment may be appropriate in spaces where the long-term maintenance of the equipment can be paid for through developer contributions.
- 4.2.35 The main source of air pollution in the City is road vehicles. The following issues should be considered when designing open space schemes to improve the health of the City's communities:
- The use and siting of trees and shrubs and other vegetation that has a positive benefit on air quality. Deciduous trees are preferable because of their ability to capture pollution;
  - Designs that encourage people to spend time away from the busiest, most polluted roads. This will help to reduce exposure to the highest levels of pollution in the City;
  - Designs that protect the people most vulnerable to poor air quality such as children and the elderly.

**Public Realm SPD** contains two relevant air quality Aims and Guidelines:

**4.9 Aim 6: More sustainable streets and spaces**

4.9.1 The enhancement and management of the public realm should embrace sustainability as an overarching and long term approach. This should include bio-diverse planting schemes, which are robust and resilient to future climate conditions and which minimise the need for high levels of maintenance, along with Sustainable drainage systems, improved air quality, reduced noise, and the use of sustainable and long life materials that can be re-laid and are easily maintained.

**4.10 Aim 7: Support and encourage wellbeing and healthy lifestyles**

4.10.1 The City's public realm should be planned, designed and managed in ways that positively influence the health and wellbeing of workers and residents. This includes improving air quality and encouraging healthy modes of transport such as walking and cycling.



## 9.2 Air quality

**Guideline 9.1: Traffic management schemes and public realm proposals should incorporate measures to lower emissions and reduce the harm caused by poor air quality.**

- 9.2.1 The whole of the City of London is designated as an Air Quality Management Area. It has some of the highest levels of air and noise pollution in the country due to the density of development and its geographical location.
- 9.2.2 The main source of air pollution in the City is road vehicles. Concentrations of pollution are highest adjacent to the busiest roads, such as Upper and Lower Thames Street. The City Air Quality Strategy 2015-2020 outlines a number of measures that are being taken to improve air quality in the Square Mile.
- 9.2.3 Streets can be designed not only to assist in the overall improvement of air quality, but also to reduce an individual's exposure to pollution. For example, concentrations of some pollutants fall off with increasing distance from the edge of the road.
- 9.2.4 The following responses should be considered in traffic management and enhancement schemes, where appropriate:
- The use of trees and other vegetation that has a positive effect on air quality.
  - Designs that encourage people to walk and cycle rather than use motorised transport.
  - Provide alternative 'quiet' cycle and pedestrian routes away from main roads.
  - Traffic restrictions in areas of high exposure to poor air quality.
  - Designs that encourage people to spend time away from the busiest, most polluted roads.
  - Defined 'engine off' areas, such as bus stands, taxi ranks and tourist coach parking.
  - Smoothing the flow of traffic by reducing congestion, stop-start traffic and traffic queues and the consequent emission 'spikes'.
  - Designs that protect and segregate play and exercise activities from areas of poor air quality.

## 14.4 Active travel

**Guideline 14.2: Practical measures to encourage active travel should be incorporated into traffic management schemes and enhancement proposals for streets and spaces.**

- 14.4.1 The layout of towns and cities and the design and quality of the street environment can directly influence activity levels, especially walking and cycling. Designing streets to promote active travel, such as cycling and walking, can reap the additional benefits of increasing physical activity, reducing the risk of obesity, reducing morbidity from air pollution and reducing the risk of road traffic accidents.
- 14.4.2 Practical measures include the provision of cycle facilities, wider and less cluttered footways with better crossing facilities, increased pedestrian priority and safer crossings and junctions.

## Appendix D: Local Plan Policies

In assessing schemes that may affect air quality in the City of London the City Corporation will have particular regard to the following specific policies relating to air quality and health found in the Local Plan.

### D1: Local Plan and Air Quality

Air quality sits in Core Strategic policy CS15 and the main supporting DM Policy is DM15.6. The relevant excerpts are detailed below:

#### **Local Plan: Sustainable Development and Climate Change – Core Strategic policy CS15:**

The aim of this strategy is to enable businesses and residents to make sustainable choices in their daily activities, creating a more sustainable City, adapted to the changing climate, by...*requiring development to positively address: local air quality, particularly nitrogen dioxide and particulates (PM<sub>10</sub>) the City's Air Quality Management Area Pollutants.*

#### **Local Plan Policy DM15.6 Air Quality**

- 1) Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.
- 2) Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.
- 3) Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NO<sub>x</sub>).
- 4) Developments will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.
- 5) Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.
- 6) 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 building in the development in order to ensure maximum dispersion of pollutants.

## D2: Local Plan: Health and Wellbeing related to Air Quality

### **Core Strategic Policy CS8 – Aldgate**

...Improve the amenities around the Aldgate area, and seek to improve opportunities for health care services and facilities for residents.....

4) Enhancing the public realm of the Aldgate area, its streets and spaces....Identifying opportunities for urban greening schemes, congestion and **pollution reduction measures**, particularly in the vicinity of Sir John Cass School and Middlesex Street and Mansell Street Estates.....

### **Core Strategic Policy CS21: Housing**

**Policy DM 21.5** ...Housing Quality Standards – All new housing has to be of a standard that facilitates the health and wellbeing of occupants.....

**Core Strategic Policy CS22 – Social Infrastructure & Opportunities** – ...Maximise opportunities for the City's residential and working communities to access suitable health facilities...and opportunities, while fostering cohesive communities & healthy lifestyles.....

2(iv) ensuring that the **use, design and management** of new development and spaces help deliver healthy outcomes, particularly for more deprived residents.....

4(II) protecting and enhancing existing education facilities including schools, adult and higher education premises, and ensuring that new facilities are **sited in appropriate locations**.....

### D3: Local Plan with reference to Section 2: Building Design

#### **Local Plan Policy DM15.6 Air Quality**

- 2) Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.
- 3) Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).
- 6) 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 building in the development in order to ensure maximum dispersion of pollutants.

**Policy DM 3.4 – Traffic Management** – ....Require developers to reach agreement with the City of London & TFL on the design and implementation of traffic management & highway security measures.....

**Local Plan Policy DM 10.4 – Environmental enhancement** – ...The City Corporation will work in partnership with developers, TFL & other organisations to design and implement schemes for the enhancement of highways, the public realm and other spaces.....

#### **Policy DM 15.1 Sustainability requirements**

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.
2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:
  - BREEAM or Code for Sustainable Homes pre-assessment;
  - an energy statement in line with London Plan requirements;
  - demonstration of climate change resilience measures.
3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.
4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.
5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

## Policy DM 15.2 Energy and CO<sub>2</sub> emissions assessments

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.
2. For all major development energy assessments must be submitted with the application demonstrating:
  - energy efficiency – showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;
  - carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;
  - where on-site carbon emission reduction is unviable, offsetting of residual CO<sub>2</sub> emissions through 'allowable solutions' for the lifetime of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;
  - anticipated residual power loads and routes for supply.

**Core Strategic Policy CS16 – Public Transport Streets & Walkways – ...Build on the City's central position and good transport infrastructure to further improve sustainability & efficiency of travel into and around the City....**

<b>Policy DM 16.1</b>	<b>Transport impacts of development</b> – ...Development proposals likely to have impact on transport must be accompanied by <b>assessment</b> of the transport implications during both construction & operation....
<b>Policy DM 16.2</b>	<b>Pedestrian Movement</b> – ...Facilitation of suitable <b>pedestrian movement</b> around the City.....
<b>Policy DM 16.3</b>	<b>Cycle Parking</b> –...on site <b>cycle parking</b> must be fitted in accordance with the local standards set out in table 16.2. The provision of on-site cycle parking supports people who cycle into the City....
<b>Policy DM 16.4</b>	<b>Facilities to encourage active travel</b> – ...such as walking, cycling and running must be provided in new developments. ...
<b>Policy DM 16.5</b>	<b>Parking &amp; Servicing Standards</b> – ...New developments must meet the regulations on <b>parking spaces</b> within the City. Parking and servicing standards allows for minimal car parking space associated with all new developments. This discourages people from driving into the City. All off street car parking spaces and serviced areas must be equipped to conveniently <b>recharge electric vehicles</b> ....
<b>Policy DM 16.6</b>	<b>Public Parking Spaces</b> – ...No new public car parks will be permitted in the City, including the temporary use of vacant sites....
<b>Policy DM 16.8</b>	<b>River Transport</b> – ...Safeguarding the piers, steps and <b>shores</b> . River transport encourages the use of the river in order to reduce road transport of people and goods....

### Local Plan: Open Spaces

**Policy CS19** ....Open Spaces and Recreation encourages greening on new developments, particularly green roofs. In addition, it encourages healthy lifestyles through improved access to open space and facilities, particularly through improved **public transport**.....

### **A summary of other Local Plan Policies**

**Core Strategic Policy CS5 – North of the City** – Ensure City benefits from transport improvements in the North of the City for rejuvenation and 'eco-design' to compensate the **sustainable transport infrastructure**.

**Core Strategic Policy CS6 – Cheapside and St Pauls** – Enhancement of the area to promote the cultural and leisure activities on offer

**Core Strategic Policy CS7 – Eastern Cluster** – Accommodate the expansion of office space, while balancing the accommodation of tall buildings, public realm, **transport** and security.

**Core Strategic Policy CS8 – Aldgate** – Regenerate the amenities & environment of the Aldgate area by **improving the transport and pedestrian links**.

**Core Strategic Policy CS9 – Thames and Riverside** – Ensure the City capitalises on the on the riverside location, sustaining the **rivers functional uses** in transport, navigation, and recreation.

#### D4: Local Plan with reference to section 3: Heating and Energy

##### **Local Plan Policy DM15.6 Air Quality**

- 3) Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NO<sub>x</sub>).
- 4) Developments will be encouraged to install non combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.

##### **Policy DM 15.3 Low and zero carbon technologies**

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.
2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered.
3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.
4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

##### **Other Local Plan Polices**

**DM2.1**.....infrastructure provision for connection to existing decentralised energy.....

**CS7** .....Energy efficient buildings in the Eastern cluster.....

**DM10.1** ....New Developments to minimise energy use.....

**D5: Local Plan with reference to Section 4: Local Policy – Construction and Deconstruction**

**Local Plan Policy DM15.6 Air Quality**

- 5) Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.

**Core Strategic Policy CS17 – Waste** – ...Promote and support sustainable decisions to be taken by the minimisation, transport and management of their waste, capitalising on the City's riverside location for **sustainable waste transfer....**

**Policy DM 17.2**

**Designing out Construction Waste** – ...New developments should be designed to reduce impact of deconstruction & construction on the environment through, transport of waste and construction materials **by river** wherever practicable. ...

**D6: Local Plan with Reference to Section 5: Air Quality Impact Assessments**

**Local Plan Policy DM15.6 Air Quality**

- 1) Developers are required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.
- 4) Developments will be encouraged to install non combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.



## Appendix E: Background to Air Quality Policy

### E1: The Air Quality Strategy for England, Scotland, Wales & Northern Ireland

The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007) sets out air quality objectives and policy options to improve air quality in the UK. It required all local authorities to assess and review air quality on a regular basis under the Local Air Quality Management (LAQM) regime. Targets were set for seven pollutants that all local authorities were obliged to work towards, which are equal to the statutory air quality objective values imposed under the Air Quality Regulations for England, Scotland, Wales and Northern Ireland. The seven pollutants for which local authorities were originally required to report and meet target values are:

- nitrogen dioxide (NO<sub>2</sub>);
- particulates (PM<sub>10</sub>);
- carbon monoxide;
- sulphur dioxide (SO<sub>2</sub>);
- benzene;
- 1,3-butadiene; and
- lead.

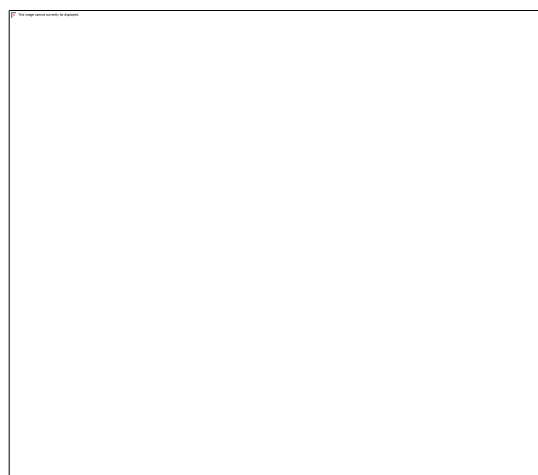
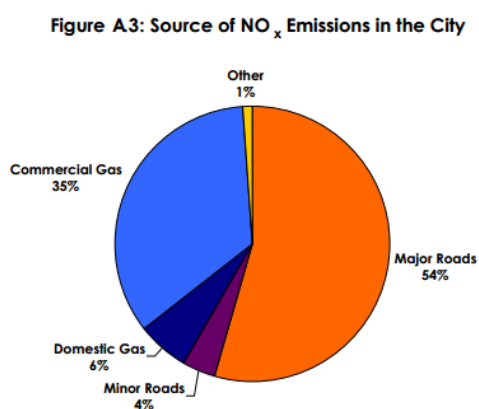
### E2: London Local Air Quality Management (LLAQM) Framework

In 2016 a new London specific LAQM regime was established (LLAQM). Defra and the Greater London Authority require local authorities to report on pollutants of greatest concern to the health of Londoners. These are: NO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub> and SO<sub>2</sub>. The City of London's LLAQM statutory reports can be found at [www.cityoflondon/air](http://www.cityoflondon/air)

### E3: Air Quality in the City of London

In January 2001 the City of London was designated an air quality management area (AQMA) for exceedences of PM<sub>10</sub> and NO<sub>2</sub>. This designation has been in place since and due to the on-going exceedences has not been revoked.

According to the 2013 London Atmospheric Emissions Inventory (LAEI), the main sources of air pollution in the borough is road transport. The following pie charts show the percentage breakdown of each vehicle type and pollutant.



The City of London's Air Quality Strategy (AQS) (which incorporates the City Corporation's AQAP) sets out measures to reduce emissions from key sources of air pollution in the City, and helps to work towards achieving the required standards and objectives. The Strategy can be found at the following link: [www.cityoflondon/air](http://www.cityoflondon/air)

**E4: Greater London Policy**

The Mayor of London's key priorities for air quality, as set out in the Mayor's Air Quality Strategy, are:

- Achieving the EU established health-based standards and objectives for a number of air pollutants; and
- Ensuring that all new developments 'air quality neutral' or better.

The London Plan policies relating to air quality and developments are set out below:

London Plan Policy 3.2	The Mayor will take account of the potential impact of development proposals on health and health inequalities. This includes improving air quality and minimising exposure to existing poor air quality.
London Plan Policy 5.3	Sustainability principles include minimising air pollution. Major development proposals should meet the minimum standards outlined in the Mayor's SPGs.
London Plan Policy 7.14	Developers and contractors should follow the guidance set out in the SPGs in the design and construction of their development. All development proposals should address local problems of air quality (e.g. within Air Quality Management Areas) and avoid further deterioration of existing poor air quality.

The Mayor has published two SPGs that deal with air quality:

- *Sustainable Design and Construction SPG* which includes guidance on preparing air quality assessments, minimising emissions, addressing exposure to air pollution, air quality neutral, emissions standards for combustion plant; and
- *The Control of Dust and Emissions during Construction and Demolition SPG* which describes requirements for dust assessments, pollutant monitoring and Ultra Low Emission Zone (ULEZ) standards for Non-Road Mobile Machinery.

**E5: National Policy**

The National Planning Policy Framework (NPPF) March 2012 states that:

"Planning policies should sustain compliance with and contribute towards EU Limit Values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan."

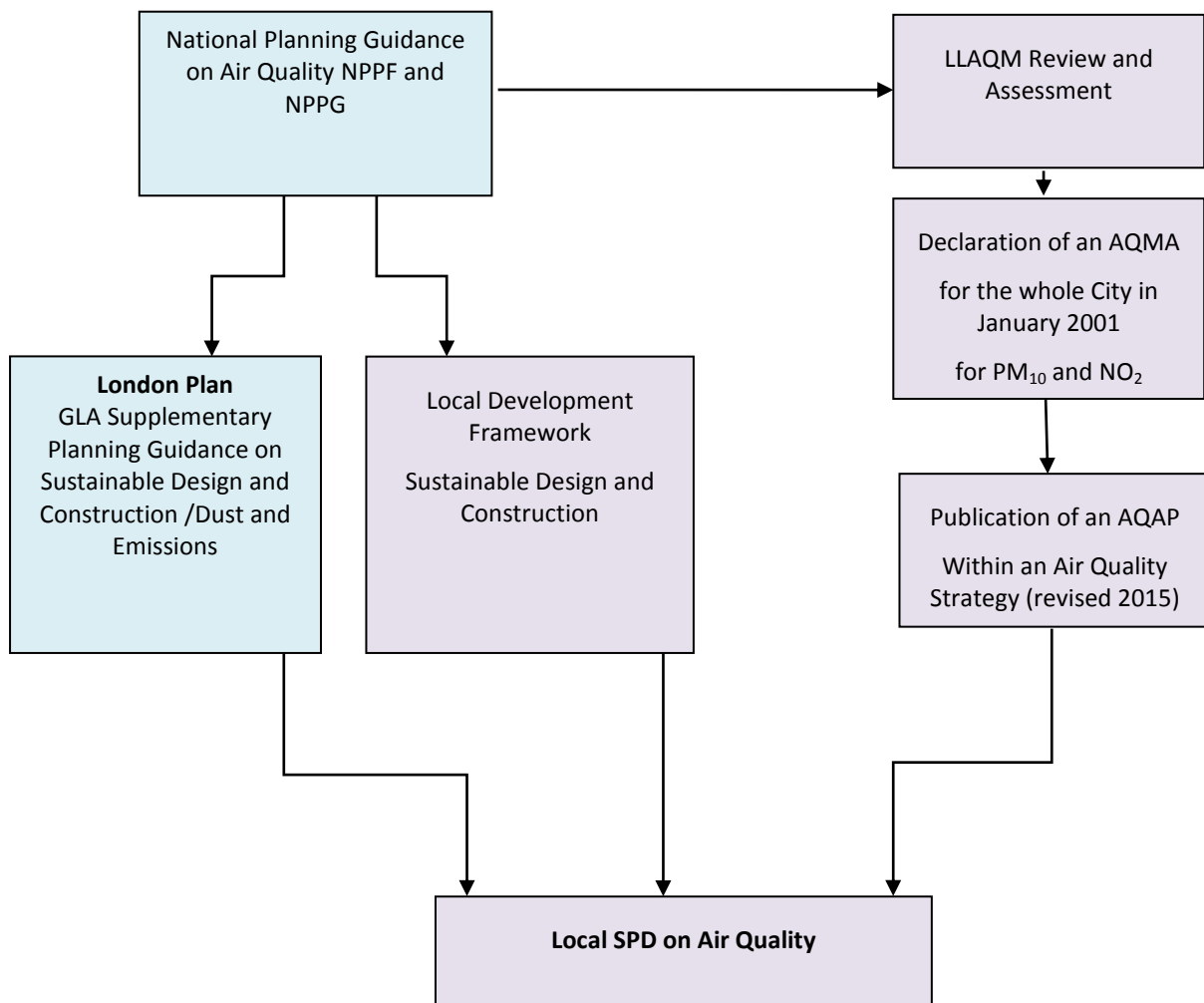
National guidance on when air quality is relevant to a planning decision, what should be included in an air quality assessment and the type of mitigation to be proposed can be found on the government's planning portal.<sup>3</sup>

**E6: Permitting Under Part 1 of the Environmental Protection Act 1990**

Industrial processes which may range from large industrial plant to dry cleaners and paint spraying workshops, are regulated by the Environment Agency (Part A1 processes) and the City (Part A2 and Part B processes). The planning regime must assume that the permitting regime will ensure the processes comply with their permits and the Act. The planning regime can, however consider whether a land use is appropriate and it must consider the exposure to pollutants. For developments requiring planning applications this is done at the planning application stage, and for existing processes it is an ongoing review through Air Quality Action Planning.

**E7: The relationship between national, regional and local policy and guidance**

The relationship of this SPD to national, regional and local policy and guidance, and the City of London AQAS is shown below together with the relevant policy.



<sup>3</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/air-quality/>

## Appendix F: Glossary

Air Quality Assessment (AQA)	An assessment of the impact of a development on the levels of certain pollutants in the local area.
Air Quality Management Areas (AQMAs)	Areas where the air quality objectives are likely to be exceeded. Declared by way of an order issued under the Section 83(1) of the Environment Act 1995.
Air Quality Objectives	Air quality targets to be achieved locally as set out in the Air Quality Regulations 2000 and subsequent Regulations. Objectives are expressed as pollution concentrations over certain exposure periods, which should be achieved by a specific target date. Some objectives are based on long term exposure (e.g. annual averages), with some based on short term objectives. Objectives only apply where a member of the public may be exposed to pollution over the relevant averaging time.
Best Available Techniques (BAT)	The basis for determining the appropriate technique for reducing pollution under the Prevention and Control of Pollution Regulations.
LLAQM.TG(16)	London Local Air Quality Management Technical Guidance (2016). This document provides London advice on how local authorities should assess air quality.
Exceedence	Concentrations of a specified air pollutant greater than the appropriate Air Quality Objective.
Limit Values/EU limit values	The maximum pollutant levels set out in the EU Daughter Directives on Air Quality. In some cases the limit values are the same as the national air quality objective, but may allow a longer period for achieving.
Mitigation	Mitigation measures will minimise, but not necessarily remove, the impact of or effect of poor air quality on a development.
National Air Quality Objectives	See Air Quality Objectives.
National Air Quality Strategy	The Air Quality Strategy for England, Scotland, Wales and Northern Ireland. The current version at the time of producing this SPD was January 2000 with addendum published in February 2003.
NO <sub>2</sub>	Nitrogen dioxide
NO <sub>x</sub>	NO <sub>x</sub> = nitrogen oxides, which includes nitric oxide and nitrogen dioxide. Most pollution sources emit nitrogen oxides primarily as nitric oxide. However, once in the atmosphere nitric oxide can be converted to nitrogen dioxide. Therefore it is important to know the concentrations of both NO <sub>x</sub> and NO <sub>2</sub> .
Offsetting	Measures which 'compensate' for anticipated increases in pollution in the area but not necessarily at the exact locality. This might be for example by

	funding more general measures in the air quality action plan.
PM <sub>10</sub>	Fine particulate matter with a diameter of less than 10 microns diameter.
Part A1 and A2 Processes	Industrial processes which are regulated under the Pollution Prevention and Control (PPC) Regulations and subsequent Integrated Pollution Prevention and Control (IPPC) for emissions to all media (i.e. atmosphere, land and water).
Part B Processes	Industrial processes which are regulated under the Local Air Pollution Control (LAPC) and Local Air Quality Pollution Prevention and Control (LAPPC) Regulations for emissions to air only.
Polluting development	A development which will directly or indirectly increase levels of relevant pollutants. This may include industrial processes but may also include developments which could cause increased traffic emissions. These types of development may increase pollution concentrations.
PPC Regulations	Pollution Prevention and Control Regulations 2000 (as amended).
Risk Assessments	A comprehensive assessment of the risks associated with a particular hazard which is relevant to the development site.
Sensitive development	A development which would allow users of the site to potentially be exposed to pollutants above the objective for the relevant period. For example, the introduction of a new residential development into an area where an air quality objective is already exceeded, would create the potential for the exposure of residents to poor air quality above the objective. Incidentally, this type of development may also generate significant additional traffic flow and also be a polluting development.

## Appendix G: Abbreviations

AQAP	Air Quality Action Plan
AQMA	Air Quality Management Area
AQO	Air Quality Objective
BEB	Buildings Emission Benchmark
CAB	Cleaner Air Borough
CDECD	<u>The Control of Dust and Emissions During Demolition and Construction SPG</u>
CAZ	Central Activity Zone
CLP	Construction Logistic Plans
DSP	Delivery and Service plans
EV	Electric Vehicle
GLA	Greater London Authority
LAEI	London Atmospheric Emissions Inventory
LAQM	Local Air Quality Management
LLAQM	London Local Air Quality Management
NRMM	Non-Road Mobile Machinery
PM <sub>10</sub>	Particulate matter less than 10 micron in diameter
PM <sub>2.5</sub>	Particulate matter less than 2.5 micron in diameter
SDC	<u>Sustainable Design and Construction SPG (2014)</u>
SPG	Supplementary Planning Guidance
TEB	Transport Emissions Benchmark
TfL	Transport for London

## Appendix H: Further Information

City of London Contact Details	e-mail: <a href="mailto:Cityair@cityoflondon.gov.uk">Cityair@cityoflondon.gov.uk</a> phone: 020 7332 3030 web: <a href="http://www.cityoflondon.gov.uk/air">www.cityoflondon.gov.uk/air</a> air quality data: <a href="http://www.londonair.org.uk/LondonAir">www.londonair.org.uk/LondonAir</a>
Mayor, Greater London Authority and Association of London Government	<ul style="list-style-type: none"> <li>✓ The London Plan The Spatial Development Strategy for London</li> <li>✓ Clearing the Air, The Mayor's Air Quality Strategy, December 2010 GLA</li> <li>✓ Sustainable Design and Construction Supplementary Planning Guidance, April 2014, GLA. <i>This provides guidance on air quality neutral procedures and combustion emission limits.</i></li> <li>✓ The Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance, July 2014, GLA. <i>The aim of this guidance is to protect the health of on-site workers and the public and to provide London-wide consistency for developers through the control and monitoring of dust and Non-Road Mobile Machinery (NRMM).</i></li> <li>✓ Technical Guidance Note: Assessment of Air Quality Issues of Planning Applications, 2006, Association of London Government (ALG)</li> </ul>
National Regulation and Guidance	<ul style="list-style-type: none"> <li>✓ Air Quality Standards Regulations 2010</li> <li>✓ UK Air Quality Strategy for England, Scotland, Wales and Northern Ireland, July 2007</li> <li>✓ National Planning Policy Framework Department for Communities and Local Government</li> <li>✓ National Planning Practice Guidance, Housing Standards Review, 2015</li> <li>✓ London Local Air Quality Management Technical Guidance LLAQM.TG(016)</li> <li>✓ Defra, Emissions Factor Toolkit</li> <li>✓ Institute of Air Quality management Guidance <ul style="list-style-type: none"> <li>• Development Control: Planning for Air Quality.</li> <li>• Biomass and Air Quality Guidance for Local Authorities</li> </ul> </li> <li>✓ Low Emission Strategies Partnership</li> </ul>

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# City of London



## City of London Air Quality Supplementary Planning Document Consultation Statement

**July 2017**

## **Introduction**

This Consultation Statement sets out details of the consultation the City of London Corporation has undertaken in the preparation of a Supplementary Planning Document (SPD) to provide guidance on the application of Local Plan Policies for air quality entitled: **City of London Air Quality Supplementary Planning Document**.

## **Consultation Requirements**

This consultation statement has been prepared in accordance with the Town and Country Planning (Local Plan) (England) Regulations 2012. Regulation 12 requires that the City Corporation to prepare a consultation statement setting out the persons consulted when preparing the SPD, a summary of the main issues raised by those persons and how these have been addressed in the SPD.

Key officers from City of London Corporation Departments and City of London members were consulted in the preparation of the Air Quality SPD consultation draft and as part of the public consultation process.

## **Consultation on the draft SPD**

Consultation on the draft SPD took place between the 3<sup>rd</sup> February and 31<sup>st</sup> March 2017 following committee approval at the following committee meetings:

- Port Health and Environmental Protection Committee: 22<sup>nd</sup> November 2016
- Planning and Transportation Committee: 13<sup>th</sup> December 2016

The following stakeholder groups were also consulted:

- Statutory consultees as identified in the City of London Statement of Community Involvement
- City of London Members
- Stakeholders who have expressed an interest in planning policy and are included in the Local Plan's consultation database.

Under the statutory Duty to Co-operate the following organisations were approached for comment:

- London boroughs
- Mayor of London
- London Enterprise Panel
- Transport for London
- The Environment Agency
- Historic England
- Natural England
- The Civil Aviation Authority
- Clinical Commissioning Groups in and around the City of London
- NHS England
- Office of Rail Regulation
- Highways Agency
- The Marine Management Organisation

The City of London Air Quality SPD was made available for consultation on the City's web site. Emails and letters were distributed to relevant stakeholders to provide details on the consultation period. Printed copies of The City of London Air Quality SPD were made available at the Department of the Built Environment Enquiries Desk and the City's five libraries, during their normal opening hours.

## **Responses**

The consultation period triggered 48 comments from 12 respondents. All representations were reviewed and appropriate changes made to the City of London Air Quality SPD. Table 1 shows the comments received, the person or organisation making them, the City Corporation's response to each comment and how the comments have been addressed, where appropriate, in finalising the SPD.

This Consultation Statement should be read in conjunction with the Statement of Adoption which states the amendments to the document following the public consultation.

**Table 1: Comments Received in response to the public consultation on the draft Air Quality SPD**

Ref	Organisation	Name	<b>Comment</b> All comments have been reproduced in full except where ** indicates that a comment has been summarised.	<b>City of London Response</b>
1/1	Natural England	Piotr Behnke	Having looked at the documents which are being consulted on with regard to the City's Air Quality SPD Natural England would not have an issue with the findings of either the Equalities Impact Assessment (EIA) screening or the Strategic Environmental Assessment (SEA) screening documents. Given the fact there are no designated sites in or near to the City of London directly and given the impacts of this work will, if implemented correctly, have a positive impact upon the environment, there are no reasons to require a full assessment being carried out.	Comments noted. No changes required.
1/2	Natural England	Piotr Behnke	The main supplementary planning document relating to Air Quality covers the main areas which would be expected given the subject matter in question and draws very effectively upon various other policies in the City's Local Plan and its subsidiary documents.	Comments noted. No changes required.
1/3	Natural England	Piotr Behnke	Given the lack of any designated sites within the local authority area itself or nearby (with the nearest being Walthamstow Marshes 5.2km to the north east along with the Lee Valley Special Protection Area (SPA) and Ramsar Sites just north of that) the main areas for assessment will be those will include improvements for local residents and those who visit and work in the City.	Comments noted. No changes required.

1/4	Natural England	Piotr Behnke	Ensuring that developments within the square mile area are at least “air quality neutral” is a step toward improving overall levels of pollution however hopefully this would lead to more and more developers competing to be the cleanest developer and thus leading to “air quality positive” developments in due course.	Comments noted. Text amended to reflect emerging air quality positive guidance (5.2.2).
1/5	Natural England	Piotr Behnke	As such Green Infrastructure (GI) use will be important in this aspect, with any inclusion on new build or renovation work having huge potential to improve the local air quality as well as helping to deal with climate change and its impacts into the future (paragraphs 2.3.6 and 2.3.7 are good examples of this).	Comments noted. No changes required.
1/6	Natural England	Piotr Behnke	Given the size of the local authority area promotion of walking and cycling would be simple ways to help potential road users choose other means of transport. Improvements to cycle lanes and promotion of bus routes and tube stations will ensure that visitors can more easily choose how to get about and avoid creating more congestion on the roads by using taxis or renting a vehicle.	Comment noted. No changes required.  Promotion of matters stipulated dealt with by the Mayor of London. Also, City of London <u>Travel Plan Guidance</u> referenced in the SPD, which is available via: <a href="http://www.cityoflondon.gov.uk">www.cityoflondon.gov.uk</a> .
1/7	Natural England	Piotr Behnke	The planting of trees along walking routes and near to roads in particular would help to filter the air in the local area and contribute to cleaning it for those who are walking or cycling around the local authority area.	Comment noted. No changes required.  The City Public Realm SPD deals with highway planting.

1/8	Natural England	Piotr Behnke	The Public Realm SPD and Open Spaces Strategy SPD policies highlighted within this SPD will help to reinforce the reasons why it's important to improve the health and wellbeing of local residents as well as those who work in and visit the City.	Comment noted. No changes required.
1/9	Natural England	Piotr Behnke	Broadly what has been set out in the Air Quality SPD is a positive step forward in cleaning up the air in central London as a whole and this will ensure the City is doing its part in that overall aim.	Comment noted. No changes required.
2/1	Environment Agency	Scott Hawkins	Having reviewed the Air Quality SPD, we agree with the measures that have been proposed and have no particular comments to make on the document. We agree with the Strategic Environmental Assessment Screening Statement, that the SPD would overall have a positive impact on air quality. We do not think the SPD would have any significant environmental effects based on the environmental issues within our remit.	Comments noted. No changes required.
3/1	Greater London Authority /TfL	Kevin Reid	As you are aware, all development plan documents have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004.	Comments noted. No changes required.
3/2	Greater London Authority	Kevin Reid	The Mayor supports the principle of a design led approach to preventing emissions of and reducing exposure to air pollution as set out in this document. Overall therefore the draft SPD is in conformity with London Plan policy 7.14 on air quality.	Comments noted. No changes required.

3/3	Greater London Authority	Kevin Reid	<p>The energy hierarchy in GLA policies may change with the development of the London Environment Strategy (due to be published as a draft in late spring 2017 and finalised in late 2017) and the new London Plan (due to be published as a draft in late 2017, with an Examination in Public during the latter half of 2018 and published in its final form during 2019). The City of London Corporation may wish to revise section 3.2 as these policies emerge.</p>	Comment noted. Text updated to highlight emerging policy (3.2.3).
3/4	Greater London Authority	Kevin Reid	<p>The defined scope for air quality impact assessments is broadly supported, however compliance with the GLA's emissions limits for CHP or biomass boilers &gt;50 kWth must not be taken to mean that this equipment does not need to be assessed. The emissions limits for CHP and biomass set out in our "Sustainable Design and Construction" SPG are not sufficient to guarantee that significant local impacts will be avoided. The SPG states:</p> <p><i>"The emission standards ... are target minimum standards. If an assessment indicates that significant air quality effects may occur even when meeting the emission standards, additional measures (such as stack height increase, enforcement of more stringent standards etc.) should be considered in order to produce an acceptable level of impact."</i></p> <p>In order to accord with our guidance CHP systems and biomass plant over 50 kWth should therefore be subject to the full assessment as set out for smaller units in the draft document.</p>	Comment noted. Text updated to require all CHP to be modelled.

3/5	Greater London Authority	Kevin Reid	Similarly we would recommend that where Clean Air Act chimney height approvals are required these should be subject to a full air quality impact assessment, rather than a D1 calculation.	Comment noted. No changes made.  Where an Air Quality Impact Assessment is required, this will include a detailed assessment of such plant.
3/6	Greater London Authority	Kevin Reid	Any large appliance, such as a CHP unit, should be subject to post-installation testing to demonstrate that it meets the standards expected in the Air Quality assessment, this could be done via planning conditions as mentioned in the Mayor's Sustainable Design & Construction SPG.	Comment noted. Text updated to highlight this will happen (3.4.5).
4/1	Off Grid Energy Ltd	Matthew Pencharz	The items [in blue text] are the suggested additions/amendments:  3.5.2 Where an available TBS is identified as being of insufficient capacity, battery storage technology must be employed to re-enforce grid supply to cater for peaks in power demand (such as for cranes and hoists for example) and so eliminate the need to install a temporary diesel generator.	Comment noted. No changes made.  Comment will be considered for inclusion within guidance to be added to Appendix B and the revision of the City's Code of Practice for Deconstruction and Construction.
4/2	Off Grid Energy Ltd	Matthew Pencharz	3.5.3 Where the need for temporary power generators on a construction site is absolutely unavoidable any generator must use the very latest Euro standard engines in a hybrid system with battery storage technology.	Comment noted. No changes made.  Comment will be considered for inclusion within guidance to be added to Appendix B and the revision of the City's Code of Practice for Deconstruction and Construction.



4/3	Off Grid Energy Ltd	Matthew Pencharz	3.5.7 In temporary applications if the use of diesel generators is unavoidable, they must be of the newest Euro standards and be part of a hybrid solution that uses battery storage technology to reduce generator size and running hours, cut fuel consumption and so reduce emissions and noise to the lowest possible level.	<p>Comment noted. No changes made.</p> <p>Comment will be considered for inclusion within guidance to be added to Appendix B and the revision of the City's Code of Practice for Deconstruction and Construction.</p>
5/1	Mother Goose Nurseries	Krish Brown	Very pleased that there is a high emphasis to reduce pollution in many way. It is also pleasing to see that part of the plan will also be looking at more electric, rapid charge points to share vehicles. Great promoting electric vehicles and the benefits that come with owning one. I still feel that there is a lot more local authority's need to do to make electric vehicle worthwhile owning.	<p>Comments noted. No changes required.</p> <p>The City of London Corporation is currently working with Transport for London to review opportunities for on and off street rapid charging facilities. At present, we are currently identifying where it may be possible to provide such facilities. As this work progresses, more information will be made publicly available when sites have been identified and are scheduled for delivery.</p>
5/2	Mother Goose Nurseries	Krish Brown	As an owner of an electric vehicle I feel that drivers are not complying with the 20 mph speed limit. More should and must be done to address this issue too in enforcing the speed restriction.	<p>Comment noted. Outside the scope of this SPD. No changes required.</p> <p>Feedback from the City of London Police demonstrates that speed checks are regularly conducted as part of normal duties on various days, roads and times and there are periodic Speed Campaigns</p>

				coordinated across Europe. The last City campaign resulted in: 29 prosecutions, 13 FPNs and 29 speed awareness courses.
5/3	Mother Goose Nurseries	Krish Brown	Also very much is favour of promoting cycling, walking to work and or school. I am very much in favour of working with the local authority in promoting a school travel plan for our nurseries.	Comment noted. No changes required.  Respondent advised to contact relevant Local Authority.
6/1	Resident	Sarah Hudson	1. It is well written, easy to read, downloads quickly without messy graphics.	Comment noted. No changes required.
6/2	Resident	Sarah Hudson	2. The provisions and intentions are commendable. However, having read an Air Quality Impact Assessment submitted by a developer – namely Taylor Wimpey in support of its Bernard Morgan House project – the reality seems to fall far short of what might be expected from the provisions in the SPD.	Comments noted. Text updated with guidance (5.3.4 and 5.3.5)  It is anticipated that by providing the SPD, clearer guidance is available for developers when preparing their assessments.
6/3	Resident	Sarah Hudson	Are Impact Assessments reviewed by a suitably qualified officer or consultant acting on behalf of the Planners?	Comment noted. No changes required.  Air Quality Impact Assessments are reviewed by relevant City Officers and comments provided to the planning department.

6/4	Resident	Sarah Hudson	Do developers have to submit a model so that assumptions can be checked?	Text amended to require assumptions to be included in the report when modelling conducted (5.3.6).  Where modelling is required, the baseline and future projection are based on either the London Atmospheric Emission's Inventory (LAEI) or Defra background modelled data.
6/5	Resident	Sarah Hudson	It would seem that the model can be massaged to show pollution levels below EU limits – whereas it seems likely from Citizen Science recording of local data that this is not actually the case.	Comment noted. No changes required.  Some modelling is based on worst case or no improvements in air quality; others are based on predicted improvements associated with GLA and Central Government policies.
6/6	Resident	Sarah Hudson	How are the modelling and assumptions checked?	The SPD text has been amended to include the requirement to provide model assumptions and parameters within the report so they can be checked by the relevant Officer (5.3.6).
6/7	Resident	Sarah Hudson	How rigorous is the review process by planners?	As detailed above, appropriate Officers are consulted regarding the content of submitted reports.

6/8	Resident	Sarah Hudson	3. There is no mention in the document of the Low Emission Neighbourhood. Is the LEN recognised by the Planning process as having special and more rigorous controls on building and traffic emissions?	<p>Comment noted. No changes required.</p> <p>The Low Emission Neighbourhood (LEN) project is in its infancy and therefore not currently a recognised planning entity and this SPD only provides guidance for exiting Local Plan policies.</p>
6/9	Resident	Sarah Hudson	4. Page 11 section 2.3.7 There is more recent research on the positive impact of plants on air quality than the Imperial College study (May 2012).	Comment noted. Text updated to be flexible to emerging research and guidance (2.3.7).
6/10	Resident	Sarah Hudson	5. Very often it is in the management of the building after the end of the construction phase when all the good practice required by planning is lost sight of. The SPD should be more explicit on how the City seeks to monitor and control emissions when buildings are in daily use – either as offices or residential.	<p>Comment noted. No changes made.</p> <p>Emissions are controlled through the type of plant installed and its location as per this SPD (which are conditioned). Further considerations are dealt with through the City Corporation's CityAir business programme.</p>
7/1	Surrey CC	Maureen Prescott	Thank you for consulting Surrey County Council on the Air Quality SPD. We have no comments to make on this consultation document.	Comment noted. No changes required.
8/1	Diocese of London	Brian Cuthberts	We consider this is a fine piece of work. It commands our confidence.	Comment noted. No changes required.

8/2	Diocese of London	Brian Cuthberts	The Diocese generally supports these proposed requirements. The key difficulty is to manage measures to (1) reduce local air pollution and (2) limit GHG emissions in such a way that they complement each other rather than conflict. This has proved a knotty problem in recent years, fraught with the law of unintended consequences, for example the notorious increase in NO <sub>2</sub> emissions from diesel vehicles (even after improved filtration), when purchase of diesel was encouraged as an intended contribution to reducing CO <sub>2</sub> emissions.	Comments noted. No changes required.
8/3	Diocese of London	Brian Cuthberts	In general however we do consider that the Corporation's approach is comprehensive and appropriately aligned with the issues.	Comment noted. No changes required.
9/1	City of London Freight Team	Edward Jackson	<i>1.7.1 &amp; Appendix B</i> Refer to DSP Guidance and forthcoming Freight SPD. We will also have a number of Delivery and Servicing Case study documents that can be included here, they will demonstrate best practice for various aspects of freight management. Should be available in summer.	Comments noted. Changes made in main text (2.2.3) and Appendices B and C
9/2	City of London Freight Team	Edward Jackson	<i>Figure 1- Section 4</i> Refer to requirement to produce Construction Logistics Plan in line with TfL best practice.	Comments noted. Changes made in main text and Appendix B.
9/3	City of London Freight Team	Edward Jackson	2.2.3 Refer to DSP Guidance and forthcoming Freight SPD. Also City Travel Plan advice notes; <a href="https://www.cityoflondon.gov.uk/services/transport-and-streets/transport-planning/Pages/travel-plans.aspx">https://www.cityoflondon.gov.uk/services/transport-and-streets/transport-planning/Pages/travel-plans.aspx</a>	Comments noted. Changes made in main text (2.2.3) and Appendices B and C.

9/4	City of London Freight Team	Edward Jackson	2.2.4 Can this be broadened to incorporate freight and servicing and construct logistics plans as per Local Plan CS16 4(v)? No mention of mode shift to river**	Comments noted. Changes made within 2.2.3 as this section deals with this policy.
9/5	City of London Freight Team	Edward Jackson	<i>Section 4</i> Requirement or encouragement for adherence to FORS standards? Not in Local Plan but included in London Plan 6.1.	Comments noted. No changes made.  This can be incorporated into the revision of the City's Code of Practice for Deconstruction and Construction.
9/6	City of London Freight Team	Edward Jackson	5.3.2 It's clearly detailed and has been thought through, but where have these criteria for an AQIA come from? I assume they are London-wide or national criteria, as they seem out of step with central London - we would not have any developments that have anything like 100 parking spaces or an increase of 5% AADT. Is there scope to review this criteria to suit the City environment?	Comments noted. No changes made.  Wording provided by the GLA and therefore kept.
10/1	Aecom	Puciato, Honor	Paragraph 5.3.4 (e) of the Draft AQ SPD states that CoL will use the Association of London Government (ALG) 2006 test on significance. Can you please send me a link to this document and provide an explanation why significant criteria are based on this document have been selected and not on the latest published Air Quality guidance?	Comments noted. Text updated (5.3.4e) to reflect ALG significance guidance and reference to the Institute of Air Quality Management Guidance.  Consultee contacted and link provided (and included in SPD) <a href="http://www.londoncouncils.gov.uk/our-key-themes/environment/air-quality/london-councils-air-quality-and-planning-guidance">http://www.londoncouncils.gov.uk/our-key-themes/environment/air-quality/london-councils-air-quality-and-planning-guidance</a>

11/1	Resident	David Coleman	This is an important issue to me as a City resident and I strongly support the measures proposed.	Comment noted. No changes required.
11/2	Resident	David Coleman	5.3.2 (a): The riverside should be included as a sensitive land use. As is clear from fig.2, the riverside offers very valuable respite from the generally high levels of NO2 throughout the City. The Noise and Open Spaces strategies draw attention to the value of the riverside for its peace and quiet, with the major contribution to health and wellbeing which this can make. All policy levers should be harnessed to maintain this position, including the Air Quality SPD.	Comment noted. No changes made.  The current choice of 'sensitive land use' (5.3.2(a)) relates to those identified in the Local Plan (which is under review) and relate to where people spend extended amounts of time (e.g. residential clusters and schools). The measures within the SPD (for example, low NOx boilers and emission control measures during development etc.) are mandatory for all developments (not just those in close proximity to sensitive land use) and will ensure the riverside is protected.
12/1	Goldsmith & Co (XEN) Ltd	Jonathan Goldsmith	Your document states that air pollution is particularly affected on main roads such as Upper Thames Street and Victoria Embankment, and similar main roads. The plan attached to your document shows this.  Please explain how the building of cycle lanes that are hardly used, actually helps traffic flow and decreases pollution? This foul air quality is of your own making, as now vehicle lanes are so narrow that emergency vehicles can not pass through traffic and even motorbikes, which should be able to filter through traffic, now have to queue and also	Comments noted. No changes made.  Comments sent to GLA (in association with the respondent) for consideration

			<p>create pollution. In bad weather, because motorcyclists now have to stand still and get wet, many are now moving back to cars and vans when if they are able to keep moving the airflow keeps them dry.</p> <p>The preoccupation with cycling over vehicles that actually pay for road use is bizarre ! and this preoccupation of trying to get (YOUNG) people on bicycles is mainly effective during warmer seasons yet the pollution caused by making traffic stand still happens all year !</p> <p>Either remove the cycle lanes, make them much narrower to be able to allow cars to have sufficient width to overtake or pass a broken down vehicle, or at least allow motorcyclists to use cycle lanes with a 20mph speed limit .... Cycles are frequently faster than that with no restrictions at all, even going through red lights and near missing pedestrians !</p>	
12/2	Goldsmith & Co (XEN) Ltd	Jonathan Goldsmith	<p>The pollution in Central London and The City is also not helped by the ever increasing business rates and rents for retail premises. This means shops close down and purchases are instead made on line.... These minor items that would normally be carried home in a pocket or backpack are now delivered in vans by Amazon with all the relevant paper packaging, all damaging the environment even further.</p> <p>The usual response from British local and central government to compensate for damage to the environment THEY actually create, is to tax the poor people who suffer the consequences of Government actions that created the problem in the first place!</p>	<p>Comments noted. No changes made.</p> <p>Comment from Chamberlains: The Rateable Value of each individual property in the City is set by the Valuation Office Agency (VOA) – an executive agency of Her Majesty’s Revenues and Customs (HMRC). Central government determines the national multipliers that are used to calculate the business rates paid on any single property. The City of London has no power to determine either the rateable value or the</p>



				<p>multipliers.</p> <p>There is no evidence to suggest an increase in the number of empty shops in the City and the overall number of shops has increased from 1,221 in April 2010 to 1,300 in April 2017.</p> <p>The City of London Corporation is in the process of delivering a transport strategy, which will include a Freight SPD. Both will be consulted on in due course.</p>
12/3	Goldsmith & Co (XEN) Ltd	Jonathan Goldsmith	<p>In conclusion, IF you are serious about reducing pollution in the centre of London stop restricting the FREE FLOW of traffic, allow delivery/collection vehicles 15mins delivery time on single yellow bands so they do not have to spend time driving round in circles looking for parking spaces. Increase the number of motorbike spaces in The City (Woefully short!), and allow motorcycles to use the cycle lanes with a 20mph speed limit. At least Motorcyclist obey the highway code and have tax and insurances.</p>	<p>Comments noted. No changes made.</p> <p>The City of London Corporation is in the process of delivering a transport strategy. This will review our policies and objectives of scheme deliverables, waiting and loading restrictions and motorcycle parking policy. The strategy will be consulted on in due course.</p>

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

**City of London**



**Air Quality  
Supplementary Planning Document  
Adoption Statement**

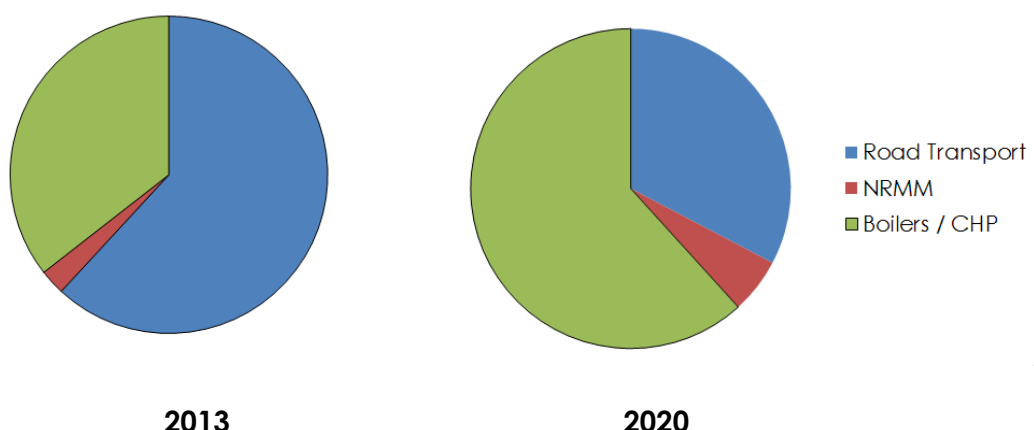
**July 2017**

1. This adoption statement is published to meet the requirements of Regulation 14 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
2. The City of London City Air Quality Supplementary Planning Document (SPD) was adopted on XXXXX 2017.
3. The appendix to this statement sets out the modifications made to the SPD to take account of representations during the consultation period and other relevant matters.
4. Any person with sufficient interest in the decision to adopt the SPD may apply to the High Court for permission to apply for judicial review of that decision.
5. Any such application must be made promptly and, in any event, not later than 3 months after the date on which the SPD was adopted (XXXX 2017).
6. Copies of the SPD, the statement of consultation and the adoption statement are available on request at the Department of the Built Environment enquiries desk, North Wing, Guildhall, London EC2V 5DH. These documents can also be viewed on the City of London website accessed via:  
[www.cityoflondon.gov.uk/airqualityplanning](http://www.cityoflondon.gov.uk/airqualityplanning)

Schedule of changes to City Public Realm Supplementary Planning Document, July 2017

Page	Paragraph	Details	Reason for Change			
7	Figure 1	<p><b>Figure 1: Summary of SPD Requirements and <del>Planning Submission Stage</del></b></p> <table border="1" style="margin-left: auto; margin-right: auto;"> <tr> <td style="text-align: center;"><u>SPD Requirements</u></td> <td style="text-align: center;">Planning Application Requirements</td> <td style="text-align: center;"><u>Pre-Commencement/ Occupation details (where conditioned)</u></td> </tr> </table>	<u>SPD Requirements</u>	Planning Application Requirements	<u>Pre-Commencement/ Occupation details (where conditioned)</u>	Text deleted and inserted for clarity.
<u>SPD Requirements</u>	Planning Application Requirements	<u>Pre-Commencement/ Occupation details (where conditioned)</u>				
7	Figure 1 section 3	<p><b>Combustion plant:</b></p> <ul style="list-style-type: none"> <li>✓ Install low/ultra-low NOx boilers</li> <li>✓ Biomass/<del>biofuel</del> plant discouraged</li> <li>✓ Meet <del>CHP and biomass</del> NOx and PM emission standards</li> </ul>	Text inserted to align with Policy DM15.6 wording and text deleted as conflicting with main text.			
8	Figure 1 section 3	<p><b>Combustion Flues:</b></p> <ul style="list-style-type: none"> <li>✓ at least 1m above roof level</li> <li>✓ 3m above general access areas / amenity space (where the Clean Air Act applies)</li> <li>✓ <u>In accordance with approved Air Quality Impact Assessment</u></li> </ul>	Text inserted to link with text			
8	Figure 1 Section 4	<p>Insert:</p> <ul style="list-style-type: none"> <li>✓ <u>CLP in line with TfL Best Practice</u></li> </ul>	Text amended as per consultation response ref: 9/2			
8	Figure 1 Section 4	Where <u>an</u> Air Quality Impact Assessment is submitted at application stage, include <u>a risk assessment</u> and sensitive receptors and methods to minimise air quality impact.	Text inserted to link with paragraph 3.5.4(a)			
8	Figure 1 Section 4	<p><b>Air Quality Neutral Assessment</b> <i>(or Air Quality Positive as policy emerges)</i> required when the floor space is 1,000m<sup>2</sup> or more or 10 or more residential dwellings:</p> <ul style="list-style-type: none"> <li>✓ Building emissions</li> <li>✓ Transport emissions</li> </ul>	Insert text following Natural England comment ref: 1/4			

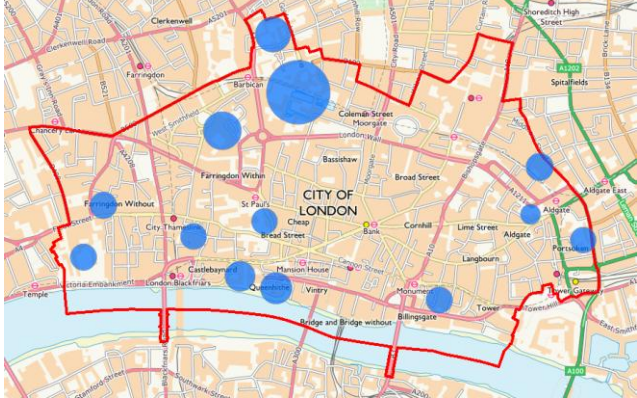
8	Figure 1 Section 5	<p><b>Detailed Air Quality Impact Assessment</b> for major developments when it:</p> <ul style="list-style-type: none"> <li>✓ is within 50m of sensitive use (<u>see figure 4</u>)</li> <li>✓ creates a significant change in traffic (see explanation)</li> <li>✓ requires an EIA</li> <li>✓ involves the Environmental Permitting Regulations</li> <li><del>✓ exposes sensitive or a high number of people to air pollution (schools hospitals and &gt;75 residential properties)</del></li> <li>✓ creates exposure for long periods of the day (e.g. adjacent to busy roads)</li> </ul> <p>For <b>all</b> developments which:</p> <ul style="list-style-type: none"> <li>✓ exposes sensitive or a high number of people to air pollution (schools hospitals and &gt;75 residential properties)</li> <li>✓ creates exposure for long periods of the day (e.g. adjacent to busy roads)</li> <li>✓ <u>include CHP, biomass or biofuel plant.</u></li> </ul> <p><b>Detailed Air Quality Impact Assessment:</b></p> <ul style="list-style-type: none"> <li>• <del>Biomass proposed or &lt;50kWth input CHP not meeting the NOx emission standard</del></li> </ul>	Text deleted, inserted and moved as per consultation response ref 3/4. Text also inserted for clarity. Text moved to ensure assessments conducted for all relevant sites.
9	2.2.3	The Local Plan Core Strategic Policy CS16 (4) V requires developers to demonstrate how the environmental impacts (together with road danger and servicing) will be minimised by submitting the following <u>plans and assessments</u> as part of the planning application process (where applicable); <u>there should also be a consideration of using low emission river transport (where applicable).</u> See Appendix B for guidance relating to:.....	Text and links inserted as per consultation responses ref: 9/1, 9/3 and 9/4
10	2.3.2	Nitrogen dioxide levels decrease with increasing distance from the edge of the road and with height. <del>Background levels of nitrogen dioxide are improving.</del>	Text deleted as may be misleading or become out of date

11/12	2.3.7	<p><b>Green Roofs, Walls and Planting:</b>          As well as increasing biodiversity, plants can play a role in trapping fine particles (PM<sub>10</sub> and PM<sub>2.5</sub>) found in the air we breathe. <del>Research by Imperial College London has</del> indicates that plants with small leaves (which disrupt the flow of air) and fine hairs on their surface work best; however, leaves which cover a large surface or are grooved also provide surfaces upon which particles can be trapped. <del>The Imperial College London report provides guidance on</del> See Appendix B for more information and the types of plants ..... additional <u>research</u>, guidance and green roofs and walls case studies.</p>	Delete and insert text to refer to emerging research and case studies in Appendix B , as per comment: ref 6/9												
13	3.1.2	<p><u>3.1.2 It should be noted that the main source of NOx in the City is currently road transport. However, there is a predicted shift by 2020 to boilers and CHP generating a greater proportion of NOx (see figure 3). Zero and low NOx technology is therefore strongly encouraged.</u></p> <p><b><u>Figure 3 Anticipated changes in the source of NOx in the City of London (source: London Atmospheric Emission's Inventory 2013)</u></b></p>  <table border="1"> <caption>Estimated data for Figure 3: Anticipated changes in the source of NOx in the City of London</caption> <thead> <tr> <th>Year</th> <th>Road Transport (%)</th> <th>NRMM (%)</th> <th>Boilers / CHP (%)</th> </tr> </thead> <tbody> <tr> <td>2013</td> <td>~55</td> <td>~5</td> <td>~40</td> </tr> <tr> <td>2020</td> <td>~35</td> <td>~5</td> <td>~60</td> </tr> </tbody> </table>	Year	Road Transport (%)	NRMM (%)	Boilers / CHP (%)	2013	~55	~5	~40	2020	~35	~5	~60	Figure and text inserted to emphasise future contribution of combustion plant to NOx levels.
Year	Road Transport (%)	NRMM (%)	Boilers / CHP (%)												
2013	~55	~5	~40												
2020	~35	~5	~60												

14	3.2.3 (new)	It is acknowledged that the GLA energy hierarchy policies may change with the development of London Environment Strategy and the new London Plan. Developers should have regard to the emerging policies at the time of application.	Inserted text following GLA comment ref: 3/3
14	3.2.3 (old)	<del>3.2.3 See section 3.4 for information relating to biomass and CHP selection and emissions.</del>	Deleted, not required
14	3.3	<b>3.3 Gas Boilers</b>	Inserted for clarity
14/15	3.4 / 3.4.1	<b>Biomass or Biofuel Boilers and CHP</b>  3.4.1 When sited and specified appropriately in accordance with the energy demands of the building, CHP systems and biomass or biofuel boilers can have benefits in terms of carbon emissions. However, they can usually give rise to significantly higher emissions of NOx and/or PM <sub>10</sub> emissions than regular gas boilers, and developers should ensure that the emission standards set in the Mayor's SDC SPG are not exceeded. The SDC SPG does not currently provide guidance where plant is <50kWth input. The City would expect all such plant to meet a NOx emission limit of <50mgNm <sup>3</sup> at 5% O <sub>2</sub> (dry gas) as a minimum.	Amended for clarity and in line with wording in Local Plan Policy DM15.6.
15	3.4.4	Where CHP, <50kWth input (i.e. those not covered by the SDC SPG NOx emission limit) or biomass or biofuel boilers are proposed, plant emissions must be evaluated as part of a detailed Air Quality Impact Assessment (see Section 5). and Where permitted, the appliance will be required to meet high standards of air pollution control, with particular emphasis on: <ul style="list-style-type: none"> <li>• boiler plant design and operation;</li> <li>• pollution abatement equipment;.....</li> </ul>	Update text following GLA comment ref: 3/4 and wording in Local Plan Policy DM15.6.
15	3.4.5	Prior to CHP, biomass or biofuel plant coming into operation the following details must be submitted to and approved in writing by the Local Planning Authority; this will be conditioned within the planning consent:	Update text following GLA comment ref: 3/6 and wording in Local Plan Policy



		<ul style="list-style-type: none"> <li>The results of an emissions test demonstrating compliance with the emission and efflux velocity requirements of the SDC SPG.....</li> </ul>	DM15.6.
16	3.6.1	.....must terminate as a minimum at least 1 metre above the highest point of the building of which the plant serves, <u>or as specified by the approved Air Quality Impact Assessment</u> , unless agreed with the City Corporation. With regard to this requirement,.....	Inserted text to link with purpose of Air Quality Impact Assessments
18	4.5.1	The NRMM policy is set out in the Mayor's Dust and Emissions SPG. Since 1 September 2015, NRMM <u>with a</u> net power between 37kW and 560kW used in <u>the</u> Central Activity Zone...	Inserted text for clarity
18	4.5.4	The AQDMP submitted should provide a commitment to adhering to this policy, <u>or any update thereof</u> .	Inserted text to ensure document does not become out of date
19	5.2.2 (new)	<u>It is acknowledged that there is an emerging policy relating to developments being air quality 'positive' rather than air quality 'neutral' and Developers should have regard to this new guidance if it is available at the time of application.</u>	Insert text following Natural England comment ref: 1/4
20	5.3.2	<p>A <u>detailed</u> Air Quality Impact Assessment must be submitted at the application stage for <b>major developments</b> which:</p> <p>(a) <b>are in close proximity to a sensitive land use.</b> This includes developments within 50m of the locations shown in figure 4 overleaf (<i>including large residential areas - <u>as detailed in the Local Plan, schools, nurseries and St Bartholomew's Hospital</u></i>)</p> <p>(b) <b>create a significant change in traffic.</b> In developments that introduce, or increase car parking facilities by 100 spaces or more, or with the potential to significantly change road traffic on any road exceeding 10,000 vehicles per day. Significant changes include:</p> <ul style="list-style-type: none"> <li>- increase in traffic volumes &gt; 5% (Annual Average Daily Traffic (AADT) – or peak);</li> <li>- lower average vehicle speed or significant increase in</li> </ul>	<p>Text inserted for clarity. Text moved to ensure assessments conducted for all relevant sites.</p> <p>Update text following GLA comment ref: 3/4 and wording in Local Plan Policy DM15.6.</p>

		<p>congestion;</p> <ul style="list-style-type: none"> <li>- significant increase in the percentage of HGVs;</li> </ul> <p><del>(c) <b>expose sensitive or a high number of people to air pollution:</b> This includes schools, hospitals and developments with more than 75 homes; or where people will be exposed to poor air quality for significant periods of the day, in particular developments located on busy roads where exceedences of the air quality objectives are seen (see figure 2 in Section 2).</del></p> <p>(d) are associated with the <b>Environmental Permitting Regulations</b></p> <p>(e) developments requiring require an <b>Environmental Impact Assessment</b></p> <p>For <b>all</b> developments which:</p> <p><u><b>expose sensitive or a high number of people to air pollution:</b> This includes schools, hospitals and developments with more than 75 homes; or where people will be exposed to poor air quality for significant periods of the day, in particular developments located on busy roads where exceedences of the air quality objectives are seen (see figure 2 in Section 2).</u></p> <p><u><b>involve the following energy generation:</b> CHP, biomass or biofuel plant, boilers and biomass or gas CHP less than 50kWth input that do not have a NOx emission of &lt;math&gt;&lt;50\text{mgNm}^3&lt;/math&gt; at 5% O<sub>2</sub> and dry gas.</u></p>	
21	Figure 4	 <p>© Crown copyright and database rights 2017 OS 100023243</p>	Insert link, for map and insert new map to align closer with the Local Plan.

		see <a href="https://www.cityoflondon.gov.uk/maps/Pages/interactive-maps.aspx">https://www.cityoflondon.gov.uk/maps/Pages/interactive-maps.aspx</a> <b>Figure 4</b> <b>Location of Sensitive Land Use within which an Air Quality Impact Assessment is required</b>	
21	5.3.3	The scope of an air quality impact assessment is: <ul style="list-style-type: none"> <li>• <u>To assess local air quality pollutants and dust</u></li> <li>• To assess the current baseline situation in the vicinity of the proposed development;</li> <li>• To predict the future impact in the first year of operation, both with and without the proposed development, but including all consented development, by calculating statistics that can be compared with the air quality objectives.</li> </ul>	Insert text from GLA SPD template document.
22	5.3.4(b)	<b>Sensitive receptors:</b> Sensitive receptors, <u>at relevant heights</u> , that could be affected <u>by the development</u> must be identified as part of the assessment <u>(and shown on a map)</u> .	Update text for clarity
22	5.3.4(e)	<b>Impact and Significance:</b> <u>Standard impact descriptors (for example as detailed in the Institute of Air Quality Management Guidance) should be used to describe the air quality impact of the development on relevant receptors. A professional judgement with regard to the significance of the impact should be provided. However, as detailed in the Association of London Government (ALG) 2006 guidance, the City Corporation will ultimately decide the air quality significance of the development.</u>	All text updated following comments ref: 10/1 and 6/2
22	5.3.5 – 5.3.6	<b><del>Detailed Air Quality Impact Assessment Modelling Requirements:</del></b>  5.3.5 <del>Where the plant installed includes CHP less than 50kWth input and low NOx technology is not proposed or biomass fuelled plant is planned, a more detailed assessment is required.</del>  5.3.5 Dispersion Modelling shall be carried out in accordance with Defra's <del>Technical Guidance Note (TG016)</del> , <u>appropriate guidance see, Appendix B</u> . Due to the complex nature of the City's environment,	Text updated and reordered for clarity following comments referenced 3/4, 6/2, 6/4 and 6/6.

		<p>the type of model selected must <u>be appropriate for a complex urban environment with tall buildings and street canyons. be ADMS Urban or equivalent and in accordance with TG-016.</u></p> <p>5.3.6 The assessment must specify the <u>model inputs and verification (where appropriate), assumptions made (for example plant operating hours and conditions) and</u> technical details related to the proposed appliance, fuel type, emission concentrations, and maintenance and exhaust stack details.</p> <p>5.3.7 The assessment must <del>also include an atmospheric dispersion model to predict a prediction of</del> the current baseline and future PM<sub>10</sub>, PM<sub>2.5</sub> and NO<sub>x</sub> concentrations. Predictions of future concentrations should be both with and without the proposed development.</p> <p>5.3.6 <del>In addition to the above, the</del> <u>Where proposed plant uses biomass or biofuel, the</u> detailed Air Quality Impact Assessment shall also compare the impact of emissions from the <u>proposed</u> biomass boiler/CHP and a gas boiler/CHP of identical thermal rating.</p>	
26	Appendix A	<p><u>Detailed</u> Air Quality Impact Assessment: Major developments when it:</p> <ul style="list-style-type: none"> <li>• is within 50m of sensitive use</li> <li>• creates a significant change in traffic (see explanation)</li> <li>• <del>exposes sensitive or a high number of people to air pollution (schools hospitals and &gt;75 residential properties)</del></li> <li>• <del>creates exposure for long periods of the day</del></li> <li>• requires an EIA or involves EPR</li> </ul> <p><u>For all</u> developments which:</p> <ul style="list-style-type: none"> <li>• <u>exposes sensitive or a high number of people to air pollution (schools hospitals and &gt;75 residential properties)</u></li> <li>• <u>creates exposure for long periods of the day</u></li> <li>• <u>include CHP, biomass or biofuel plant</u></li> </ul>	<p>Insert and delete text as per comment ref: 3/4 and wording in Local Plan Policy DM15.6. Text moved to ensure assessments conducted for all relevant sites.</p>

		<p><del>Modelling of Biomass and small CHP (not meeting low NOx limit)</del></p> <p>Submit intention for:</p> <ul style="list-style-type: none"> <li>• Low NOx boilers and <u>low</u> NOx CHP</li> <li>• Exclusion of biomass / <u>biofuel</u></li> <li>• Minimised generator use</li> </ul>	
27/28	Appendix B	<p>Updated and inserted text and links to guidance and case studies.          Inserted '<b>Appendix B : Amendment Log</b>' to document future changes / additions.</p>	<p>As per comments received to link to main text and in light of emerging guidance.</p> <p>Log inserted to assist with transparency.</p>
29	Appendix C	<p><b>C2: Supporting Strategies and SPD's</b>          The City Corporation has a number of strategies and SPDs which support the implementation of the Local Plan and Air Quality Strategy. These documents can be found on the City of London website. <u>it should be noted that a Freight SPD is being developed at the time of this SPD's publication.</u></p>	Text inserted as per comment 9/3
39	Appendix E	<p>E2: London <u>Local Air Quality Management</u> (LLAQM) Framework          E3: According to the 2013 <u>London Atmospheric Emissions Inventory (LAEI)</u>,          .....</p>	Text inserted to give full name
44	Appendix H	Web links removed	To stop links becoming outdated

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# Agenda Item 10

<b>Committee</b>	<b>Dated:</b>
Planning & Transportation Committee	25 July 2017
<b>Subject:</b> Revenue Outturn 2016/17	<b>Public</b>
<b>Report of:</b> Chamberlain Director of the Built Environment Director of Open Spaces The City Surveyor	<b>For Information</b>
<b>Report author:</b> Dipti Patel, Chamberlain's Department	

## Summary

This report compares the revenue outturn for the services overseen by your Committee in 2016/17 with the final budget for the year. Overall total net expenditure across all risks during the year was £18.491m, whereas the total budget was £18.877m, representing an underspend of (£0.386m) as set out below:

<b>Summary Comparison of 2016/17 <u>All Risk</u> Revenue Outturn with Final Agreed Budget</b>			
<b>Direct Net Expenditure</b>	<b>Final Budget £000</b>	<b>Revenue Outturn £000</b>	<b>Variations Increase/ (Reduction) £000</b>
Director of Built Environment	4,889	4,624	(265)
Director of Open Spaces	1,468	1,504	36
The City Surveyor	905	686	(219)
<b>Total Direct Net Exp</b>	7,262	6,814	(488)
<b>Capital &amp; Support Services</b>	11,615	11,677	62
<b>Overall Totals</b>	<b>18,877</b>	<b>18,491</b>	<b>(386)</b>

Chief Officers have submitted requests to carry forward local risk underspending and these requests will be considered by the Chamberlain in consultation with the Chairman and Deputy Chairman of the Resource Allocation Sub Committee.

## Recommendation

It is recommended that this revenue outturn report for 2016/17 and the proposed carry forward of local risk underspendings to 2017/18 are noted.

## MAIN REPORT

### Revenue Outturn for 2016/17

1. Actual net expenditure across all risks for your Committee's services during 2016/17 totalled £18.491m, an underspend of (£0.386m) compared to the final budget of £18.877m. A summary comparison with the final budget for the year is tabulated below. In this and subsequent tables, figures in brackets indicate income or in hand balances, increases in income or decreases in expenditure.

<b>Table 1 - Summary Comparison of 2016/17 All Risk Revenue Outturn with Final Budget</b>				
	<b>Final Budget £000</b>	<b>Revenue Outturn £000</b>	<b>Variations Increase/ (Reduction) £000</b>	<b>Variation Increase/ (Reduction) %</b>
<b>Local Risk</b>				
Director of Built Environment	9,336	8,749	(587)	(6.3)
Director of Open Spaces	1,468	1,504	36	2.5
The City Surveyor - Breakdown Repairs Maintenance	538	508	(30)	(5.6)
- Additional Works Programme	367	178	(189)	(51.5)
	-----	-----	-----	-----
The City Surveyor	905	686	(219)	(24.2)
	-----	-----	-----	-----
<b>Total Local Risk</b>	<b>11,709</b>	<b>10,939</b>	<b>(770)</b>	<b>(6.6)</b>
	-----	-----	-----	-----
<b>Central Risk</b>				
Director of Built Environment	<b>(4,447)</b>	<b>(4,125)</b>	322	<b>(7.2)</b>
<b>Capital and Support Services</b>	<b>11,615</b>	<b>11,677</b>	62	<b>0.5</b>
<b>Overall Totals</b>	<b>18,877</b>	<b>18,491</b>	<b>(386)</b>	<b>(2.0)</b>

2. The main local risk variation comprises:

- **Director of Built Environment (£587,000 underspend):**
  - i. Off-Street Parking savings (£210,000) due mainly to refund on electricity costs, reduced car park maintenance costs relating to contract variation adjustments and increase in car park income.



- ii. Drains and Sewers saving (£192,000) as a result of increase in admin fees from recoverable jobs, additional income from Thames Water Contract reimbursements and increases in pipe-subway opening fees.
  - iii. Building Control underspends (£84,000) due to salary savings as a result of difficulties in recruiting, additional income from Approvals in Principle and other running cost savings.
  - iv. Transportation Planning underspend (£73,000) due mainly to anticipated spend on Freight Strategy in 2016/17 now going ahead in 2017/18 and reduced printing costs.
  - v. On-Street Parking underspend (£74,000) due to breakdown maintenance repair work on pay and display meters not required during the year.
  - vi. Highways overspend £47,000 mainly as a result of high levels of repairs and maintenance works being carried out due to increased numbers of building sites and activity in the City including high levels of defects to correct £156,000. This was offset by reduced electricity costs (£33,000), additional admin costs recovered from increase in recoverable jobs (£23,000) and increase in staff cost recovery from projects (£51,000).
- **City Surveyor (£219,000)** - the underspend on 'Breakdown Repairs Maintenance' was (£30,000) due to a reduced requirement for reactive works during the year. The Additional Works Programme (AWP) underspend of (£189,000) was mainly due to works on the Holborn Viaduct Bridge Project for corrosion painting not going ahead and works to Baynard House Car Park lighting and power rewire to be carried out in 2017/18 due to change in the expected works programme. The AWP does not form part of the City Surveyor's local risk budget and will be rolled over to 2017/18. This is a three year rolling programme reported to the Corporate Asset Sub Committee (CASC) quarterly, where the City Surveyor will report on financial performance and also phasing of the projects. Under the governance of the programme, unspent budgets are automatically rolled over for the life of the programme to allow for the completion of projects which span multiple financial years.
3. The main central risk overspend of £322,000 comprises:
- i. Shortfall in planning fee income £173,000
  - ii. Reduced funding transfer from the On-Street Parking Reserve Account £275,000 due to lower net operating costs for Off-Street parking services.
  - iii. Increased surplus funds transferred to the On-Street Parking Reserve Account £870,000 due to increases in income for PCN's (£497,000), parking meters (£312,000) and suspended meters/dispensations (£159,000); partly offset by an increase in the provision for PCN bad debts £146,000.
  - iv. Reduced funding contributions from Bridge House Estate to City Fund for the London Bridge Staircase project (£79,000) and spend on consultant fees for the Thames Bridges not required for the year (£53,000).

4. The capital and support services overspend of £62,000 is mainly due to increase in premises insurance for the Thames Bridges.
5. Appendix A provides a more detailed comparison of the local and central risk outturn against the final budget, including explanation of significant variations.
6. Appendix B provides a movement in budget from the latest approved budget to the final budget in 2016/17.

### **Local Risk Carry Forward to 2017/18**

7. The Director of the Built Environment had a local risk underspending of (£587,000) on the activities overseen by your Committee, which is eligible to carry forward to 2016/17. The Director also had local risk underspends of (£50,000) on activities overseen by other Committees she supports. The Director is proposing that a total of £500,000 is carried forward, and relates directly to activities overseen by your Committee for the following purposes:
  - £200,000 resources for Future City Initiatives agreed in principle by Policy & Resources Committee.
  - £50,000 for consultants to advise on Traffic congestion as agreed by members.
  - £50,000 to be utilised to build on the work undertaken to attend MIPIM 2017 when consultants were engaged to develop a new media campaign relating to broadening the attractiveness of the City to a more diverse range of business industries.
  - £50,000 to commission detailed City wide map of air pollution in the City.
  - £45,000 for temporary resource to support the transition phase of the Department of Built Environment portfolio which will deliver the Department's priority programmes which in turn is helping to deliver the draft Corporate and Place priorities.
  - £30,000 for Gigabit City WiFi deployment as part of the Citywide WiFi deployment (which will house WiFi equipment on 150 City owned street furniture locations); around 60 street furniture columns will need to be replaced to provide the required coverage in certain areas.
  - £20,000 for POD furniture to accommodate an increase in employees on the first floor North Wing. The furniture will allow staff to envisage the AWOW scheme and can be incorporated into the project when it goes 'live'.
  - £15,000 is required for Strategic Environmental Assessment (SEA) of Freight & Servicing Strategy.
  - £15,000 to fund additional 3D modelling building on the on-going development of the 3D model to model the future development massing scenarios to understand opportunities and capacity with the Eastern Cluster for additional commercial floor space to ensure the City's role as the World's foremost Business Centre.

- £15,000 is required for commissioning of 'Planning for Lighting' document to join emerging family of Planning Advise Notes which will be integral part of planning for the 'Future City'.
  - £10,000 for Cross River Partnership Click & Collect proposal. The Initiative is part of the Freight Strategy.
8. These requests will be considered by the Chamberlain in consultation with the Chairman and Deputy Chairman of the Resource Allocation Sub Committee.
  9. The Director of Open Spaces had a local risk overspend of £36,000 on the activities overseen by your Committee. The Director also had a local risk underspend totalling (£582,000) on activities overseen by the Culture, Heritage and Libraries Committee and is proposing that £200,000 of his underspend be carried forward to 2017/18.

### **Thames Bridges' Repairs, Maintenance and Major Works Fund**

10. The Bridges Repairs, Maintenance and Major Works Fund is operated to provide sufficient resources to meet the maintenance costs of the five bridges over a period of 50 years. The fifty year programme of works undertaken by the City Surveyor and the Director of the Built Environment to be met by the fund was agreed by your Committee on 13th December 2016. The breakdown is shown below in Table 2.
11. The actual expenditure for 2016/17 was £7.808m against a budget of £9.033m, an underspend of (£1.225m).

<b>Table 2: Thames Bridges Repairs, Maintenance and Major Works Fund Analysis of Outturn for 2015/16</b>				
	Final Budget £'000	Outturn £'000	Variance increase/ (decrease) £'000	Variation Increase/ (Reduction) %
Blackfriars Bridge	191	175	(16)	(8.4)
Southwark Bridge	171	33	(138)	(80.7)
London Bridge	329	217	(112)	(34.0)
Millennium Bridge	63	25	(38)	(60.3)
Tower Bridge	8,279	7,358	(921)	(11.1)
<b>Total</b>	<b>9,033</b>	<b>7,808</b>	<b>(1,225)</b>	<b>(13.6)</b>

12. The principal reasons for the (£1.225m) variances are set out below:

- **Southwark Bridge** - underspend of (£138,000) was mainly due to on-going delays in the re-waterproofing of Park Street Bridge, part of the approach to Southwark Bridge. The work cannot start until leaking water main has been fixed. This is due to be repaired in 2017/18.
- **London Bridge** - underspend of (£112,000) was mainly due to the flood lighting project which was due to be carried out in 2016/17. The project was put on hold as the Illuminated River Project was launched, proposing a very similar solution. The works have therefore been co-ordinated and the flood lighting replacement will be carried out in 2017/18. Also, there was an underspend in the testing of the track fixing for the inspection cradle. The cradles are now operational.
- **Tower Bridge** - underspend of (£921,000) was mainly due to works to the walkway roof being postponed as a result of the major works carried out to re-deck the bascules and approaches. From the main Tower Bridge Re-decking Project, the underspend related to saving from the risk money, retention fees due to TfL and delays to upgrading the ANPR cameras works. These and other minor works are being re-programmed into the next financial year.

13. The balance on the fund at 31st March 2017 was £147.799m (£142.802m 31st March 2016), an increase of £4.997m from a year earlier, as set out in Table 3 below.

	£'000
<b>Balance brought forward 1<sup>st</sup> April 2016</b>	<b>(142,802)</b>
<u>Expenditure:</u>	7,808
<u>Income:</u>	
Planned contributions to fund on 1 <sup>st</sup> April	(1,093)
Interest accruing	(123)
Rental income	(1,251)
Investment income	(2,185)
Other income	(83)
Gain on fair value of investments	(12,413)
<u>Capital Movements</u>	
Additions	8,524
Gain on property revaluation	(4,181)
<b>Balance carried forward at 31<sup>st</sup> March 2017</b>	<b>(147,799)</b>

14. The gain on the fair value of investment is primarily due to strong returns in public equity markets for the year ending 31<sup>st</sup> March 2017. The additions relates to the purchase of 21 Lime Street. The gain on property revaluation reflects the in-year, unrealised market movement in the value of property investments made from the balances held in the Bridges Repairs Fund. The balance on the fund as at the 31st March 2017 of £147.799m will be carried forward to meet the cost of works in 2017/18 and later years.
15. An updated 50 year programme will be presented later on in the year to your committee for approval, as part of the annual estimate cycle.
16. The Court of Common Council approved the published Efficiency and Sustainability Plan on the 13th October 2016. This plan focuses on the existing Service Based Review programme which is now nearing completion, other agreed transformation initiatives and developing a framework for continuous efficiency improvement for 2017/18 and later years. This plan needs to be viewed in the context of the overall Medium Term Financial Strategy to have a five year plan with sufficient cashable savings to present a balanced budget for all four funds and adopting an investment approach utilising the headroom to invest in one-off projects such as the Museum of London relocation project and 'bow wave' list of outstanding repairs. To assist with this context and messaging, a set of core messages on the City of London Corporation's Finances have been developed and are set out in Appendix C for members information.

**Contact Officers:**

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**Appendices:**

**Appendix A** – Planning & Transportation Committee – Comparison of 2016/17 Revenue Outturn with Final Budget

**Appendix B** – Planning & Transportation Committee – Movement in 2016/17 Latest Approved Budget to Final Budget

**Appendix C** – Efficiency and Sustainability Plan – Core messages

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## Planning &amp; Transportation Committee – Comparison of 2016/17 Revenue Outturn with Final Budget

	<b>Final Budget £000</b>	<b>Revenue Outturn £000</b>	<b>Variation Increase/ (Decrease)</b>	<b>Variation Increase/ (Reduction) %</b>	<b>Reasons</b>
<b>LOCAL RISK</b>					
<b>Director of the Built Environment</b>					
City Fund					
Town Planning	2,563	2,571	8	0.3	
Planning Obligations	0	0	0	0	
Transportation Planning	885	812	(73)	(8.2)	1
Road Safety	403	371	(32)	(7.9)	
Building Control	79	(5)	(84)	(106.3)	2
Structural Mtce/Inspections	476	508	32	6.7	
Highways	3,168	3,215	47	1.5	3
Traffic Management	(1,251)	(1,270)	(19)	(1.5)	
Off-Street Parking	(232)	(442)	(210)	(90.5)	4
On-Street Parking	2,633	2,559	(74)	(2.8)	5
Drains & Sewers	356	164	(192)	(53.9)	6
Committee Contingency	0	0	0	0	
<b>Total City Fund</b>	<b>9,080</b>	<b>8,483</b>	<b>(597)</b>	<b>(6.6)</b>	
Bridge House Estates					
Thames Bridges	256	266	10	3.9	
<b>Total Director of the Built Environment</b>	<b>9,336</b>	<b>8,749</b>	<b>(587)</b>	<b>(6.3)</b>	
<b>Director of Open Spaces</b>					
Tower Bridge	<b>1,468</b>	<b>1,504</b>	<b>36</b>	<b>2.5</b>	
<b>The City Surveyor*</b>					
Town Planning	38	8	(30)	(78.9)	
Highways	294	174	(120)	(40.8)	
Off-Street Parking	573	504	(69)	(12.0)	
<b>Total City Surveyor</b>	<b>905</b>	<b>686</b>	<b>(219)</b>	<b>(24.2)</b>	7
<b>TOTAL LOCAL RISK</b>	<b>11,709</b>	<b>10,939</b>	<b>(770)</b>	<b>(6.6)</b>	

(\*includes the Additional Works Programme)

## Reasons for significant Local Risk variations

1. **Transportation Planning** - underspend due to spend anticipated for Freight Strategy in 2016/17 now going ahead in 2017/18 (£50,000), reduced printing costs (£10,000) and savings across other supplies and services expenditure budgets (£13,000).
2. **Building Control** - underspend due to staff vacancies (£27,000), spend on consultant not required in 2016/17 (£15,000), savings across other supplies and services expenditure budgets (£9,000), additional income from Approvals in Principal (£25,000) and increase in staff time recharged to reserve for work carried out on Sustainable Drainage (£8,000).
3. **Highways** – overspend mainly due to due to high levels of repairs and maintenance works being carried out due to increased numbers of building sites and activity in the City including high levels of defects to correct £156,000. This was offset by reduced electricity costs (£33,000), additional admin costs recovered from increase in recoverable jobs (£23,000) and increase in staff cost recovery from projects (£51,000).
4. **Off-Street Parking** - underspend mainly due to increase in car park income (£72,000), refunds on electricity costs (£63,000), spend on professional fees not required (£20,000), reduced car park maintenance contract costs due to variation adjustments (£32,000) and savings across other running budgets (£23,000).
5. **On-Street Parking** - underspend of (£68,000) due to work on pay and display meter breakdown maintenance repairs not required, reduced contract costs due to reduction in PAS charges (£13,000) and increases in other running budgets £7,000.
6. **Drains and Sewers** – underspend of (£155,000) mainly due to increase in admin fees for recoverable jobs, reimbursement from Thames Water contract (£36,000), increase in pipe-subway openings fees due to increased activity (£25,000) and salary underspends (£28,000). This has been offset by overspend in repairs and maintenance works £41,000 and increased spend on safety equipment £13,000.
7. **City Surveyor** - underspend of (£30,000) on Breakdown Repairs Maintenance is due to no requirement for reactive works during the year and conservations works to the City Wall now been undertaken in 2017/18. The City Surveyor's Additional Works Programme underspend of (£189,000) was mainly due to works on the Holborn Viaduct Bridge Project for corrosion painting not going ahead and works to Baynard House Car Park lighting and power rewire to be carried out in 201718 due to change in the expected works programme.



Planning & Transportation Committee – Comparison of 2016/17 Revenue Outturn with Final Budget

	<b>Final Budget £000</b>	<b>Revenue Outturn £000</b>	<b>Variation Increase/ (Decrease) £000</b>	<b>Variation Increase/ (Reduction) %</b>	<b>Reasons</b>
<b>CENTRAL RISK</b>					
<b>Director of the Built Environment</b>					
City Fund					
Town Planning	(746)	(573)	173	23.2	<b>8</b>
Transportation Planning	66	66	0	0	
Street Scene	106	106	0	0	
Highways	(1,964)	(1,971)	(7)	(0.4)	
Off-Street Parking	(573)	(298)	275	48.0	<b>9</b>
On-Street Parking	(2,861)	(2,813)	48	1.7	<b>10</b>
Structural Maintenance	(130)	(150)	(20)	(15.4)	
Committee Contingency	15	0	(15)	(100.0)	
	(6,087)	(5,633)	454	7.5	
Bridge House Estates					
Thames Bridges	1,640	1,508	(132)	(8.0)	<b>11</b>
<b>TOTAL CENTRAL RISK</b>	<b>(4,447)</b>	<b>(4,125)</b>	<b>322</b>	<b>7.2</b>	

Reasons for significant Central Risk variations

8. **Town Planning** – shortfall mainly due to planning fee income which was anticipated in the last quarter of the financial year from a couple of large planning applications did not come through until the new year.
9. **Off-Street Parking** – local risk operating underspend of (£210,000), reduced spend by the City Surveyor on the Additional Work Programme (£69,000) and increased support services recharges £4,000, resulted in a reduced requirement to draw down from the On-Street Parking Reserve Account.
10. **On-Street Parking** – income increases for PCN's (£497,000), parking meters (£312,000) and suspended meters/dispensations (£159,000); together with an increase in the provision for bad debts of £146,000, resulted in a surplus position and allowed an increase in the funds transferred to the On-Street Parking Reserve Account of £870,000.
11. **Thames Bridges** – variance due to reduced contribution required from Bridge House Estate to City Fund for the London Bridge Staircase project (£79,000) and underspend on consultant costs not required during the year (£53,000).

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Planning & Transportation Committee – Movement in 2016/17 Latest Approved Budget to Final Budget

Service Managed	Original Budget 2016-17 £'000	Latest Approved Budget* 2016-17 £'000	Final Budget 2016-17 £'000	Movement £'000	Notes
<b>CITY FUND</b>					
Town Planning	2,450	2,508	2,592	84	(a)
Transportation Planning	1,525	1,830	1,924	94	(b)
Planning Obligations	0	0	0	0	
Road Safety	449	505	509	4	
Street Scene	0	0	106	106	(c)
Building Control	554	475	495	20	
Structural Maintenance/Inspections	202	188	192	4	
Highways	9,524	8,692	8,711	19	
Rechargeable Works	0	0	0	0	
Traffic Management	(721)	(944)	(913)	31	(d)
Off- Street Parking	0	5	5	0	
On – Street Parking	0	88	88	0	
Drains & Sewers	479	484	491	7	
Contingency	15	15	15	0	
<b>TOTAL CITY FUND</b>	<b>14,477</b>	<b>13,846</b>	<b>14,215</b>	<b>369</b>	
<b>BRIDGE HOUSE ESTATES</b>					
Bridges	2,037	2,474	2,688	214	(e)
Tower Bridge Operational	1,906	1,966	1,974	8	
<b>TOTAL BRIDGE HOUSE ESTATES</b>	<b>3,943</b>	<b>4,440</b>	<b>4,662</b>	<b>222</b>	(d)
<b>TOTAL</b>	<b>18,420</b>	<b>18,286</b>	<b>18,877</b>	<b>591</b>	

\*Latest Approved Budget as reported to your Committee on 13<sup>th</sup> December 2016.

**Notes:**

- a) Adjustment for support service recharge of £84,000 for IS recharge.
- b) Transfer of £66,000 from Town Clerks to City Public Realm Team relating to Cultural Hub – Look and Feel Strategy and adjustment for support service recharge of £28,000 for IS recharge.
- c) Supplementary Revenue project budget adjustment of £106,000 relating to City Wide Pedestrian Modelling, St Pauls Area Security and City Way Finding Signage.
- d) Adjustment for support service recharge of £18,000 for film liaison staff costs and £13,000 for IS recharge.
- e) £214,000 was agreed at Policy & Resources Committee in January 2017 for an annual contribution from Bridge House Estate to City Police to cover the cost of policing services on the five City Bridges.

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**Efficiency & Sustainability Plan**

**CORE MESSAGES ON THE CITY OF LONDON CORPORATION'S FINANCES – January 2017**

**Our aim:**

Our funds are there to help the City of London Corporation promote financial, professional and business services, provide excellent public services and support the City, capital and country as a whole.

They must be used economically, efficiently and effectively to maintain the City's underlying infrastructure and services and so we can prioritise paying for initiatives which meet our long-term ambitions.

**How we do this:**

The City has four funds.

Two of these are paid for by ratepayers and taxpayers:

- City Fund - money used to cover local authority activities in the square mile and beyond.
- Police Fund – the money used to pay for the City of London Police Force

Two are provided at no cost to the taxpayer:

- City's Cash - an endowment fund built up over 800 years and passed from generation to generation used to fund services that benefit London and the nation as a whole.
- Bridge House Estates - the money used to look after five bridges over the Thames with any surpluses being used for charitable purposes and awarded through the City Bridge Trust.

It is a duty on us to make the best use of the resources we have. This can only be done through continually reviewing the economy, efficiency and effectiveness of our services, the outcomes that are achieved and how they meet our long-term ambitions.

Everyone has a role to play in constantly challenging what we do and thinking about how we could do things better.

### **Are there further cuts being made?**

Yes, but only 2% and only to ensure continuous improvement. In 2014, we estimated that due to cuts in government funding City Fund would be facing deficits approaching £11m by 2017/18 so we had to deal with this by scrutinising all our activities in what we called the Service Based Review.

We could, of course, have just made efficiencies in those areas paid out of public funds. But we decided it was not fair or equitable to ask some parts of our organisation to be more efficient and not others.

Proposals totalling £20m in efficiencies/extra income were identified and are well underway to being implemented. Following the completion of the Service Based Review programme, a continuous 2% per annum budget reduction target will be introduced across all our services. Departments will be expected to meet this through efficiency and performance improvements.

### **Why are we continuing to make budget reductions?**

Firstly, we have a duty to ensure the most effective and efficient use of our resources.

Secondly, we continue to have big cost pressures. We live in an historic and ageing City. Many of our properties are deteriorating which requires an increased level of investment, and our IT infrastructure and service needs investment. In addition the City of London Police needs to address the changing nature of policing and the increasing demands placed on the service in the context of increased security threats from terrorism, growing cybercrime and online economic crime and intelligence requirements.

Thirdly, by being economic, efficient and making savings and focusing our efforts where we are most effective we can enhance existing services and pursue new priorities and increasingly ambitious outcomes for the benefit of the City, London and the nation.

### **Why not utilise the City's Cash fund endowment?**

This is money which has been passed down to us over the years, produces income for us and is not to be used lightly as we want to pass it on to future generations to sustain services in the medium to longer term. Its income comes mainly from property and investments and is used to finance activities for the benefit of the City, London and the nation as a whole. Any sale of the underlying investments reduces the ability of the fund to generate income in future years.

The City's Cash budget will be running a deficit over the next three years to allow us to carry out essential investment before returning to a small surplus in 2020/21.

## **So what does the future look like for these funds?**

The financial forward look for two of our funds is relatively healthy but uncertainties remain.

- City Fund: we have been planning for a continuing reduction in government grant and the underlying budget position is robust. We will be using the headroom to invest in essential repairs and maintenance and to fund the building of the new Museum of London to the benefit of all Londoners and the country as a whole.
- City's Cash: The forecast deficit over the next three years reflects our commitment to carry out essential investment and to support cultural development before returning to a small surplus in 2020/21.
- Bridge House Estates: the rising surplus will increase the resources available to the City Bridge Trust for charitable giving across London.
- The Police Fund: The underlying financial position remains very challenging with the recent Police core grant settlement marginally lower than anticipated. Additional cost pressures have meant the fund has moved into deficit, utilising the remaining ring fenced reserves in 2016/17 and 2017/18. An interim strategy has been developed and proposed for dealing with the deficit to the end of 2017/18. The Town Clerk, the Chamberlain and the Commissioner, have commissioned a review of the Police operating model, focusing on future demand modelling and how best to secure VFM, to identify options to address the, as yet unfunded, projected deficits of £5.6m in 2018/19 and £3.8m in 2019/20.

## **What are your total assets?**

The City of London Corporation has assets of around £4bn. Income from these assets fund our services and any sale of assets to fund on-going services in the short term would harm our ability to protect services in the medium to longer term. Sale of many of our local authority assets to fund day to day services is also effectively prohibited by Local Government accounting rules.

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<b>Committee(s)</b>	<b>Dated:</b>
Policy & Resources Committee	<b>6 July 2017</b>
Planning and Transportation Committee	<b>25 July 2017</b>
<b>Subject:</b> Review of designation of the Still & Star Public House as an Asset of Community Value	<b>Public</b>
<b>Report of:</b> Chamberlain	<b>For Information</b>
<b>Report author:</b> Peter Kane	

## Summary

This report informs your Committee of the outcome of a request for a Review of the decision of Policy and Resources Committee to include the Still and Star public house (“the public house”) on the City’s List of Assets of Community Value, and of the conclusion of the Review that the public house should remain on the List.

### Recommendation

To note the outcome of the review of the decision regarding the inclusion of the Still and Star on the City’s List of Assets of Community Value.

## Main Report

### Background

1. The public house was included in the City’s List of Assets of Community Value (the only entry on the List) following the decision taken on 15 December 2016. On 3rd February 2017 the landowner requested a review of the decision. An oral hearing was requested, which was held on 31st May.
2. In accordance with statutory requirements a senior officer, the Chamberlain, was authorised to act as the Reviewing Officer.

### Conclusion

3. After carefully considering the Grounds of Review and all other relevant evidence, and after applying the statutory criteria in considering the Listing and Review, it was found that the public house should remain on the City’s List of Assets of Community Value. A Decision Notice was issued on 6 June 2017, and subsequently notified to the relevant parties, and uploaded on the List of Assets of Community Value section of the City’s website as required. It can be viewed at:-

<https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-policy/Pages/localism-and-neighbourhood-planning.aspx>

4. The landowner has a right of appeal against the Review decision to the First Tier Tribunal, part of the HM Courts and Tribunals.

**Background Papers:-**

- (i) Grounds for Review on behalf of 4C (received 4<sup>th</sup> April 2017)
- (ii) Email from Marianne Fredericks (received 4<sup>th</sup> April 2017)
- (iii) Comments on Review Grounds from Nominating Group (received 22 May 2017)
- (iv) Nominating Body's Submission for Listing (5<sup>th</sup> September 2016) and related representations
- (v) Report on Listing to Planning and Transportation Committee 25<sup>th</sup> October 2016 and minute
- (vi) Report on Listing to Policy and Resources Committee 15 December 2016 and minute
- (vii) The City's Guidelines for Determining Nominations
- (viii) Decision Notice of Reviewing Officer and Reasons (6 June 2017)

**Dr Peter Kane**

Chamberlain

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