



Planning and Transportation Committee

INFORMATION PACK

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

Date: TUESDAY, 7 MARCH 2023
Time: 10.30 am
Venue: LIVERY HALL - GUILDHALL

9. **WHOLE LIFECYCLE OPTIONEERING PAN*** (Pages 3-74)
Report of the Executive Director Environment.
10. **PUBLIC LIFT AND ESCALATOR MONTHLY REPORT*** (Pages 75-78)
Report of the City Surveyor.
11. **RISK MANAGEMENT UPDATE REPORT*** (Pages 79-96)
Report of the Executive Director Environment.
12. **PARKING METER SURPLUS REPORT*** (Pages 97-102)
Report of The Chamberlain.
[N.B. A non-public appendix is included in Part 2 of the agenda.]
13. **PLANNING AND TRANSPORTATION COMMITTEE MEMBER TRAINING PROGRAMME*** (Pages 103-106)
Report of the Executive Director Environment.
14. **OUTSTANDING ACTIONS*** (Pages 107-110)
Report of the Town Clerk.
15. **MINUTES OF THE STREETS AND WALKWAYS SUB-COMMITTEE***

- a) To note the minutes of the Streets and Walkways Sub-Committee meeting on 17 January 2023* (Pages 111 - 122)
- b) To note the draft minutes of the special Streets and Walkways Sub-Committee meeting on 14 February 2023* (To Follow)

16. **MINUTES OF THE PLANNING APPLICATIONS SUB-COMMITTEE***

- a) To note the minutes of the Planning Applications Sub-Committee meeting on 22 November 2022* (Pages 123 - 138)
- b) To note the minutes of the Planning Applications Sub-Committee meeting on 13 December 2022* (Pages 139 - 154)
- c) To note the minutes of the Planning Applications Sub-Committee meeting on 31 January 2023* (Pages 155 - 164)

22. **NON-PUBLIC MINUTES OF THE STREETS AND WALKWAYS SUB-COMMITTEE MEETING ON 17 JANUARY 2023***

To note the non-public minutes of the Streets and Walkways Sub-Committee meeting held on 17 January 2023.

23. **PARKING METER SURPLUS REPORT - NON-PUBLIC APPENDIX***

(Pages 167 - 168)

Ian Thomas
Town Clerk and Chief Executive

Committee(s)	Dated:
Planning and Transportation Committee	7 th March 2023
Subject: Consultation Responses and Finalisation of the Planning Advice Note: Whole Life-Cycle Carbon Optioneering	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1, 5, 7, 10, 11, 12
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	£0
What is the source of Funding?	n/a
Has this Funding Source been agreed with the Chamberlain's Department?	n/a
Report of: Juliemma McLoughlin, Executive Director, Environment	For Information
Report author: Kerstin Kane, Environment Department	

Summary

This report provides information on the consultation responses received for the Whole Life-Cycle Carbon Optioneering Planning Advice Note. It sets out the consultation engagement undertaken, the type of responses received and the subsequent changes that were made to this Planning Advice Note in response to the received comments and feedback.

Recommendation(s)

Members are asked to:

- Note the report (and Appendix 1 – WLC PAN Consultation Responses, and Appendix 2 – WLC PAN Pre-Design Version)

Main Report

Background

1. On 7 June 2022, the Planning and Transportation Committee approved the draft Whole Life-Cycle Carbon Optioneering Planning Advice Note (WLC PAN) for public consultation. At that meeting, Members suggested that the WLC PAN should be widely consulted on, and feedback should be sought particularly from industry experts and other relevant stakeholders.

2. This report and the accompanying consultation statement (see Appendix 1) describe the consultation responses received and the subsequent changes made to the WLC PAN, for Members' information.

WLC PAN Consultation Process

3. The Whole Life-Cycle Optioneering Planning Advice Note will be used by developers and those designing new development. It is a technical document, standardising the information and process required for an applicant to demonstrate their proposed development is optimising whole life-cycle carbon impacts.
4. The consultation was launched on 6 July 2022, with email notifications sent to a wide variety of recipients, including around 500 groups or individuals that are signed up to the Local Plan consultation database as well as a range of other stakeholders. (Documents were loaded to the website prior to the notifications being sent, in order to verify information and validate links.) Given the timing of the consultation, it was run across the summer and through to 30 September 2022, giving stakeholders full opportunity to engage. This twelve week consultation period was substantially longer than the four week period that the regulations require for Supplementary Planning Documents. Engagement events were held in September 2022, to maximise availability, and notifications about those events were sent in advance.
5. A wide variety of stakeholders were invited to attend engagement sessions, including professionals involved in developments, other London government bodies, organisations such as LETI, and local residents. The engagement sessions comprised:
 - a. Two public sessions to ensure the public interest and their priorities are reflected in the PAN.
 - b. Two sector experts sessions, to allow stakeholders involved in developments to scrutinise and buy into the approach. These sessions were attended by professionals - including architects, planning consultants and sustainability experts-, London boroughs, and other organisations.
 - c. A separate meeting was held with the GLA to clarify the approach and alignment with the GLA Whole Life-Cycle Carbon Assessments Guidance.
6. Feedback from stakeholders was captured at all of the engagement sessions, and additional written submissions were received via email. All feedback was collated and a consultation statement was produced alongside the final PAN, setting out how the engagement informed the final document (Appendix 1).
7. Stakeholders have been kept notified throughout the process, including the engagement period, after it closed, and as the document is adopted.

WLC PAN Consultation Responses

8. Comments and questions raised during the engagement sessions were noted and reviewed. Written consultation responses were received via email. All comments have been collated in a spreadsheet, and responses have been set out for each comment. Due to some duplication and similarity between questions, comments and responses were grouped together where appropriate and presented in the consultation statement (Appendix 1).
9. While a lot of comments were received, on the whole most responses were supportive of the broad approach being taken by the PAN and welcomed it as a way to help guide development and inform decision-making. Most comments were asking for clarification on the role of optioneering in the wider planning process as well as technical clarifications on the methodology and presentation of results. Some feedback raised specific issues, such as the risk of making some options appear better than others by using different carbon factors and assumptions. Amendments were made to the PAN to address these types of comments (see point 10 and 11 for more detail). The three most significant shifts in the updated PAN are:
 - a. A request for independent third-party verification for all schemes that undertake optioneering to ensure the accuracy of the optioneering results.
 - b. A firmer steer on the types of schemes that would be required to undertake the optioneering process. This has now been changed to all major and referable schemes as well as non-major applications that do not retain the majority of the sub- and superstructure.
 - c. The option to be used as the baseline scenario. This was previously the existing building with no intervention, which has now been changed to a minor refurbishment option. This is a more realistic baseline, as in most cases some works will be required to the existing building to keep the building in use.
10. **Planning process** – Part of the specific feedback relates to the planning process. Questions included how the PAN relates to other planning policy and guidance, how planning officers consider the optioneering results in the planning process, and when optioneering is required. Adjustments were made to the PAN to clarify that optioneering takes place at pre-application stage to guide the discussion with planning officers around retention options and the associated constraints and opportunities. The links between the PAN and other guidance documents on whole life-cycle carbon were described in more detail, highlighting that the PAN methodology forms a pre-cursor to the GLA Whole Life-Cycle Carbon Assessments Guidance and is our preferred way to demonstrate that different options were considered early in the process. It was explained that optioneering is done at an early-stage and is based on many assumptions, and therefore the results will only be used to compare options for a specific site and not to make comparisons across different schemes. It was clarified that the lowest carbon option is not automatically the preferred option, and that other sustainability and planning considerations will

be taken into account when evaluating the optioneering results. It was emphasised that only the preferred option needs to be developed further at planning stage.

11. **Technical Clarifications** – Other feedback relates to the technical side of the PAN to better understand how to apply the methodology correctly and how to avoid bias towards the applicants preferred option. The dashboards and figures were revised to capture all necessary information and avoid misinterpretation. Recommendations were made for the use of operational carbon factors and justification is requested if different factors are used. It was emphasised that assumptions need to be the same across all options and clearly stated to prevent bias towards the applicant's preferred option. Clarification on some of the terminology and abbreviations were requested. To address this, the wording of technical information was revised where needed and specific terms were added to the glossary. The desire for a template or digital tool was expressed to allow for standardised visualisation of the optioneering results. Therefore, an Excel template has been prepared to be used by the applicants to input data for the generation of standardised figures. The PAN methodology will be reviewed frequently and updated when needed to reflect the latest industry and technological advances.

WLC PAN Design and Formatting

12. Some changes were made to the structure and layout of the document to improve the flow and allow for easier navigation. This included shifting some background text to the appendices to keep the main body concise and the focus on the methodology. A section on the scope of the document was added at the start. The design has been improved to ensure the document is fully accessible for visually impaired readers.

Corporate & Strategic Implications

13. **Strategic implications-** The WLC PAN supports the delivery of the following outcomes in the Corporate Plan:
- Outcome 1: People are safe and feel safe
 - Outcome 5: Businesses are trusted and socially and environmentally responsible
 - Outcome 7: We are a global hub for innovation in financial and professional services, commerce and culture
 - Outcome 10: We inspire enterprise, excellence, creativity and collaboration
 - Outcome 11: We have clean air, land and water and a thriving and sustainable natural environment
 - Outcome 12: Our spaces are secure, resilient and well-maintained.
14. **Financial implications-** There are no financial implications arising from this report.

15. **Resource implication-** Delivery of the Planning Advice Note will be through existing Environment Department staff resources.
16. **Equalities implications-** The WLC PAN will be published in an accessible format, in line with the requirements for publication of Corporation documents.
17. **Climate implications-** Delivery of the Planning Advice Note will contribute towards meeting the objectives of the Climate Action Strategy and ensure that as relevant applications come forward, the whole life-cycle carbon implications of the development they propose is considered as part of the application process.
18. **Legal implications** -There are no legal implications arising from this report.
19. **Risk implications** - There are no additional new risks arising from this report.
20. **Security implications** - There are no security implications arising from this report.

Conclusion

21. A large number of responses were received from a broad range of stakeholders throughout the engagement process, which were predominantly positive and in support of the optioneering approach. As a result, the PAN remains largely unchanged. Some specific feedback was received in relation to clarifications on the role of optioneering in the wider planning process as well as some technical clarifications, which have been addressed in the updated version of the PAN. The public consultation helped to raise awareness of the optioneering methodology, to achieve buy-in from a range of stakeholders and to fine-tune the PAN to create a robust, clear and practical document. Adopting this document will help the City to reach its goal of achieving net zero for the Square Mile by 2040.

Appendices

- Appendix 1 – WLC PAN Consultation Responses
- Appendix 2 – WLC PAN Pre-Design Version

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Whole Lifecycle Carbon Optioneering Planning Advice Note 2022 - Consultation Statement

Introduction

The City of London Corporation undertook public engagement on the draft Whole Lifecycle Carbon Optioneering Planning Advice Note (WLCO PAN) between 6 July 2022 and 30 September 2022.

This document sets out the main issues that were raised in written responses and at events, and how those issues have been addressed in the final version of the PAN.

Consultation events

- Hybrid in person/virtual public consultation event on Wednesday, 7th September 2022, 6-7:30pm
- Virtual public consultation event on Thursday, 8th September 2022, 12:30-1:30pm
- Expert workshop on 13th September 2022, 9-10:30am
- Expert workshop on 15th September 2022, 9-10:30am

Policy responses

This table sets out the issues raised during the engagement and how it has been addressed.

Number	Issue	How this issue has been addressed
1	The WLCO PAN should be clearer on the Climate Action Strategy goals.	We will clarify and set into context our CAS goals in the introduction to the PAN.
2	The WLCO PAN should clarify when optioneering is recommended and define technical terms.	<p>The optioneering exercise is a means of comparing a limited number of development options in order to find the best balance in carbon emissions terms prior to adding other considerations into the planning balance.</p> <p>This approach will aid the review and decision-making process through the submission of more in-depth information that demonstrates how developers have arrived at a particular proposal. This process can be</p>

Number	Issue	How this issue has been addressed
	Some respondents suggested that optioneering should be required for every proposed development and others suggested that optioneering should be limited to only those schemes that propose substantial demolition.	<p>relevant to various application types that have a significant proportion of new built elements including replacing existing built elements.</p> <p>The types of development that the WLCO PAN applies to has been clarified. The PAN is now clear that optioneering is required for all major schemes. Other developments should carry out optioneering if they do not retain the majority of substructure and superstructure.</p> <p>Schemes that propose to retain the majority of the substructure and superstructure are classed as retrofits for the purposes of this PAN. While such schemes are not required to undertake a full optioneering exercise, applicants are encouraged to explore different options during the pre-application process, with the aim of incorporating design approaches that minimise the carbon intensity of the development. The purpose of the optioneering exercise is to compare bespoke development options for a particular site, which can mean that comparison with other City development proposals may not be relevant.</p> <p>The PAN advises on the consistent presentation of options in planning applications (see dashboard 1) and of the whole life-cycle carbon assessment results of the planning application scheme (see dashboard 2), so that this information is easier to understand and assess as part of the application consultation process.</p>
3	<p>Why is optioneering required?</p> <p>How are options chosen, in particular where there appears to be no beneficial re-use scenario?</p>	<p>The optioneering exercise is a means of comparing a limited number of development options in order to find the best balance in carbon emissions terms prior to adding other considerations into the planning balance.</p> <p>The GLA's Whole Life-Cycle Carbon Assessment Guidance and Circular Economy Statement Guidance – which apply to applications that are referable to the Mayor of London – require the full exploration of options before considering substantial demolition. The PAN sets out a methodology by which this can be carried out, and how this should be demonstrated in the planning application.</p> <p>Options will be developed in early discussions with applicants in the pre-application process and their details will vary on a case-by-case basis. The number of options will be limited and agreed based on presenting clearly discernible, feasible design approaches to the proposal in order to inform the optimum design for the application scheme, both in WLC terms and in considering other environmental opportunities such as urban greening and climate resilience opportunities.</p>

Number	Issue	How this issue has been addressed
		<p>The final preferred option may or may not be one or a combination of the assessed options.</p> <p>Options are hypothetical. They should be based on the same assumptions including which energy strategy is thought to be the most advantageous in carbon reduction terms, in order to be able to compare the options - unless there are reasons for not doing so which should be clearly stated.</p>
4	The guidance appears to be geared more toward the land use preference of the developer rather than what the existing building could be. The question should be whether optimal site capacity can be achieved through retention.	In addition to the GLA requiring carbon calculations per square meter, we also request and evaluate the absolute figures and ensure that we understand the upfront proportion of carbon emissions. The land use proposal should be in line with our land use policies. We need to ensure that a well-balanced development is coming forward that considers both low carbon impact and future proofing generally. The focus of this exercise is on reducing carbon emissions, notwithstanding whether this is through a high or low level of retention.
5	How will the optioneering results be used in the later planning stages?	The optioneering exercise will stand on its own and not be used to challenge the preferred/planning application proposal which is developed based on much more detail than the options. The methodology has been developed to inform the design approach to the preferred option that will become the planning application scheme. Once this has been given planning permission, the Energy, Whole Life-Cycle Carbon and Circular Economy strategies of the approved scheme will be further detailed and approved during the planning conditions stages.
6	Will the options be monitored?	We will consider how we monitor post-completion Whole Life-Cycle Carbon information across all relevant applications. We are not intending to monitor options in order to compare optioneering results across CoL sites. However, the optioneering results may prove useful to learn more about the opportunities and constraints of certain building types which may help with pre-application discussions. The GLA monitors the Whole Life-Cycle Carbon Assessments of all referable planning application schemes.
7	Clarify how other policy considerations and issues are	<p>We will make clearer how other policy considerations and opportunities influence the optioneering results.</p> <p>The WLC carbon impact of each option will be presented in the context of the evaluation of other</p>

Number	Issue	How this issue has been addressed
	<p>integrated into the Optioneering exercise.</p> <p>How about considering land use, e.g. change of use to residential?</p>	<p>environmental opportunities and constraints as well as social and economic sustainability issues such as commerciality, quality of the spaces and building, health and wellbeing.</p> <p>We will update the PAN to include all recent and emerging policy guidance and regulations.</p> <p>The City has a number of successful schemes that convert office buildings or sites to hotel or student accommodation. The review of the Local Plan (City Plan 2040) will consider the overall balance of uses across the City. There is still demand for offices in the City as a place for business.</p>
8	Third-party verification should be required.	We have incorporated third-party verification in the updated version of the PAN, which should be done by all schemes that undertake the optioneering exercise.
9	How is CoLC collaborating with other organisations and keeping up-to-date?	<p>CoLC is engaged with ongoing discussions about how to reduce WLC carbon emissions effectively across the whole industry. CoLC officers are involved in collaboration meetings on a variety of platforms that include other Local Authorities, London Councils, ReLondon, LETI and NLA expert panels.</p> <p>The methodology is designed and will be refined to be flexible to respond to different development types and needs – this will be discussed with applicants on a case-by-case basis – and that the methodology is easily updatable in accordance with changing and emerging national and GLA policies and standards.</p> <p>We are liaising with the GLA and keep up to date with government initiatives to ensure that the methodology remains up-to-date. This is easier to be achieved if the methodology itself remains an adaptable Planning Advice Note while the requirement for optioneering is already a requirement through London Plan SPDs, and which will be written into our forthcoming policy documents.</p>
10	Do planning officers have the necessary skills to assess whole life-cycle carbon assessments?	<p>Specialist CoLC officers (sustainability, climate resilience, biodiversity, SuDS, engineering etc) review proposals with the help of all available internal and external guidance currently available. Applicants' consultants will be approached to provide additional explanations and justifications as required to underpin the review of the proposals. Further upskilling, however, is ongoing.</p> <p>We are happy to arrange knowledge exchange meetings with or training for individual authorities and organisations, and we regularly attend CPD events on the subject.</p>

Number	Issue	How this issue has been addressed
11	<p>Clarify other reporting requirements mentioned in the PAN, e.g. through conditions.</p> <p>Updates to WLC Carbon Assessments should be requested at the time of submission to building control (design and as built) to reduce burden on applicants.</p>	<p>We encourage every major application, not just GLA referable applications, to include a WLC carbon assessment. We encourage minor development proposals to include information of how carbon emissions have been reduced in their design approach. We will strengthen this approach in our forthcoming Local Plan (City Plan 2040).</p> <p>For each major application, we request by condition an updated Detailed Whole Life-Cycle Carbon Assessment to be submitted before construction begins. Whole life-cycle carbon assessments submitted with planning applications are based on RIBA stage 2 design, therefore calculations are based on a number of intentions and assumptions. CoLC's approach to request RIBA stage 4 updates prior to construction is to understand more clearly how the detailed design evolves and impacts on carbon emissions. This might include new technologies, structure, material and construction choices that can be incorporated as a scheme evolves, and that contribute to a lower carbon impact. This information will help with managing the planning process, managing expectations of all involved and to document the progress during the detailed design phase. However, this is independent from the optioneering approach at pre-application stage.</p> <p>All submitted Whole Life-Cycle Carbon Assessments are available on the planning register for the public to view. We also request post-completion statements by condition.</p>
12	<p>What sanctions are proposed for exceeding whole life-cycle carbon emissions – please not offsets?</p>	<p>There are no standards that are required by policies to be achieved at the moment. The GLA has published the Standard benchmark and the Aspirational benchmark following their study of cases. The current requirement for developments to submit WLC carbon emissions to the GLA (for referable schemes) is to gather further evidence as to achievable carbon emission reduction for typical development types (by use).</p> <p>Policies are aiming for net zero whole life-cycle carbon emissions, however, this is not yet achievable as decarbonisation, alternatives in low carbon construction materials and materials exchange/reuse/recycling and processes/technologies to remove carbon from the atmosphere are not advanced enough yet. Net zero implies offsetting by means of carbon removal from the atmosphere and reducing energy use/production of renewable energy elsewhere. Zero whole life-cycle carbon development is not possible at the moment as every development activity (even minor refurbishment) will result in carbon emissions. Zero WLC carbon development will only become possible once the grid is fully decarbonised, materials sourced and transport</p>

Number	Issue	How this issue has been addressed
		and processes carried out that don't rely on the burning of fossil fuel. Hence, carbon targets are expressed as net zero targets.
13	How is optioneering affected by risks due to policy conflicts, such as the preference to connect to district energy systems?	<p>Options are hypothetical, all based on the same assumptions including which energy strategy is thought to be the most advantageous in carbon reduction terms. It is important that all options are based on the same energy strategy (where possible), in order to assess and compare the options, unless there are reasons for not doing so which should be clearly stated.</p> <p>Networks such as Citigen do have a strategy to decarbonise, however, for the sake of the optioneering exercise, the most realistic and best energy strategy should be applied to all options.</p> <p>Discussion on district energy will require practical dialogue at pre-application stage in relation to the planning application scheme.</p>
14	Clarify details of the expected operational energy modelling.	<p>At pre-application stage it will be very difficult to provide a TM54 (operational energy performance) or NABERS UK (certification scheme for operational energy performance) review, however reasonable assumptions on consumption should try and align with targets for the project. Methods should be consistent across options and include the upgrade of refurbished facades to highest level of energy efficiency. The dashboard will be adapted following feedback to make this clearer.</p> <p>The EPC rating was included into the dashboard information as reference only. The energy assumptions should not be based on the EPC for the optioneering exercise.</p>
15	Photovoltaics - clarify why it appears that the PAN suggests they are not effective over the building lifetime.	This was not the intention and will be clarified in the update. A review of low and zero carbon technology solutions should be provided as part of the energy strategy of planning applications.

Technical responses

Number	Subject	Response
1	How will data reviews and misrepresentation of options/third-party review be accounted for?	<p>The intention of the document is for an initial review and transparent reporting for officers to make an informed decision. Planning Officers will seek out inconsistencies across documents and scrutinise approaches. Officers are taking part in training to identify inconsistencies in options and propose adjustments where necessary. Additionally, third-party verification has been included as a requirement for all schemes that undertake optioneering, in the revised version of the PAN.</p> <p>It should be noted that the lowest carbon option may not always be the best option for development in the overall planning context, or it could have significant technical challenges that need to be overcome.</p>
2	How will operational energy Carbon Factors be accounted for?	<p>A number of queries were raised relating to the use and declaration of carbon factors, which were welcomed.</p> <p>The updated PAN will set out the recommended approach to applying carbon factors. These should be kept consistent across options for the given energy source type. All options will require the carbon factor(s) to be reported in the dashboard. An operational energy carbon factor to be used as a basis for reporting will be included in the reporting template for B6. Teams will need to declare the energy carbon factors for each option. Where deviation occurs this will need to be clearly explained.</p> <p>The operational energy strategy would be more detailed for the planning application scheme in accordance with TM54 (operational energy performance modelling tool) or NABERS UK Design for Performance as required and recommended, respectively, by the GLA. At optioneering stage, this is unlikely to be feasible.</p>

Number	Subject	Response
3	Will the PAN account for decarbonisation of materials and/or declare carbon factors for the embodied carbon of materials?	<p>Grid decarbonisation will not be included in the embodied carbon assessment for this exercise. Supply chains are global and it is currently difficult to ascertain with any accuracy the decarbonisation pathways for materials with unknown procurement routes or locations.</p> <p>The decarbonisation carbon factor will not be altered for embodied carbon estimations (as in the energy decarbonisation effect on embodied carbon results).</p>
4	Dashboard 1 - Please clarify the % material retained relating to existing/recycled content	The aim of this reporting metric is to demonstrate what is being considered for reuse. We will clarify this in the final document . At an early stage, it would be appropriate to provide estimations of the substructure and structure by mass and the facades by square meter. It would be sensible to be on the conservative side at this early stage. The % retained is purely for providing a metric for elements reused in situ. The industry is undertaking wider work in relation to circular economy metrics.
5	What benchmarks are being used in the PAN?	<p>The PAN is trying to align with the GLA benchmarks for initial assumptions. It should be noted that taller buildings may fall outside of this range and should be considered very carefully from an early stage.-Dashboard 2 would require more detailed information, based on the selected option and this would be refined in the final documentation.</p> <p>The Built Environment Carbon Databases (BECD, https://www.becd.co.uk/) should help in future with better collated data and future benchmarks.</p>

Number	Subject	Response
6	How will data collection/databases and the understanding of embodied carbon impacts be accounted for in terms of as-built real-world numbers?	The PAN will not currently be monitoring results in a database. As built data could inform the estimations made in the PAN as other datasets improve over time.
7	<p>How is waste and demolition accounted for in the assessment?</p> <p>Where does the waste go?</p>	<p>Waste and the end of life of new products is considered in WLC carbon assessments. Waste generation (from the building materials) would be considered in the estimations for life-cycle module C at the end of the building life.</p> <p>Waste from the existing building (where there is one) would have formed part of the previous building's assessment.</p> <p>Guidance and best practice (EN 15978 & RICS guidance) does not currently account for the demolition waste as part of the assessment, however it is recognised there is an impact associated with removing a building. The updated RICS guidance in 2023 will be addressing and clarifying this. EN 15978-1 is due for an update in 2024 (https://standardsdevelopment.bsigroup.com/projects/2020-01551#/section).</p> <p>Demolition estimations should be added using the GLA rate as a default. The GLA do require reporting on demolition waste as a separate metric using an assumed value of 50 KgCO₂e/m² (where a defined number has not been calculated). The revised PAN will clarify that options should consider this based on the area of the existing building.</p> <p>It is worth noting that a refurbishment with major changes would make demolition impacts difficult to predict (for example carbon impact of soft strip and facade replacement compared to full demolition). In time the availability of data will improve.</p> <p>The question as to where the waste goes falls outside the remit of the PAN. Relevant UK legislation on waste already exists and the amount of waste diverted from landfill has improved greatly in the last 10-15 years.</p>

Number	Subject	Response
8	<p>“Façade interfaces” and “Health and wellbeing” ignore opening windows as a means of ventilation without increasing carbon emissions. Is there a contradiction in the “design considerations” should be “intervention considerations”?</p>	<p>This will be reviewed. Openable windows are not a means of consistent ventilation but a means of free cooling. This is often confused. Windows should ideally be open in mild weather conditions only (and managed - we can see a 3kWh/m² increase on consumption in deep plan offices if mismanaged). The benefits of open windows or facades have the potential to save energy if used correctly, as well as the sense of wellbeing due to occupant control.</p> <p>Our view is that “considerations” is the correct term for the detailing of the options.</p>
9	<p>Is more ambition needed than the stated reduction of global emissions by 43% by the end of this decade?</p>	<p>The IPCC stresses the need to reduce greenhouse gas emissions by 43% by 2030 compared to the 2019 baseline. This is the minimum reduction needed to stay within a 1.5 degree increase in temperature by the end of this century, in line with the Paris agreement.</p>
10	<p>Will more in-depth analysis of two specific options be acceptable/ a better way of evaluating options?</p>	<p>There is no requirement for a set number of options but a view on variations in project should be undertaken. The PAN is about the fundamentals of building decisions for reuse. Approaches should be discussed with the planning officers to be practical but also to consider what could be done technically to try and reduce carbon, rather than defaulting to a new build position.</p> <p>In many cases, detailed analysis will not be feasible yet due to the lack of information and reliance on assumptions. Should a team want to look into two viable options with more detail that would be acceptable if the options cover the anticipated opportunities of a site, and this should be discussed with the planning officer. This will be clarified in the PAN revision. Applicants will not be required to undertake detailed WLC assessments of more than one option in the following planning and design stages.</p>

Number	Subject	Response
11	How is the PAN methodology accounting for the progress towards net zero by corporate entities?	The PAN is not intended as a tool for reporting or demonstrating progress towards net zero by corporate entities. However, developers and occupiers or incoming tenants may want to understand the choices that have been made in terms of the carbon impacts of the developments they occupy, and the information and data presented as part of the optioneering exercise can provide useful insights.
12	How are carbon factors used for specific materials and how do you deal with the risk of consultants using different factors for the same materials across the options?	<p>Detailed decisions about the fundamentals of a building design and about procurement can cause variation in embodied carbon performance-</p> <p>The PAN methodology recommends using the RICS Whole Life Carbon Assessment for the Built Environment default specification that is due to be updated in 2023, as a baseline approach (Page 18, Table 6: https://www.rics.org/profession-standards/rics-standards-and-guidance/sector-standards/building-surveying-standards/whole-life-carbon-assessment-for-the-built-environment).</p> <p>This approach should be confirmed as part of the optioneering exercise or justified if a different approach is taken.</p> <p>The initial appraisal may be based on structural and material assumptions plus estimated breakdowns of elements to build an options profile. All assumptions about materials or structure must be declared and be consistent between options where the detail is the same.</p>
13	The capacity of the grid and ensuring that there is sufficient investment in the infrastructure to deliver all-electric buildings will be critical.	This is one of the critical areas in terms of energy consumption reduction. UKGBC have set out a pathway relating to capacity. The Net Zero Building Standard will set out performance criteria as a leading standard (due to be launched in 2023/2024). NABERS UK is based on energy consumption rather than carbon. Both are critical for driving a lower carbon future and targets to be achieved in use.
14	Why is NABERS UK stated to be the more onerous approach in the section	There are varying levels of energy modelling. NABERS UK (Design for Performance) is the most complicated type of modelling standard than currently exists, hence why it is more onerous - however, it is currently voluntary. The wording in the PAN will be reviewed to clarify this point.

Number	Subject	Response
	‘Operational Energy Modelling’ in chapter 2 of the PAN (Related Reporting Requirements), since its requirements seem to warrant the use of “rational” instead?	
15	Is it better to do 5 high level options or work closely with design team to develop one viable option that can be interrogated in more detail? Not all 5 options will be developed further in the later stages.	Options will be limited and agreed based on presenting clearly different, feasible design approaches to the proposal in order to inform the best approach to the application scheme, both in WLC carbon terms and in considering other environmental opportunities such as urban greening and climate resilience opportunities. This will be discussed and agreed with the applicants at an early stage during the pre-application process.
16	What is the difference between the whole life-cycle carbon assessments developed by the GLA and the PAN, are there any concerns about clashes?	<p>The intention of the CoLC is for this exercise to be a standalone assessment of high-level options rather than the detailed Whole Life-Cycle Carbon Assessment required in line with the GLA’s guidance for an application proposal. It forms a precursor to the GLA guidance in which different options are compared, before undertaking detailed assessments of the selected option.</p> <p>The results of the optioneering are based on different data (some estimated or assumed) and design details than those of the assessment of a planning application scheme and therefore can vary and will not be compared with each other.</p> <p>For the same reason, whole life-cycle carbon options will not be compared to GLA benchmark data as part of the evaluation presented to the CoLC. However, GLA benchmarks – as they firm up through assessing the growing evidence base of post-completion data - can help developers making initial decisions, and the PAN approach has been designed to keep consistency between the two.</p> <p>The GLA (and other London boroughs) have been consulted on the PAN methodology during this process and their comments will be incorporated.</p>

Number	Subject	Response
17	Going from RIBA stage 2 to 4 is critical, as stage 2 may promise the world and later on it is found not to be feasible. This should be acknowledged in the PAN or SPD. How will it be accounted for?	The aim is to ensure carbon reductions are considered at the earliest possible stage of the project. Possible changes resulting from later stage details should be acknowledged but the detailed design stages of an application scheme are not subject to this advice note. All major applications are expected to undertake Whole Life-Cycle Carbon Assessments to the GLA's standards, and this requires planning reporting and as built reporting. All applications with new build elements will be encouraged to undertake life-cycle assessments of the associated construction works. Further detail will be provided in the forthcoming City Plan 2040.
18	What is the basis of the required life cycle of 60 years?	<p>The PAN methodology is aligned with the GLA guidance requirement of reporting carbon emissions on a standard baseline of a 60-year life cycle as set out in the RICS Whole Life-Cycle professional statement.</p> <p>We use the 60-year period, as this is the industry metric for LCA based professional guidance documents, such as RICS Whole life carbon assessment for the built environment. We therefore use this as the basis for the PAN.</p>
19	What about the development of a pre-redevelopment audit guide document?	Pre-redevelopment audits are required by the adopted GLA Circular Economy Statement Guidance which include the consideration of development options relating to the retention of buildings and building elements. The suggested guide would be a useful separate exercise with a wider focus compared to this PAN.
20	What is the purpose of the updated Whole Life-Cycle Carbon Assessment at pre-commencement stage and at practical completion?	This section of the PAN refers to the future planning stage proposals that are outside the scope of this advice note. It explains the whole life-cycle carbon reporting required at planning stage and recommends how the optioneering results can be developed to the required detail. This includes the request for applicants to submit an update of the whole life-cycle carbon assessment before construction begins to demonstrate how further details of the design, materials and construction would impact on whole life-cycle carbon emissions. The post-completion statement is required by GLA guidance and will provide important evidence about the real whole life-cycle carbon impact of development in order to help develop future standards.

Number	Subject	Response
21	The PAN is unclear about updates to Part L in relation to LZCT i.e. PV, please can this be clarified?	<p>The new Part L 2021 applies renewable energy to the notional building as a way to reduce target carbon emissions relative to the previous target and to encourage a fabric-first approach. The use of renewable energy is therefore not discouraged. However, designers should be aware of the embodied carbon of all building services, which are responsible for a significant proportion of embodied carbon emissions of a development, especially in refurbishments due to their relatively shorter lifecycle. 7</p> <p>The optimum solutions will vary on a project-by-project basis. They will depend on opportunities for energy storage and demand-side energy management, and more detail would be expected in applications.</p> <p>The comments relating to this PAN section have been very useful and detailed. It has become clear how this chapter can be misinterpreted, and therefore it will be revised accordingly.</p>
22	Does the PAN methodology apply to commercial proposals only? In the executive summary, should the fourth to last paragraph also refer to the commercial and residential built environment?	The PAN optioneering methodology should apply to all development types, but this will be confirmed on a case-by-case basis for each scheme. We will make this clearer in the revised document.
23	<p>Options should also be reviewed for refurbishment cases where there might be a number of possible variations.</p> <p>Opportunities for strategic reductions in embodied carbon that have been</p>	<p>The PAN will be reviewed to clarify that there is no precise threshold for the expectation that an optioneering exercise will be undertaken.</p> <p>We will however provide examples of development proposals for which we expect optioneering, such as schemes that only retain a small proportion of an existing building. However, schemes that are classed as retrofits (retention of structural elements, alterations, to include facades in most cases, and extensions, new building services) are likely to only be assessed qualitatively, including requiring details as to the need for carbon intensive alterations. This will be discussed and agreed between developers and planning officers.</p>

Number	Subject	Response
	considered but are not taken forward, need to be justified.	The purpose of the PAN is to demonstrate how a development can reduce whole life-cycle carbon emissions, including through encouraging retention.
24	Can the PAN show more regard to the benefit of new buildings that are adaptable, and the beneficial impact this can have on extending the lifespan of buildings?	<p>Noted. However, the purpose of this note is to reduce carbon emissions throughout the full life-cycle of a building, including limiting the upfront carbon emissions before designing with major adaptation in mind, i.e. to another use type. This aspect could be included in the justification where appropriate.</p> <p>There could be a case that the new building would become outdated in future, too, and that occupiers then will have to start compromising to ensure the WLC emissions remain low.</p>
25	How does the PAN address responsible sourcing?	<p>This is an important sustainability aspect, but this cannot be covered by the PAN methodology as responsible sourcing can only be confirmed at later RIBA stages. This should, however, not affect the interpretation of the optioneering exercise, which needs to be based on comparable assumptions about material choices.</p> <p>Sourcing is covered by Local Plan development policies and by BREEAM assessments (Credit Mat 03).</p>
26	Despite low carbon emissions, minor refurbishment is not considered to be good in carbon terms due to required maintenance/replacement/upgrade work within a short timeframe - how will this be accounted for?	<p>Carbon emissions are an important factor in the decision-making process but planning also covers a range of other issues and requirements. The question will depend on the level of quality of the existing building and the detailed extent of intervention and renewal under consideration. It is difficult to set a general rule. A minor refurbishment may extend the life of the building which could be beneficial in carbon terms and reduce upfront carbon emissions in the near future.</p> <p>We want the PAN to guide developers to make better decisions and consider options in the wider context of carbon emissions and the climate. Planning committees will then have an enhanced ability to make an informed decision.</p>

Number	Subject	Response
27	Will a template/digital tool be created?	<p>An Excel template will be created for consistency and graph set up/reporting as part of the final version.</p> <p>A digital tool is not currently planned.</p>
28	Some guidance should be provided to ensure consistency and transparency of input data and carbon factors, will this be added?	We have recommended an approach in the WLC PAN following consultation and require applicants to report the figures used in each option for greater transparency . see response 2 for further information on carbon factors.
29	Why is the PAN not allowing comparison across different schemes?	<p>The purpose of the PAN is to compare options of a site with specific opportunities and constraints that may not be comparable to other sites. However, over time, the assessment of optioneering exercises may help to build an experience base for planning officers and the industry generally.</p> <p>For detailed WLC assessments The Built Environment Carbon Database (BECD) database is designed to make comparisons across schemes, if desired. Comparison should be treated with caution as there are so many variations within the built environment sector. Sometimes impacts will be contextual to a specific site, i.e. ground conditions affecting substructure options.</p>
30	<p>In relation to the comparison graph, how much confidence do we have in the comparison of different options?</p> <p>It's our opinion that different software tools lead to</p>	<p>Consultants should be following RICS (Royal Institute of Chartered Surveyors) Whole Life Carbon Assessment for the Built Environment guidance for the baseline and GLA guidance, consistently across all options. RICS is due to provide an update in 2023 which should add clarity to this issue. In many cases, at optioneering stage, there may not be sufficient data available to model individual elements. Substructure, superstructure and facade are the crucial elements at this stage.</p> <p>Hilson Moran have reviewed a few projects using both tools (etool and Oneclick). The variation when the same information and assumptions made are about 2-4%, which is not a significant difference (as</p>

Number	Subject	Response
	different results and are influenced by people using different assumptions.	<p>both tools use the ecoinvent databases as a basis). From our reviews (although a small sample size) and looking at several applications, a number of buildings at planning stage seem to have selected materials with limited availability, which makes a bigger difference. Hopefully these projects will be able to procure the materials or the as built numbers will increase (they will also increase due to greater materials quant accuracy at later stages).</p> <p>Often bigger differences are down to the model and making lower material choices that may be very challenging to procure. This is the danger of using low target but using the same construction methods.</p>
31	The PAN omits technologies such as the creation of bio-solar roofs, will measures like this be included?	This PAN methodology is not designed to be a detailed dive into solutions. The positive or negative impact of carbon emissions from photovoltaics and green roofs could be factored into the optioneering as long as it is consistently applied across the options or reported where such solutions cannot be incorporated for some of the options.
32	How are tenants' impacts accounted for?	<p>It should be estimated as part of the optioneering exercise and included in the estimations. It would be reasonable to assume the levels would be similar across the options. Reporting should include assumptions made. The impacts of internal finishes & FF&E are estimated to be around 21% (GLA WLC guidance estimates) of the impact over a 60-year period, due to the number of anticipated replacements.</p> <p>Note: for an office, the tenant fit-out is not included if not in the applicants' scope of works.</p>

Number	Subject	Response
33	The term embodied carbon is misleading and shouldn't be used, as we are talking about carbon that is being emitted. Can you please clarify your choice in terminology	<p>Embodied carbon is part of the agreed industry wide terminology. Carbon is being emitted, but it is also contained within certain materials, which is why it is appropriate to use in this way.</p> <p>Upfront and in-use carbon may also be referenced. The definitions and terms used in the PAN are part of industry wide terminology and align with current guidance and standards such as RICS, UKGBC, World Green Building Council (WGBC) definitions. The terms in the glossary are in line with NABERS, GLA, RICS and LETI terminologies.</p> <p>LETI have just released a Whole Life-Cycle Carbon definition document (Jan 2023) to which the PAN will be aligned.</p>
34	The "Cumulative Carbon Emissions" in Figure 11 do not account for the phasing out of fossil fuels.	<p>Figure 11 will be changed and updated. This is a graphic that CoLC members requested, however it does not reflect the estimated nature of changes. It is likely that fossil fuels will not be phased out for a while, so there is a need to account for other fuel types. It will be some time before the grid reaches 'zero emissions' on an annual basis.</p> <p>In terms of options, the change in carbon emissions as a result of the phasing out of fossil fuels would often be consistent regardless of type (unless a different system is used).</p>
35	Terminology - please expand on abbreviations where used?	We will expand on abbreviations to make them clearer in the final version.
36	Can the references to existing structures be clarified, as this requires qualification rather than generalisation (page 24 of the draft PAN)?	Current industry experience shows that particular care should be taken when considering 1950s / 60s concrete structures, due to the construction techniques and curing of the concrete used in buildings of this age, as well as the grading of the concrete and steel used at the time. However, each project should ideally check the condition of the existing building materials quality as far as practically possible to enable informed decisions to be made.

Number	Subject	Response
37	What is the role of hydrogen and other fuel types?	This is part of the solutions applicant teams can propose if viable. Hydrogen has its complexities at the building level. Other heating sources are more likely to produce satisfactory results in the near future.
38	What is the role of commerciality in the PAN?	An acknowledgment that commerciality is a factor to be considered will be added. Commerciality should be included into the evaluation of the options in the Dashboard.
39	What is the role of transport in the PAN?	Transport of materials is accounted for in the whole life-cycle carbon assessment methodology. Transport impacts of building users is not accounted for in WLC assessments.
40	LETI support the inclusion of references to existing guidance and initiatives, including the RICS Professional Statement, Part Z and LETI. Please see our suggestions for additional materials to be included in the PAN. Can these be included?	Sources will be reviewed and updated wherever possible.

Number	Subject	Response
41	<p>How does variation in building use type and hours affect operational energy? And how is demand for types of space considered i.e. gyms and labs?</p> <p>How is this accounted for?</p>	<p>Operational hours can vary, for instance food establishments use a lot of unregulated energy. It's just one example given for context. The operational energy calculations for options will be based on very early estimates and should be consistent across the options.</p> <p>The different use types in the PAN are just cited as examples of certain considerations that may be needed. Light types labs (life sciences) are becoming a fast-growing sector, so we need to be adaptable to this use type and the City adapts to future needs. This links to circular economy principles and ensuring adaptability and flexibility in the change of use over time.</p>

Stakeholders

The following list provides an overview of the key stakeholders that were invited to one of the consultation sessions and/or submitted written comments on the PAN.

Stakeholder group	Organisation
Professional bodies and expert organisations	CIBSE
	Low Energy Transformation Initiative (LETI)
	Historic England
	Institute of Structural Engineers
	New London Architecture (NLA)
	Royal Institute of Chartered Surveyors (RICS)
	Royal Town Planning Institute (RTPI)
	The Architects' Journal
	UK Green Building Council
	Architects Climate Action Network
	Building Research Establishment (BRE)
	Royal Institute of British Architects (RIBA)

Professional companies involved in the built environment (architects, engineers, environmental and planning consultants, property managers, landowners etc.)	Hilson Moran (Authors of the PAN)
	DP9
	Brookfield Asset Management
	Waterman Group
	Igloo Regeneration
	Etude
	Make architects
	Shaw Corporation
	Hertshten Properties
	3XN
	AECOM
	Arcadis
	Arup Group
	Atelier Ten
	Buro Happold
	Chapmanbdsp
	Greengage Environmental
	Hoare Lea
	Milieu Consult
	Ramboll
	Sweco
	TFT Consultants
	British Land
	City Property Association (CPA)
	Dominvs
	Gerald Eve
	Land Secs
	Lichfields
	London First
	Montagu Evans
	Stanhope
	Turley

	Concrete Centre
	Ray King
London government bodies & Statutory authorities	Greater London Authority (GLA)
	Environment Agency
	London Councils
	Natural England
	Transport for London (TfL)
	Central London Forward
	Diocese of London
	North London Waste Plan (NLWP)
	Port of London Authority (PLA)
London boroughs	Camden
	Hackney
	Islington
	Kingston
	Lambeth
	Newham
	City of Westminster
	Richmond and Wandsworth
	Southwark
	Tower Hamlets
Business Improvement Districts	Aldgate Connect
	Cheapside Business Alliance
	City Property Advisory Team (CPAT)
	The Eastern City Partnership (EC Partnership)
	Fleet Street Quarter/Partnership
Other	A number of individuals, including subject matter experts, City of London residents, people working in related fields and others generously gave their time and feedback during the production of the Planning Advice Note. Individuals are not listed for data protection purposes.



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Executive Summary

The City of London Corporation (CoLC) has committed working towards net zero carbon (NZC) for both embodied and operational carbon emissions. The Climate Action Strategy (CAS) specifically commits to

- **NZC for by 2027 in the CoLC's operations**
- **NZC by 2040 across the CoLC's full value chain and in the Square Mile.**

These targets include embodied carbon emissions for the CoLC's own capital projects, but they do not include embodied carbon emissions of other Square Mile buildings that occur outside the boundaries of the City of London. However, in addition to setting up a fully funded action plan to deliver and achieve annual targets against a decarbonisation pathway, the CAS is also supporting workstreams to address the reduction of embodied carbon emissions that make up a large proportion of overall emissions from the built environment.

Planning applications under consideration in 2021 and early 2022 have reported carbon optioneering and WLCA in various ways. The diversity of approaches was making it difficult for planning officers to assess and evaluate proposals as well as to report consistent key results and conclusions to the CoLC's members for decision making.

Hilson Moran was appointed to develop a Planning Advice Note (PAN) on Whole Life-Cycle Carbon Optioneering. The purpose of this study is to advise on:

- The merits of a whole life-cycle carbon (WLC) emission options appraisal as part of the pre-application process to ensure that development proposals maximise the reduction of carbon emissions.
- The scope and methodology of comparative WLC emission options for development proposals at the earliest project stage.
- To ensure a like for like comparison, enable consistency of reporting of carbon emissions and the evaluation of pre-application schemes as a substantive basis for the planning application scheme.

The majority of planning applications, 76%, fall under the definition of major development, (which includes the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more). The remaining applications are varied full applications covering change of use, external works and extensions. This means that major development will be responsible for a large proportion of new carbon emissions in the City of London.

The review of data concludes that there is a need for emissions to be accounted for and for options to be considered in the City of London for **all major and referable applications**. Major applications are to consider development options and carbon impacts, applying the methodology presented later in this document. Optioneering should also be carried out for non-major applications, where the majority of the substructure and superstructure is not retained. All schemes should undertake independent third-party verification as a quality assurance mechanism for their optioneering results.

Other applications should aim to follow this guidance wherever possible, setting out how carbon emissions have been reduced in the design of the proposed works.

Following the optioneering study, planning officers expect that all major developments undertake a whole life-cycle carbon Assessment (WLCA) for the chosen option in the planning application.

This is supported by Greater London Authority (GLA) WLC assessment guidance, recommending that all major applications undertake whole life-cycle carbon assessments (WLCA).

This PAN establishes the variety of ways by which carbon is estimated in the current planning process and proposes a methodology that recommends options for different degrees of major interventions in development to be considered and presented.

The methodology establishes the minimum data set required at the pre- planning and planning stages, and the level of transparency to be disclosed to planning officers. The proposed methodology aligns with the GLA's adopted guidance on Whole Life-Cycle Carbon Assessments (March 2022). The detailed WLC for the chosen option should be provided as part of the planning application.

Two dashboards have been created to equip planning officers with visual and quantified information that is clear and benchmarkable, enabling informed discussions between the applicants, planning officers and other stakeholders. Both the proposed dashboards, for the options and for the planning application scheme, are designed to clearly and consistently present data and results in the planning application documents so they can be more easily scrutinized by all stakeholders and interested parties.

An excel reporting tool accompanies this report which enables a format for consent reporting to be established based on the dashboards.

The WLC PAN is designed to be adaptable to the evolving carbon policies and procedures. However, future updates of the methodology may be required as the market matures, industry standards are updated and as assessment tools become more robust and reliable.



Scope of Document

This PAN is designed to provide guidance for development site WLC optioneering evaluations. The PAN is a first step of carbon evaluation and is designed to enable a consistent, early-stage approach to assessing options.

The optioneering exercise is a means of comparing a representative number of development options, in order to find the optimum balance in carbon emissions terms, prior to evaluating other considerations in the planning process.

This is considered to be one of the first steps in the CoLC's pursuit to achieve outstanding, best in class buildings that contribute to an attractive and vibrant City environment.

This approach will be recommended to aid the review and decision-making process, through the submission of more in-depth information that demonstrates how applicants have come to a development decision. This process can be relevant to various application types, that have a significant proportion of new build elements.

The assessment will contribute to the justification for the application proposal and may help with achieving a successful outcome.

An evaluation of recent planning applications and types has been undertaken, based on the City of London Corporation Development Schedule '*Development Schedules March 2021 - Updated Jan*' issued to Hilson Moran by CoLC. The details can be viewed in Appendix 6.

The document sets out a recommended approach to optioneering and provides a reporting dashboard template. An Excel reporting spreadsheet is available and should be completed, to enable applicants to provide the information for pre- applications and submissions, should it be required. Section 8 details the consideration of options in the planning process.

Once completed, it is advised that applicants complete the full WLCA analysis for the chosen option for the planning application, in line with the Mayor of London's (Greater London Authority, GLA) '*Whole Life-Cycle Carbon Assessment Guidance (March 2002)*' or, where updated, in line with the guidance in force at the time of application.



Climate Change

Human activities which result in the release of greenhouse gases, including carbon dioxide (CO₂), are estimated to have caused 1°C of global heating above pre-industrial levels. As a result, there have already been sea level rises, increased likelihoods of extreme weather events and melting of sea ice and permafrost. This has direct and devastating impacts on society, including land loss; increased severity and occurrence of wildfires; drought; and difficulties producing food.

Alongside this, there have been unprecedented declines in global biodiversity, with the average abundance of native species in most major land-based habitats falling by at least 20%, mostly since 1900. The quality of habitats which support this biodiversity has also declined, with a 30% reduction in global terrestrial habitat integrity caused by habitat loss, fragmentation and deterioration.' (CIEEM, 2019).

Global emissions need to decrease by 43% by the end of this decade to stay under the preferable 1.5 degrees C global warming target set as part of the Paris Agreement (2015). This is the current recommended threshold to avoid unprecedented heatwaves, terrifying storms, flooding and widespread water shortages (Intergovernmental Panel on Climate Change IPCC, 2022).

The built environment contributes 25% of UK greenhouse gas emissions (CO₂e) that it has direct control over. If emissions influenced by the built environment are included (surface transport vehicle emissions) the built environment contributes around 42% of the UK's total greenhouse gas emissions, MtCO₂e. (Net Nero Whole Life Carbon Roadmap, UKGBC, 2021).

The property and construction industry has a moral duty to act and reduce the environmental impacts of this sector as well as mitigate the effects of climate change.



Climate Action Strategy 2020-2027

The City of London is major global commerce centre with huge influence and opportunity to lead the net zero carbon and climate change mitigation and adaptation agenda.

The City of London Corporation (CoLC) has adopted a radical Climate Action Strategy which breaks new ground and sets out how the organisation will achieve net zero, build climate resilience and champion sustainable growth, both in the UK and globally, over the next two decades. By adopting the strategy, CoLC has committed to:

- **Achieve net zero carbon emissions from their own operations by 2027**
- **Achieve net zero carbon emissions across their investments and supply chain by 2040**
- **Support the achievement of net zero for the Square Mile by 2040**
- **Invest £68m over the next six years to support these goals of which £15m is dedicated to preparing the Square Mile for extreme weather events.**

CoLC has set out a fully funded action plan for 2020-2027 and set annual targets. Data on progress will be shared via a programme dashboard, expected to go live for the public mid-2022. At the end of each year CoLC will publish a report of progress against targets for that year. Stakeholders will be invited to participate in a survey to help us understand how well they are reaching and engaging with them.



Whole Life-Cycle Carbon Optioneering

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1. Carbon in Planning Policy

This section outlines the means by which carbon emission quantification and reduction are required or encouraged to be reported for planning applications in the City of London.

Part 2 R.2.i of the National Model Design Code (Ministry of Housing, communities and Government, 2021) states a preference for reuse/ refurbishment of buildings over new build development.

Development proposals are generally required to report, for GLA/ CoLC, both the:

- **Embodied carbon emissions, i.e. carbon emissions resulting from materials, construction and the maintenance of a building's life-cycle, and**
- **Operational carbon emissions, from energy consumption throughout the life-cycle of the building.**

However, the scope of reporting in applications is determined by several factors relating to the type of application, the size of the building and the scope of the intervention proposed.

There are a number of policy and guidance documents that determine reporting requirements:

Building Regulations:

At a national level, 'Approved Document L2: Conservation of fuel and power in new buildings other than dwellings 2021 edition' ('Part L2') regulates some elements of design and specification of buildings that affect energy consumption, including insulation, solar control, the efficiency of building services and renewable energy generation. Part L sets minimum requirements and targets for carbon emissions and defines the carbon intensity of fuel and power. The Part L 2021 update tightens target requirements and introduces a minimum Primary Energy metric to place more emphasis on reducing energy demand and on site renewable energy generation.

'Unregulated emissions' refer to the elements of energy use that sit outside Part L and includes carbon emissions from plug-in equipment and cooking.

Embodied carbon emissions are not regulated at a national level. A bill was proposed in Parliament in February 2022 to change this based on a proposed Part Z, developed by industry experts. Whilst Part Z has been widely supported by industry, at the bill's second reading the Government declined to support it. However, the UK Government have committed to undertake consultations on embodied carbon in 2023 and 2024 (*Environmental Audit committee - Building to net zero: costing carbon in construction: Government Response to the Committee's First Report, third special report of session 2022-2023, September 2022*).

The UK Government has recently set out a project to evaluate Measurement and Reduction of Embodied Carbon in New Buildings with the research to be concluded in Q1 2024.

Greater London Authority (GLA) policy:

The Mayor of London's London Plan 2021 requires proposals referable to the MGLA to be net zero carbon.

The London Plan Policy SI 2 sets out the strategies for GLA referable projects to minimise carbon emissions. Part F of Policy SI 2 requires development proposals referable to the GLA should calculate whole life-cycle carbon emissions through a nationally recognised whole life-cycle carbon assessment and demonstrate actions taken to reduce life-cycle carbon emissions. There is a separate GLA (London Plan) policy guidance document - *Whole Life-Cycle Carbon Assessments Guidance, March 2022* - which sets out the requirements applicants must undertake.

Reporting requirements and the scope of the assessment are defined in the London Plan Guidance for WLCA [https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/](https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-)



Figure 1: The proposed amendment of the Building Regulations, Part Z, to regulate embodied carbon on a national scale.

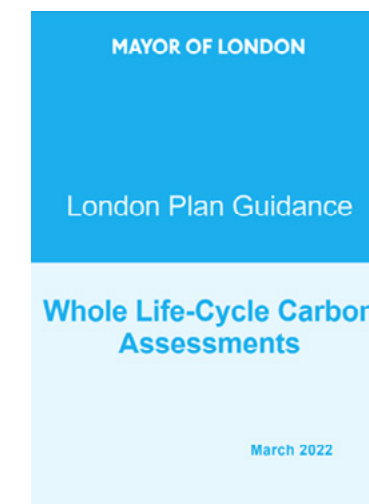


Figure 2: The new London Plan Guidance 'Whole Life-cycle Carbon Assessments' March 2022, sets out a framework of priorities and carbon information required

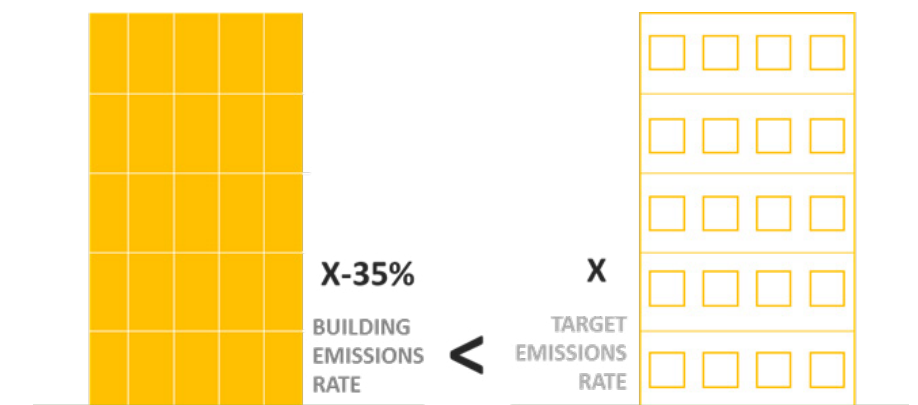


Figure 3: Regulated target operational carbon emissions are reduced further by local planning policy minimum requirements

[guidance/whole-life-cycle-carbon-assessments-guidance](#). WLCA reporting is required at pre-application, application and post-completion stages of schemes that are referable to the GLA, but it is also encouraged for all major developments. All studies account for a 60-year life-cycle period, as standard. Provisions for a different assessment period can be established if accompanying explanations are provided.

The guidance document is recognised as industry-leading. It contains a detailed methodology and list of information to be included for materials across a number of Life-Cycle Assessment (LCA) modules (Table 1) as well as including requirements for reporting emissions for demolition of existing assets on site and from refrigerants.

The Mayor of London's London Plan 2021 sets out a clear energy hierarchy for net zero operational carbon emissions. It defines the process required for reducing these emissions, clarifying local priorities for heating and cooling strategies, setting minimum target savings and local carbon offsetting mechanisms. The carbon savings targets are based on regulated operational carbon and a 30-year life-cycle. Reporting unregulated carbon is encouraged through the design process and building infrastructure provision. Other policy requirements are in place for on-site energy generation and energy storage.

The Mayor of London's 'Energy Assessment Guidance (June 2022)' clearly outlines reporting requirements for planning applications to demonstrate that the proposed climate change mitigation measures comply with London Plan energy policies, including the energy hierarchy and energy performance metrics in terms of Energy Use Intensity for regulated emissions (EUI). It also introduces a new 'be seen' stage to calculate whole building EUI (including unregulated emission), to monitor and report its energy performance post-construction. This will help to ensure that the actual carbon performance of the development is aligned with the Mayor's net zero carbon target.

The 'Be Seen Energy Monitoring Guidance' (September 2021) explains the process that needs to be followed and reporting requirements to demonstrate compliance with the London Plan policy addressing the monitoring, verifying and reporting of energy performance after a building's practical completion ('Be Seen' level of the Energy Hierarchy). It also requires undertaking analysis for regulated and unregulated energy loads using a process such as TM54 (it is aligned with the London Plan guidance for 'Whole Life-cycle Carbon Assessments (WLCA)' module B6 approach.

City of London Corporation policy:

City of London's Local Plan (2015) aligns with the London Plan (see point 3) at the time of its adoption. The London Plan has subsequently been updated (2021). The adopted Local Plan focusses on reducing operational 'regulated' carbon emissions resulting from energy used in operation, low and zero carbon technologies for on-site and local energy generation (including existing and planned District Energy Networks), local and national carbon offsetting mechanisms. Carbon offsets are required for a 30-year period of operation but there is no specific mention of unregulated carbon and embodied carbon (WLCA) in this policy document. However, Policy CS 15 does state that development should 'avoid demolition through reuse of existing building or their main structures...'

The Local Plan is being reviewed and a replacement Plan, City Plan 2040, is in preparation. This City Plan will reference the London Plan's carbon emissions requirements towards achieving whole life-cycle net zero carbon emissions. The City Plan is in the process of being drafted and will ensure that it aligns with the London Plan, recent Mayoral guidance and best practice in the City development market.

Related Reporting Requirements:

There are other carbon-related planning reports that should be taken into consideration. They include Greenhouse Gas impact assessments, the Circular Economy Statement, operational energy and operational water assessments. Where relevant, these should be referenced in WLCA reporting, in particular to highlight discrepancies and overlaps in design considerations and decisions. The related reporting requirements are in Appendix 7.

The current CoLC planning policy for major developments in the City of London does not require a WLCA. However, it does require the achievement of a minimum BREEAM 'Excellent' certification rating, with a provision to ideally achieve 'Outstanding'. BREEAM does include criteria relating to Life-Cycle Assessment, Environmental Product Declarations and Circular Economy. These aspects of design and procurement are therefore typically addressed in proposals targeting a minimum 'Excellent' rating.

The BREEAM scope for Life-Cycle Assessments extends between life-cycle stages A and C, but the scope of building elements to be included is optional and limited compared to the GLA approach (see Table 2, page 16). BREEAM does not currently require a post-completion review of embodied carbon performance.

The total life-cycle carbon emissions of major, non-referable planning applications with reduced scopes, e.g. limited to addressing BREEAM requirements for fewer building elements, are not comparable to

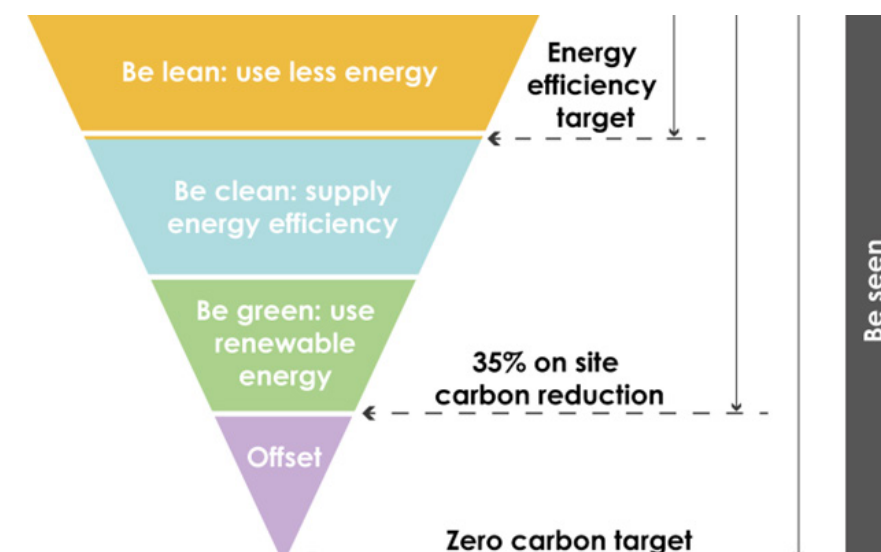


Figure 4: The Energy Hierarchy defines policy priorities and interim



Figure 5: The draft City Plan 2040 is currently under development targets to Net Zero Carbon in operation

GLA benchmarks. Note that Modules B6, B7 and D (EN 15978: 2011 Sustainability of construction works. Assessment of environmental performance of building) are excluded from the GLA WLCA benchmarks.

Table 1 in the following section outlines the typical current carbon reporting scopes driven by national, GLA and local policy requirements.

There are a number of forthcoming updates to guides and standards relating to whole life-cycle carbon and whilst the document aims to account for these, they may require further clarification in future updates to this PAN.

2. Whole Life-Cycle Carbon Assessments

There is currently a variety of different approaches and scopes relating to Whole Life Carbon and what information should be included within the review. Tables 3 and 4 include a comparison between industry drivers such as the UK Green Building Council (UKGBC), GLA, Low Energy Transformation Initiative (LETI) and BREEAM scopes in terms of [EN 15978:2011 Sustainability of construction works](#). The assessment of environmental performance of buildings is broken down into modules / stages and building element groups to be included.

Modules A1-A3 include the product manufacture, modules A4-A5 cover transport to site and installation processes. Combined these is known as upfront **embodied carbon (i.e. at Practical Completion (PC) of the building)**. Modules B1-B5 cover operational emissions relating to use, maintenance, repair, replacement and refurbishment, modules C1-C4 cover demolition, transport to a disposal facility, waste process and disposal. Module D covers emissions beyond the system boundary, accounting for consideration of what happens to material at the end of the building life-cycle. In a WLCA, operational energy use, B6 and operational water use, B7, are also included.

Table 1: Comparison of life-cycle stages. Whole life-cycle carbon Scope of whole life-cycle carbon reporting in the City of London. Major developments' scope of works is currently dictated by BREEAM requirements

Scope (Stages based on EN 15978)	Sub-groups	National –Building Regulations	GLA referable developments in CoL	Major developments in CoL*	Minor developments in CoL
Impact of Existing building					
Demolition impact of existing building structures (required to be reported separately for GLA)*			✓●	✓●	
Product and Construction Process (Practical Completion) Stage					
A1-A3 Construction product supply, transport and manufacturing			✓●	✓●	
A4-A5 Transport to site and Construction			✓●	✓●	
Use Stage					
B1-B5 Operational emissions			✓●	✓●	
B6 Operational energy use	Regulated	✓● 1 year	✓ 30 years for energy, 60 years for whole life carbon assessments#	✓ 30 years for energy, 60 years for whole life carbon assessments#	Depends on scope of works
B6 Operational energy use	Unregulated		✓●	✓●	
B7 Operational Water Use			✓●	✓●	
End of Life-Cycle Stage					
C1-C4 End of life stage including deconstruction, demolition, transport, waste processing and disposal			✓●	✓●	
Beyond the Project Life-Cycle					
D Stages beyond the life-cycle, including re-use, recovery, recycling			✓●		

* - Demolition of the existing assets is not currently required in the 2017 RICS PS WLC methodology, it is expected to be included in the 2023 version.

- Operational energy assessment i.e.TM54 or NABERS where possible, to enable a more accurate estimation of in use energy performance.

The policy drivers listed in Table 1 (previous page) and industry drivers by element also vary in scope as shown below in Table 2. It is worth noting that the source documents may change and the landscape is evolving and continually improving at pace. The GLA methodology is currently the most comprehensive of all the industry methods. This states that the EN 15978 principles and the RICS Professional Statement: Whole Life Carbon Assessment for the Built Environment, 1st edition (November 2017) should be followed as a methodology. It also sets out some additional requirements in Box 1, ‘Key requirements of this guidance that differ from the RICS PS methodology.’

It **should be noted that updates** to the RICS Whole Life Carbon Assessment for the Built Environment 1st edition will occur in 2023. BS EN 15978 will be updated and is likely to be published in Q1 of 2024, and methodologies may need to be adapted to account for these changes. The WLC PAN is designed to ensure these updates would not affect the intended outcomes of the process. The latest, most up to date version of guidance should be used for the optioneering assessment and be clearly stated in its assumptions.

For the GLA method, a minimum of 95 per cent of the capital cost allocated to each building element category should be included for at each stage of the WLCA. This should be approved by the project Quantity Surveyor. In addition, for building services the GLA guide includes a list from which the applicant is required to indicate in-scope items.

Table 2: Whole life-cycle carbon comparison of scopes vs building part element/group (full version including notes is located in Appendix 3).

Building part / Element group	UKGBC Full Assess-ment	UKGBC Minimum Reporting	GLA WLC Guide	RIBA 2030 CC Ver.2	LETI Embodied Carbon Primer	BREEAM NC 2018 and RFO 2014***
Demolition prior to construction			YES Reported separately. Benchmarks do not include these building elements.			
Facilitating works	✓		YES Reported separately. Benchmarks do not include these building elements.			
Substructure	✓	✓	✓	✓	✓	NC credit option RFO if in scope
Superstructure (Frame, upper floors, roof, stairs, ramps)	✓	✓	✓	✓	✓	NC mandatory RFO if in scope (excludes ramps)
Superstructure (External walls, windows, doors)	✓	✓	✓	✓	✓	NC mandatory RFO if in scope
Superstructure (Internal walls, partitions, doors)	✓		✓	✓	✓	NC mandatory education only RFO if in scope
Finishes	✓		✓	✓	✓	RFO if in scope
Fittings, furnishings and equipment (FF and E)	✓		✓	✓		RFO if in scope to CN7 limited furniture / shop fitting
Building services/ MEP	✓		✓	✓	✓	NC credit option RFO if in scope
Prefabricated Buildings and Building Units	✓		✓	✓	✓	
Work to Existing Building	✓		✓	✓		
External Works	✓		✓			NC credit option RFO if in scope: hard landscaping and boundary protection only

3. Introduction to Carbon Optioneering

This PAN provides the recommended methodology to compare a number of development options in order to find the best balance in carbon emission terms prior to adding other considerations into the planning process.

The PAN is a first step of carbon evaluation and is designed to enable a consistent, early-stage approach to assessing options, and is one of the first steps in the CoLC's pursuit to achieve outstanding, best in class buildings that contribute to an attractive and vibrant City environment.

This approach will be recommended to aid the review and decision-making process, through the submission of more in-depth information, that demonstrates how applicants have come to a development decision. This process can be relevant to various application types, that have a significant proportion of new build elements.

Optioneering is required for all major schemes. Other developments should carry out optioneering if they do not retain the majority of substructure and superstructure. All schemes should undertake independent third-party verification as a quality assurance mechanism for their optioneering results.

Schemes that propose to retain the majority of the substructure and superstructure are classed as retrofits for the purposes of this PAN. While such schemes are not required to undertake a full optioneering exercise, applicants are encouraged to explore different options during the pre-application process, with the aim of incorporating design approaches that minimise the carbon intensity of the development. The purpose of the optioneering exercise is to compare bespoke development options for a particular site, which can mean that comparison with other City development proposals may not be relevant.

The WLC PAN advises on the consistent presentation of options in planning applications (see Dashboard 1) to make the information is easier to understand and assess, as part of the application consultation process.

The development of this methodology is driven by the growing realisation that the construction of new buildings using the most common and current construction techniques and materials result in high carbon emissions over the building's life-cycle. For this reason, the assessment and benchmarking of embodied carbon to practical completion (Modules A1-3 and A4-A5) can be used as an effective way to evaluate and then mitigate emissions from construction and materials. It is also acknowledged that the majority of the existing building stock has relatively high operational emissions, primarily due to inferior energy efficiency standards and technologies at the time of their construction, compared to current requirements (insulation, air tightness, solar control glass, building services etc.).

Another major contributor to existing operational emissions is the common use of natural gas combustion equipment for space heating and hot water. Investments in alternative renewable power sources have resulted in the carbon emissions of electricity generation to decrease rapidly, to almost half that of gas, and this trend is set to continue. Therefore, a feasible carbon balance needs to be explored in any intervention of the built environment. This will help to provide clarity about the measures that would result in the greatest whole life-cycle carbon emissions reduction for each development proposal, both short term and long term, be it through the retention of buildings or building elements or through redevelopment.

This methodology recommends comparing a number of development options in order to find the best balance in carbon emission terms, prior to adding other considerations into the planning balance. These can be expressed as potentials and constraints of each option, ensuring that all primary and secondary considerations form part of the design process, so that informed decisions can be made. These considerations frequently encountered in the decision process are set out in this section.



4. Optioneering Considerations

Quality of existing building: The condition of materials and structures in an existing building will be a critical determinant of the extent of elements that can be retained in an intervention aimed at improving an asset and bringing it up to current performance and functional market standards.

For example, a structure that was poorly constructed or maintained may require too many life-cycle interventions to maintain structural integrity for retention to be feasible. Often, existing assets require extensions to validate the Capital Expenditure (CAPEX) of a major intervention. Extension potential will be dictated by structure and substructure design from the existing building.

Adding piles and foundations to an existing building could mean a level of complexity that increases cost and programme to a degree that the proposition becomes unviable. Current industry experience shows that due to the construction techniques and curing of the concrete in building of this age, as well as the grading of the concrete/steel used at the time, particular care should be taken when considering 1950s/60s concrete structures. However, each project should check the condition of the existing building materials quality as far as practically possible, to enable informed decisions to be made. Poorly maintained windows can be restored to improve air permeability, but conductivity, light transmittance and solar control are difficult to achieve without additional material or complete replacement.

Façade interfaces: As well as quality, decisions around façade retention need to take into consideration new interfaces with the internal environment, for example for on-floor ventilation systems and mixed-mode ventilation opportunities. The two examples are increasingly being adopted by commercial buildings to improve energy efficiency, spatial adaptability (as part of a health and wellbeing design strategy) and to free up roof area for amenity uses.

Health and wellbeing: Design considerations and interventions around health and wellbeing have become more prevalent in workspace over the past few years, and increasingly so in a post-pandemic era. More consideration is being given to quantities of fresh air to dilute indoor pollutants, for example through the application of enhanced on-floor ventilation systems. Aligning a ventilation strategy to an existing façade retention can be challenging. Increased fresh air rates are also leading to increases in operational carbon emissions.

Other design considerations for healthier internal environments include internal levels of daylight and thermal comfort, which may shift a decision to replacing existing glass in a refurbishment; and the presence of toxic materials, such as asbestos, which could result in the removal of existing building elements.



Floor to ceiling heights: Existing floor to ceiling heights could constrain the functional adaptation of an existing structure and new building services solutions. For example, low floor to ceiling heights may not lend themselves to certain uses, and optimised clear heights, by transferring heating, cooling and ventilation plant to an underfloor system is often limited by existing lift lobby and stair landing levels.

Land use and building type: It is important to note that different land uses and building types have an effect on the structural requirements of a building due to loading expectations and flexibility requirements. A few examples include uses that require wider clear spans, such as retail, which could make the structural solution and carbon impact more intense; and uses that have higher loading requirements and need vibration control, for example in science labs (life sciences) and gymnasiums; and increased structural materials due to lateral loading on tall buildings.

The way a building is operated and managed also has a direct effect on operational carbon emissions from energy consumption, for example longer hours of operation by food and beverage establishments.

Power infrastructure: For the reason described in point 1 above, substituting gas-fired heating systems with energy efficient electric alternatives is a very effective way of reducing operational carbon emissions. However, in some cases, securing enough power to serve a development's decarbonisation initiatives can be challenging due to utilities infrastructure constraints. This is another reason why reducing energy demand should be prioritised. A mitigating action could be that a building's systems and controls are set to prioritise electricity and thermal storage, before gas is consumed.

Buildings that apply electric heating may still have other intermittent uses of fossil fuel, such as life safety generators and façade maintenance equipment. These systems require on-site storage of fuel, which is frequently diesel. Alternatives that can be explored for generators are secondary utility high voltage supply fed from a primary network substation that is independent from that of the primary supply, or uninterruptible power supply equipment incorporating an appropriately sized battery installation (subject to authority approval). An alternative fuel that is considered due to low environmental impact relative to diesel is Hydrotreated Vegetable Oil, a synthetic diesel, manufactured from waste products comprising a mix of vegetable oils and animal/fish fats.

Building complexity: Design complexity and the number of elemental sub-components increases carbon intensity. Therefore, simplification of structure, façades, systems, etc. has carbon benefits and is encouraged.

Procurement: The options and availability of low carbon building products on the market are currently limited. In some cases, lower carbon options are available from longer distances, increasing the emissions associated with transport (Stage A4), although these can be comparatively minor compared to the product manufacture. However, this is changing rapidly as manufacturing processes are adapting and supply chains recognise the high value of low carbon in sections of the market, for real estate in London in particular.

Invariably, a limited quantity of higher value products is less attractive during a time of economic inflation. Applicants of major developments could be asked to state what measures they have in place to increase the probability of lowering embodied and operational carbon in procurement processes.

Assumptions: In addition to fewer options of low carbon products, information about the quantity of carbon in products is also limited. A requirement for EPD certificates, or similar third party verified information, should be a requirement in procurement. For products with no certified embodied carbon data, assumptions and metrics should be clear and reliable market-average databases should be used, derived from a verifiable tool or software, such as One Click LCA and Cerclos (eTool).

Supply chains can be constrained by a very long lead time, impacting the construction programme and leading to product changes with potentially higher carbon impact.

Due to market fluctuations and limitations, it is recommended that, at application stage, the WLCA is based on market averages of a committed specification, based on a Quantity Surveyor's bill of quantities. Product-specific Environmental Product Declaration (EPD) certificates should not be used in early design stages (unless the manufacturer is known, sector level data e.g. EPDs that use data covering several manufacturers could be used) because they may be giving a false impression of future procurement opportunities. This is an area the industry needs to improve upon over the next few years.

Commerciality: A critical factor in decision making around the level of intervention in a building is the commerciality of the asset. In commercial buildings, the net lettable area and lease value are imperative metrics. The market in City of London is shifting demand for net zero carbon, fossil fuel free, health and wellbeing conscious and smarter workspace. As market demands change, a number of asset holders are racing to update their lettable spaces at the end of the next lease term. This is to ensure that buildings don't become stranded assets, and equity and operating value are maintained.

The standard for what is required in a building update needs to be competitive in the market that it is trying to attract, and the cost of the intervention needs to be justified by a likely return on investment.

Densification: As London tries to move towards a polycentric city to release infrastructural pressures and improve quality of life, its existing 'mega-centres' remain very relevant. Urban densification (the increasing density of people in urban areas) is accepted as a necessary part of limiting land take while serving population growth. Densification tends to occur in fast growing population centres with a combination of demographic change, economic pressure and large transport infrastructure projects. The City of London is very well served by sustainable transport infrastructure and planning policies are in place to limit pressures on utility infrastructure and the existing community (the people who live, work and use the City of London).

Densification, e.g. extensions and taller buildings, tend to increase the carbon intensity of structural elements relative to benchmarks derived from mid-height buildings.

Striking the right balance between the environmental (and social) costs and benefits of increasing NIA on brownfield sites is a critical factor that policy makers have to deal with, in particular in addressing climate change. Resilience and sustainability should be central priorities for increasing existing building heights.

5. Other Policy Opportunities

This section addresses circumstances where other planning policy requirements may result in lower or higher carbon emissions. All factors need careful consideration on a project-by-project basis, and policy requirements need to be fine-tuned depending on priorities discussed at pre-application stage.

Circular Economy:

The Mayor of London has introduced a requirement for referable proposed developments to develop a circular economy strategy and produce a statement as part of an application. The approach is defined in the 'Circular Economy Statement Guidance' (adopted 25th March 2022). The principles encourage building reuse, recovery of material for reuse and recycling, material efficiency, waste management and infrastructure to support material reuse (such as storage and collection systems).

The circular approach often aligns with the principles of low carbon interventions. For example, it encourages refurbishment and efficient use of materials and requires consideration of the end-of-life stage by a proposed new building (building as a material banks/materials passport approach). This area is still evolving and can significantly reduce carbon.

There are, however, some circumstances where actions that align with circular principles can increase carbon emissions. For example, on occasion, it has been found that recovering/repurposing a material for re-use on site frequently requires the material to be reformulated into a new high value use (or upcycled), a process that requires transport to and from the site and energy to repurpose the materials. Recovering material can also lengthen construction programmes prolonging stage A5 of the life-cycle and local environmental impact.

Therefore, it is important to compare the carbon emissions of the product stages of recycled elements to their newly made equivalents with the lowest carbon opportunity established.

Low and zero carbon technologies:

Planning policy, building regulations and the BREEAM assessments have for years required the inclusion of low carbon and zero carbon technology in the energy hierarchy of proposed developments. One example, and the most viable option in the City of London, is frequently to install a maximum area of roof-mounted photovoltaics (PV) and air source heat pumps (ASHPs). Policy prioritises operational energy and carbon reduction in advance of renewable energy

generation, but no consideration is given to reducing the embodied carbon of PV and other renewable energy sources. An array in London can achieve carbon break-even within a decade, but as the electrical grid decarbonises, there is an argument that the array will displace less carbon and could never recover the embodied carbon emitted. For this reason, it is recommended that circularity principles are applied to their specification (e.g. reusable mounting and take-back schemes) and energy storage is incorporated to increase the proportion of renewable energy uptake at time of use.

It is important to note that PV can bring other benefits like localised power, and we tend not to factor in the impact or wider power networks' embodied carbon (i.e. the impact of the power plant construction upgrades, cabling etc.). PV will be a crucial piece of the UK energy and decarbonisation strategy.

District Energy Networks:

Another local policy requirement is connecting to existing District Energy Networks (DEN) or preparing for a future connection to a planned DEN. This is emphasised by both the London Plan's and draft City Plan's heat infrastructure priorities. The City of London includes the extensive Citigen network, which is planned to extend south in the near future and eastwards at a later date. However, due to the drive to remove fossil fuel combustion from buildings, for reasons relating to both carbon reduction and air quality targets, electrically heated buildings tend to have much lower carbon emissions than existing heat networks. This is because the Energy Centres that serve the DENs still run on gas systems, and while they are intended to decarbonise over time, there is very little information about their programme. In addition, the carbon intensity of planned networks is unknown at this stage. Therefore, the policy can be interpreted to contradict the Climate Action Plan and can impact life-cycle aspirations, such as high NABERS UK energy ratings.

Public realm and urban greening:

The City of London includes a network of gardens, small open spaces and squares that are maintained by the Corporation. Nevertheless, the area of green and open space per capita is relatively small, and the discrepancy will increase as the population and densification rises.

Planning policy encourages urban greening and biodiversity net gain, for which the City of London has adapted the London Plan's Urban Greening Factor (UGF) calculation which is required for proposed developments to demonstrate higher value green infrastructure.

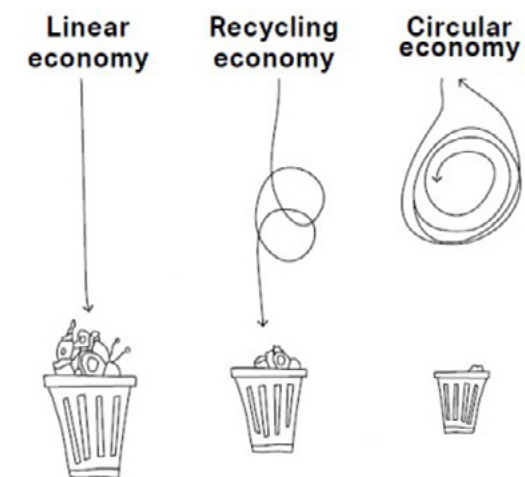
However, urban greening does not often translate into open space, because private roof gardens and green walls are often used to satisfy the UGF target.

In order to increase the amount of open and green space in the City, brownfield and lower quality space may need to be upgraded. This may result in decisions to demolish lower quality infrastructure. In addition, the UGF can be difficult to achieve on existing structures mostly due to loading limits and plant requirements, however, all solutions to overcome this should be explored and communicated.

In addition, major developments are required to carry out ecological surveys of the site, and propose ecological protection, enhancement and maintenance measures.

Climate resilience:

Adapting to climate change is crucial in the City as a densely built environment which is especially prone to local flooding and urban heat island effects. Integrating measures to minimise the risk of local flooding and overheating of buildings as well as the public realm are key to making the City a resilient area as the effects of climate change become more pronounced. Space constraints and loading limits of existing buildings can make it challenging to incorporate measures such as green roofs and walls, sustainable urban drainage measures such as blue roofs, rainwater harvesting and attenuation tanks, adapted façade systems and sustainable heating, ventilation and air conditioning (HVAC) systems. Opportunities and constraints must be clearly communicated to identify the balance between climate change mitigation and adaptation.



FROM TAKE • MAKE • USE • DISCARD TO RE-MAKE • USE-AGAIN

Diagram courtesy of Circular Flanders

Figure 7: Circular Economy compared to Linear Economy (Source: Circular Flanders)

6. Outline Methodology

The GLA's Whole Life-Cycle Carbon Assessments Guidance and Circular Economy Statement Guidance require the full exploration of options before considering substantial demolition. This PAN recommends a methodology to do so, and it recommends how this should be demonstrated in the planning application.

Due to the significant impact on carbon emissions and climate change by major interventions and new construction, proposed developments need to demonstrate reduction and mitigation of carbon emissions using a consistent optioneering approach.

Options will be developed in early discussions with applicants in the pre-application process, and their details will vary on a case-by-case basis. The number of options will be limited and agreed based on presenting clearly discernible, feasible design approaches to the proposal in order to inform the optimum design for the application scheme, both in WLC carbon terms and in considering other environmental opportunities such as urban greening and climate resilience measures.

Options are hypothetical, they provide an indication of the potential for a given site. They should be based on the same assumptions including which energy strategy is thought to be the most advantageous in carbon reduction terms, in order to be able to compare the options - unless there are reasons for not doing so, which should be clearly stated. Option review reporting and their considerations should be transparent with clearly identified opportunities and constraints.

The CoLC requires all major developments to consider and assess both operational and embodied carbon emissions over a whole life-cycle. There may be development proposals where an optioneering exercise would not provide useful information in which case the consideration of options should be discussed and agreed with officers.

Optioneering should also be carried out for non-major applications, where the majority of the sub- and superstructure is not retained.

Pre-Application stage

Optioneering as part of pre-application discussions with the City of London should include the following:

1. Well-considered options that are realistic and feasible development proposal for a specific site.
2. Demonstrating different levels of interventions to the existing buildings on site in the design process.
3. Providing options information in Table A of the WLCA Dashboard 1 (section 7 and the Excel tool), including:
 - Gross internal area (GIA)
 - Increase in net internal area (NIA)
 - Embodied carbon to practical completion (Modules A1-A5)
 - Life-cycle embodied carbon (A1-A5, B1-B5, C1-C4)
 - Percentage of material retained (by volume, relative to existing building)
 - Operational carbon from energy consumption (Module B6) (see carbon factors below)
 - Regulated operational carbon savings relative to current Part L Target Emissions Rate
 - EPC rating
 - Fuel source for operational energy (gas, electricity, other to be defined)
 - Carbon factor(s) used for operational energy
 - Whole life-cycle carbon (A1-A5, B1-B6, C1-C4) in kgCO₂e/m²GIA and tCO₂e
 - Opportunities and constraints, specifically in relation to carbon emissions and other policy areas.
 - Any assumptions and justifications for the above in the estimations
4. Using consistent carbon factors across options for the type of fuel used. Figure 8 shows the Part L carbon factors for Part L 2013 and Part L 2021, however these figures do not account for grid decarbonisation.

Guidance on carbon factors for grid electricity is provided for the optioneering statement. The electricity figure is based on the average decarbonisation figures from the UK Government, from the latest

Carbon Emissions Factors kgCO₂/kWh

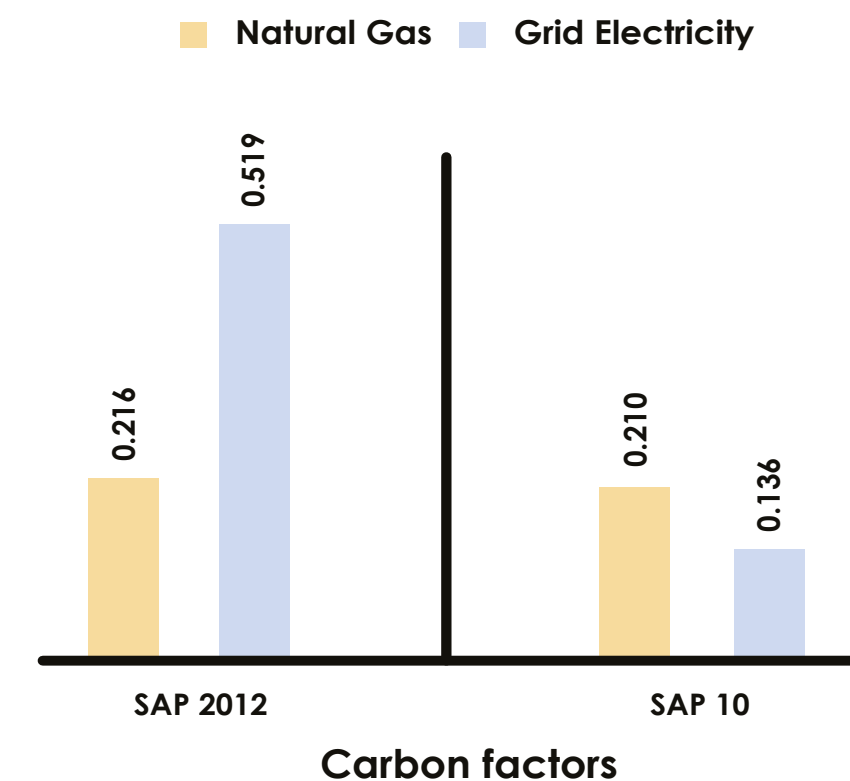


Figure 8: Investments in renewable energy and infrastructure are resulting in rapid decarbonisation of grid electricity compared to natural gas. SAP 10.1 was published in October 2019 with subsequent updates.

BEIS tables supporting the Treasury Green Book supplementary appraisal guidance on valuing energy use and greenhouse gas (GHG) emissions; [Table 1: Electricity emissions factors to 2100, kgCO₂e/kWh, Long-run marginal](#) figures. Note: BEIS was dissolved on 7th February 2023, and split into different departments, including the Department for Energy Security and Net Zero.

These should be used for evaluating each option for consistency. Where a district energy network is used, the carbon factor should be stated based on information from the network provider. Should a different factor be used, this must be declared for each option with clear justification provided. The suggested factor to use are:

- Electricity: 0.0067 KgCO₂/kWh (to be adjusted in accordance with forthcoming industry guidance)
- Gas: 0.2035 kgCO₂/kWh
- District Network: Based on supplier information (follow GLA Energy Assessment Guidance) and report assumptions in Dashboard 1.

Where a mix of carbon factors are used, estimations depending on consumption by fuel type should be calculated.

5. Ensuring like-for-like reporting, without bias to favour one option against the others. For example, the opportunity for energy and carbon improvements should be equivalent across all options, except where constraints can be clearly demonstrated, and the equivalent level of aspiration to reduce elemental embodied carbon should be applied equally across all options.
6. Presenting the development options on the basis of consistent, assumed and proposed data including:
 - An equivalent approach to the level of assumptions and certainty applied to embodied carbon estimates
 - Equivalent scope for the WLCA (life-cycle stage and building element scopes)
 - Embodied carbon impact of further interventions to be included with justifications provided i.e. what has been assumed. For example, estimated impact of plant replacement every 15 years of operation over the life-cycle, using life-cycle modules B1-B5, C1-C4.
7. Excluding Module B7 'Water Consumption' at this stage, because it does not vary significantly between options. Any variances, in particular where an opportunity or constraint occurs for one option and not another, should be clearly presented.

It should also be noted that the WLCA emissions fluctuate and are likely to be different in later design and construction stages. Generally, this is due to the availability of more detailed design and cost plans. Emissions at practical completion may also change due to procurement variations and the market. As more data becomes available it will inform future projects to refine early estimations.

Application stage

The preferred option to be developed after the pre-application optioneering should include the following:

1. Justification to support the decision of the application proposal
2. Calculations of the WLCA in alignment with GLA guidance at the time of the assessment, and completion of the GLA reporting template spreadsheet, i.e. including all modules and building elements.
3. Clarification of the scope of the WLCA (life-cycle stage and building element scopes), by completion of Table B (section 7).
4. Clarification of all assumptions, exclusions and level of certainty of the data used in the assessments.
5. Plotting of the life-cycle stages A1-A5, B-C (excluding B6 and B7) against the GLA WLCA benchmarks (see Figure B):
 - By stage for the proposed land use
 - By building element for Stage A1-A5 (embodied carbon to practical completion)
6. Reporting of the total kgCO₂e/m² GIA and the total whole life-cycle Carbon in tonnes.

The WLCA should be based on the cost plan in line with GLA guidance. The GLA WLCA reporting template should be completed and submitted to the CoLC and GLA where applicable. The post-completion report should follow the GLA WLC guidance and include CIBSE TM 65 data for building services as required in the GLA guidance.



7. Dashboard

Dashboard 1: Pre-application Options Appraisal

Completion of Dashboard 1 is required to improve reporting consistency, transparency and standardisation across applications. An Excel reporting tool has been created for design teams to use. This should be completed and presented at pre-application stage. The template should be completed with project information, which will populate some of the required graphs.

The graph in **Figure A** will need to be created separately.

Dashboard Input Methodology: General Recommendations:

The optioneering information is not based on a prescriptive method. Assumptions and building information should be as transparent as possible. The following recommendations have been made to guide design teams:

Whole life-cycle operational energy:

- Scope of works should be summarised/defined for each option.
- The information should aim to be consistent across options where the fuel source is the same.
- The recommended carbon factors for electricity and gas should be used (as appropriate, see section 6).
- The applied carbon factor needs to be declared where district heating and/or cooling is proposed, i.e. from Citigen London Network. This should be listed in the assumptions. Reasonable estimations of energy use intensity should be used for the whole building. This should be reported based on GIA per m². If a lighter touch refurbishment is proposed, it is recommended to apply general assumptions in anticipation of future policy. After a 15–20-year period for example, building services upgrades may be required (due to forthcoming legislation and system life expectancy) as it is unlikely that the building could be left operating in situ over a period of 60 years or more. For operational energy reporting of estimated whole building operational energy in kWh if gas is used, it will need to be converted to an electric equivalent in kWh. To convert gas consumption (kWh/m²) to electrical equivalent (kWh/m²), by multiplying kWh gas by 0.75. Refer to latest guidance from NABERS/BRE/BBP/UKGBC as appropriate.

Embodied carbon estimates:

New Build

- The embodied carbon of the substructure and structure should be calculated for each option using structural engineer estimations.
- Other elements or layers can either be based on a detailed calculation, should the information be available, or on an estimation based on percentage rates from the GLA WLC (A-C, excluding B6 & B7) benchmarks. Where a different methodology/estimation is chosen, this should be clearly identified and explained.

Major Refurbishment/Retrofit

- The structure and substructure interventions should be calculated for each option using structural engineer estimations. The type of works should be declared in the assumptions section.
- Other elements can either be based on a detailed calculation, should the information be available, or on an estimation based on percentage rates from the GLA WLC benchmarks or similar building types. Where a different methodology is chosen, this should be clearly identified and explained.

Each option should clearly state the assumptions made in the determining factors for the outputs provided.

The graph below demonstrates, in general terms, the relationship between carbon emitted at practical completion of a building intervention and the estimated operational carbon over the building's life-cycle (year on year). The decarbonisation of the electrical grid and minor maintenance and replacement interventions during the life-cycle are also included. The existing building approach could not claim to be net zero carbon in operation where fossil fuels are used, and it would be likely to undergo upgrades at some point during the 60-year period. It is difficult to predict decarbonisation of materials and embodied carbon - this could be lower in future as sectors/global supply chains decarbonise, however currently it should not be accounted for.

The cumulative carbon emissions graph (Figure A) is an example showing options comparisons. This could vary depending on the levels of intervention and scope of works, especially in relation to the minor refurb/major refurb options.

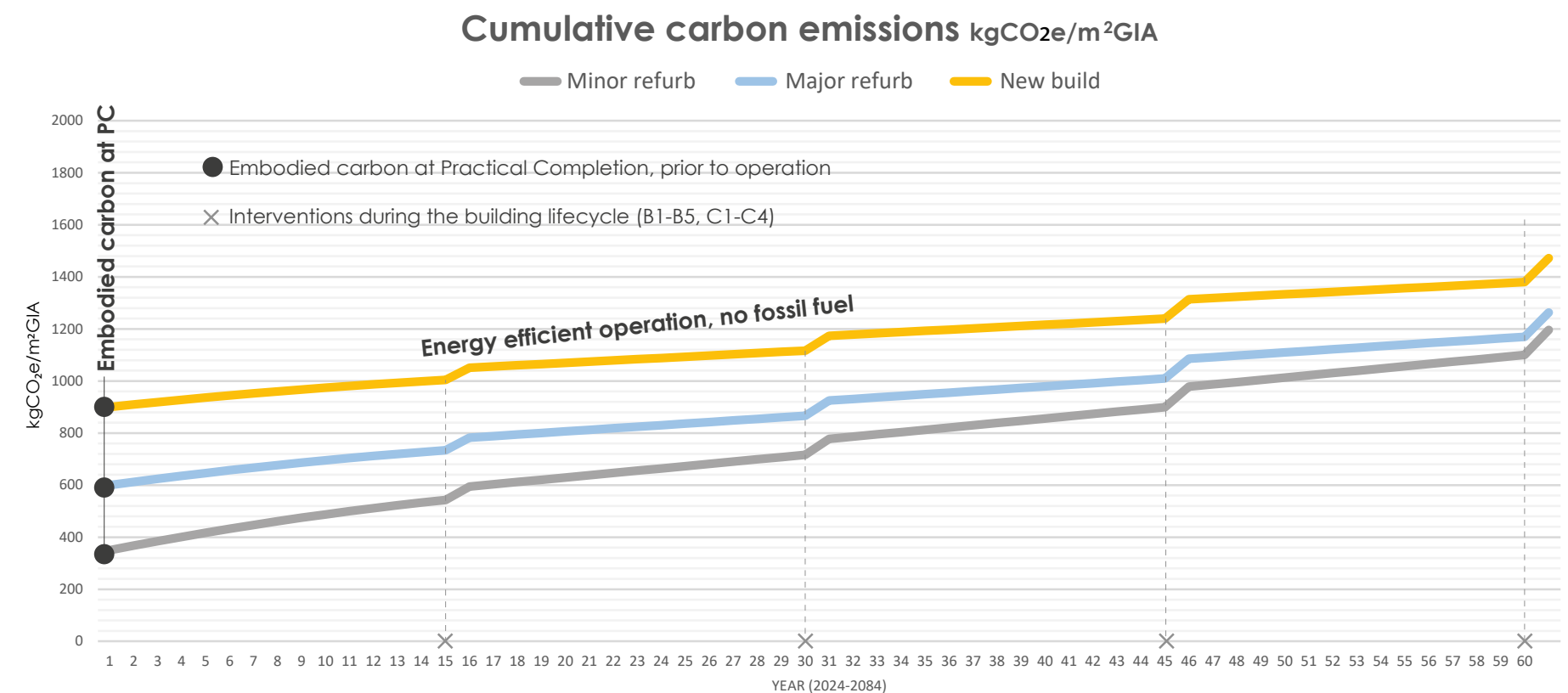


Figure A: Example of completed template optioneering graph over a 60-year period, including whole life-cycle carbon (embodied and operational) emissions, indicative only. Depending on scope and intervention, emissions parity may be achieved between options at a certain time during the life-cycle (Source: Hilson Moran).

The graph should be created on the basis of:

- The scope of works for each option should be identified (see dashboard 1) and assumptions clearly stated.
- The estimated / predicted energy consumption of each option should be provided.
- An equal rate of electrical grid decarbonisation over time applied to operational energy (derived from the latest ‘The Department for Business, Energy and Industrial Strategy (BEIS) Energy and Emissions Projection (EEP)’. See section 6 Outline Methodology. Note: BEIS was dissolved on 7th February 2023, and split into different departments, including the Department for Energy Security and net zero). See section 6.
- An equivalent approach to the level of assumptions and certainty applied to embodied carbon estimates.
- The declared fuel source and carbon factor used.
- An equivalent scope for the WLCA (life-cycle stage and building element scopes).
- The embodied carbon impact of further interventions to be included, for instance every 15 years of operation over the life-cycle, using life-cycle modules B1-B5, C1-C4. Where different, the method should be stated and clarified in the dashboard.
***Note:** Buildings will likely be de-gassed to meet future market demand and policy drivers for fossil-free heating / hot water. The above diagram does not currently take account of future de-gassing due to unpredictability. This would necessitate the refurbishment of existing heating infrastructure.”*
- In addition to the cumulative carbon emissions graph showing data per square metre (Figure A), the absolute carbon emissions values should be demonstrated for each option in the table (right) showing the split between embodied carbon and operational energy in Table A.

TABLE A: Optioneering outcomes to be presented to planning officers at the pre-application stage.

Example of Applicable Option	Minor refurbishment	Major refurbishment	Major refurbishment with extension	New build, reclaim and recycle
	Provide building Image / Section	Provide building Image / Section	Provide building Image / Section	Provide building Image / Section
Scope of works summary	e.g. Change of plant /minor alterations to windows	e.g. Major interior modifications, change to façade, upgrade services	e.g. Major interior modifications, change to façade, upgrade services plus 2 storey extension	New build
Gross Internal area (GIA)	___m ²	___m ²	___m ²	___m ²
Net Internal area (NIA)	___m ²	___m ²	___m ²	___m ²
Change in NIA (compared to existing)	___m ²	___m ²	___m ²	___m ²
Substructure % Retained by mass	%	%	%	%
Superstructure % Retained by mass	%	%	%	%
Façade % Retained by area	%	%	%	%
Estimated existing building demolition	kgCO ₂ e/m ² GIA	kgCO ₂ e/m ² GIA	kgCO ₂ e/m ² GIA	kgCO ₂ e/m ² GIA
Embodied Carbon (A1-A5)	kgCO ₂ e/m ² GIA	kgCO ₂ e/m ² GIA	kgCO ₂ e/m ² GIA	kgCO ₂ e/m ² GIA
Embodied Carbon (A1-A5, B1-B5, C1-C4)	___kgCO ₂ e/m ² GIA	___kgCO ₂ e/m ² GIA	___kgCO ₂ e/m ² GIA	___kgCO ₂ e/m ² GIA
Estimated Whole building Operational Energy	Kwhe/m ² /yr	Kwhe/m ² /yr	Kwhe/m ² /yr	Kwhe/m ² /yr
Fuel source	<input type="checkbox"/> Gas <input type="checkbox"/> Electricity <input type="checkbox"/> Other (state)	<input type="checkbox"/> Gas <input type="checkbox"/> Electricity <input type="checkbox"/> Other (state)	<input type="checkbox"/> Gas <input type="checkbox"/> Electricity <input type="checkbox"/> Other (state)	<input type="checkbox"/> Gas <input type="checkbox"/> Electricity <input type="checkbox"/> Other (state)

TABLE A: continued

Example of Applicable Option	Minor refurbishment	Major refurbishment	Major refurbishment with extension	New build, reclaim and recycle
Estimated Whole Building Operational Carbon for building life time (B6)	___kgCO ₂ e/m ² GIA	___kgCO ₂ e/m ² GIA	___kgCO ₂ e/m ² GIA	___kgCO ₂ e/m ² GIA
Carbon Factor used for B6	___kgCO ₂ e/Kwh	___kgCO ₂ e/Kwh	___kgCO ₂ e/Kwh	___kgCO ₂ e/Kwh
District heating carbon factor	kgCO ₂ e/Kwh	kgCO ₂ e/Kwh	kgCO ₂ e/Kwh	kgCO ₂ e/Kwh
District cooling carbon factor	kgCO ₂ e/Kwh	kgCO ₂ e/Kwh	kgCO ₂ e/Kwh	kgCO ₂ e/Kwh
EPC rating				
Total WLCA	___kgCO ₂ e/m ² GIA	___kgCO ₂ e/m ² GIA	___kgCO ₂ e/m ² GIA	___kgCO ₂ e/m ² GIA
Total WLCA Opportunities Constraints Notes and assumptions made in calculations Please state detail here	___tCO ₂ e	___tCO ₂ e	___tCO ₂ e	___tCO ₂ e

Graphs for options should also be provided (the oposite are for illustrative purposes only), number of options and assumptions may vary.

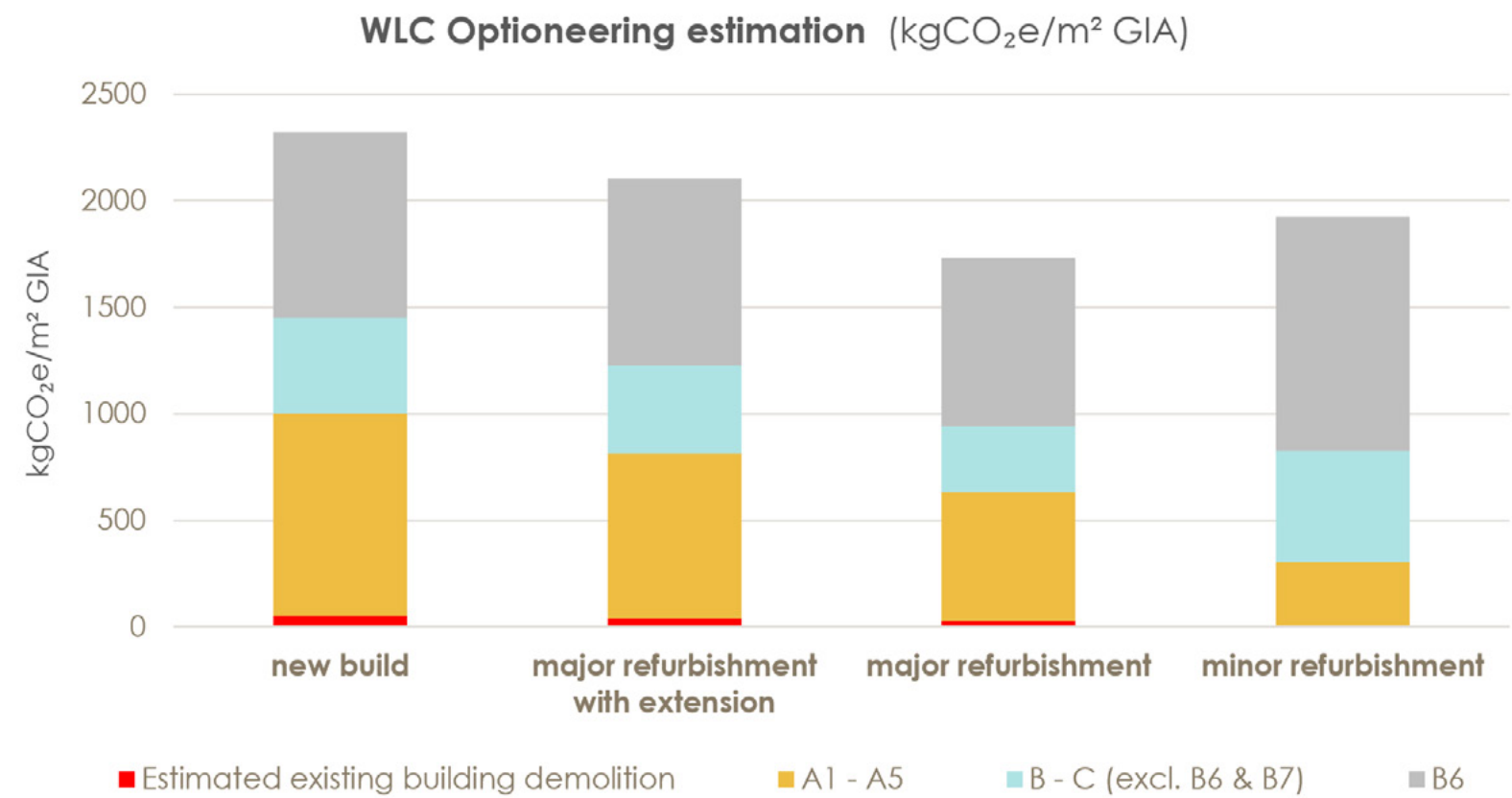


Figure B: Whole Life Carbon Options comparison for each in Kg CO₂e/m² GIA

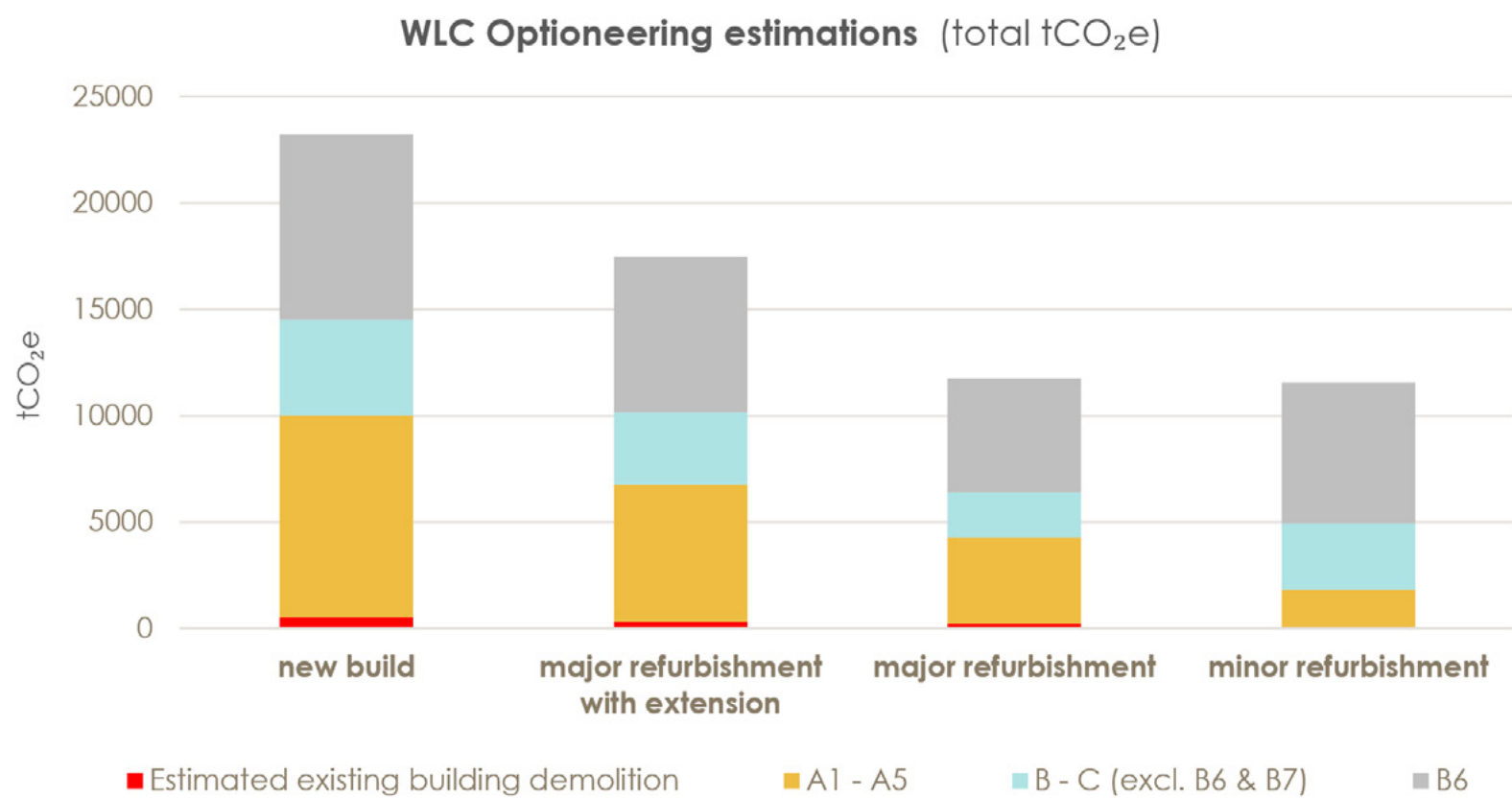


Figure C: Whole Life Carbon Options comparison in total tonnes of CO₂ for each option. Note: the difference in floor area of options will affect the total tonnage of CO₂e for each option

Dashboard 2:
Application WLCA Preferred Option

Life-cycle stage scope

Scope (Modules based on EN 15978)	Proposed development
Product and construction process stage	
A1-A3	✓
A4-A5	✓
Use Stage	✓
B1-B5	✓
B6	✓ SAP <input type="checkbox"/> TM54 <input type="checkbox"/> NABERS UK <input type="checkbox"/>
B7	✓
End of life stage	✓
C1-C4	✓
Beyond project Life-cycle	✓
D	✓

Table B: Example of completed scoring template tables for whole life-cycle carbon

Completion of Dashboard 2 is required to provide reporting consistency, improved transparency and standardisation across applications. Applicants are to complete and include it in the executive summary of the WLCA report that forms part of the planning application. The GLA WLCA reporting template should also be used for submitting the final results.

Applicant to identify reasons where benchmarks are exceeded for life-cycle stages and building elements, using evidence of explored improvements where possible.

Additional opportunities for improvements should also be identified in the application report.

Building elements scope

Building part/Element group	Proposed development
Demolition prior to construction	✓
Facilitating works	✓
Substructure	✓
Superstructure (Frame, upper floors, roof, stairs, ramps)	✓
Superstructure (External walls, windows, doors)	✓
Superstructure (Internal walls, partitions, doors)	✓
Finishes	✓
Fittings, furnishings, and equipment (FF and E)	✓
Building services / MEP	✓
Prefabricated Buildings and Building Units	✓
Work to Existing Building	✓
External Works	✓

Comments
Justification
Exclusions
Assumptions
Certainty

TABLES C: Information in relation to the preferred option providing justification for preference, and clarity on assumptions, exclusions and level of certainty of the data used in the assessment

Whole Lifecycle Carbon__kgCO2/ m2 GIA (modules A1-A5, B1-B7, C1-C4, D)

FIGURE D: Example of completed template table comparing the WLC modules A1-A5, B1-B5, C1-C4 to the published GLA standard and aspirational benchmarks

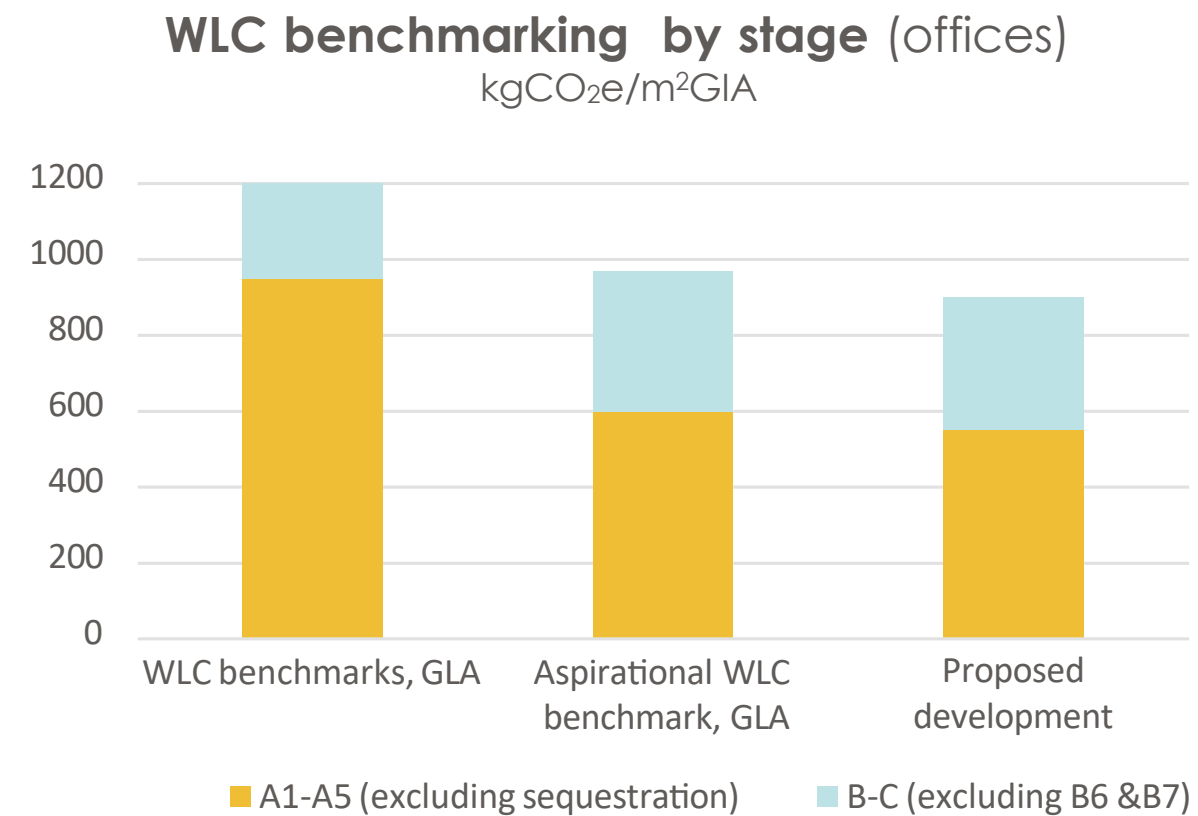
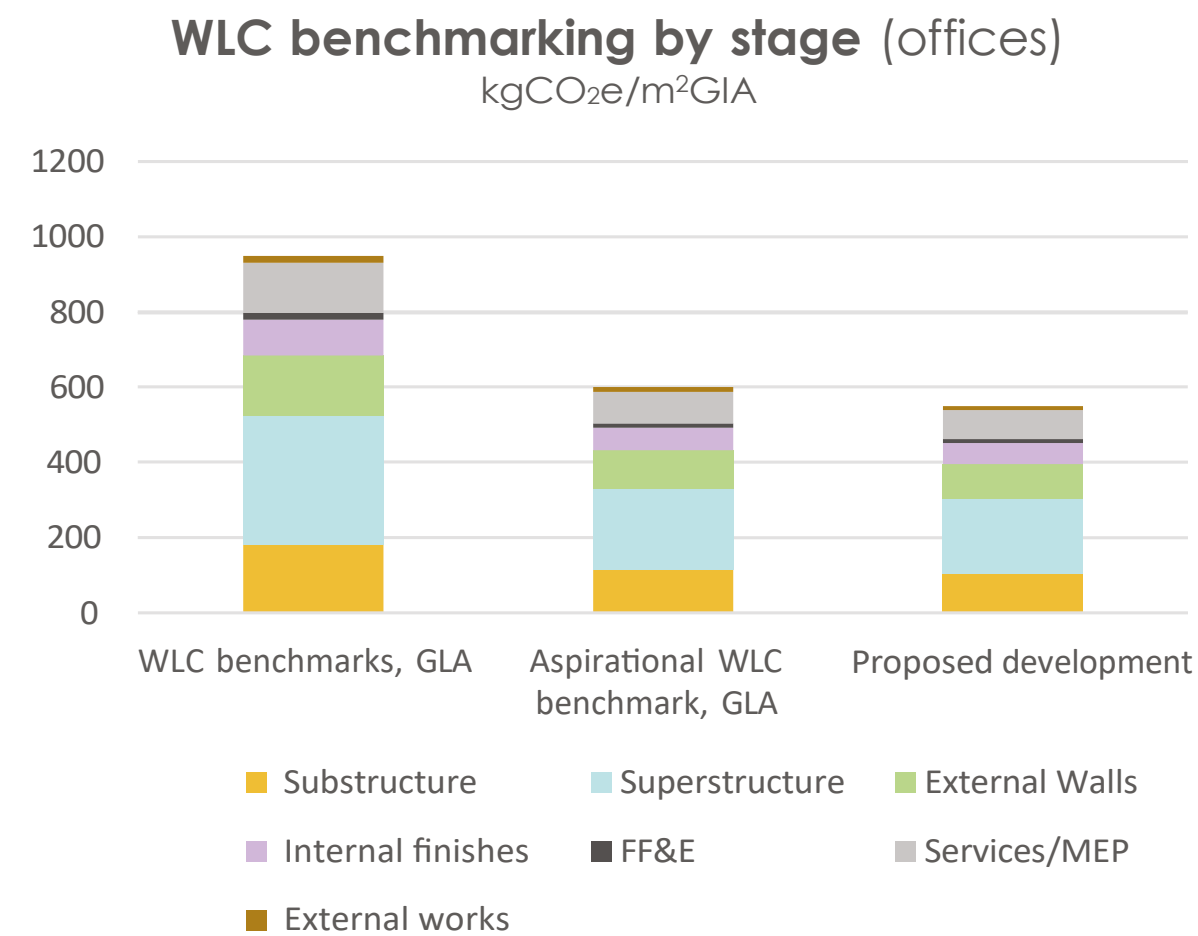


FIGURE E: Example of completed template table comparing the embodied carbon (Modules A1-A5) to published GLA standard and aspirational benchmarks for elemental carbon emissions



8. The Consideration of Options in the Planning Application Process

Planning applications received by the CoLC are expected to provide a narrative of how optioneering considerations about reducing carbon emissions have informed the design of an application scheme. The optioneering results include high level data about whole life-cycle carbon emissions and an analysis of the opportunities and constraints of each option against the vision and deliverables of a site. The optioneering exercise is designed as a tool in the discussion and negotiation of a proposal in the early pre-application stage between applicants and planning officers to help optimise the design of the application scheme.

This methodology is not designed to link the optioneering designs and results to the details of the planning application scheme as the latter is based on more, and perhaps different, design detail compared with the options. The chosen option should follow the GLA WLC assessment guidance for the application and achieve the current benchmark guidance.

Once a planning application scheme has been given planning permission, the Energy, Whole Life-Cycle Carbon and Circular Economy strategies of the approved scheme will be further detailed and approved during the planning conditions stages. The CoLC will monitor post-completion results that are required to be submitted by condition.

The methodology set out in the previous chapters will be updated as frequently as necessary to reflect the latest scientific advances, technologies, policies and regulations.



Appendix 1 Climate Action Strategy 2020-2027

Headlines

Through this strategy the City Corporation commits to achieving:

- Net zero by 2027 in the City Corporation's operations
- Net zero by 2040 across the City Corporation's full value chain
- Net zero by 2040 in the Square Mile
- Climate resilience in our buildings, public spaces and infrastructure

Across the Square Mile we will:

- Work with all stakeholder groups to accelerate the transition to net zero
- Support SMEs to reach net zero
- Invest in making the Square Mile more resilient to extreme weather and flooding

At the City Corporation we will do this through major investments in:

- Improving energy efficiency at our investment and corporate properties
- Aligning our investment portfolio with the Paris Agreement
- Enhancing carbon removal in our open spaces
- Protecting our shared natural resources
- Driving net zero through our supply chain
- Integrating climate considerations into all our decisions

Our climate vision, aims and goals

Our vision

- The City of London is Responsible, Sustainable and Competitive

Our aims

- To support the achievement of net zero
- To build climate resilience
- To champion sustainable growth

Our goals

For the City of London Corporation:

- City of London Corporation **scope 1 and 2 emissions are net zero by 2027** and **scope 3 emissions are net zero by 2040**.
- The City of London Corporation and its assets **are resilient to climate change**.
- The City of London Corporation supports UK and overseas organisations to **become climate responsible**.

For the Square Mile's fabric and function

- The Square Mile's scope 1, 2 and 3 emissions (BASIC+ definition) are net zero by 2040.
- The Square Mile's buildings, public spaces and infrastructure are **resilient to climate change**.

For society

- People in the Square Mile and beyond **benefit from a clean, green and safe environment and job creation**.





The first six years

Actions to support the achievement of net zero

The City of London Corporation

- Transform the energy efficiency of our operational buildings through the adoption of best available technologies
- Maximise the use of renewable energy sources across our operational buildings
- Introduce new land management practices across our open spaces aiming to maximise their ability to remove carbon, and optimise their biodiversity and resilience value
- Align our financial investment portfolio with the goals of the Paris Agreement on climate change
- Embed circular economy principles into our capital projects and reduce carbon intensity by using life cycle carbon and cost assessment techniques and design specifications
- Accelerate the move to net zero carbon and energy efficient tenanted buildings, working closely with tenants to achieve shared goals
- Strengthen our requirements and supplier engagement to drive performance and innovation in delivering sustainable products and solutions
- Upskill our workforce on net zero

The Square Mile

- Work with other organisations to develop a Climate Action Fund to invest in effective zero carbon technologies and accelerate decarbonisation
- Develop a Square Mile renewable energy strategy Use our planning role to influence others to embed carbon analysis and circular economy principles in capital projects
- Advocate the importance of green spaces and urban greening as natural carbon sinks, and their contribution to biodiversity and overall wellbeing
- Support organisations in the Square Mile to build circular, low carbon and resilient supply chains
- Provide tailored support to SMEs on their decarbonisation journeys
- Increase engagement and communications about sustainability with residents, businesses, visitors and other stakeholders

Actions to build climate resilience

The City of London Corporation

- Build on our existing work to develop an early warning system, and clear resilience strategies for pests and diseases across our ports and markets, driving down the climate related food security risks
- Embed resilience measures into our upgrade plans for our owned and operated buildings
- Upskill our workforce on climate resilience
- Embed a climate resilience lens into all our decision-making

The Square Mile

- Make the Square Mile public realm more climate change ready through adding in more green spaces, urban greening, flood resistant road surfaces, adaptable planting regimes and heat resistant materials
- Reduce the risk of flooding through developing sustainable rain and surface water management policies, resulting in a connected system of water recycling, sustainable urban draining and rainwater management measures
- Strengthen our planning guidance on climate resilience measures for new developments
- Work with our partners to create a more climate resilient and diversified energy network across the Square Mile
- Develop a strong, data-led approach to deepen our understanding of climate related risks and mitigations across the Square Mile
- Ensure that we continue to protect the residents, critical assets, infrastructure and heritage of the Square Mile

Actions to champion sustainable growth

The City of London Corporation

- Mobilise capital into sustainable finance
- Secure the UK's place as a leader for investment in sustainable finance products
- Help faster development and adoption of sustainable finance products and services
- Share best practice on standards, tools, platforms and expertise to facilitate green and sustainable investment and growth
- Encourage global movement towards disclosure and production of credible transition plans as the norm
- Foster an ambition to achieve net zero emissions by 2050 or sooner for UK-based financial and professional services firms
- Join other investors working through development and implementation of net zero transition action plans
- Support financial institutions committing to net zero in the 2040s at the latest, covering all emissions, including scope 3 and where data allows reliable measurement
- Support charities and SMEs to consider, prepare for and lead the response to climate change
- Promote responsible procurement and investment practices
- Enhance the UK/London's capacity to finance sustainable investment opportunities globally, including emerging markets

- Work with the financial services sector and UK Government to promote and scale sustainable finance products and services that countries and corporates need to help them transition to net zero
- Influence and support the delivery of technical solutions to increase comparability of data and ease of reporting
- Share learning and best practice about the challenges and opportunities of our net zero journey
- Address existing inequalities and ensure no one is left behind
- Prepare people for skills needed in a net zero economy
- Facilitate collaborative action on air pollution in London
- Reduce pollution and increase the resilience of the Square Mile
- Reduce air pollution through implementing our ambitious air quality and transport strategies
- Embrace circular economy principles across our strategies and work
- Work with our creative and educational sector partners to deliver sustainable initiatives
- Enhance greening and biodiversity across our public realm and open spaces

Appendix 2 Related Reporting Requirements

Non-policy related reporting for net zero carbon

Over the past three years, the UK property industry has done more to advance the environmental agenda than ever before. Developers, consultants and professional bodies have come together to declare a climate and biodiversity emergency and have taken concrete action. Together we have developed much needed clarity and guidance on how to truly achieve zero carbon by 2030.

Property lenders, investors, asset managers and occupiers are all driving this shift by demanding a very high standard of environmental, social and governance policy as a prerequisite to any transaction. This trend is

increasing rapidly across all workplace environments, both for new and existing assets.

A number of businesses have declared that they have become net zero carbon in operation across portfolio assets

and activity within their control. These declarations in the London market tend to align with the World Green

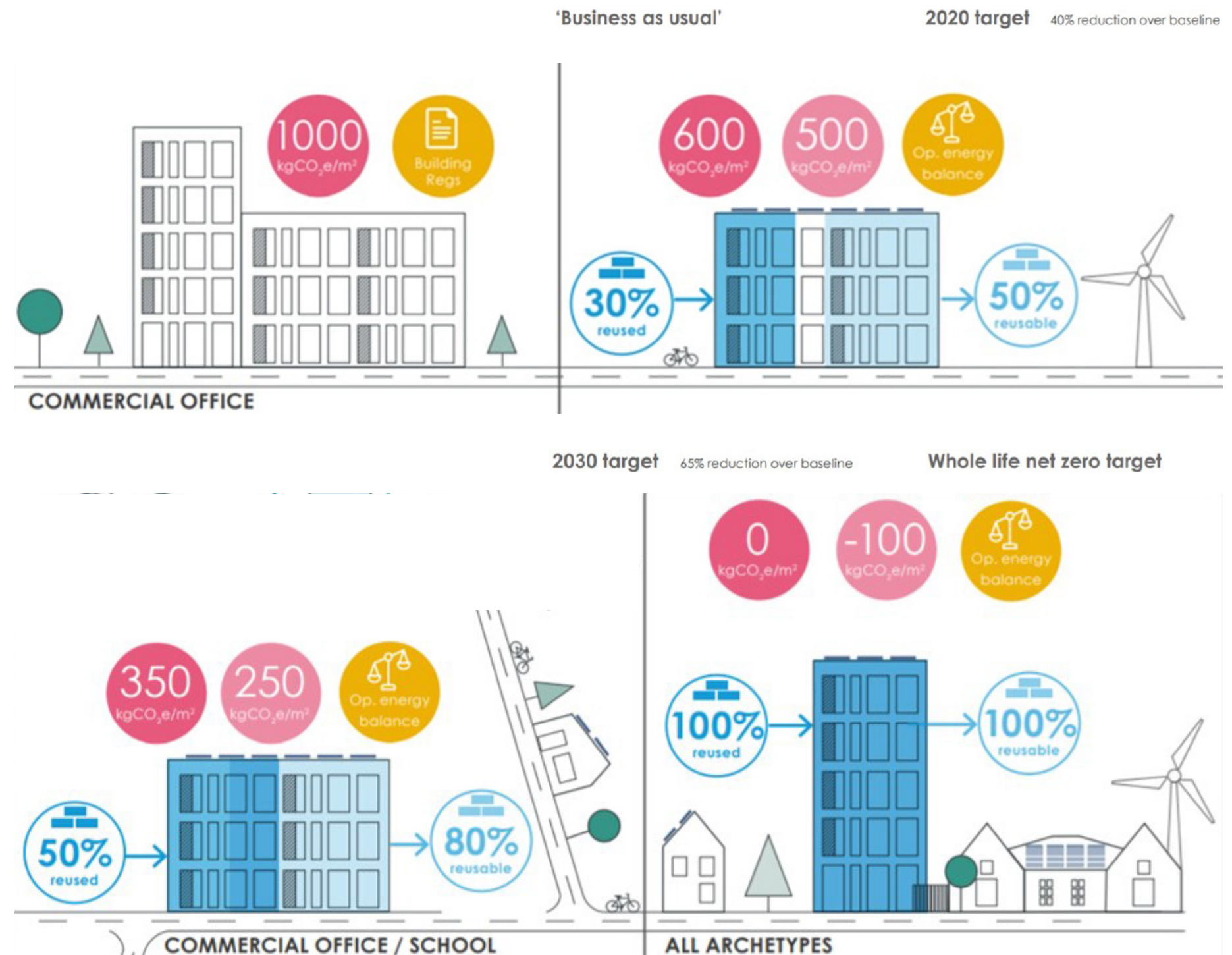
Building Council or UK Green Building Council Definition Framework and consists of accounting for and reducing carbon emissions, investing in renewable energy, offsetting residual carbon through accepted credit frameworks and publicly disclosing their pathway.

Other approaches adopted by applicants that vary in scope to planning policy requirements include:

- The Low Energy Transformation Initiative (LETI) targets and scope
- The UKGBC Net Zero Carbon Definition Framework and benchmarks
- The forthcoming Net Zero Carbon Buildings Standard. Note: this initiative is currently in the early stages of development. Once requirements become available, they should be a valuable point of reference for planners and project teams to assess proposals.

Low Energy Transformation Initiative (LETI)

LETI has recently published several design guidance documents that set out a trajectory of embodied carbon and operational energy targets required to address the climate emergency. The WLCA scope associated with their targets is limited to stages A1-A5 to practical completion.



UKGBC Net Zero Carbon Buildings Framework Definition

The UKGBC sets out guidance in consultation with the industry to define net zero carbon. At time of writing this planning guidance, a building can claim to be net zero carbon in construction or in operation or in both. UKGBC has published benchmarks for operational energy with a trajectory to net zero carbon, but none for embodied carbon at this time.

The framework requires third party verification of whole life-cycle assessments and operational energy assessments, including a minimum carbon reporting template and information that needs to be publicly disclosed. Notably, key differences between the UKGBC Net Zero Carbon definition and the London Plan definition are shown in the following table.

Scope	Metric	Interim Targets 2020-2025	Interim Targets 2025-2030	Interim Targets 2030-2035	Paris Proof Target 2035-2050
Whole building energy	kWhe/m2(NLA)/Year	160	115	90	70
	kWhe/m2(GIA)/Year	130	90	70	55
	DEC rating	D90	C65	B50	B40
Base building energy	kWhe/m2(NLA)/Year	90	70	55	35
	kWhe/m2(GIA)/Year	70	55	45	30
	NABERS UK star rating	4.5	5	5.5	6
Tenant energy	kWhe/m2(NLA)/Year	70	45	35	35

Comparison of Net Zero Carbon Definitions

	UKGBC Net Zero Carbon	London Plan Net Zero Carbon
Whole Life-Cycle carbon	Minimum reporting Stages A1-A5, B4 for superstructure ext. walls and windows/external doors, B6 operation energy. Full Assessment Modules A-C	Modules A-D (B6, B7, and D not included in benchmarks).
Regulated operational carbon emissions from energy use	Includes all energy use within declarant's control	Part L2 regulated carbon assessment used to determine net zero carbon target TM54 required for 'be seen' (non-residential)
Unregulated operational carbon emissions from energy use	Includes all energy use within declarant's control	Unregulated energy to be estimated and infrastructure in place to monitor, verify and report all annual energy consumption. NABERS UK Design for Performance (see below) encouraged for commercial office buildings 5,000m2 TM54 requires for 'be seen' (non-residential)
Renewable energy generation	Onsite and off-site renewables	Priority for on-site renewables, but offsite renewables are acceptable alternative to carbon offset (conditional)
Carbon offsetting	Offset all residual carbon using an approved international or domestic carbon offset standard, applying standard market rates. UKGBC recommend also using higher rate from HMT Green Book at the time of offset to create Transition Fund for further decarbonisation	Offset residual carbon relative to 100% regulated carbon savings only, determined by Part L2 target. Carbon offset is recommended as £95/tonnes CO2 paid in advance and for a 30-year life-cycle

Appendix 3

Detailed Building Element Scope

Table 3 compares the UKGBC, GLA, LETI and BREEAM reporting scopes for building elements in more detail (refer to Table 1 in section X).^{*} Building-related items are building-integrated technical systems and furniture, fittings and fixtures built into the fabric or included in the shell and core specification. Building-related MEP and FFE typically include the items classified under shell and core and Category A fit-outs.



Table 3: Detailed comparison of scopes per building part element /group

Building part/Element group	Building Element	UKGBC Full Assessment	UKGBC Minimum Reporting	GLA WLC Guide	RIBA 2030 CC Ver.2	LETI EC Primer	BREEAM NC 2018 and RFO 2014***
Demolition prior to construction	0.1 Toxic/Hazardous/Contaminated Material Treatment			YES Reported separately. Benchmarks do not include these building elements			
	0.2 Major Demolition Works			A 'fabric first' approach should be prioritised to minimise energy demand and reduce carbon and in-use costs.			
Facilitating works	0.3, 0.4, 0.5 Temporary/Specialist ground/Enabling Works	✓		"			
	0.4 Specialist groundworks	✓		"			
Substructure	1 Substructure	✓	✓	✓	✓	✓	NC credit option, RFO if in scope
Superstructure	2.1 Frame 2.2 Upper Floors 2.3 Roof 2.4 Stairs and Ramps	✓	✓	✓	✓	✓	NC mandatory, RFO if in scope (excludes ramps)
Superstructure	2.5 External Walls 2.6 Windows and External Doors	✓	✓	✓	✓	✓	NC mandatory, RFO if in scope
Superstructure	2.7 Internal Walls and Partitions 2.8 Internal Doors	✓		✓	✓	✓	NC mandatory education only, RFO if in scope
Finishes	3.1 Wall finishes 3.2 Floor finishes 3.3 Ceiling finishes	✓		✓	✓	✓	RFO if in scope
Fittings, furnishings and equipment (FF&E)	4.1 Fittings, Furnishings and Equipment incl. Building-related* and non- building related**	✓		✓	✓		RFO if in scope to CN7 limited furniture/ shop fitting
Building services/MEP	5.1–5.14 Services incl. Building-related* and non-building related**	✓		✓	✓	✓	NC credit option, RFO if in scope
Prefabricated Buildings and Building Units	6.1 Prefabricated Buildings and Building Units	✓		✓	✓	✓	
Work to Existing Building	7.1 Minor Demolition and Alteration Works	✓		✓	✓		
External Works	8.1 Site preparation works 8.2 Roads, paths, paving and sur- facing 8.3 Soft landscaping, planting and irrigation systems 8.4 Fencing, railings and walls 8.5 External fixtures 8.6 External drainage 8.7 External services 8.8 Minor building works and ancillary buildings	✓		✓			NC credit option RFO if in scope: hard landscaping and boundary protection only

** Non-building-related items are loose furniture, fittings and other technical equipment like desks, chairs, computers, refrigerators, etc. Such items are usually part of Category B fit-out. Therefore, for shell and core construction this is not part of the assessment scope.

***BREEAM NC = BREEAM New Construction 2018; BREEAM RFO = BREEAM Refurbishment and Fit-out 2014

Appendix 4

GLA WLCA Pre-App Reduction Principles Proforma

	WLC reduction principles	Key benefits
1	Reuse and retrofit of existing buildings	Significant retention and reuse of structures is likely to be carbon efficient and reduces construction costs.
2	Use re-purposed or recycled materials	Reduces waste and carbon emissions.
3	Material selection	Appropriate material choices are key to carbon reduction. Ensuring that materials are selected with consideration of the planned life expectancy of the building reduces waste, the need for replacements and the in-use costs.
4	Minimise operational energy use	A 'fabric first' approach should be prioritised to minimise energy demand and reduce carbon and in-use costs.
5	Minimise the carbon emissions associated with operational water use	Choice of materials and durability of systems, which help to avoid leakage and subsequent building damage, contribute to reducing the carbon emissions of water use.
6	Disassembly and reuse	Designing for future disassembly ensures that products do not become future waste and that they maintain their environmental and economic value.
7	Building shape and form	Compact efficient shapes help minimise both operational and embodied carbon emissions from repair and replacement for a given floor area. This leads to a more efficient building overall resulting in lower construction and in use costs.
8	Regenerative design	Removing carbon emissions from the atmosphere through materials and systems absorbing it makes a direct contribution to carbon reduction.
9	Designing for durability and flexibility	Durability means that repair and replacement is reduced which in turn helps reduce life-time building costs. A building designed for flexibility can respond with minimum environmental impact to future changing requirements and a changing climate, thus avoiding obsolescence which also underwrites future building value.
10	Optimisation of the relationship between operational and embodied carbon	Optimising the relationship between operational and embodied carbon contributes directly to resource efficiency and overall cost reduction.
11	Building life expectancy	Defining building life expectancy gives guidance to project teams as to the most efficient choices for materials and products. This aids overall resource efficiency, including cost efficiency and helps future proof asset value.
12	Local sourcing	Sourcing local materials reduces transport distances and supply chain lengths and has associated local social and economic benefits.
13	Minimising waste	Waste represents unnecessary and avoidable carbon emissions. Buildings should be designed to minimise construction waste, and to ease repair and replacement with minimum waste, which helps reduce initial and in-use costs.
14	Efficient construction	Efficient construction methods (e.g. modular systems, precision manufacturing and modern methods of construction) can contribute to better build quality, reduce construction phase waste and reduce the need for repairs in the post completion and the defects period (snagging).
15	Lightweight construction	Lightweight construction uses less material which reduces the carbon emissions of the building as there is less material to source, fabricate and deliver to site.
16	Circular economy	The circular economy principle focusses on a more efficient use of materials which in turn leads to carbon and financial efficiencies.

Appendix 5 Indicative Example of Completed Table A

To be updated once dashboards are completed

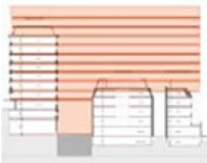

Example of Applicable Option	Minor refurbishment	Major refurbishment	Major refurbishment with extension	New build, reclaim and recycle
		N/A		
Scope of works summary	e.g. Change of plant /minor alterations to windows	e.g. Major interior modifications, change to façade, upgrade services	e.g. Major interior modifications, change to façade, upgrade services plus 2 storey extension	New build
Gross Internal area (GIA)	17,309m²	___m²	29,860m²	35,948m²
Net Internal area (NIA)	___m²	___m²	___m²	___m²
Change in NIA (compared to existing)	___m²	___m²	___m²	___m²
Substructure % Retained by mass	%	%	%	%
Superstructure % Retained by mass	%	%	%	%
Façade % Retained by area	%	%	%	%
Estimated existing building demolition	kgCO ₂ e/m² GIA	kgCO ₂ e/m² GIA	kgCO ₂ e/m² GIA	kgCO ₂ e/m² GIA
Embodied Carbon (A1-A5)	kgCO ₂ e/m² GIA	kgCO ₂ e/m² GIA	kgCO ₂ e/m² GIA	kgCO ₂ e/m² GIA
Embodied Carbon (A1-A5, B1-B5, C1-C4)	___kgCO ₂ e/m² GIA	___kgCO ₂ e/m² GIA	___kgCO ₂ e/m² GIA	___kgCO ₂ e/m² GIA
Estimated Whole building Operational Energy	Kwhe/m²/yr	Kwhe/m²/yr	Kwhe/m²/yr	Kwhe/m²/yr
Fuel source	<input type="checkbox"/> Gas <input type="checkbox"/> Electricity <input type="checkbox"/> Other (state)	<input type="checkbox"/> Gas <input type="checkbox"/> Electricity <input type="checkbox"/> Other (state)	<input type="checkbox"/> Gas <input type="checkbox"/> Electricity <input type="checkbox"/> Other (state)	<input type="checkbox"/> Gas <input type="checkbox"/> Electricity <input type="checkbox"/> Other (state)

TABLE A: continued

Example of Applicable Option	Minor refurbishment	Major refurbishment	Major refurbishment with extension	New build, reclaim and recycle
Estimated Whole Building Operational Carbon for building life time (B6)	___kgCO ₂ e/m ² GIA	___kgCO ₂ e/m ² GIA	___kgCO ₂ e/m ² GIA	___kgCO ₂ e/m ² GIA
Carbon Factor used for B6	___kgCO ₂ e/Kwh	___kgCO ₂ e/Kwh	___kgCO ₂ e/Kwh	___kgCO ₂ e/Kwh
District heating carbon factor	kgCO ₂ e/Kwh	kgCO ₂ e/Kwh	kgCO ₂ e/Kwh	kgCO ₂ e/Kwh
District cooling carbon factor	kgCO ₂ e/Kwh	kgCO ₂ e/Kwh	kgCO ₂ e/Kwh	kgCO ₂ e/Kwh
EPC rating	D		B	A
Total WLCA	___kgCO ₂ e/m ² GIA	___kgCO ₂ e/m ² GIA	___kgCO ₂ e/m ² GIA	___kgCO ₂ e/m ² GIA
Total WLCA	68,102 tCO ₂ e	___tCO ₂ e	54,137 tCO ₂ e	64,757 tCO ₂ e
	<ul style="list-style-type: none">Retention of existing 3 buildingsExtends building lifeEmbodied carbon lowest for immediate future	N/A	<ul style="list-style-type: none">Retains most of substructure and some structural elements with new build extension	<ul style="list-style-type: none">Better operational energy opportunitiesWider social benefitsMore opportunities for roof space/greening (UGF)Greater adaptabilitySome foundations retainedSome stonework to be repurposed
	<ul style="list-style-type: none">Retention and intervention relies on gas due to roof space.Poor floor area does not maximise space, risk of poorer EPC performanceServices upgrades restricted due to existing space constraints.Assumes like for like plant changes if upgrades	N/A	<ul style="list-style-type: none">Structurally challenging. Existing structure would need considerable new structure to support building which add to the complexity of the constructionSubstantial temporary works required.Quality of existing steel unknown.Services challengingRestricted Floor to floor heights and level changes add to complexityNot maximising land useLess roof space for plantingDid not meet tenant space requirements.	<ul style="list-style-type: none">Embodied carbon is highest but there is a trade of for other wider benefits.
	Assumes no fabric interventions. Pro rata carbon data estimates based on new build for building element categories, internal works 2.7 - 8. Does not include future façade intervention which is likely to be required. Making embodied carbon worse over life—cycle	N/A	<ul style="list-style-type: none">Structure recalculation: for 1 Substructure, 2.1 Superstructure - frame, 2.2 Superstructure - upper floors.2.3 - 8 estimated pro rata	<ul style="list-style-type: none">Increase in GIA vs existing building(s) GIABased on new build cost plan so good data set for GLA reporting.
Notes and assumptions made in calculations Please state detail here				

Appendix 6 Planning Application Trends

An evaluation of planning applications and types has been undertaken based on the City of London Development Schedule 'Development Schedules March 2021 -Updated Jan' issued to Hilson Moran by CoLC.

This review was undertaken to establish trends and to provide the evidence base to support this guidance document.

The majority of applications, 76% (of which 40% where GLA referable), fall under the City's definition of major development (>1,000m²) and/ or require an environment impact assessment. This demonstrates that the greatest proportion of projects are likely to have the largest carbon impact and therefore should be required to mitigate it.

Project type	Year(s)	Number of applications	FULMAJ	FULEIA	FULL	GLA referable
Office	2014-March 2021	37	15	11	11	4
Office	March 2021-2022	9	4	5		8
Total		46	19	16	11	12
Percentage		100%	76%		24%	41%
Hotel/Student accommodation	2012-2021	9	5	0	4	2
Percentage		100%	56%		44%	22%
Other (law court, police + commercial)	2021	1		1		1
Percentage			100%			100%

Table 4: Number and types of commercial development applications in the City of London.

The remaining applications are varied full applications covering change of use and extensions (24%). These are broken down as follows:

Project type	Full	Change of Use - Partial Building	Extension only	New Buildings with Change of Use	Refurbishment with Change of Use	Refurbishment without Change of Use
Office	11	1	4	2	2	2
Percentage by type	100	9	36	18	18	18

Table 5: Number of full planning applications, excluding major application, by development type.

Conclusion

Based on the above, it is reasonable and recommended to follow the GLA approach for a WLCA to provide a consistent approach across the City of London.

Advantages:

- Leads to consistent and more transparent results;
- Will create a uniform and well-understood approach across the industry;
- Will build consistency around the metrics used over time;
- Can be compared to GLA benchmarks for benchmarking;
- Future-proofs policy updates across London;
- Greater awareness of impacts could lead to better design decisions and to greater carbon savings.

Disadvantages:

- Will require additional time and detail from the design team for evaluation and assessment. However, the assessment will contribute to the justification for the application proposal and may help with achieving a successful outcome.

The review of data concludes that there is a need for emissions to be accounted for and for options to be considered in the City of London for all major applications. Full major applications are to consider development options and carbon impacts, applying the methodology presented in this document.

Following the optioneering CoLC expects that all major developments undertake a whole life-cycle carbon assessment (WLCA) for the final application for the chosen option.

Within this is a requirement to review building options accounting for carbon in a more consistent way, to ensure the best choices are made. There will always be some carbon emissions associated with developments. However, there is a duty to try and limit them wherever possible and for the CoLC to be able to make informed decisions in line with the CoLC's Climate Action Strategy.

The following is a breakdown of office applications by size. The majority have an area above 10,000m² (76%). This also confirms the trend for larger scale applications with potentially bigger impacts.

Project type	Total	1,000-5,000 sqm	5,001-10,000 sqm	10,001-15,000 sqm	15,000 sqm +
Office	46	9	2	5	30
Percentage	100	20	4	11	65

Table 6: Size of office development applications in the City of London.

				Circular Economy	Whole Life-Cycle Carbon Assessment			Operational Energy	
Project	Size (GIA m ²)	Land use class/es	Referable/major	Options	Life-cycle scope	Building elements scope	Value kgCO ₂ e/m ² GIA	Scope	Value kgCO ₂ e/m ² GIA
14-21 Holborn Viaduct	35,948	Class E	FULMaj Referable	Demolish and rebuild Mitigate impacts	GLA (draft guidance) A1-A5, B1-B5, C1-C4, D	GLA (draft guidance) WLC spreadsheet submitted	670 (Stage 2)	Estimated	925** (Stage 2)
115 – 123 Houndsditch	66,867	Class E (Sui Generis)	FULMaj Not Referable	Demolish and rebuild Mitigate impacts	GLA (draft guidance) A1-A5, B1-B5, C1-C4,	State followed GLA (draft guidance)	768 (+25% factor used) (Excludes module D)	Estimated	844* (Stage 2)
120 Fleet Street**	61,135	Class E	FULEIA Referable	Demolish and rebuild Mitigate impacts	GLA (draft guidance) A1-A5, B1-B5, C1-C4, D	GLA (draft guidance) WLC spreadsheet submitted	753	Estimated	1,321

Table 7: WLC sample from recent projects submitted for planning to the City of London.

*TM54 not provided, source of operational energy use unclear

** Project is using early NABERS DfP model for operational energy use rather than the CIBSE TM54 approach

*** Multiple buildings indicated but only 1 WLCA sheet submitted for main development

Appendix 7 Related Reporting Requirements

There are other carbon-related planning reports that should be taken into consideration. They include Greenhouse Gas impact assessments, the Circular Economy Statement, operational energy and operational water assessments. Where relevant, these should be referenced in WLCA reporting, in particular to highlight discrepancies and overlaps in design considerations and decisions.

Greenhouse Gas Reporting in Environmental Impact Assessments

A greenhouse gas (GHG) is a gas that absorbs and emits radiant energy within the thermal infrared range, essentially, they trap heat causing the greenhouse effect. Very large developments, such as infrastructure projects and high-rise buildings, usually require a GHG chapter within the Environmental Impact Assessment scoping for a planning application.

In February 2022 the Institute of Environmental Management and Assessments (IEMA) published an update to their guide 'Assessing Greenhouse Gas Emissions and Evaluating their Significance' (2nd ed.) to align with government and industry agendas. The methodology for writing this environmental impact assessment chapter includes a full life-cycle scope, aligning with parts of the GLA WLCA method referred to above. The approach covers similar themes but may not be as detailed as a full WLCA due to the timing of the assessment.

The differences in the approach include:

- 1. The range of gases is broader than carbon (carbon dioxide CO₂) and includes methane (CH₄), nitrous oxide (N₂O), and ozone (O₃);
- 2. The scope of emitters is broader, including for example emissions from operational transport and leaking F-gases (refrigerants). Note, the GLA requires separate calculation of refrigerant emissions in the reporting WLCA template;
- 3. The proposal is compared to a current baseline;
- 4. Exclusions, metrics, data quality, degree of uncertainty and mitigation measures need to be clearly defined; and
- 5. GHG assessments can be carried out a lot earlier than a detailed application WLCA (to GLA standards), for example for an Outline Planning Application, and therefore the data tends to be based on industry averages/benchmarks.

The process and content of a GHG assessment is structured by the IEMA guidance and should not preclude the need for a WLCA. In many cases, the information in relation to carbon in a GHG assessment may differ from that of a WLCA due to timing and the accuracy of information available at the time of assessment.

IEMA Greenhouse Gas Management Hierarchy (updated 2020)	
Eliminate	<ul style="list-style-type: none">• Influence business decisions/use to prevent GHG emissions across the lifecycle• Potential exists when organisations change, expand, rationalise or move business• Transition to new business model, alternative operation or new product/service
Reduce	<ul style="list-style-type: none">• Real and relative (per unit) reductions in carbon and energy• Efficiency in operations, processes, fleet and energy management• Optimise approaches (eg technology) and digital as enablers
Substitute	<ul style="list-style-type: none">• Adopt renewables/low-carbon technologies (on site, transport etc)• Reduce carbon (GHG) intensity of energy use and of energy purchased• Purchase inputs and services with lower embodied/embedded emissions
Compensate	<ul style="list-style-type: none">• Compensate 'unavoidable' residual emissions (removals, offsets etc)• Investigate land management, value chain, asset sharing, carbon credits• Support climate action and developing markets (beyond carbon neutral)

Table 1: GHG Management Hierarchy, 2020 (Source: EIMA, Assessing Greenhouse Gas Emissions and Evaluating their Significance' (2nd ed.)

GLA Pre-application Optioneering

The London Plan Guidance 'Whole Life-Cycle Carbon Assessments' (March 2022) explains how to calculate WLC emissions and the information to be submitted to comply with the policy, including the scope required. It also includes information on design principles and WLC benchmarks (by life-cycle stage) to aid planning applicants in designing buildings that have low operational carbon and low embodied carbon.

A WLC assessment template needs to be completed in four parts, namely, at pre-application, planning submission (outline and details) and post construction (prior to occupation).

The GLA encourages WLC assessments on major applications that are not referable to the Mayor. The CoLCis supportive of this approach and requires that they are provided as part of the planning application in line with the GLA requirements. In addition to the above, planning officers request, by condition, a more detailed update of

the WLCA following the detailed design phase (RIBA Stage 4) prior to construction when more design and procurement information is available to the project team. This is to ensure that the CoLC is aware of and understands opportunities and constraints through changes of and improvements to developments.

The GLA's pre-application section includes a hierarchy of WLC reduction principles (see Appendix 4 for full list). Principle 1 relates to options for 'significant retention and reuse of structures' as shown in Table 2 below, requiring examples to demonstrate that:

- Options for retaining existing buildings and structures have been fully explored before proposing substantial demolition, including incorporating the fabric of existing buildings into the new development (aligned with London Plan Guidance for Circular Economy Statements, March 2022);
- Carbon emissions associated with pre-construction demolition are currently reported separately;
- An estimate of the percentage of the new build development which will be made up of existing façades, structures and other key components is reported;
- An optional requirement to report on the effects of future grid decarbonisation on the development's embodied carbon emissions.
- The WLC principles are informing the proposed development of the site.

If substantial demolition is proposed, applicants will need to demonstrate that the benefits of demolition would clearly outweigh the benefits of retaining the existing building or parts of the structure.

Further considerations and options in relation to the retention of building elements and material are required by the circular economy principles (see following page).

Note, the GLA (and optionally BREEAM) requires the reporting of refrigerant Global Warming Potential emissions in kgCO₂e/m² GIA. This is important to include in the WLCA. The GLA requires reporting of refrigerant impact in the Whole Life-Cycle Carbon Assessment template spreadsheet. Measures can be installed to prevent and manage refrigerant leakage to the atmosphere. The requirement for leak detection and containment of refrigerants as part of the commissioning process could be secured through a condition.

WLC reduction principle: 1. Reuse and retrofit of existing buildings

Key benefit: Significant retention and reuse of structures is carbon efficient and reduces construction costs

Provide examples of how the reduction principle has been used, or give reasons why it cannot be used.

Confirmation that options for retaining existing buildings and structures have been fully explored before considering substantial demolition	[Outline the options that have been considered - plus an explanation of opportunities and limitations, and why demolition outweighs the benefits of retaining existing buildings/structures where applicable]
Carbon emissions associated with pre-construction demolition (kgCO ₂ e)	[If estimates are not possible, please apply standard assumption of 50kgCO ₂ e/ m ² of the existing building/s]
Estimate of the percentage of the new build development which will be made up of existing elements	[e.g. X% existing facades; Y% existing foundations; Z% superstructures etc.]

Table 2: Retention of existing building and structures from the GLA WLCA assessment template, March 2022

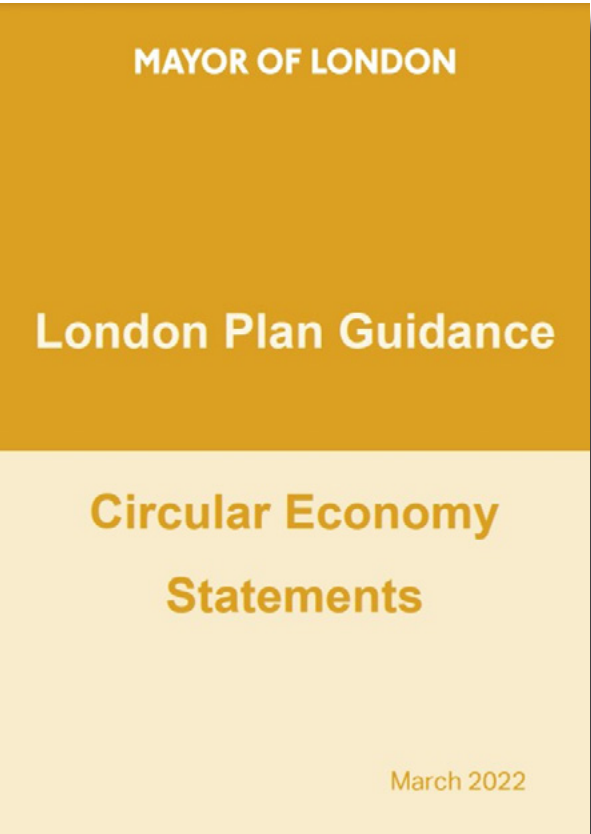


Figure 9: The new London Plan Guidance ‘Circular Economy Statements’ sets out the principles to be adopted to demonstrate the adoption of circularity in design and construction

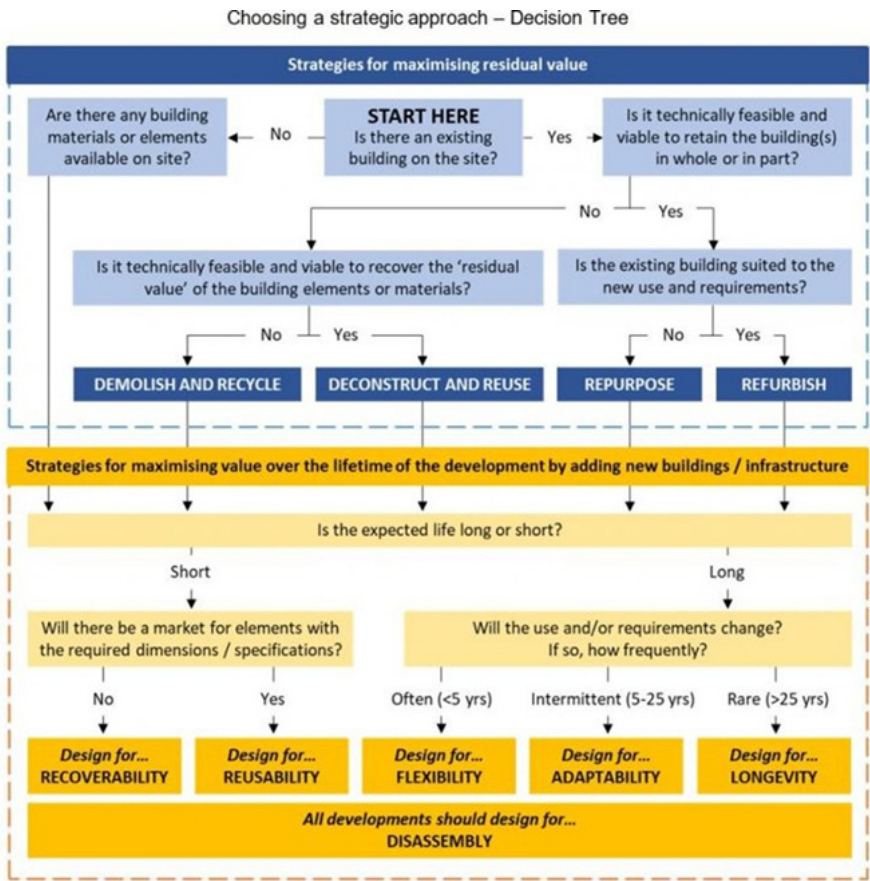


Figure 10: Decision tree for design approaches to existing structures/buildings -GLA Circular Economy Guidance March 2022

Circular Economy Statement

The Mayor of London’s London Plan 2021 requires proposals referable to the Mayor to calculate a development’s impacts and solutions to meet circular economy principles. It sets out the aim of retaining material at their highest value for as long as possible, to increase reuse and recycling, leaving minimal residual waste.

The reporting requirements and scope of the assessment are described in a London Plan Guidance ‘Circular Economy Statements’ (adopted 25th March 2022), which structures a reporting framework and principles to be considered by all referable applications. This needs to be considered alongside the WLCA.

The guidance includes requirements for a decision pathway to be outlined and for pre-redevelopment and pre- demolition audits, which need to be communicated at the earliest stages possible. The aim is for projects to incorporate these into their brief at procurement stage.

The guidance sets out six principles which are seen as critical to the design process:

1. Building in layers, ensuring that different parts of the building are accessible and can be maintained and replaced where necessary
2. Designing out waste, ensuring that waste reduction is planned in from project inception to completion, including consideration of standardised components, modular build, and reuse of secondary products and materials
3. Designing for longevity
4. Designing for adaptability or flexibility
5. Designing for disassembly
6. Using systems, elements or materials that can be reused and recycled.

The principles apply to the waste hierarchy to reduce or avoid waste wherever possible and to try and ensure that materials are applied and used at their highest value. The concept for building in layers attributes design life to different aspects of the building in terms of skin, shell, structure/frame, building services, Space/space plan/interior/ interior space, stuff and contents.

Carbon Emissions from Operational Energy and Water

The WLCA includes life-cycle stages B6 (Operational Energy) and (B7 Operational Water). GLA planning policy currently requires separate energy and water consumption reporting. This section clarifies the requirements and overlaps between reporting requirements. GLA benchmarks exclude stages B6 and B7.

Operational Energy Modelling

NABERS UK 'Design for Performance' (DfP) and CIBSE TM54 'Evaluating operational energy use at the design stage' (2022) are increasingly being used by applicants to more accurately estimate and reduce operational energy during design, and to inform metering, commissioning and management requirements to maintain low energy consumption throughout a building's life-cycle.

BREEAM New Construction's (optional) operational energy modelling requirements are similar. NABERS UK is the most onerous approach of the three because of independent design reviews required during design, post completion and post occupancy seasonal monitoring, and tuning, metering infrastructure criteria to facilitate annual rating and annual energy rating updates. Note that the UK Government is proposing to introduce a new obligatory energy rating disclosure, that aligns with NABERS UK, starting with all offices greater than 1,000m², from 2022/23, indicatively. In addition, CIBSE TM54 has recently aligned with NABERS UK Design for Performance (DfP), and BREEAM is set to do the same at the next update (estimated 2023).

The GLA requires referable schemes to evaluate operational energy as part of the 'be seen' stage of the Energy Hierarchy. The associated guidance sets out parameters for evaluating performance at the planning, post-completion and in use stages of a development.

The planning stage requires an estimation of the regulated and unregulated energy. The recommendation is for the use of analysis guided by CIBSE TM54 'Evaluating operational energy use at the design stage'. NABERS UK DfP is encouraged for office buildings greater than 5,000m².

CIBSE, TM54 and NABERS UK give a far more accurate and complete estimate of operational carbon emissions than Building Regulations Part L as they allow for detailed prediction of regulated and unregulated energy using more detail and realistic parameters to evaluate energy performance, rather than a uniform set of standardised regulated energy parameters. Part L modelling is used to

ensure that buildings meet the minimum energy efficiency standards set by building regulations, while TM54 operational energy modelling is used to identify areas where energy consumption can be reduced and to inform decisions on building design and operation.

Both the TM54 and NABERS UK (currently for commercial offices only, other schemes are being developed) approaches align with the reporting requirements of Stage B6 'Operational Energy Use' under the GLA's WLCA Guidance (March 2022) and the GLA's 'Be seen' guidance.

The GLA also requires in use monitoring and Energy Use Intensity (EUI) reporting of actual energy use for the first 3 years of a building's operation.

Operational water use

Operational water consumption in planning applications is currently reported in 2 ways:

1. Part of the WLCA (module B7), in line with the RICS method, which requires all carbon emissions related to water supply and wastewater treatment to be reported, using BSRIA benchmarks initially, then estimated values once known. Carbon conversion factors for water use and treatment as published by the local water supplier should be used.
2. Part of the BREEAM Assessment, which aims to reduce and benchmark the consumption of potable water for sanitary use (credit Wat 01) in new and refurbished buildings through the use of water efficient components and water recycling systems. CoLC's current policy refers to requiring all BREEAM water credits to be achieved.

The latter consumption evaluation is therefore limited to potable water only, while the former looks at all water consumption and treatment and associated carbon emissions. BREEAM does review non potable water but in a qualitative way (credit Wat 04).

The UK Government is proposing to introduce a new obligatory water rating disclosure (in a similar way to energy, above) and to regulate all water consumption for different land uses. Currently only potable water in residential uses is regulated.

Evaluating operational energy use at the design stage



Figure 11: The new revised CIBSE Technical Manual for evaluating operational use at the design stage provides a framework for more accurate prediction of regulated and unregulated energy consumption

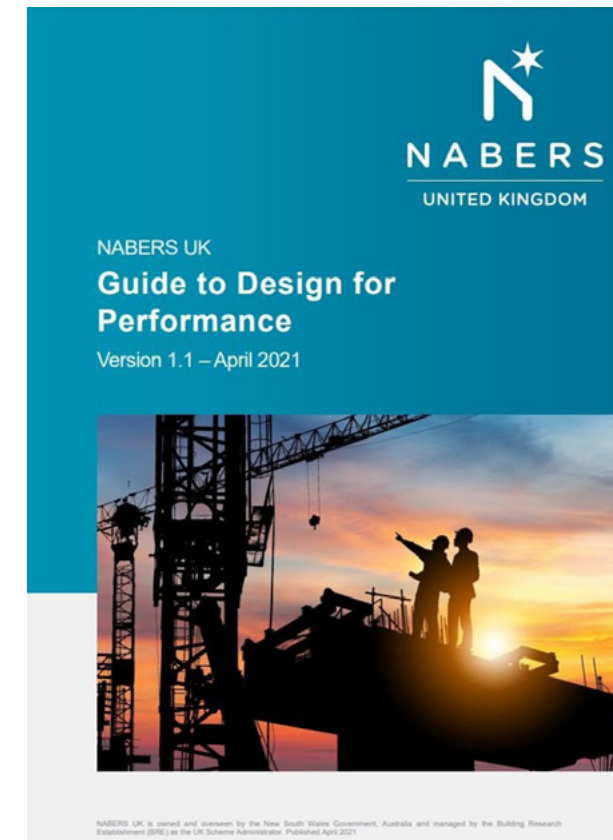


Figure 12: The NABERS UK Design for Performance guidance manual

Glossary

The below included a series of definition for terms used in the document. A number of these terms are aligned with industry standards including the document *Improving Consistency in Whole Life Carbon Reporting Assessment and report – Carbon definitions for the Built Environment Buildings and Infrastructure, January 2023*. (<https://www.leti.uk/carbondefinitions>). 'This document was put together initially by a working group within the Whole Life Carbon Network (WLCN, a group of some 90 built environment professionals) and includes detailed discussions between WLCN, LETI, CIBSE, RIBA, RICS, IStructE, ICE, and UKGBC. The 'Definitions' are structured around CEN TC 350 life-cycle modules, (e.g. BS EN 15978:2011 for buildings, BS EN 17472: 2022, PAS 2080:2016 for Infrastructure, BS EN 15643 2021.)'

Absolute Zero Carbon: Eliminating all carbon emissions without the use of offsets.

Approved Document Part L conservation of fuel and power: Part L is a building regulation that covers both new and changes to existing dwellings and non-dwellings. Part L sets minimum requirements and targets for energy performance and carbon emissions. It also defines the carbon intensity of fuel and power.

Beyond Life-cycle (Beyond – LC): Carbon emissions arising from any benefits or burdens of materials and components beyond the life-cycle (Module D).

Biogenic Carbon: 'Biogenic Carbon' refers to the carbon removals associated with carbon sequestration into biomass as well as any emissions associated with this sequestered carbon. Biogenic carbon must be reported separately if reporting only upfront carbon but should be included in the total if reporting embodied carbon or whole life carbon.

BREEAM – Building Research Establishment Environmental Assessment Method: A leading and well-established scheme for the evaluation, rating and certification of the sustainability of buildings developed by the BRE. It is the main sustainability certification standard in the UK but also is used internationally. The main schemes apply to new buildings and both non-domestic refurbishment and fit-outs and domestic refurbishments.

Carbon Dioxide equivalent (CO₂e): A metric expressing the impact of all greenhouse gases on a carbon dioxide basis. A measure used to compare the emissions from various greenhouse gases based upon their global warming potential in a common unit over a 100 year period. E.g. 1 kg of methane is converted into the amount of CO₂

needed to cause the same effect, in this case 23 kg. Therefore 1 Kg methane has a CO₂ equivalent of 23.

Carbon Sequestration: 'Carbon sequestration' is the process by which carbon dioxide is removed from the atmosphere and stored within a material – e.g. stored as 'biogenic carbon' in 'biomass' by plants/trees through photosynthesis and other processes.

Climate Change: Climate change refers to long-term shifts in temperatures and weather patterns. These shifts may be natural, such as through variations in the solar cycle. However, since the 1800s, human activities have been the main driver of climate change, primarily due to burning fossil fuels like coal, oil and gas.

Densification: Is a term used by planners, designers, developers and theorists to describe the increasing density of people living in/using urban areas. There are a number of metrics attributing to densification on is total building floor area divided by the area of land the buildings are built on.

Embodied Carbon or Life-Cycle Embodied Carbon: Embodied carbon emissions of an asset are the total GHG emissions and removals associated with materials and construction processes throughout the whole life-cycle of an asset (Modules A0-A5, B1-B5, C1-C4, with A02 assumed to be zero for buildings).

Upfront Carbon Embodied Carbon at Practical Completion:

'Upfront carbon' emissions are the GHG emissions associated with materials and construction processes up to practical completion (Modules A0-A5). Upfront carbon excludes the biogenic carbon sequestered in the installed products at practical completion. A1-A3 covering materials product, A4 transport of materials and A5 construction and installation processes.

Energy use intensity (EUI): An indicator of the energy efficiency of a building's design and/or operations. It is the total amount of energy used in a building in a year divided by its floor area (kwh/m²/yr). It can be expressed in terms of GIA or NLA, and this should be clearly stated when reporting.

Environmental Aspect: An aspect of construction works, part of works, processes or services related to their

Life-cycle that can cause change to the environment.

Environmental Impact: A change to the environment, whether adverse or beneficial, wholly or partially, resulting from environmental aspects.

Environmental Performance Declaration (EPD): A transparent, objective report that communicates what a product or material is made of and how it impacts the environment across its entire life-cycle. An EPD is usually valid for five years, and is generated according to a number of relevant standards.

Global Warming: Is the long-term heating of Earth's climate system observed since the pre-industrial period (between 1850 and 1900) due to human activities, primarily fossil fuel burning, which increases heat-trapping greenhouse gas levels in Earth's atmosphere.

Global Warming Potential (GWP): The standard metric used to calculate CO₂-equivalent emissions of different greenhouse gases in carbon budgets and the Kyoto Protocol. GWP measures the total radiative forcing over a given period (usually 100 years) after a pulse emission, relative to that from the same mass of CO₂.

Greenhouse Effect: A process that occurs when gases in Earth's atmosphere trap the Sun's heat. This process makes the Earth much warmer than it would be without an atmosphere.

Greenhouse Gases (GHG): 'Greenhouse Gases' are constituents of the atmosphere, both natural and anthropogenic, that absorb and emit radiation at specific wavelengths within the spectrum of infrared radiation emitted by the Earth's surface, the atmosphere, and clouds: For these 'carbon definitions', we are only addressing the GHGs with Global Warming Potential assigned by the Intergovernmental Panel on Climate Change (IPCC), e.g. carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFC's), perfluorocarbons (PFC's), and sulphur hexafluoride (SF₆).

Grid Decarbonisation: The gradual reduction of the carbon intensity of electricity production.

Gross Internal Area (GIA): The area of a building measured to the internal face of the perimeter walls at each floor level. In the UK this is determined according to Royal Institute of Chartered Surveyors (RICS) property measurement standards.

IMPACT (Integrated Material Profile and Costing Tool): A specification and database for software developers to incorporate into their tools to enable consistent Life-cycle Assessment (LCA) and Life-cycle Costing (LCC). IMPACT compliant tools work by allowing the user to attribute environmental and cost information to drawn or scheduled items in the BIM. Put simply, IMPACT takes quantity information from the BIM and multiplies this by environmental impact and/or cost 'rates' to produce an overall impact and cost for the whole (or a selected part) of the design.

Life-cycle: consecutive and interlinked stages in the life of the object under consideration.

Life-cycle Assessment (LCA): is a process to evaluate the environmental burdens associated with a product, process or activity:

- By identifying and quantifying energy and materials used and wastes released to the environment;
- To access the impact of those energy and materials used and releases to the environment; and
- To identify and evaluate opportunities to affect environmental improvements.

The assessment includes the entire life-cycle (from cradle to grave) of the product, process or activity encompassing extracting and processing of raw materials, manufacturing, transportation and distribution; use and re-use; maintenances; recycling and final disposal.

Minimum Energy Efficiency Standards (MEES): The Energy Efficiency (Private Rented Property)(England and Wales) Regulations 2015 established the new Minimum Energy Efficiency Standards in the residential and commercial private rented sector in 2016.

NABERS UK ‘Design for Performance’ (DfP): A building rating scheme (currently for offices only) designed to help projects deliver against their design intent and overcome the well-evidenced performance gap between design and operation. It requires a developer or owner to commission a new office to a defined rating. It is a more detailed way of undertaking an energy model with the aim of enabling better design decisions to help reduce carbon emissions once the building is operating.

Net Zero Carbon: A ‘net zero (whole life) carbon asset is one where the total sum of all assets related to GHG emissions, both operational and embodied, over an asset’s life-cycle (Modules A0-A5, B1- B8, C1-C4) are minimised, which meets local carbon, energy and water targets or limits, and with residual ‘offsets’, equals zero.

NABERS Energy: NABERS Energy measures the efficiency of an office building and rates its performance (0-6 Stars). The energy rating works by comparing the energy consumption of a building against a set of benchmarks that have been developed using actual data. It is based on in-use data.

Operational Energy (modelling): A detailed energy model that attempts to reflect real world energy consumption of a building during the design and construction stages of a development. This would include more detail than a standard model used for building regulations, and would include unregulated energy.

Operational Carbon Energy building (use): ‘Operational Carbon – Energy’ (Module B6) are the GHG emissions arising from all energy consumed by an asset in-use, over its life-cycle.

Operational Carbon Water (use): ‘Operational Carbon – Water’ (Module B7) are those GHG emissions arising from water supply and wastewater treatment for an asset in-use, over its life-cycle.

Recycling: Recycling is the process of converting waste materials into new materials and objects. A recovery operation by which waste materials are reprocessed into products, materials or substances either for the original purpose or other purposes.

Refurbishment: Modification and improvements to an existing building in order to bring it up to an acceptable condition. The refurbishment of something is the act or process of cleaning it, decorating it, and providing it with new equipment or facilities.

Regulated Energy Consumption: The building energy consumption resulting from the specification of controlled, fixed building services and fittings, including space heating and cooling, hot water, ventilation, fans, pumps and lighting.

Retrofit: The act of providing something with a feature not fitted in the original construction or a replacement of a component. Often this refers to building systems upgrades, however it can refer to improving fabric and or glazing. This work generally improves amenities for the building’s occupants and the overall building performance.

TM 54: A CIBSE Technical Memorandum that covers all types of building energy modelling with the aim of more accurately estimating a building’s energy consumption in the design process and allowing more meaningful comparison with actual in-use consumption once operational.

Unregulated energy: Energy consumption that is not ‘controlled’, it does not fall under Part L of the Building regulations. This would include consumption from elements such as IT equipment, lifts and other plug-in equipment such as white goods, laboratory equipment, external lighting and audio visual equipment.

Whole life-cycle Carbon (WLC) or Whole Life Carbon over Life-Cycle: Whole life carbon emissions are the total sum of all asset related GHG emissions and removals, both operational and embodied over the life-cycle of an asset including its disposal (Modules: A0-A5; B1-B7; B8 optional; C1-C4, all including biogenic carbon, with A0* assumed to be zero for buildings). Overall whole life carbon asset performance includes separately reporting the potential benefits or loads from future energy or material recovery, reuse, and recycling and from exported utilities (Modules D1, D2). * A0 is generally assumed to be zero for buildings, however for infrastructure projects A0 can

include ground investigations and activities associated with designing the asset.

Demolition of existing structures or buildings must be separately identified and included within Module A5.

Application types:

FULLEIA: any application requiring EIA in support

FULMAJ: – Any application over 1,000m² - Major applications may include schemes for redevelopment, substantial refurbishments and extensions. Residential development of 10 or more dwellings or on a site of 0.5 hectares or more, and all other development of 1,000 square metres gross or more floorspace, or on a site of 1 hectare or more.

FULL: All other full applications

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Committee(s): Planning and transportation committee – For Information	Dated: 21 February 2023
Subject: Public Lift & Escalator Monthly Report	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	Shape outstanding Environments – Our spaces are secure, resilient, and well-maintained
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	n/a
What is the source of Funding?	n/a
Has this Funding Source been agreed with the Chamberlain's Department?	
Report of: City Surveyor	For Information
Report author: Matt Baker – Head of Facilities Management	

Summary

This report outlines the availability and performance of publicly accessible lifts and escalators monitored and maintained by City Surveyor's, in the reporting period 16 January 2023 to 21 February 2023. The reporting period is driven by the committee meeting cycle and the associated reporting deadlines.

The report also references publicly accessible lifts and escalators on property where the freehold is owned by the City of London Corporation, which are not monitored or maintained by City Surveyor's. This report does not provide information on availability of these assets.

In this reporting period, publicly accessible lifts and escalators were available for **96.00%** of time. The aggregated 12-month availability across all publicly accessible lifts/escalators is **89.94%**.

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

Main Report

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

Table 1.0

Asset Reference	Name	Availability in last reporting period	12 Month Availability	Trend
SC6458969	Pilgrim Street Lift	100.00%	89.00%	↑
CL24	Duchess Walk Public Lift	100.00%	93.39%	↑
SC6459146	Speed House Glass/Public Lift	100.00%	95.83%	↑
SC6458967	Little Britain	100.00%	95.94%	↑
SC6458964	London Wall East	100.00%	96.67%	↑
SC6458963	Tower Place Scenic Lift	100.00%	96.99%	↑
SC6458962	Tower Place Public Lift	100.00%	97.37%	↑
SC6458968	Moor House	100.00%	98.37%	↑
SC6458958	London Wall Down Escalator	100.00%	90.75%	↑
SC6458966	Atlantic House	100.00%	93.03%	↑
SC6458959	London Wall Up Escalator	100.00%	89.52%	↑
SC6462850	33 King William Street	97.69%	87.83%	↑
SC6459244	Glass South Tower	96.78%	94.60%	↑
SC6458965	London Wall West	95.64%	45.34%	↑
SC6462771	Blackfriars Bridge	83.22%	86.52%	↓
SC6458970	Wood Street Public Lift	68.15%	87.86%	↓

2. Table 2.0 identifies the worst performing lifts/escalators (based on 12 month availability) and the associated actions being undertaken and expected completion dates, to improve availability.

Table 2.0

Name	12 Month Availability	Trend	Current Issues	Action Required	Expected Completion Date
London Wall West Lift	45.34%	↑	Intermittent fault which has been rectified.	Issue rectified 9/11/22. Trending positively since rectification.	n/a
Blackfriars Bridge	86.52%	↓	Issues caused by vandalism to door openers on 2 separate occasions	Issues rectified	n/a
Wood Street Public Lift	87.86%	↓	Doors being held open causing lift to	N/a	n/a

			go out of service. Monitoring system restoring to service. No technical faults.		
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3. Table 3.0 categorises the causes of faults/outages in this reporting period.

Table 3.0

Category	No of call outs
External/Environmental factors	3
Equipment faults/failure	2
Planned Insurance Inspections	2
Planned Repairs	2
Resets following emergency button press or safety sensor activation	1
Damage/misuse/vandalism	3
Autodialler faults	0
Total	13

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

Table 4.0

Category	No of call outs
External/Environmental factors	17
Equipment faults/failure	79
Planned Insurance Inspections	17
Planned Repairs	26
Resets following emergency button press or safety stop equipment activation	1
Damage/misuse/vandalism	15
Autodialler faults	6

5. The lift/escalator monitoring system upgrade is currently having snagging works completed following inspection by City of London.

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

Table 5.0

Lift/Escalator	Project	Status	Expected Completion
London Wall Up Escalator	Modernisation Project	Contract Awarded	31/3/23

London Wall Down Escalator	Modernisation Project	Contract Awarded	31/3/23
Pilgrim Street Lift	Modernisation Project	Complete	Complete
Little Britain Lift	Modernisation Project	Contract Awarded	31/3/23
Atlantic House Lift	Modernisation Project	Complete	Complete

Committee(s): Planning and Transportation Committee	Dated: 7 March 2023
Subject: Risk Management Update Report	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	All
Does this proposal require extra revenue and/or capital spending?	N
Report of: Juliemma McLoughlin, Executive Director Environment	For Information
Report authors: Joanne Hill, Business Planning and Compliance Manager	

Summary

This report provides the Planning and Transportation Committee with assurance that risk management procedures in place within the Environment Department are satisfactory and that they meet the requirements of the Corporate Risk Management Framework.

Risk is reviewed regularly within each service area as part of the ongoing management of operations. In addition to the flexibility for emerging risks to be raised as they are identified, a process exists for in-depth periodic review of the risk register.

This report considers the key risks managed by the service areas of the Environment Department which fall within the remit of your Committee.

Recommendation

Members are asked to:

- Note the report and the actions being taken by the Environment Department to monitor, mitigate and effectively manage risks arising from their operations.

Main Report

Background

1. The Risk Management Framework of the City of London Corporation requires each Chief Officer to report regularly to Committee on the key risks faced by their department.

2. To fulfil this requirement, the key risks of the service areas of the Environment Department which fall within the remit of the Planning and Transportation Committee are presented to you every four months.
3. Risk Management is discussed regularly by the Department's Senior Leadership Team and at the meetings of each service area's Senior Management Team.
4. Between Management Team meetings, risks are reviewed in consultation with risk and control owners, and updates are recorded in the corporate risk management system (Pentana).

Current Position

5. This report provides an update on the key risks that exist in relation to the operations of service areas of the Environment Department which fall within the remit of the Planning and Transportation Committee:
 - The Planning and Development Division, including the District Surveyor
 - The City Operations Division: Highways and Transportation services

Summary of key risks

6. The service areas which report to your committee hold a total of eight key risks (three RED and four AMBER). The risks are summarised below and the Risk Register is presented in full at Appendix 2.
 - **ENV-CO-TR 001:** Road Safety (Red, 24)
 - **ENV-CO-HW 010:** Car parks: safety (Red, 24)
 - **ENV-CO-HW 009:** Car parks: repairs and maintenance (Red, 16)
 - **ENV-PD-PD 007:** Adverse planning policy context (Amber, 12)
 - **ENV-PD-DS-001:** The District Surveyor's (Building Control) Division becomes too small to be viable (Amber, 12)
 - **ENV-PD-DS 003:** Inspecting dangerous structures (Building Control) (Amber, 8)
 - **ENV-CO-HW 002:** Working in service/pipe subways (confined spaces) (Amber, 8)

Red risks

7. **ENV-CO-TR 001: Road Safety.** This current score of this risk is Red 24 (likelihood: possible; impact: extreme) and the target is to reduce it to a score of Red 16 (unlikely; extreme) by the end of March 2027 by delivering a range of projects, campaigns, training and engagement activities to reduce road danger and encourage safe behaviour. Further details are provided in Appendix 2.

8. **ENV-CO-HW 010: Car parks: safety.** This risk is currently scored at RED, 24 (possible/extreme). Due to the dilapidation and location of some car parks, the risk of fire, accidents and near misses is increased. Officers are undertaking a range of actions to improve the car parks and aim to reduce the risk rating to a score of Amber, 12 (possible; serious).
9. **ENV-CO-HW 009: Car parks: repairs and maintenance.** Currently scored as Red 16 (likely/major). This risk addresses the impact of delays in the provision of facilities management of the car parks. Officers continue to liaise closely with the City Surveyor's Department to discuss repairs and maintenance requirements and carry out regular inspections to assess current issues. The target for this risk is to reduce it to a score of Amber, 12 (possible/major).

Increased risk

10. **ENV-PD-DS-001: The District Surveyor's (Building Control) Division becomes too small to be viable.** This risk has recently been increased from a score of Amber 8 (unlikely/major) to Amber, 12 (possible/major). Two existing members of staff will, or are expected to, retire in the near future and a recent recruitment campaign was unsuccessful. There is, therefore, increased concern over the potential lack of sufficient numbers of competent and trained staff to deliver building control services.

New risks

11. A new risk is being developed to address the potential impacts on delivery of the Transport Strategy should TfL and/or City funding for accessibility, road danger reduction and strategic projects be limited or unavailable. This risk will be added to the register in the coming weeks and will be included in the next report to your Committee.
12. New and emerging risks are identified through a number of channels, the main being:
 - Directly by Senior Management Teams as part of the regular review process.
 - In response to ongoing review of progress made against Business Plan objectives and performance measures, e.g., slippage of target dates or changes to expected performance levels.
 - In response to emerging events and changing circumstances which have the potential to impact on the delivery of services, such as availability of funding, Brexit and the COVID-19 pandemic.

Corporate & Strategic Implications

13. Effective management of risk is at the heart of the City Corporation's approach to delivering cost effective and valued services to the public as well as being an important element within the corporate governance of the organisation.

14. The proactive management of risk, including the reporting process to Members, demonstrates that the department is adhering to the requirements of the City of London Corporation's Risk Management Policy and Strategy.
15. The risk management processes in place in the Environment Department support the delivery of the Corporate Plan, our Departmental and Divisional Business Plans and relevant Corporate Strategies

Conclusion

16. Members are asked to note that risk management processes within each service area adhere to the requirements of the City Corporation's Risk Management Framework. Risks identified within the operational and strategic responsibilities of each area are proactively managed.

Appendices

- Appendix 1 – City of London Corporation Risk Matrix
- Appendix 2 – Environment Department Key Risks (Planning and Transportation Committee)

Contacts

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T: 020 7332 1301
E: Joanne.Hill@cityoflondon.gov.uk

City of London Corporation Risk Matrix (Black and white version)

Note: A risk score is calculated by assessing the risk in terms of likelihood and impact. By using the likelihood and impact criteria below (top left (A) and bottom right (B) respectively) it is possible to calculate a risk score. For example a risk assessed as Unlikely (2) and with an impact of Serious (2) can be plotted on the risk scoring grid, top right (C) to give an overall risk score of a green (4). Using the risk score definitions bottom right (D) below, a green risk is one that just requires actions to maintain that rating.

(A) Likelihood criteria

	Rare (1)	Unlikely (2)	Possible (3)	Likely (4)
Criteria	Less than 10%	10 – 40%	40 – 75%	More than 75%
Probability	Has happened rarely/never before	Unlikely to occur	Fairly likely to occur	More likely to occur than not
Time period	Unlikely to occur in a 10 year period	Likely to occur within a 10 year period	Likely to occur once within a one year period	Likely to occur once within three months
Numerical	Less than one chance in a hundred thousand (<10-5)	Less than one chance in ten thousand (<10-4)	Less than one chance in a thousand (<10-3)	Less than one chance in a hundred (<10-2)

(B) Impact criteria

Impact title	Definitions
Minor (1)	Service delivery/performance: Minor impact on service, typically up to one day. Financial: financial loss up to 5% of budget. Reputation: Isolated service user/stakeholder complaints contained within business unit/division. Legal/statutory: Litigation claim or find less than £5000. Safety/health: Minor incident including injury to one or more individuals. Objectives: Failure to achieve team plan objectives.
Serious (2)	Service delivery/performance: Service disruption 2 to 5 days. Financial: Financial loss up to 10% of budget. Reputation: Adverse local media coverage/multiple service user/stakeholder complaints. Legal/statutory: Litigation claimable fine between £5000 and £50,000. Safety/health: Significant injury or illness causing short-term disability to one or more persons. Objectives: Failure to achieve one or more service plan objectives.
Major (4)	Service delivery/performance: Service disruption > 1 - 4 weeks. Financial: Financial loss up to 20% of budget. Reputation: Adverse national media coverage 1 to 3 days. Legal/statutory: Litigation claimable fine between £50,000 and £500,000. Safety/health: Major injury or illness/disease causing long-term disability to one or more people Objectives: Failure to achieve a strategic plan objective.
Extreme (8)	Service delivery/performance: Service disruption > 4 weeks. Financial: Financial loss up to 35% of budget. Reputation: National publicity more than three days. Possible resignation leading member or chief officer. Legal/statutory: Multiple civil or criminal suits. Litigation claim or find in excess of £500,000. Safety/health: Fatality or life-threatening illness/disease (e.g. mesothelioma) to one or more persons. Objectives: Failure to achieve a major corporate objective.

(C) Risk scoring grid

Likelihood	Impact				
	X	Minor (1)	Serious (2)	Major (4)	Extreme (8)
	Likely (4)	4 Green	8 Amber	16 Red	32 Red
	Possible (3)	3 Green	6 Amber	12 Amber	24 Red
	Unlikely (2)	2 Green	4 Green	8 Amber	16 Red
	Rare (1)	1 Green	2 Green	4 Green	8 Amber

(D) Risk score definitions

RED	Urgent action required to reduce rating
AMBER	Action required to maintain or reduce rating
GREEN	Action required to maintain rating

This is an extract from the City of London Corporate Risk Management Strategy, published in May 2014.

Contact the Corporate Risk Advisor for further information. Ext 1297

October 2015

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Environment Department Key Risks (Planning & Transportation Committee)

Report Author: Joanne Hill

Generated on: 21 February 2023

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
ENV-CO-TR 001 (Formerly CR20) Road Safety	<p>Cause: Limited space on the City's medieval street network to cope with the increased use of the highway by vehicles, pedestrians and cyclists within the City of London. Interventions and legal processes take time to deliver safely and effectively.</p> <p>Event: The City Corporation's statutory duties and the measures outlined in the Transport Strategy are not fully and effectively implemented.</p> <p>Effect:</p> <ul style="list-style-type: none"> •The number of casualties occurring on the City's streets rises or remains unchanged instead of reducing •The safety and feeling of safety of the City's communities is adversely affected (Corporate Plan Outcome 1) •Physical or mental harm suffered by those involved in collisions and their associates •Economic costs of collisions impact on individuals, City businesses and wider society •The City Corporation's ability to improve road safety is adversely impacted with businesses and/or 	<p>Likelihood</p> <p>Impact</p>	24	<p>The risk assessment remains at 24 (Impact 8 - Extreme, Likelihood 3 – Possible), from 16. This reflects the increasing numbers of people travelling in the City and that one person has been killed in a collision in the last 12 months.</p> <p>Mitigating actions include:</p> <ul style="list-style-type: none"> - Delivery of All Change at Bank, the Pedestrian Priority Programme and Healthy Streets minor schemes. - Continuing to progress St Paul's Gyratory with Gateway 4 report to go to Committees in May. - Delivering cycle training to 154 people over the 12 months to February 2023. 	<p>Likelihood</p> <p>Impact</p>	16	31-Mar-2027	


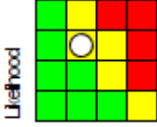
	the public by virtue of loss of credibility and/or authority			<p>- External engagement activity jointly with City of London Police, including safety awareness training at cycle road shows</p> <p>The Police also address unsafe behaviour, including through regularly stopping and prosecuting drivers for speeding, alcohol and drug intoxication, unsafe and uninsured vehicles, and use of mobile phones.</p> <p>The draft Vision Zero Plan will be considered by Committees in March.</p>				
23-Oct-2015				17 Feb 2023			Reduce	Constant
Ian Hughes; Bruce McVean								

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
ENV-CO-TR 0011 (formerly CR20)	<p>A programme of projects to reduce road danger on the City's streets including:</p> <ul style="list-style-type: none"> • Bank on Safety and All Change at Bank • RDR engineering programme • 15mph traffic limit • Ludgate Circus (lead by TfL) 	<p>Construction underway on All Change at Bank, due to complete in spring 2024. Committee approval to deliver permanent improvements on King Street, Old Jewry and King William Street through the Pedestrian Priority Programme was secured in February, with construction starting on King Street in April. Recommendations on permanent changes to Cheapside, Threadneedle Street and Old Broad Street are due to go to Committee in May. An experimental closure of Chancery Lane to through traffic begins on 20th February and can remain in place for up to 18 months. Continuing to progress St Paul's Gyratory with Gateway 4 report to go to Committees in May. Works to deliver 10 Healthy Streets Minor Schemes across the City are due to complete by the end of March 2023. These largely consist of raising carriageway at junctions or on desire lines for informal crossing to provide a 'step-free' crossing point, making it more accessible for wheelchair users, and create a calmer and safer environment by reducing traffic speeds. The draft Vision Zero Plan will be considered by Committees in March, this identifies 10 priority locations for future Safer Streets investment and a range of actions relating to changing streets to reduce road danger.</p>	Ian Hughes	16-Feb-2023	31-Mar-2023

Appendix 2

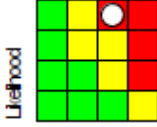
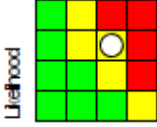

ENV-CO-TR 001m (formerly CR20)	<p>Campaigns and engagement activities to encourage safe behaviours and promote safe vehicles, including:</p> <ul style="list-style-type: none"> • Active City Network • User and stakeholder liaison • Schools programme 	<p>154 people received cycle training over the 12 months to February 2023. Over the same period our external engagement activity jointly with City of London Police included 34 cycle road shows, which include safety awareness training. The Police also address unsafe behaviour, including through regularly stopping and prosecuting drivers for speeding, alcohol and drug intoxication, unsafe and uninsured vehicles, and use of mobile phones. The draft Vision Zero Plan will be considered by Committees in March, this a range of actions relating to safer behaviours that will be delivered in partnership with the City of London Police.</p>	Ian Hughes	17-Feb- 2023	31-Mar- 2023
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Appendix 2

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
ENV-CO-HW 010 Car Parks: Safety 02-Sep-2022 Ken Stone	Cause: Dilapidation of the car parks and the location of some car parks, e.g. London Wall car park is beneath the road where a fire or structural issue could have wider implications. Event: Fire risk is increased and there is a greater likelihood of accidents and near misses within the car parks. Impact: Serious injury or death; structural failure could have wider implications; vehicle damage; increased insurance claims; potential enforcement action and fines; reputational damage.		24	We are aiming to improve the safety of the car parks through replacing lighting, redecoration and FM projects. A range of projects are underway or being considered for future implementation which should help to reduce this risk. 16 Feb 2023		6	31-Dec-2023	Constant
							Reduce	

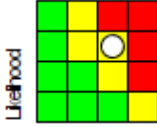
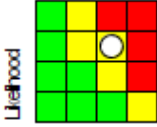

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
ENV-CO-HW 010a	Monthly meetings are held with City Surveyor's Department (CSD) on the fire works project, and we request regular updates on progress.	CSD are going out to tender for the fire suppression works on the ventilation at London Wall car park. Works will not commence until 2023 at the earliest.	Ken Stone	16-Feb-2023	31-Dec-2023
ENV-CO-HW 010b	A Fire Risk Assessment is carried out at each car park by an external body every 18 months.	The next Fire Risk Assessments are due to be carried out in July 2023.	Ken Stone	16-Feb-2023	30-Sep-2023
ENV-CO-HW 010c	Finalise the Fire Management Plan.	The Fire Management Plan has been drafted but we are waiting for CSD to provide the Fire Strategy so that we can incorporate it into the final version.	Ken Stone	16-Feb-2023	31-Dec-2023
ENV-CO-HW 010c	Consider ways to reduce speed within the car parks.	We are currently looking into possibilities for installing speed humps across the portfolio to reduce speed and the likelihood of accidents.	Ken Stone	16-Feb-2023	31-Dec-2023
ENV-CO-HW 010d	Improve lighting across all car parks to improve safety and reduce energy use.	There is an ongoing project led by the Energy Team to change all lighting across CoL buildings to LED. This will include the car parks.	Ken Stone	16-Feb-2023	31-Dec-2023
ENV-CO-HW 010e	Carry out lighting and ventilation works in Tower Hill car park to improve safety.	Changing to LED lighting and undertaking ventilation improvement works in Tower Hill Coach and Car Park has been agreed. Works are due to be completed by July 2023.	Ken Stone	16-Feb-2023	31-Aug-2023

Appendix 2

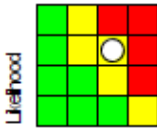
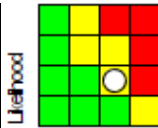

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
ENV-CO-HW 009 Car Parks: Repairs and maintenance 02-Sep-2022 Ken Stone	Cause: The facilities management of the car parks is dependent upon action by City Surveyor's Department (CSD) and generally beyond our direct control. Event: Required repairs and maintenance to the car parks is delayed. Impact: Increased possibility of structural and safety failure; greater likelihood of fire; serious injury or death of member of the public; our liability as the occupier increases; financial impact of insurance claims and increased premiums; reputational damage.	 Likelihood	16	We are reliant on the City Surveyor's Department (CSD) actioning our requests for facilities management. On a continuous basis, we liaise with CSD to address outstanding issues. Looking to employ a Parking Asset Manager to take control of FM. 16 Feb 2023	 Likelihood	12	31-Dec-2023	 Constant
							Reduce	

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
ENV-CO-HW 009a	The contractor responsible for each car park reports daily and weekly on any issues, including near misses. Issues are logged on the Concerto (CSD) system by CoL officers for action to be taken.	This is an ongoing action which is kept under review to ensure reports are received and issues logged appropriately.	Ken Stone	16-Feb-2023	31-Dec-2023
ENV-CO-HW 009b	Quarterly meetings are held with CSD and other stakeholders to discuss all CoL owned car parks and current issues.	This is ongoing action. Officers ensure the meetings take place on schedule	Ken Stone	16-Feb-2023	31-Dec-2023
ENV-CO-HW 009c	Monthly site 'walk-arounds' of each car park are carried out with the FM Manager, car park management contractor and CoL staff to identify and review issues.	This is an ongoing action. CoL staff ensure the monthly visits are carried out with appropriate attendees.	Ken Stone	16-Feb-2023	31-Dec-2023
ENV-CO-HW 009d	Consider alternative options for the provision of facilities management.	Alternative FM options are being investigated, such as direct FM arrangements at each car park.	Ken Stone	16-Feb-2023	31-Dec-2023

Appendix 2

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
ENV-PD-PD 007 Adverse planning policy context 06-Mar-2015 Rob McNicol	Cause: A desire in Government and others to change the existing planning system in a way which may be detrimental to the City. Event: Changes detrimental to the City are implemented. Impact: Adverse changes cannot be prevented using local planning control.	 Likelihood Impact	12	The risk is considered to be unchanged since its last assessment. 21 Feb 2023	 Likelihood Impact	12		 Constant
							Accept	

Action no	Action description	Latest Note			Action owner	Latest Note Date	Due Date
ENV-PD-PD 007a	(1) Ongoing monitoring of government regulations; (2) continue monitor progress of, and seek to influence, forthcoming legislation.	Government is currently consulting on proposed changes to the NPPF and these are being reviewed currently. The risk will be reviewed again in due course.			Rob McNicol	21-Feb-2023	31-May-2023

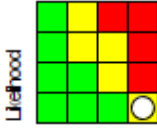
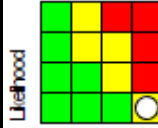

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
ENV-PD-DS 001 The District Surveyor's (Building Control) Division becomes too small to be viable	<p>Cause: Reduced income causes the service to be unviable.</p> <p>Event: Development market fails to maintain momentum or our market share shrinks.</p> <p>Impact: Reduced staffing levels do not provide adequate breadth of knowledge and experience.</p>	 <p>Likelihood</p> <p>Impact</p>	12	<p>The risk has changed been reviewed and the scoring has changed due to failure to recruit new staff.</p> <p>The plans to create a Local Authority Trading Company are still on hold and are being reviewed in the light of expected changes in the Building Control Regulation regimen that arose following the publication of the Hackett Report (on the Grenfell fire) and the Building Safety Bill. The new Act received Royal Assent in May 2022, with implementation for Building Control around October 2023. However, we are awaiting secondary legislation to understand the full impacts.</p> <p>In parallel, the City of London is working with other Boroughs under the London District Surveyors Association to deliver the anticipated new work under the Building Safety Act across London, which is expected to commence in October 2023. A report was approved by Planning & Transportation Committee on the 10th January 2023 for the District Surveyors to act as the Single Point of contact between the Regulator and London</p>	 <p>Likelihood</p> <p>Impact</p>	8		

Appendix 2

25-Mar-2015 Gordon Roy				<p>Boroughs known as the "HUB". Implementation date October 2023.</p> <p>An additional strand to the BAU control has been added (involvement with developers as part of the planning application process) and appears to be working well.</p> <p>One member of the team has submitted their retirement notice with another expected shortly. Recent recruitment has failed to attract any new staff. High concern regarding numbers of competent and trained staff, resulting in the changed risk status.</p> <p>20 Feb 2023</p>			Accept	Constant
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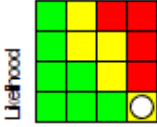

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
ENV-PD-DS 001a	(1) Continue to provide excellent services [evidenced by customer survey]; (2) Maintain client links with key stakeholders; (3) Continue to explore new income opportunities; (4) Continue to undertake cross-boundary working. (5) Involvement with developers as part of the planning application process.	Business as usual controls have been reviewed and are suitable.	Gordon Roy	20-Feb-2023	31-Dec-2023
ENV-PD-DS 001c	Following approval by P & T Committee, a Business Plan is being developed and will be presented to Members for consideration in due course.	Awaiting further government/Building Safety Regulator guidance. Due October 2023.	Gordon Roy	20-Feb-2023	31-Oct-2023

Appendix 2

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
ENV-PD-DS 003 Inspecting Dangerous Structures 24-Nov-2015 Gordon Roy	Cause: Officers involved in inspecting a dangerous structure. Event: Any of the following: (a) structural failure or building collapse; (b) falling object(s); (c) fire; (d) live electrics; (e) toxic substances; and/or (f) trips and falls. Impact: Ranging from minor injury to death.	 Likelihood Impact	8	Risk is unchanged and remains valid. 20 Feb 2023	 Likelihood Impact	8		 Constant
							Accept	

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
ENV-PD-DS 003a	Emergency Planning procedures in place - only authorised personnel to respond to Dangerous Structures call-outs and enter buildings. Take advice from Fire Brigade and emergency services. PPE issued and monitored. ISO9001:2015 Accredited (Quality Management Systems in place)	All mitigation measures in place.	Gordon Roy	20-Feb-2023	31-Mar-2024

Appendix 2

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
ENV-CO-HW 002 Service/Pipe Subways 02-Dec-2015 Ian Hughes; Giles Radford	Cause: Safe access and egress for utilities and maintenance functions is required, whilst having operatives entering the confined space to undertake checks. Event: A lack of Oxygen; poisonous gases, fumes and vapour, liquids and solids that suddenly fill spaces; fire and explosions; hot conditions; entrapment and falling debris. Impact: Fatality / major injury / illness.	 Likelihood Impact	8	The risk assessment is still suitable and sufficient 20 Feb 2023	 Likelihood Impact	8		 Constant
							Accept	

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
ENV-CO-HW 002a	<p>Confined space working is avoided when possible. All PPE and other equipment required for a SSOW shall be suitable and sufficient for the tasks identified. Suitable PPE and equipment shall be provided, as stated in the approved code of practice. All openings are controlled through a central booking system. A subway must not be entered if permission to do so has been refused. No booking will be granted to parties who are not on the database. If the contractor is not on the database, they must seek approval from CoL regarding their works. Once confirmed, the contractors will be added to the system before agreeing access. All works and operatives entering the pipe subway must comply with the code of practice for access and safe working in local authority subways. Regular inspections of the structure, covers, condition and asbestos surveys are undertaken. The Permit to Enter form must be completed and contractors checked to ensure they have suitable and sufficient equipment to enter a confined space. No smoking is allowed at any time.</p>	This is an ongoing action.	Giles Radford	16-Feb-2023	31-Dec-2023

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Committee(s)	Dated:
Streets and Walkways Sub Finance Planning & Transportation Court of Common Council	14 th February 2023 21 st February 2023 7 th March 2023 27 th April 2023
Subject: Annual On-Street Parking Accounts 2021/22 and Related Funding of Highway Improvements and Schemes	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	n/a
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	n/a
What is the source of Funding?	n/a
Has this Funding Source been agreed with the Chamberlain's Department?	n/a
Report of: The Chamberlain	For Information
Report author: Simon Owen, Chamberlain's Department	

Summary

The City of London in common with other London authorities is required to report to the Mayor for London on action taken in respect of any deficit or surplus in its On-Street Parking Account for a particular financial year.

The purpose of this report is to inform Members that:

- the surplus arising from on-street parking activities in 2021/22 was £10.699m;
- a total of £6.172m was applied in 2021/22 to fund approved projects; and
- the surplus remaining on the On-Street Parking Reserve at 31st March 2022 was £51.652m, which will be wholly allocated towards the funding of various highway improvements and other projects over the medium term.

Recommendation

Members are asked to:

- Note the contents of this report for their information before submission to the Mayor for London.

Main Report

Background

1. Section 55(3A) of the Road Traffic Regulation Act 1984 (as amended), requires the City of London in common with other London authorities (i.e. other London Borough Councils and Transport for London), to report to the Mayor for London on action taken in respect of any deficit or surplus in their On-Street Parking Account for a particular financial year.
2. Legislation provides that any surplus not applied in the financial year may be carried forward. If it is not to be carried forward, it may be applied by the City for one or more of the following purposes:
 - a) making good to the City Fund any deficit charged to that Fund in the 4 years immediately preceding the financial year in question;
 - b) meeting all or any part of the cost of the provision and maintenance by the City of off-street parking accommodation whether in the open or under cover;
 - c) the making to other local authorities, or to other persons, of contributions towards the cost of the provision and maintenance by them, in the area of the local authority or elsewhere, of off-street parking accommodation whether in the open or under cover;
 - d) if it appears to the City that the provision in the City of further off-street parking accommodation is for the time being unnecessary or undesirable, for the following purposes, namely:
 - meeting costs incurred, whether by the City or by some other person, in the provision or operation of, or of facilities for, public passenger transport services;
 - the purposes of a highway or road improvement project in the City;
 - meeting the costs incurred by the City in respect of the maintenance of roads at the public expense; and
 - for an “environmental improvement” in the City.
 - e) meeting all or any part of the cost of the doing by the City in its area of anything which facilitates the implementation of the Mayor’s Transport Strategy, being specified in that strategy as a purpose for which a surplus can be applied; and
 - f) making contributions to other authorities, i.e. the other London Borough Councils and Transport for London, towards the cost of their doing things upon which the City in its area could incur expenditure upon under (a)-(e) above.
3. In the various tables of this report, figures in brackets indicate expenditure, reductions in income or increased expenditure.

2021/22 Outturn

4. The overall financial position for the On-Street Parking Reserve in 2021/22 is summarised below:

	£m
Surplus Balance brought forward at 1st April 2021	47.125
Surplus arising during 2021/22	10.699
Expenditure financed during the year	(6.172)
Funds remaining at 31st March 2022, wholly allocated towards funding future projects	51.652

5. Total expenditure of £6.172m in 2021/22 was financed from the On-Street Parking Reserve, covering the following approved projects:

Revenue/SRP Expenditure:	£000
Highway Resurfacing, Maintenance & Enhancements	(2,029)
Barbican Podium Waterproofing - Phase 2	(744)
Off-Street Car Parking Contribution from Reserves	(688)
Concessionary Fares & Taxi Card Scheme	(442)
West Smithfield Area Public Realm & Transportation	(286)
Climate Action Strategy – Pedestrian Priority	(171)
Bank Junction Improvements (All Change at Bank)	(120)
City Streets COVID 19 – Phase 3	(92)
St Paul's Gyratory	(63)
Climate Action Strategy – Cool Streets & Greening	(53)
Cleaning Maintenance Lord Mayors Show	(46)
Aldgate Maintenance for Open Spaces	(40)
COVID Response	(25)
Dominant House Footbridge – Future Options	(19)
Special Needs Transport	(11)
City Wayfinding Signage/Legible London	(11)
Minories Car Park – Structural Building Report	(6)
London Wall Car Park Waterproofing and Repairs	(2)
Traffic Enforcement CCTV	(1)
Total Revenue/SRP Expenditure	(4,849)
Capital Expenditure:	
Baynard House Fire Safety	(621)
Bank Junction Improvements (All Change at Bank)	(411)
Climate Action Strategy – Pedestrian Priority	(138)
City Wayfinding Signage/Legible London	(77)
Bank Junction Interim Safety Scheme	(22)
Holborn Viaduct & Snow Hill Pipe-Subways	(15)
Street Lighting Project/Strategy	(13)
HVM Security Programme	(13)
Climate Action Strategy – Cool Streets & Greening	(12)
Traffic Enforcement CCTV	(1)
Total Capital Expenditure	(1,323)
Total Expenditure Funded in 2021/22	(6,172)

6. The surplus on the On-Street Parking Reserve brought forward from 2020/21 was £47.125m. After expenditure of £6.172m funded in 2021/22, a surplus balance of £4.527m was carried forward to future years to give a closing balance at 31st March 2022 of £51.652m.
7. Currently total expenditure of some £97.8m is planned over the medium term from 2022/23 until 2026/27 (as detailed in Table 1), by which time it is anticipated that the existing surplus plus those estimated for future years will be fully utilised.
8. The total programme covers numerous major capital schemes including funding towards the Barbican Podium Waterproofing; Bank Junction Improvements (All Change at Bank); Climate Action Strategy Cool Streets & Greening and Pedestrian Priority; Holborn Viaduct & Snow Hill Pipe-Subways Repairs; Baynard House Fire Safety; Traffic Enforcement CCTV; Minories Car Park Structural Building Report; West Smithfield Area Public Realm & Transportation Project; St Paul's Gyratory; Dominant House Footbridge Repairs; London Wall Car Park Waterproofing, Joint Replacement & Concrete Repairs; Fire Safety at the Car Parks; Lindsey Street Bridge Strengthening; and Beech Street. The progression of each individual scheme is, of course, subject to the City's normal evaluation criteria and Standing Orders.
9. The programme also covers ongoing funding of future revenue projects, the main ones being Highway Resurfacing, Enhancements & Road Maintenance Projects; Concessionary Fares & Taxi Cards; Traffic Review Order; Contributions to the Costs of Off-Street Car Parks; Special Needs Transport; Cleansing Maintenance for the Lord Mayors Show; and Annual Maintenance of Aldgate
10. In addition to the currently agreed allocations of On-Street Parking surplus monies, a newly formed Priorities Board chaired by the Town Clerk will review all future new eligible bids for surplus funds before recommending successful bids to Members of Resource Allocation Sub Committee for decision. This new mechanism has been designed to ensure surplus monies are allocated to eligible projects in an efficient and speedy process to meet spending priorities.
11. A forecast summary of income and expenditure arising on the On-Street Parking Account and the corresponding contribution from or to the On-Street Parking surplus, over the medium-term financial planning period, is shown below:

Table 1 On-Street Parking Account Reserve Projections 2021/22 to 2026/27	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	Total
	Actual £m	Forecast £m	Forecast £m	Forecast £m	Forecast £m	Forecast £m	£m
Income	14.5	13.6	12.6	13.0	13.5	13.8	81.0
Expenditure (<i>Note 1</i>)	(3.8)	(3.5)	(4.0)	(4.1)	(4.3)	(4.4)	(24.1)
Net Surplus arising in year	10.7	10.1	8.6	8.9	9.2	9.4	56.9
Capital, SRP and Revenue Commitments	(6.2)	(14.3)	(23.7)	(39.5)	(7.7)	(12.6)	(104.0)
Net in year contribution (from)/ to surplus	4.5	(4.2)	(15.1)	(30.6)	1.5	(3.2)	(47.1)
(Deficit) / Surplus cfwd at 1 st April	47.1	51.6	47.4	32.3	1.7	3.2	
(Deficit) / Surplus cfwd at 31st March	51.6	47.4	32.3	1.7	3.2	0.0	

Note 1: On-Street operating expenditure relates to direct staffing costs, current enforcement contractor costs, fees & services (covering pay by phone, postage, printing & legal), IT software costs for enforcement systems, provision for bad debts for on-street income and central support recharges.

12. A reduction in income is forecast from 2022/23 onwards for a number of years, mainly due to suspension of enforcement at Beech Street, ongoing long term works and changes to Bank Junction, future projections of motorist's compliance and CCTV enforcement suspension at Throgmorton Street. The suspension at Throgmorton Street is due to a major closure which is expected to continue until February 2024. Further savings from operation and enforcement costs on the new parking contracts awarded from 1st April 2022 have been phased into future expenditure projections.

Conclusion

13. So that we can meet our requirements under the Road Traffic Regulation Act 1984 (as amended), we ask that the Court of Common Council notes the contents of this report, which would then be submitted to the Mayor of London.

Background Papers

14. Road Traffic Regulations Act 1984; Road Traffic Act 1991; GLA Act 1999 sect 282.
15. Final Accounts 2021/22.

Appendix

Appendix 1 – Non-Public Confidential Appendix of Proposed OSPR Schemes

Report author

Simon Owen

Chamberlain's Department

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Committee(s): Planning and Transportation Committee – For Information	Dated: 07/03/2023
Subject: P&T Member Training Programme	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	The planning system supports all outcomes of the Corporate Plan.
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Juliemma McLoughlin, Executive Director of Environment	For Information
Report author: Rob McNicol, Environment Department	

Summary

This report sets out a series of training opportunities for Members of the Planning and Transportation Committee to ensure members have access to the most up to date information on key aspects of the planning system and transportation issues. The training opportunities will be quarterly, recorded and circulated in advance, and delivered through a mixture of in-house and external expertise.

Recommendation(s)

Members are asked to:

- Example: Note the report.

Main Report

Background

1. During 2021, a programme of member training was undertaken covering the following topics:
 - Culture
 - Daylight and sunlight
 - Healthy streets

- Material planning considerations
 - Strategic views
 - Sustainability
 - The planning system
2. These sessions were delivered online and recorded; they remain available in the Member training SharePoint site (link available internally on request).
 3. Members have requested further training opportunities so that new issues can be explored and complex topics unpacked, to ensure continued high quality decision-making on strategic planning and transportation issues.

Proposals

4. It is proposed that training opportunities are run as a combination of pre-recorded videos and hybrid (in person and online) Q&A sessions. The Q&A sessions will be held on a broadly quarterly basis, on the morning of Planning and Transportation Committee meetings. The training videos will be sent a month in advance.
5. Training will be delivered by officers as well as through expertise from external partners who can provide additional specialist insight and advice.
6. It is proposed to cover the following topics over the coming two years:
 - 2023/24
 - Material planning considerations
 - Fire safety
 - Daylight and sunlight
 - Whole lifecycle carbon and sustainability
 - The legal framework for planning following the Levelling Up, Regeneration and Planning Bill and wider changes to the planning system
 - 2024/25
 - Thermal comfort and wind modelling
 - Equality and inclusion in the built environment and public realm
 - Highways duties and transport modelling
 - Strategic views, heritage and tall buildings
 - Viability
7. The first Q&A will be organised for the day of the Planning and Transportation Committee in May 2023, with the training material sent out a month in advance.
8. As well as the training opportunities set out above, when policy approaches are developed for the City Plan, Transport Strategy, planning guidance or other documents that the City Corporation develops, members will have the opportunity to explore these with officers as part of the relevant committee and sub-committee meetings.

Corporate & Strategic Implications

Strategic implications – The Member training proposed will assist Members of the Planning and Transportation Committee in exercising their duties to implement the City Plan and Transport Strategy through decision making. These strategies are key to delivering the City of London Corporation's Corporate Plan as well as legislative obligations and national policy requirements.

Financial implications – Training will be provided by officers in-house alongside external expertise. From previous experience, external organisations are frequently willing to provide these services on a *pro bono* basis to the City Corporation.

Resource implications – The development of the training programme will require officer time. By limiting training to a quarterly basis, the resource implications should not unduly impede on the progress of key strategies and other workstreams.

Legal implications – None.

Risk implications – None.

Equalities implications – Training will include a session on equality and inclusion in the public realm and built environment.

Climate implications – Training will include a session exploring embodied carbon and wider sustainability objectives related to the planning system.

Security implications – None.

Conclusion

9. This paper outlines a proposed series of training opportunities for members of the Planning and Transportation Committee, covering a broad range of current and complex issues related to the work of the committee. Members are asked to note the report.

Appendices

- None

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PLANNING AND TRANSPORTATION COMMITTEE – OUTSTANDING ACTIONS

Item	Date	Action/ Responsible Officer	Progress Update and Date to be progressed/completed
1	6 March 2020 2 June 2020 23 June 2020 14 July 2020 8 Sept 2020 6 Oct 2020 27 Oct 2020 17 Nov 2020 15 Dec 2020 5 Jan 2021 26 Jan 2021 16 Feb 2021 24 Feb 2021 9 March 2021 30 March 2021 22 April 2021 12 May 2021 8 June 2021 29 June 2021 20 July 2021 7 Sept 2021 21 Sept 2021 26 Oct 2021 16 Nov 2021 14 Dec 2021 11 Jan 2022 1 Feb 2022 22 Feb 2022	<p style="text-align: center;"><u>Daylight/Sunlight – Alternative Guidelines</u></p> <p style="text-align: center;">Chief Planning Officer and Development Director</p> <p>A Member argued that the Committee should separate out the desire for Member training and the desire for alternative guidelines on daylight/sunlight and requested that a report be brought to Committee setting out how the City of London Corporation might go about creating alternative guidelines, including timescales, if Members were so minded and the legal implications of this.</p>	<p>UPDATE (10 January 2023) – see action 1a)</p> <p>The new BRE guidance for daylight/sunlight was published in June 2022 which Officers are reviewing. A report will be brought back to Committee in 2023 to set out options for producing a new advice note/guidance for the City.</p>

1a)	5 March 2020 30 March 2021 22 April 2021 12 May 2021 8 June 2021 29 June 2021 20 July 2021 7 Sept 2021 21 Sept 2021 26 Oct 2021 16 Nov 2021 14 Dec 2021 11 Jan 2022 1 Feb 2022 22 Feb 2022 26 April 2022 17 May 2022 7 June 2022 1 July 2022 19 July 2022 20 Sept 2022 11 Oct 2022 1 Nov 2022	<p style="text-align: center;"><u>Radiance Studies</u></p> <p style="text-align: center;">Chief Planning Officer and Development Director</p> <p>A Member referred to a training session that had taken place for the Committee earlier this morning, and in which a consultant had expressed a view that radiance studies were the best way for laymen to assess the impact of developments on daylight where there was a genuine concern about this issue. The consultant felt that, in appropriate cases, the applicant should be asked to provide a radiance study.</p> <p>In view of this, the Member asked Officers to undertake, when future applications were received in which daylight will be an issue, to ask the applicant to prepare a radiance study to be provided to this Committee so that Members could make an informed assessment of the issue.</p>	<p>UPDATE (10 January 2023) - The Chief Planning Officer and Development</p> <p>Radiance assessments continue to be requested and submitted with planning applications. An update on the use of this methodology will be incorporated into the abovementioned report to Committee setting out options for a new advice note/guidance.</p>
2	17 Nov 2020 15 Dec 2020 5 Jan 2021 26 Jan 2021 16 Feb 2021 24 Feb 2021 9 March 2021 30 March 2021 22 April 2021 12 May 2021	<p style="text-align: center;"><u>Member Training</u></p> <p style="text-align: center;">Chief Planning Officer and Development Director / Director of the Built Environment</p> <p>A Member questioned whether there would be further training provided on Daylight/Sunlight and other relevant planning matters going forward. She stated that she was aware that other local</p>	<p>UPDATE: (10 January 2023):</p> <p>New Committee Members are provided with training on key aspects. A programme of wider Member training will be implemented in 2023.</p>

	8 June 2021 29 June 2021 20 July 2021 7 Sept 2021 21 Sept 2021 26 Oct 2021 16 Nov 2021 14 Dec 2021 11 Jan 2022 1 Feb 2022 22 Feb 2022 26 April 2022 17 May 2022 7 June 2022 1 July 2022 19 July 2022 20 Sept 2022 11 Oct 2022 1 Nov 2022	<p>authorities offered more extensive training and induction for Planning Committee members and also requested that those sitting on the Planning Committee signed dispensations stating that they had received adequate training.</p> <p>The Chair asked that the relevant Chief Officers consider how best to take this forward. He also highlighted that the request from the Town Clerk to all Ward Deputies seeking their nominations on to Ward Committees states that Members of the Planning & Transportation Committee are expected to undertake regular training.</p>	
3.	11 Jan 2022 1 Feb 2022 22 Feb 2022 26 April 2022 17 May 2022 7 June 2022 1 July 2022 19 July 2022 20 Sept 2022 11 Oct 2022 1 Nov 2022	<p><u>Sustainability SPD</u></p> <p>Chief Planning Officer and Development Director</p> <p>A Member questioned whether the production of a Sustainability SPD could feature on the list of outstanding actions.</p> <p>The Chief Planning Officer and Development Director stated that he would be liaising with his sustainability officers to provide a more targeted timeline around the production of the Sustainability SPD and agreed to include this information in the list of outstanding actions.</p>	<p>UPDATE 10 January 2023:</p> <p>The Sustainability SPD is being developed and will be brought to the Committee in March 2023, before public consultation.</p>

4.	22 Feb 2022 26 April 2022 17 May 2022 7 June 2022 1 July 2022 19 July 2022 20 Sept 2022 11 Oct 2022 1 Nov 2022	<p><u>Update to Statement of Community Involvement</u></p> <p>Chief Planning Officer and Development Director</p> <p>The Chief Planning Officer agreed that now would be an appropriate time to fundamentally review the DBE Users Panel and look again at how best to engage with all stakeholders given that DBE no longer existed as a department with a new, wider Environment Department with a wider remit now established. He reported that work on this was already being undertaken at present and that a key element of this would be a review of the Statement of Community Involvement. It was hoped that Officers would be in a position to report back to Committee on this in Autumn 2022 as to future options around receiving feedback about how engagement with various stakeholders could be improved.</p>	<p>UPDATE 10 January 2023:</p> <p>The draft new Statement of Community Involvement has been approved by this committee and is currently out for public consultation. The consultation can be found here:</p> <p>https://www.cityoflondon.gov.uk/services/planning/planning-policy/other-planning-policy-documents</p>

STREETS AND WALKWAYS SUB (PLANNING AND TRANSPORTATION) COMMITTEE

Tuesday, 17 January 2023

Minutes of the meeting of the Streets and Walkways Sub (Planning and Transportation) Committee held at Committee Room 2 - 2nd Floor West Wing, Guildhall on Tuesday, 17 January 2023 at 1.45 pm

Present

Members:

Deputy Graham Packham (Chairman)
John Edwards (Deputy Chairman)
Deputy Shravan Joshi
Deputy Randall Anderson
Deputy Marianne Fredericks
Alderwoman Susan Pearson
Ian Seaton
Alderman Ian David Luder

Officers:

Ian Hughes	- Environment Department
Gillian Howard	- Environment Department
Kristian Turner	- Environment Department
Melanie Charalambous	- Environment Department
Clarisse Tavin	- Environment Department
Tom Noble	- Environment Department
Michelle Ross	- Environment Department
Samantha Tharme	- Environment Department
Emmanuel Ojugo	- Environment Department
Bruce McVean	- Environment Department
Giles Radford	- Environment Department
Jayne Moore	- Town Clerk's Department
Olumayowa Obisesan	- Environment Department
Maria Herrera	- Environment Department
Daniel Laybourn	- Environment Department
Mark Lowman	- City Surveyor
Zoe Lewis	- Town Clerk's Department

1. **APOLOGIES FOR ABSENCE**

Apologies were received from Judith Pleasance and Oliver Sells KC.
Paul Martinelli observed the meeting via video-conferencing facilities.

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

There were no declarations.

3. **MINUTES**

RESOLVED, That the public minutes of the meeting of 08 November 2022 be approved as an accurate record of the proceedings subject to the following change to the minutes in respect of item 6:

from

“The meeting heard that there were a few playgrounds in the City already.”

to:

“The meeting noted that there was a single playground in the City.”

4. **40 LEADENHALL STREET SECTION 278 HIGHWAY WORKS (INCLUDING DEFERRED WORKS FROM THE 52-54 LIME STREET S278), 10 FENCHURCH AVE S278 PROJECTS, AND 51 LIME ST S106 PUBLIC REALM ENHANCEMENTS**

The Committee considered the following reports together: *40 Leadenhall Street Section 278 highway works (including deferred works from the 52-54 Lime Street S278 and 10 Fenchurch Avenue S278 projects); and 51 Lime Street S106 public realm enhancements – outstanding work.*

A Member queried the £1.2M costings figure and asked whether there was money still to spend. The meeting heard that the initial figure was an estimate range and that the current more detailed estimate was robust. It was confirmed that no money was being returned to the developer at this time.

A Member asked why only a part of the pavement was being taken over (according to the plans submitted). The meeting heard that the amended land adoption was negotiated with the developer and that the developer was being charged under a commuted maintenance sum for its future maintenance, therefore there was no financial risk to the City under the current plans.

A Member asked whether there would be any discernible difference in the surface finishings of the roadway and/or footway either side of the lines shown on the plans. The meeting heard that different building materials were expected to be used, and there would be clear delineation between the two.

A Member asked for further information on the methodology used in drawing up the table on p.25 of the main agenda pack to be submitted to the Grand Committee and to the forthcoming awayday.

A Member asked whether a cleansing arrangement could be agreed with a building owner/developer (particularly for cleaning up when people have been unwell on private land), noting the difficulties of asking the building's owner to maintain and cleanse the area. The meeting noted that such arrangements and requests presented a challenge, and that discussions were ongoing and needed to take into account elements of privately-owned infrastructure (such as rising bollards). The Committee noted that a Late Night Levy was already in place in respect of licensed premises.

RESOLVED, That the Committee

1. Note and approve the contents of the reports and the intention to complete outstanding works;
2. Approve an increase in the approved budget of £995,111 (an increase of £895,111, excluding costed risk and commuted maintenance) to reach Gateway 6;
3. Approve the Risk Register in Appendix 2 and the requested Costed Risk Provision of £190,000, and approve delegation to the Executive Director Environment to authorise the drawdown of funds from this register;
4. Note the Commuted Maintenance sum of £47,135;
5. Note the revised total project cost of £1,232,246 inclusive of costed risk and commuted maintenance; 52-54 Lime Street and 10 Fenchurch Avenue S278 projects;
6. Approve that the previously approved works from 52-54 Lime Street and 10 Fenchurch Avenue projects which were deferred (as shown in Appendix 4 and 5 respectively) will be delivered using their existing funding alongside the improvements around 40 Leadenhall Street;
7. Approve the budget adjustment for the 10 Fenchurch Avenue S278 project as shown in Appendix 6;
8. Note that the associated remaining budget is sufficient to complete the 52-54 Lime Street S278 work; and
9. Approve the additional tree-planting and budget adjustment in respect of 51 Lime St as set out in Appendix 1 to the 51 Lime St report to enable the works to proceed.

5. **100 MINORIES PHASE TWO: PUBLIC REALM ENHANCEMENTS**

The Committee considered the report of the Executive Director, Environment.

A Member asked for further clarification on the permeable paving (that comprises resin/rubber material) to be used that allows some rainwater to pass directly into the ground, thereby reducing storm water flow into sewers. The meeting heard that the paving would be bound gravel that was currently being tested at Cheapside and Bevis Marks, noting that the associated additional maintenance costs had been factored in. A Member commented on the potential for that material to be hazardous in wet and cold weather.

RESOLVED, That the Committee

1. Approve the additional budget of £49,500 to reach Gateway 5 – Authority to Start Work, funded from S106 receipts as detailed in Appendix 2;
2. Approve the revised total estimated cost range (excluding risk) of £900,00 - £1,150,000, with the additional costs to be funded from S106 receipts, as detailed in Appendix 2;
3. Delegate approval of Costed Risk Provision to Chief Officer if one is sought at Gateway 5; and
4. Approve the statutory consultation on proposed traffic management changes as set out in Appendix 6.

6. **CANNON STREET PEDESTRIAN CROSSING - BSCU**

The Committee considered the report of the Executive Director, Environment.

RESOLVED, That the Committee

1. Authorise officers to negotiate and enter into a S278 agreement with TfL, to implement the proposal as detailed in the report, noting that all costs associated with the project will be fully funded by TfL and noting also that this authority must be given by the Streets and Walkways Sub-committee and that all other requested decisions (below) be delegated to the Director of City Operations Division:

Decisions Delegated to Director of City Operations Division:

2. Agree the proposal as detailed in this report;
3. Approve a budget of £175,000 to reach the next Gateway;
4. Note the total estimated cost of the project as £175,000 (excluding risk). All costs associated with this project are to be fully funded by TfL; and
5. Approve a Costed Risk Provision of £15,000 for works (to be drawn down via delegation to the Director of City Operations Division).

7. **CITY GREENING AND BIODIVERSITY - PHASE 3 OF THE COOL STREETS AND GREENING PROGRAMME**

The Committee considered the report of the Executive Director, Environment.

RESOLVED, That the Committee

1. Approve the proposals for re-landscaping and re-planting strategically located sites in the City to reach Gateway 5 as described in the report;
2. Approve the additional budget of £95,000 for design development of the re-landscaping and re-planting proposals to reach the next Gateway, funded from the On Street Parking Reserve (OSPR) Climate Action Strategy funding agreed for the Cool Streets and Greening programme;
3. Note that the tree-planting proposals have already been approved at Gateway 5 at a total estimated cost of £755,000 (excluding risk) and are to be implemented across the next two planting seasons; and

4. Note the total estimated cost of the project (Phase 3) at £2.5m (excluding risk).

8. **CITY CLUSTER VISION - WELL-BEING & CLIMATE CHANGE RESILIENCE PROGRAMME: JUBILEE GARDENS IMPROVEMENTS**

The Committee considered the report of the Executive Director, Environment.

RESOLVED, That the Committee

1. Agree authorisation to implement the Jubilee Gardens relandscaping works as set out in Appendix 3;
2. Approve an increase in the project budget of £80,000 to a total cost of £680,000 (excluding risk) to be funded from 60-70 St Mary Axe (S106), 40 Leadenhall Street (S106 LCEIW), Cool Streets & Greening Programme (OSPR) - funding breakdown is set out in Appendix 5;
3. Approve a Costed Risk Provision of £95,000 (to be drawn down via delegation to Chief Officer) funded by 40 Leadenhall Street (S106 LCEIW), taking the total budget (including risk) to £775,000;
4. Agree that the Comptroller and City Solicitors Department are permitted to finalise all necessary legal agreement amendments to facilitate the implementation of relandscaping works to Jubilee Gardens; and
5. Delegate authority to the Executive Director of Environment and Chamberlain to adjust the project budget between staff costs, fees and works, provided the overall budget is not exceeded beyond standard tolerances (inclusive of interest accrued to date).

9. **DOCKLESS CYCLES POLICY AND LEGAL POWERS UPDATE**

The Committee considered the report of the Executive Director, Environment.

The Committee noted that a co-ordinated penalty arrangement was desirable to deal with misuse of bikes, noting also the relative paucity of parking spaces in the west part of the City. The Committee heard that bike parking provision was to be improved.

Noting the disparity in operators' performance and the recommendation to extend Lime's review period in the light of that, the Committee discussed means of enforcement and the following points were made:

- Bikes (and e-scooters) tend to fall over when parked
- It is incumbent on operators to ensure that bikes are parked safely, particularly in respect of pavement-users with disabilities and those using wheelchairs and buggies
- Operators already fine users who do not park the bikes properly, though some users appear to be indifferent to these charges
- Approaches vary across neighbouring boroughs on enforcement, and it would be resource-intensive to co-ordinate any such measure
- There is scope for enhancing sanctions for misuse, and it would be desirable for the Corporation to work constructively with operators on the issue.

RESOLVED, That the Committee

1. Agree to continue to approve dockless cycle hire operators in the City, renewing HumanForest's status and extending the review period on Lime's approval status until May 2023 (Option 2, paragraphs 39 to 45); and
2. Delegate powers relating to changes to the structure of voluntary financial contributions from dockless cycle hire operators to the Executive Director Environment in consultation with the Chairmen and Deputy Chairmen of the Planning & Transportation Committee and the Streets & Walkways Sub-Committee.

10. FLEET STREET AREA HEALTHY STREETS PLAN

The Committee considered the report of the Executive Director, Environment.

RESOLVED, That the Committee

1. Approve that the budget be increased by £35,000 to £276,254 (excluding risk) as set out in Appendix 3, following the receipt of the funding from the Fleet Street Quarter BID;
2. Note the total estimated cost of the project at £276,254 (excluding risk);
3. Approve the draft Healthy Streets plan for public consultation; and
4. Delegate authority to the Director of City Operations, in consultation with the Chairman of the Streets and Walkways Sub-Committee, to approve the (non-statutory) public consultation content and then proceed with the consultation.

11. MUSEUM OF LONDON S278 PROJECT

The Committee considered the report of the Executive Director, Environment.

RESOLVED, That the Committee

1. Approve a budget of £100,000 to reach the next Gateway, when received from the developer;
2. Note the total estimated cost of the project at £5-£10M (excluding risk) at this preliminary stage;
3. Authorise officers to enter into a Section 278 agreement with the developer at the appropriate time; and
4. Delegate authority to the Chief Officer, in consultation with the Chamberlain, to increase and/or adjust the project budget for the Design and Evaluation phase if - following initial Design and Evaluation work - further investigation is deemed necessary to complete the phase (to be carried out at the Developer's cost).

12. VISION ZERO PLAN 2023 - 2028

The Committee considered the report of the Executive Director, Environment.

The Committee considered the report of the Executive Director, Environment.

A discussion ensued, during which the following points were made:

- Focus should be concentrated going forward on safe behaviours – approximately 50% of City accidents are caused by inattention, there are a significant minority of cyclists who flout the highway code and pedestrians who put themselves and others at risk by using their smart phones when crossing busy streets.
- A commitment to eliminate KSIs by 2040 is unachievable – this is an admirable aspiration which should be maintained - but we should not be committing to outcomes that we know are unrealistic.
- Proper enforcement of existing speed limits is critical, otherwise the benefit of recent reductions to 20mph is reduced;
- Lower speeds reduce the incidence of serious injury in the event of a collision;
- Consistent speed limits across boroughs would be welcome;
- A cyclist could reasonably expect to travel at 15mph so if the speed limit was reduced to 15mph, cyclists would feel safer and this would encourage cycling;
- Speed-limiting devices are currently fitted to about a third of TfL buses travelling through the City;
- It is important for the City to continue to be accessible to vehicles, particularly for those servicing our businesses;
- Further low-tech measures including pedestrian refuges which help traffic-calming are worth considering; and
- There are fewer pedestrian barriers and more dropped kerbs in the City than there used to be, which has altered the pedestrian environment.

A Member disagreed with elements of the draft Plan, noting the change of classification of serious injury and the cumulative effect to the City of the action points, including speed reductions that could negatively impact vehicle movement.

A Member asked whether evidence was available to support a reduction from 20mph to 15mph. The Committee heard that such figures were not currently available and heard that research strongly suggested that speed reductions reduced injuries. The Committee asked for further data on the impact of a reduction from 20mph to 15mph.

RESOLVED, That the Committee agree with the recommendation to progress the draft Vision Zero Plan to the Police Authority Board and to the Planning & Transportation Committee for further consideration, noting the points made above.

13. SPECIAL EVENTS ON THE HIGHWAY

The Committee considered the report of the Executive Director, Environment.

A Member commented that Sunday closures were likely to impact on congregations attending places of worship. The meeting heard that the matter had been taken into consideration, particularly in respect of the impact of event closures on the churches of St Bride's and St Magnus-the-Martyr (among others).

On the Sports Strategy (paragraph 22) a Member expressed concern that any consultation appeared more formal in nature than was actually the case. The meeting heard that the view would be fed back to the forum, and that formal engagement was desirable.

On appendix 4, a Member queried the accuracy of the parking suspension figures in respect of the St Matthew's Day Parade of 06 October 2022, noting that a corrected version would be circulated within the next week.

The meeting heard that Destination City had recently proposed a reconstituted St Bartholomew's Fair in September 2023.

RESOLVED, That the Committee

1. Agree to support the regular core events programme listed in paragraph 7 and detailed in Appendix 1;
2. Agree to support the additional one-off events outlined in paragraphs 14-22, subject to final assessment regarding safety, licencing, traffic orders (where required) and impact on local stakeholders; and
3. Note the benefits in kind listed in Appendix 4, subject to a correction of the error shown in respect of parking suspension figures against the event of 06 October 2022.

14. OUTSTANDING REFERENCES

The Committee noted the report of the Clerk.

TfL London Bridge Experimental Scheme: A response to the consultation has now been provided, and the item has been removed from the list.

15. TRAFFIC ORDER REVIEW - PHASE 2 UPDATE

The Committee considered the report of the Executive Director, Environment.

A Member sought clarification on the status of Bishopsgate as part of the review.

The meeting heard that Bishopsgate was part of the TfL network, and that no information had yet been provided by TfL on the status of Bishopsgate as part of TfL's Traffic Orders. Recommendations based on that information could be submitted to the Committee once that information had been provided. The

previously-agreed experimental scheme at Bishopsgate would not be covered by the review as such a scheme is subject to review by its nature.

Referencing paragraphs 13 and 14, a Member noted the resources dedicated to the exercise so far, commenting on the benefit of collating the information contained in the report.

A Member suggested that a note be written to Members outlining the current report contents offering the option of accessing the report submitted to this Committee in order to give Common Councillors the opportunity to properly scrutinise the report.

The Committee noted that the report was expected to be submitted to the Planning & Transportation Committee in March 2023, and then to the Court of Common Council.

RESOLVED, That the Committee

1. Agree the scoring against Transport Strategy outcomes for each category of traffic order, as detailed in Appendix 1;
2. Note the outcome of the Stage 2a desktop review, which has ranked all TMOs and measures as detailed in Appendix 2; and
3. Agree to progress the 75 highest-ranking TMOs and measures for further investigation during Stage 2b, as outlined in paragraph 12 and highlighted in Appendix 2.

16. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE

Referencing Moor Lane environmental enhancements considered by the Committee in July 2022, a Member commented that the scheme may not have been considered in its entirety, expressing concerns around the delays (to September 2023) and asking whether the west side of the street would be completed. The Member sought clarification on whether a small area had been taken out of scope.

The Committee noted that the process had been ongoing since at least 2012, and that any further consultation might benefit from being more user-friendly.

The Committee heard that communication on delays with the developer was ongoing, and that the Corporation had no control over those delays. A further report was expected to be submitted to the Committee on the scheme during the first half of 2023 that would take into account the feedback received, and the aim was to ensure that all the work ran concurrently to reduce disruption.

A Member asked who was meeting the costs of these delays, noting that a firm line should be taken on asking for developer funding if the developer was the cause of the delay. The meeting heard that the developer was funding all east-side works and that the current agreement did not provide for developer funding of delays to the west-side works, noting that the cost of the west-side works still fell within the budget envelope due to changes made to the programme, though there were other reasons for the delay.

On the bus review, a Member asked whether a view had been expressed on the number 11 bus, noting that the local MP was running a campaign to keep it going. The meeting heard that a consultation had taken place, and that no view had formally been taken beyond that noting also that a different route was being re-named to 11.

17. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

A question was asked by a Member on the process around the proposed closure of West Smithfield Road, noting the disruption that such a closure would cause. The Member asked whether the correct consultation procedure had been followed.

The meeting noted that temporary traffic orders to facilitate temporary works (that can last up to 18 months) are governed by a different process to the one that governs permanent or experimental traffic orders. Temporary orders are required to be advertised in the press (once their suitability, impact and appropriateness has been considered), and the City of London also usually issues local notices though that is not a requirement. The standard process requires the developer (the applicant) to undertake local engagement with affected stakeholders. The City heard that surrounding streets would be kept open to facilitate movement through the area, and that recent restrictions nearby would not affect the Smithfield area.

A Member sought clarification on the status of Giltspur St, and the meeting heard that Giltspur St was part of the 'ring of steel' and that changes in the area were likely to involve further security infrastructure.

The meeting heard that further (and permanent) road-strengthening, waterproofing and road-rebuilding work was required. Two meetings with the Smithfield Market Tenants' Association on the issue took place during the final quarter of 2022 during which it had become clear that the original 12-week closure was likely to be extended, though it appeared likely that a single carriageway could be open in May 2023 assuming a road closure as of mid-January 2023.

A Member noted that road closure details and maps were helpful, noting that the website updates were now available at [Road closures - City of London](#), and that work was ongoing to make a live map available.

18. EXCLUSION OF THE PUBLIC

The Committee agreed to exclude the public from the Non-Public part of the meeting in line with Section 100A(4) of the Local Government Act 1972.

19. NON-PUBLIC MINUTES

The Committee considered the non-public minutes of the meeting of 08 November 2022.

20. REPORT OF ACTION TAKEN

The Committee received the report of the Clerk.

21. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**
22. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE SUB COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

The meeting ended at 4.10 pm

Chairman

Contact Officer: Jayne Moore
Jayne.Moore@cityoflondon.gov.uk

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PLANNING APPLICATIONS SUB-COMMITTEE **Tuesday, 22 November 2022**

Minutes of the meeting of the Planning Applications Sub-Committee held at Livery Hall - Guildhall on Tuesday, 22 November 2022 at 10.30 am

Present

Members:

Deputy Shravan Joshi (Chairman)
Deputy Alastair Moss (Deputy Chairman)
Brendan Barns
Ian Bishop-Laggett
Deputy Michael Cassidy
John Edwards
Deputy John Fletcher
Deputy Marianne Fredericks
Jaspreet Hodgson
Alderman Bronek Masojada
Deputy Brian Mooney
Deborah Oliver
Deputy Graham Packham
Ian Seaton
Alethea Silk
William Upton KC

Officers:

Gemma Stokley	- Town Clerk's Department
Tim Fletcher	- Media Officer
Fleur Francis	- Comptroller and City Solicitor's Department
Gemma Delves	- Planning and Development Director
Gwyn Richards	- Director, Environment Department
Juliemma McLoughlin	- Environment Department
David Horkan	- Environment Department
Rob McNicol	- Environment Department
Gwyn Richards	- Environment Department
Tom Nancollas	- Environment Department
Iain Steele	- Environment Department
Robin Whitehouse	- Environment Department

Also In attendance:

Ben Sturdy – West Smithfield resident
Sharon Ament – Director, Museum of London
Paul Williams – Principal Director, Stanton William Architects

1. APOLOGIES

Apologies for absence were received from Deputy Randall Anderson, Emily Benn, Deputy Keith Bottomley, Anthony Fitzpatrick, Martha Grekos, Alderman

and Sheriff King, Deputy Edward Lord, Deputy Natasha Lloyd-Owen, Alderman Ian Luder, Alderwoman Susan Pearson, Judith Pleasance, Deputy Henry Pollard, Shailendra Umrada and Alderman Sir David Wootton.

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

The Town Clerk reported that the vast majority of apologies reported today (for Deputy Randall Anderson, Deputy Keith Bottomley, Martha Grekos, Deputy Edward Lord, Alderman Ian Luder, Judith Pleasance and Alderman Sir David Wootton) had been received in light of the required separation of functions between an authority in its capacity as an applicant for planning permission, and an authority in its capacity as local planning authority. She reported that the City's Capital Buildings Board and the Museum of London Board had responsibility for promoting the proposals that were the subject of the application to be considered today. Therefore, Members of those Boards (as those listed above were) should not, if also on this Sub-Committee, participate in the decision on this matter and had recused themselves for this reason.

3. MINUTES

The Sub-Committee received the public minutes of the Planning and Transportation Committee meeting held on 1 November 2022.

The Chairman highlighted that, as these were minutes of the Grand Committee, they would be officially signed off by the next meeting of that scheduled for 10 January 2023 but were here today for information.

MATTERS ARISING

CRIPPLEGATE HOUSE 1 GOLDEN LANE LONDON EC1Y 0RR (pages 7-29) –

A Member questioned why the comment made as to etiquette and the conduct of debate at the last meeting had not been minuted. The Chairman highlighted that this had also been raised in advance by another Member via email. He highlighted that the purpose of the minutes was to record matters that were pertinent to or impacted upon the decision reached and that they were not designed to be a verbatim record of the meeting. However, he stated that if the Committee were of the strong opinion that this comment ought to also be articulated in the minutes then he was happy to discuss this and the appropriate form of wording for this. The Member commented that she was of the view that, in this instance, the comment ought to feature.

At the invitation of the Chairman, the Town Clerk highlighted that the entirety of the public session of the last meeting had been recorded and was therefore available on the City's webpages.

Some Members made the general point that the minutes of these meetings ought to be reduced as opposed to expanded further given that they were already 35 pages long in this particular instance.

22 Bishopsgate (page 7) – In response to a question regarding the trees at 22 Bishopsgate, the Planning and Development Director reported that he had been made aware that the trees that were part of the approved scheme here had unfortunately and, quite unusually, failed. He added that the original

landscape architects were now undertaking a very detailed assessment as to the reasons for the failure which would precede the replanting of the trees in this location.

RECEIVED.

4. POULTRY MARKET AND GENERAL MARKET AND THE ANNEXE BUILDINGS WEST SMITHFIELD LONDON EC1A 9PS

The Sub-Committee considered a report of the Planning and Development Director regarding the Poultry Market And General Market And The Annexe Buildings West Smithfield London EC1A 9PS, specifically:

General Market

Partial demolition, repair, refurbishment and extension of the existing building known as the General Market at 43 Farringdon Street on the basement, ground, first and roof levels; creation of a new entrance structure on West Poultry Avenue (and associated refurbishment of the existing canopy over West Poultry Avenue) with new facades to West Smithfield and Charterhouse Street; new entrances on the corner of Farringdon Street and Charterhouse Street; Change of use to provide a museum and ancillary uses and areas, together with a flexible retail, restaurant, drinking establishment and leisure (gym) use for the perimeter 'houses'.

Poultry Market

Partial demolition, repair, refurbishment and alteration of the existing building known as the Poultry Market, Charterhouse Street at basement, ground and first levels; change of use to a museum and ancillary uses and areas.

Annexe Site (Red House, Iron Mountain, Fish Market and Engine House)

Partial demolition, refurbishment and extension of the existing buildings known as the Annexe Site at 25 Snow Hill and 29 Smithfield Street at basement, ground, first, second and third levels; creation of a triple height canopy above a public realm space; change of use to a flexible museum, offices, retail, restaurant, drinking establishment, events and functions use. Refurbishment of and minor alterations to the existing building known as the Engine House at West Smithfield at basement and ground levels; Change of use to a flexible retail and museum use. (The proposal would provide 32,864sq.m of Museum floorspace (Class D1), 4,079 sq.m of flexible A1/A2/A3/A4/B1/D1 & D2 floorspace, 2,377sq.m of flexible B1/D1 floorspace, 870sq.m of flexible A3/A4/D1 & D2 floorspace, 18sq.m of flexible A1/D1 floorspace and 82sq.m of flexible A1/A3/A4/D1 floorspace.)

The Town Clerk introduced the item stating that both this and the related Listed Building Consent report at Agenda Item 5 would be considered in tandem. She added that, in addition to the agenda pack, Members would have also received a copy of the Officer presentation slides and an addendum.

Officers presented the application, underlining that it related to the western most buildings of the Smithfield Market complex and that, of note, were the operational East and West markets directly to the east of the site which, as a whole, comprised the General Market, East and West Poultry Avenue, the Poultry Market and the Annexe site. Members were reminded that the site was situated within the Smithfield Conservation Area and that the Poultry Market was in operation in

market use with the General Market and Annexe sites now vacant as had been the case for a number of years.

The Sub-Committee were shown an aerial-view image of the site taken in 2019. It was reported that, at present, the General Market and Annexe site had hoardings and scaffolding around them as repair and restoration works were being undertaken here. As the report indicated, some of the works had planning permission and some were permitted development. An aerial view image of the proposed scheme was shared depicting the conversion of the General Market and Poultry Market to a new site for the Museum of London. It was proposed that the two buildings would be joined by an enclosure along West Poultry Avenue. The Annexe site would be refurbished, repaired and extended and converted to flexible retail, leisure and office uses. Officers commented that many would already be familiar with the site and scheme set out here given that it was considered by the Planning and Transportation Committee in 2020 when Members resolved to grant planning permission and listed building consent. However, due to the delays around obtaining vacant possession of the Poultry Market and issues around the Museum obtaining an interest in the site, the decision was never issued. The scheme was now therefore brought back to Members with the application documentation updated to reflect changes in policy and material considerations since the scheme was last considered – most notably, the adoption of the London Plan. It was reported that the Museum had also taken this time to refine the design of the scheme and some minor design revisions were now proposed. That being said, the scheme still remained fundamentally the same as that considered in 2020.

Officers took the Sub-Committee through an overview of the scheme. Ground floor plans were shown which showed that the new museum had a number of entrances making for a permeable and accessible ground floor plane. The primary entrances would be via the new West Poultry Avenue enclosure, with secondary entrances on Harts Corner, West Smithfield and East Poultry Avenue. The General Market would be serviced via the existing ramp on Snow Hill, with some secondary servicing being undertaken from Charterhouse Street. The Poultry Market would be serviced via the existing loading bay on the north side of the site and the Annexe site would be serviced on-street. A package of 278 works would be needed in conjunction with the scheme to make it acceptable in Highway terms – Officers clarified that this would include works such as footway widening, the provision of coach drop offs and alterations to loading bays. It was reported that the scheme had been designed to function alongside a working market on the basis that the Museum would primarily function during the day, and the market would operate overnight. The loading bays would therefore be available for the market to use overnight. It was reported that the Market Superintendent had reviewed the details and had confirmed that a feasible arrangement was being proposed.

Officers went on to refer to a letter of representation received from a local resident which raised concern as to the construction, the impacts of the proposal upon market traffic. It was highlighted that the temporary impacts of construction would be managed through a Construction Logistics Plan and an Environmental Management Plan which would be secured via condition.

The Committee were then told the details in respect of each building. Officers reported that the scheme was based on renewal, restoration and conservation of

as much of the existing fabric of the buildings as possible, although, inevitably, in bringing these buildings into modern use and up to modern standards, the proposals did result in some harm to the Poultry Market as a Grade II listed building and the Smithfield Conservation Area as well as designated heritage assets and also some harm to the significance of the General Market and parts of the Annexe site as non-designated heritage assets. That being said, the Committee papers conclude that the harm to this significance is decisively outweighed by the public benefits of the scheme.

Members were shown existing and proposed visuals of the General Market where floorplans depicted that the form of the buildings would be retained as part of the proposal. The former central market space would be used as gallery space and an engagement area with the 'houses' around the perimeter of the ground floor also retained and retained – some for museum use and some for commercial use as flexible retail, office or leisure uses. At basement level, more permanent gallery space would be provided in addition to some back of house facilities. At roof level, some flat roof areas would be created in order to enable the formation of a green roof to accommodate PV panels and roof plant. Although some greening would be provided on this part of the scheme, as a whole the scheme would not meet the 0.3 Urban Greening Factor requirement, but this was accepted given that the developer was working within the constraints of these historic buildings. Next, the Committee were shown images of the existing and proposed elevations, with Officers reporting that, at present, the site was made up of a relatively eclectic mix of shop fronts. Some shop fronts would be retained as part of the proposals with others replaced with new display windows inserted to showcase some of the Museum's collections. Officers reported that, as part of the 2022 updates to the proposal, some minor revisions had been made to these shopfronts. It was also highlighted that canopies would be added to the shop fronts as a unifying feature. Members were next shown some proposed visuals of the ground floor level where visitors would continue to be able to appreciate the domed roof alongside many of the historic features of the building which were to be retained. Of particular note here would be the reuse of the Lockhart's Cocoa Rooms. At basement level, the vaulted brick arches would be retained to showcase the Museum's collections and, of particular interest here, would be the insertion of a window at basement level so that visitors could view the trains running adjacent to this area.

With regard to the West Poultry Avenue enclosure, Officers reported that, in order to create this, West Poultry Avenue would need to be Stopped Up. Members were shown a proposed visual of the new entrance featuring an LED screen above this. As part of the permission, it would be recommended that an Access Management Plan is secured to secure access through this route even for those not visiting the Museum. The route would also be curated with Museum artefacts embedded within the floor – a unique offer for the City.

With regard to the Poultry Market, Officers acknowledged that the agenda papers set out that the scheme was contrary to Policy CS5 of the Local Plan which sought to support the continued presence of Smithfield Market. It was reported that there were some facilities within the Poultry Market which support the function of the East and West Markets such as waste storage and animal by-product facilities. These would all be relocated to ensure that the East and West Markets could continue to function, and this would be secured via a Grampian condition. A proposed ground floor plan of the Poultry Market showed that the site would be

used to accommodate the Museum's temporary gallery space which would be a very important part of the Museum's offer. On the north side of the site, the existing loading bay would be used for servicing, and, on the south, an education and schools' area would be created to enable the Museum to realise its aspiration of engaging with every school child in London. Long-stay cycle parking would be provided within the Poultry Market for the Poultry Market and General Market, and this would have its own separate entrance off of East Poultry Avenue. The proposed basement plans showed that the area would be used for stores and back of house areas. A new temporary gallery space would be introduced at first floor level with the area around the perimeter of this being used for research and back of house Museum functions. The ground floor of the Poultry Market (which sloped at present) would be removed and replaced by a flat ground floor level allowing for the insertion of the proposed first floor gallery space. The existing and proposed elevations of the building depicted that, overall, there was minimal intervention. The clear story glazing would be replaced in order to enable the building to be naturally ventilated. It would be secured by a condition stipulating that the replacement glazing was as closely matched as possible to the existing offering in terms of appearance. The Committee were informed that, as part of the 2022 design updates, some of the ground floor entrances had been rationalised to enable even more of the fabric of the existing building to be retained. Visuals of the proposal here illustrated how visitors would still get to appreciate the domed roof from the new first floor gallery space with Officers commenting that the domed roof was one of the most significant aspects of the listed building.

With reference to the Annexe site, Officers reported that this was currently made up of Horace Jones' Fish Market, the 1960's Iron Mountain storage facility, the Victorian Red House (a former cold store) and the Engine House. At basement level here, cycle parking would be provided with the Annexe converted for flexible retail, leisure and office uses. At ground floor, of particular note was the proposed removal of the Iron Mountain storage facility which would have a positive impact on the Smithfield Conservation Area given that it was of no architectural or historical importance. This would be replaced by a new, covered, public realm area. A new extension (a contemporary yet subservient addition to the building) was being proposed over the Red House in association with which new external terrace areas would be formed. The extension would be used for flexible office and leisure use. Visuals of the proposed elevation showed that new windows would be inserted into the Red House façade which was considered to cause some harm on the Red House but it would be ensured that the windows and the detailing had the effect of minimising impact. Officers highlighted that, as part of the 2022 design revisions, some changes had been made to the ground floor of the Annexe site, again, in an attempt to try and retain as much of the existing historic fabric as possible. The lift overrun on the Engine House had also been increased in size slightly although it was proposed that this would be largely screened by greening.

With regard to the proposed public realm around the site, Officers reported that consideration had been given to thermal comfort, wind and daylight/sunlight and all of these had been considered acceptable.

To conclude, Officers stated that it was considered that this scheme represented a unique opportunity to regenerate and revitalise these historic buildings that sat within the Culture Mile. The scheme would also deliver a number of economic,

environmental and social benefits and it was recommended that the planning permission and listed building consent were granted.

The Town Clerk welcomed Mr Ben Sturdy, a West Smithfield resident, to the meeting and asked that he now address the Committee having registered a representation in opposition to the scheme.

Mr Sturdy clarified that his representation concerned a traffic management issue. He reported that work at the new Museum site was restricting Market loading bays causing intensive, illegal use of the double yellow lines along 4-8 West Smithfield by Market HGVs. He added that the partial collapse of East Poultry Avenue and pavement layout changes had already restricted Market loading bays. Post lockdown Christmas 2020 traffic management by the Market demonstrated that the double yellow issue was preventable but these enabling resources were only deployed for one month at this time. Mr Sturdy remarked that the Market Superintendent had called West Smithfield and East Poultry Avenue a 'pinch point' and had given him assurances that the double yellow lines would be dealt with by himself and his officers. However, their measures were unfortunately ignored by Market HGV and forklift drivers who had been verbally abusive and even threatened violence when asked not to use the double yellow lines. Mr Sturdy shared photographic images of the issue showing recent examples of sustained parking by market HGVs. Mr Sturdy also referred to a female traffic warden having been shouted at by a market officer and market HGV driver over a legitimate parking enforcement offence. He commented that the Parking Enforcement Office and local parking wardens had reported that they were now ordered by the Highways Department not to issue tickets to Market HGVs parking on these double yellow lines specifically contrary to the Department having written to him to state that parking on them for more than ten minutes was an offence if not unloading and that this should be for no longer than forty minutes at a time. Mr Sturdy reported that, currently, the double yellow lines were used in heavy rotation by Market HGVs to park and then unload with individual HGVs sometimes parking here for up to eight hours. He highlighted that the problem occurred from as early as 2-3pm, continuing until 6am Sunday – Thursday. He went on to state that 2-3 often parked on the lines simultaneously causing a serious pinch point of congestion. Since Market HGVs will also be parked in the legitimate loading bays opposite, manoeuvring was slowed causing further congestion. Mr Sturdy also referred to the fact that the aggregate noise, vibration and pollution from all of this was an extreme nuisance. He mentioned that parked Market HGVs frequently entered 'defrost' mode where the level of noise nuisance was equivalent to an HGV accelerating for a sustained period – something that was audible and frequently interrupted sleep even from his own double-glazed bedroom at the rear of the building. He described the situation as a breach of the Environmental Protection Act 1990. Mr Sturdy attested that, according to an official surveyor for Smithfield Market and an engineer that he had spoken with, the recent part-collapse of East Poultry Avenue tunnel and failure of parts of the glass canopy surrounding the central Market were caused by Market HGV vibrations. He went on to state that he suspected that these had also contributed to the collapse of the concrete ceiling tiles under the pedestrian bridge by Barbican Station. He added that the Victorian buildings alongside the double yellow lines in question were part of the Smithfield Conservation Area and not designed to deal with these stresses and reported that several cracks had begun to show in both the shopfront glass and pavement glass vault lights within his own building in recent years.

Mr Sturdy highlighted that the December 2019 issue of City View magazine described the very serious, newly discovered links between vehicle caused air pollution and health. He reported that the kerb alongside these double yellow lines was marked with yellow chevrons which prohibit unloading at any time. Yet the Highways Department had now informed him that these now faded markings were not in the current traffic plan. Mr Sturdy underlined that he had attempted to identify when and how this decision had been made but was yet to receive a response.

In summary, Mr Sturdy stated that the loss of Market loading bays due to works required for the new Museum of London was causing unsustainable pressure on the double yellow lines by Market HGVs. He added that this representation urged that this material consideration was examined with a traffic management solution added to the planning application.

The Chairman thanked Mr Sturdy for his contributions and invited any questions that the Committee may now have of him. The Chairman began by acknowledging that this was a serious matter and suggested that a meeting be held between Mr Sturdy and officers to discuss this important traffic management piece. Mr Sturdy responded to state that, whilst he would welcome the meeting, he had been given various assurances in the past with no sustained outcome/improvement of any kind.

A Member, also the current Chairman of the Streets and Walkways Sub-Committee, expressed concern at what had been reported here. He suggested that his Sub-Committee therefore be tasked with looking into this matter in greater detail. The Chairman agreed with this approach and asked that a report be brought to a future meeting of the Sub-Committee.

Another Member stated that she would like this matter explored in further detail, particularly around understanding how the City's processes were working in terms of when these matters were reported.

A Member commented that, ultimately, this underlined the importance of moving the Market from the centre of London.

Mr Sturdy stated that this was not solely about noise disturbance but also very much about pollution levels in such close proximity to residential buildings and also about vibrations. He added that he had resided here for over twenty years now and regularly used the market and was not therefore against its operation per se. He also commented that he felt that the proposed scheme was, architecturally, very impressive.

The Town Clerk welcomed those speaking in support of the application – Ms Sharon Ament, Director of the Museum of London and Mr Paul Williams, Principal Director of Stanton William Architects.

Ms Ament began by clarifying that the Museum would be very happy to work with Mr Sturdy to see if they could help ameliorate the situation at all in relation to the site construction. The Committee were informed that there were a number of others present to respond to any questions that they might have on the revised proposals presented today including Alex Shaw, Director of the new

Museum project, Emma Lally from Momentum Transport, Andy Sedgwick from Arup and Jeremy Randall from Gerald Eve. Ms Ament reiterated that this proposal sought approval for minor amendments to the previously agreed planning application. She went on to report that the Museum had now reached many important milestones in relation to this site, not least the stabilisation of the fabric of these historic buildings that had saved the site from disrepair. Ms Ament also took the opportunity to restate the vision for the project and how this related to the City Corporation's own ambitions. She underlined that this was not just about relocation but was a total reimagination of what the Museum could be, making it totally fit for society in a post-COVID world. She underlined that this was the Capital's only Museum properly dedicated to London and that this represented a once in a generation opportunity to create a truly world-class destination that told the story of London – a global, capital City. Whilst the Museum had done everything it could at its current London Wall site since opening its doors in 1976, this project would really set a new benchmark and be a project for all Londoners.

The proposals would offer visitors a better sense of arrival and large-scale exhibitions in collaboration with other international museums. They would also feed the urge of those living, working and visiting the capital to learn more about the City. In this vein, the Museum would embody the City Corporation's Culture Mile and Destination City aspirations, seeking to enhance the Square Mile's leisure offer to ensure that the City of London remains a hugely attractive place to invest, work, live, learn and visit long into the future. Culturally, the Museum aspired to become one of London's top ten visitor destinations and to support the growth of curators, artists and small businesses. Economically, the Museum Masterplan was forecast to generate £755 million in gross added value during the first ten years of operation, bringing two million visitors to the City which would be key to the economic growth of the local area. In terms of learning, the ambition was for the Museum to reach every London school child thus contributing to social mobility. In heritage terms, these beautiful buildings would be saved, creating a remarkable new offer. Environmentally, the Museum was also extremely proud of the story it could tell here. The proposals here would be a landmark in terms of sustainability which would see over 70% of the existing fabric preserved and would reduce operational carbon through connecting to Citigen and smart technologies. Ms Ament commented that the Museum were keen to lead the way in helping reach the City's Net Zero target and Climate Action Strategy.

Mr Williams opened by stating that this application was the product of seven years of detailed work. This ambitious, remarkable project would redefine what it means to be a 21st Century Museum whilst simultaneously securing the sustainable future of the three Market buildings in Smithfield. He reported that the Victorian General Market and Fish Market buildings as well as the 1960s Poultry Market had unfortunately fallen into significant disrepair. Under these plans, the General and Poultry Markets would provide the Museum with wonderfully dramatic, contrasting spaces both above and below ground and spaces capable of hosting an extensive range of displays, exhibitions, learning activities and events to trigger the imagination of both young and old. The ambition here was for a world-class venue with no parallels. Proposals for the

Fish Market and Annexe site as a whole were a fundamental and exciting component of the submission and would be developed separately.

Mr Williams went on to report that the brief on this had remained constant throughout – to preserve and celebrate the historic fabric of these buildings and to deliver a truly world-class destination that can effectively tell the story of London and Londoners. The aim was also to create the most sustainable set of buildings possible. It was highlighted that the Team's design approach adhered to the principle of the circular economy, looking to reuse, repair and recycle materials where possible to reduce the embodied carbon footprint and targeting 95% diversion of waste from landfill. The buildings would connect to the local Citigen facility across Charterhouse adjacent to the buildings for the supply of low carbon heating and cooling produced as a by-product or electricity generation. The proposals were targeting a rating of BREEAM excellent and, by preserving up to 70% of the site's fabric, the proposals would ensure that the history and character of this part of the City would remain, be celebrated and become an integral part of the Museum's storytelling.

The Committee were informed that early work repairing, stabilising and cleaning the site had begun but no construction work had yet commenced. The project aimed for practical completion of the General Market and West Poultry Avenue by 2025 with a public opening in 2026. Work on the Poultry Market should be completed later in 2027 and opening shortly thereafter. Whilst Mr Williams acknowledged that several changes had been made to the 2019 application, these were largely in response to updated planning and environmental policies and were therefore minimal. Some of these changes were also as a result of site discoveries impacting upon internal layouts. Mr Williams concluded by encouraging the Committee to approve this application which was clearly a once in a lifetime project.

The Chairman thanked both for their contributions and invited any questions that Members might now have of the applicant team.

A Member underlined that the preservation of these historic buildings was a major benefit of this application however Harts Corner and the Turret were not to be reinstated. He asked Mr Williams why this was the case. Mr Williams recognised that Harts Corner was part of the history of the building that had been bombed during the Second World War. The team had therefore had discussions around its preservation. He reported that the intention here was to tell the story of the building.

With no further questions of the speakers, the Chairman invited any questions of Officers.

A Member commented that the Committee had previously expressed concerns as to how the project would work alongside the existing market. He therefore sought an update from Officers on this point. He went on to refer to the holding objection received from the Smithfield Market Tenants' Association and questioned whether there was any further update on this. Officers responded to state that the holding objection still stood and was addressed in detail within the Committee papers. Officers also acknowledged that the existing market which was to be retained and the Museum both had relatively intense uses of the public highway but were also,

in many ways, complimentary in that the Museum would see peak activity over lunchtime periods with high levels of pedestrian activity with the Market seeing more intensive use during the evening and overnight periods. It was reported that Officers had worked closely with the applicant and the Market Superintendent to examine how the two uses could be facilitated to successfully coexist. Members were informed that the public realm would be subject to Section 278 works which would include areas of significant footway widening, particularly in the area adjacent to the Poultry Market where the removal of some market bays was also proposed. The market bays adjacent to the General Market would also be re-timed and integrated into a wider public realm strategy such that during the day they could function and create generous footways yet also accommodate loading activities associated with the General Market during the evening period. Members were therefore informed that a lot of conversation and negotiation had gone into the ways in which both uses could be accommodated. The proposed coach drop off area on East Poultry Avenue would also function as a dual use and accommodate Market activity at appropriate times. All of the Section 278 works would also be subject to further consideration and detailed design.

Another Member spoke on the proposed stopping up of West Poultry Avenue stating that the condition imposed upon the Museum would be around maintaining a thoroughfare through here. He commented that this seemed to be unnecessary given that there were plenty of walkways around the perimeter of the site and that this would reduce their flexibility in terms of this being a curated space. Officers stated that the part of the proposals that would form the main entry point and access to the Museum was intended to form an orientation point and for this to be a curated space. It was therefore considered necessary for this area to be stopped up but, at the same time, Officers were keen to maintain as much permeability as possible through the site for those not visiting the Museum. Officers went on to refer to policies within the Local Plan which sought to enhance permeability around the City and stated that the Museum had indicated that they could potentially open the route from 7am to midnight as a through route for people. That being said, it was acknowledged within the papers that at times there might be higher security here depending on what exhibitions were showing and that they may also wish to use this space for events. All of this would be factored into the Access Management Plan.

The Chairman then invited members of the Committee to debate the application.

A Member stated that she was delighted to see this scheme coming to fruition and that this would be a public building with public use, opening up the City's heritage to all and telling the story and history of London and its people.

Another Member commented that he was fully supportive of the application however he referred once more to the traffic management issues which he was keen to see taken very seriously and have the Streets and Walkways Sub-Committee scrutinise in further detail to achieve a satisfactory outcome as opposed to just leaving this to Officers to resolve.

Another Member questioned whether anything needed to be put forward to strengthen this point around Member oversight of the issue. The Chairman stated that he felt that it was sufficient to instruct Officers to bring the matter back to the

Streets and Walkways Sub-Committee at this juncture. Officers undertook to action this.

A Member stated that he was very pleased to learn that so much thought had been given to how the Museum site would work alongside the existing market and how the transition would be managed. As a result, he now felt able to support this extraordinary project.

The Chairman summed up by underlining that this was not an isolated project, and that the Museum's move played a much bigger, critical role in what the City would look like over the coming decades making it a genuine global destination. He also commended the way in which the project was being designed sympathetically to maintain the fabric of these buildings and tell their stories as active workplaces. He encouraged the Committee to vote in favour of these proposals.

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

Votes were cast as follows: IN FAVOUR – 16 Votes
OPPOSED – None
There were no abstentions.

The recommendations were therefore carried unanimously.

RESOLVED –

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

- (a) the Mayor of London being given 14 days to decide whether to allow the Corporation to grant planning permission as recommended, or to direct refusal, or to determine the application himself (Article 5(1)(a) of the Town & Country Planning (Mayor of London) Order 2008);
- (b) planning obligations and other agreements being entered into (or given unilaterally by the City Corporation as landowner) under Section 106 of the Town & Country Planning Act 1990 (and ancillary powers) 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 a commitment has been given by the City Corporation as landowner that it will comply with the obligations in connection with the development and that it will ensure that the obligations are binding on any future purchaser or development partner;

(2) That your officers be instructed to negotiate and secure the planning obligations through an agreement or unilateral undertaking as detailed in this report;

(3) That it is noted in principle that land affected by the building which is currently public highway and highway over which the public have a right of access, including West Poultry Avenue may be stopped up to enable the development to proceed and, upon receipt of the formal application, officers may proceed under delegated authority with arrangements for advertising and

making of a stopping-up order for the various areas, to the extent that such stopping-up order is unopposed . If there were to be any unresolved objections to the stopping-up order, a report would be taken to the Planning and Transportation Committee for decision;

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

5. POULTRY MARKET CHARTERHOUSE STREET LONDON EC1A 9LH - LISTED BUILDING CONSENT

The Sub-Committee considered a report of the Planning and Development Director regarding the Poultry Market Charterhouse Street London EC1A 9LH – specifically,

the part demolition, repair, and refurbishment of the building known at the Poultry Market, Charterhouse Street at ground, first and basement levels, associated with a change of use of the building to provide a museum and ancillary uses and areas; including: works associated with an entrance structure on West Poultry Avenue; internal alterations including creation of a part new first floor; fabric removal and refurbishment on all floors; replacement glazing; facade cleaning and other facade repair; levelling of ground floor; works of repair to the roof; installation of new heating and cooling equipment; new M&E services; repurposing of the south service bay and associated infill structure; remodelling of the north service bay; internal decoration; replacement balustrade; and other associated works as shown on the submitted plans and drawings.

The Committee voted on these recommendations alongside those set out under Agenda Item 4.

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

Votes were cast as follows: IN FAVOUR – 16 Votes
OPPOSED – None
There were no abstentions.

The recommendations were therefore carried unanimously.

RESOLVED - That listed building consent be granted for the above proposal in accordance with the details set out in the attached schedule.

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

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

RESOLVED – That the report be noted.

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

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

RESOLVED – That the report be noted.

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

Local Plans Sub-Committee

A Member recognised that this came under the work of the Grand Committee but noted that they were not now scheduled to meet until January 2023. The Member referred to the recent cancellation of Local Plans Sub-Committee meetings for the remainder of 2022 in order to enable Officers to work up the engagement strategy around this. However, there were now some concerns as to the time delay and Members being able to see and comment upon this Strategy ahead of it being finalised and in between meetings.

Aa a more general point, the Member questioned whether matters relating to the work of the grand Committee could also be raised at this Sub-Committee given that it was now set to meet much more frequently. The Deputy Chairman stated that he would also appreciate some clarity on this point. The Comptroller and City Solicitor stated that questions here should really be related to the work of this Sub-Committee as stipulated on the agenda. It could, however, be at the Chair's discretion to alter this for time critical matters although it was suggested that these could equally be dealt with in writing or via email in between scheduled Grand Committee meetings.

With regard to a further comment as to the frequency of meetings now proposed for the Grand Committee, the Town Clerk reported that this matter was entirely within the hands of the Committee and the Chairman and that if they were of view, in due course, that quarterly meetings were not sufficient, this could be added to or revisited as necessary.

Reporting on Discharged Conditions

The Chairman highlighted that this matter had been raised with him on a few occasions by another Committee member who had questioned how these matters were reported on once they had been discharged. He stated that he felt that it would be helpful for Officers to include this information within the weekly summary distributed to the full Court. Officers stated that they would be happy to action this and would also continue to include within the agenda papers for Planning and Transportation Committee meetings.

A Member questioned whether the website featured a list of conditions attached to individual planning applications alongside information as to when these were discharged for the public to consult. The Planning and Development Director

reported that whenever a condition was discharged this was made clear on the website however, he recognised that this might require the public to plough through the paperwork in relation to a given application as, at present, a summary sheet detailing this did not exist. The Member commented that this did exist for other Local Authorities and questioned whether a suitable solution could be found here. Officers added that when planning history was searched for on the website the planning permission featured alongside a list of conditions that had been discharged on that same page, but it was accepted that this could possibly be more helpfully summarised going forward.

9. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
Forthcoming Committee Visits

The Chairman reported that the Committee had the opportunity to undertake two visits in the coming weeks. Firstly, a visit to the public terraces at 22 Bishopsgate was scheduled for Monday, 18 November at 10.30am for which he encouraged Members to RSVP as soon as possible. Secondly, a tour of the Lloyds Building was also being proposed for Friday, 2 December at 2pm and further details on this would be communicated to all in the coming days.

Consolidation

A Member noted that at the last meeting, there had been some discussion around bringing back a future report on the success (or otherwise) of consolidated services and how these were working in practice for applicants. She suggested that it might be helpful to invite them to address a future meeting of the Committee on this. The Planning and Development Director reiterated that 22 Bishopsgate was probably the best, current, working example of this and he suggested that this might also helpfully be weaved into next week's visit to the site.

The meeting ended at 11.43 am

Chairman

Contact Officer: Gemma Stokley
gemma.stokley@cityoflondon.gov.uk

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PLANNING APPLICATIONS SUB-COMMITTEE Tuesday, 13 December 2022

Minutes of the meeting of the Planning Applications Sub-Committee held at Livery Hall - Guildhall on Tuesday, 13 December 2022 at 10.30 am

Present

Members:

Deputy Shravan Joshi (Chairman)
Deputy Randall Anderson
Brendan Barns
Emily Benn
Ian Bishop-Laggett
Deputy Keith Bottomley
Deputy Michael Cassidy
Anthony David Fitzpatrick
Jaspreet Hodgson
Deputy Natasha Maria Cabrera Lloyd-Owen
Alderman Ian David Luder
Alderman Bronek Masojada
Deborah Oliver
Deputy Graham Packham
Alderwoman Susan Pearson
Shailendra Kumar Kantilal Umradia

Officers:

Gemma Stokley	- Town Clerk's Department
Ben Dunleavy	- Town Clerk's Department
Tim Fletcher	- Media Officer
Deborah Cluett	- Comptroller and City Solicitor's Department
Gwyn Richards	- Planning & Development Director
Rob McNicol	- Environment Department
Neel Devlia	- Environment Department
Kerstin Kane	- Environment Department
Emmanuel Ojugo	- Environment Department
Joanna Parker	- Environment Department
Peter Shadbolt	- Environment Department
Richard Steele	- Environment Department
Robin Whitehouse	- Environment Department

1. APOLOGIES

Apologies for absence were received from Deputy Alastair Moss (Deputy Chairman), Deputy John Fletcher, Deputy Marianne Fredericks, Andrew Mayer, Deputy Brian Mooney, Deputy Edward Lord, Deputy Henry Pollard, Ian Seaton, Alethea Silk and William Upton KC.

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

There were no declarations.

3. **MINUTES**

The Committee considered the public minutes of the Planning Applications Sub-Committee meeting held on 22 November 2022 and approved them as a correct record.

4. **IBEX HOUSE 42 - 47 MINORIES LONDON EC3N 1DY**

The Sub-Committee considered a report of the Planning and Development Director concerning Ibex House 42 - 47 Minories London EC3N 1DY – specifically alteration and extension to the existing building at ground and lower ground floor on Haydon Street and Portsoken St with the incorporation of courtyard garden areas, an on-site servicing bay and blue badge parking areas adjacent; Roof level extensions at the 8th and 9th floors; Alterations to the ground floor Minories facade, including level access provision; Alteration and creation of roof terraces and green roofs; replacement / upgrade of balustrades on all elevations; internal reconfiguration of lower levels to incorporate a new mezzanine level, internal cycle storage, and refuse store; creation of a new learning / cultural centre (sui generis) at the ground floor corner of Portsoken Street and Minories;; and retention of existing public house (sui generis) at ground floor / lower ground corner of Haydon Street and Minories including elevational alterations.

The Town Clerk referred to those papers set out within the main agenda pack as well as the Officer presentation slides and an addendum containing additional/late representations that had been separately circulated and published. Members were informed that agenda Items 4 and 5 would be presented and considered alongside each other.

Officers presented the application, explaining that the site was located in the east of the City and bounded by Minories to the west, Haydon Street to the north and Portsoken Street to the south. It was reported that the surrounding area was characterised mainly by commercial uses but also had a consistent presence of hotels, service accommodation and residential uses. Opposite the site on Portsoken Street was Portsoken Street Garden – a site of importance in terms of nature conservation. Members were informed that the existing building is Grade II listed but that the site was not located within a Conservation Area nor within the setting of any nearby statutorily listed buildings.

It was reported that Ibex House was built between 1935-37 and was an important example of an inter-war commercial building at a London-wide and national level and a rare and unique survivor of the streamlines modern style as well as a historic example of the emerging interwar trend for large open-plan office space. The primary pedestrian entrance to the site is from Minories but there is currently no level access to the site from this entrance or the side entrances. Forecourts exist on the southern and northern sides of the building but were currently underutilised for things such as outdoor cycle parking and bin storage. Internally, the building had been heavily altered over time and was

in need of upgrading in line with modern office standards. It was reported that the existing building was not fully occupied with several office floors currently vacant along with the existing public house which had now been vacant since 2018. The commercial gym tenancy on the lower levels had now also ceased. The applicant was now proposing the refurbishment and extension to the lower ground, mezzanine and upper ground levels. Upgrades to terrace balustrades and surface materials on the sixth, seventh and eighth floors and the refurbishment and construction of infill extensions with new terraces at the eighth and ninth floors, complete with green roofs were also proposed. Internally and as part of the works, various alterations to the allocation of existing uses were proposed which would result in an uplift in class E office floorspace with new, flexible reception, meeting areas and new external amenity spaces, public realm improvements, urban greening, a new café use, new cultural use and revitalised pub use also all formed part of the scheme.

Officers reported that a listed building consent was issued in 2021 for the refurbishment works to levels 1-7 which were now currently underway on site. These approved works alongside the application today would lift the office accommodation here from Grade B quality to Grade A quality. Members were shown a proposed lower ground floor plan depicting the northern and southern additions within the forecourts alongside refurbished class E office space in the centre. It was reported that sunken gardens were proposed on either side of the southern extension on Portsoken Street, providing green amenity space and daylight egress to the office accommodation on this level. Part of the proposed on-site cycle parking provision was also shown in the top-right hand corner of this floorplan. Officers reported that the existing building currently contained 89 external cycle parking spaces, with this scheme delivering a significant uplift with 333 long-stay and 53 short-stay spaces alongside shower and locker facilities proposed. This would meet London Plan standards for the building as a whole and not just the floor space uplift.

Next, Members were shown proposed plans for the mezzanine level, depicting cycle parking, shower and storage facilities as well as an internal bin storage area which would approve existing conditions where bins were currently stored externally within the forecourts. On Haydon Street, two blue badge parking spaces would be provided which was an improvement on the existing offering where only one was provided. This too complied with London Plan standards. On the right-hand side of the northern pavilion, an on-site servicing bay was present which would significantly improve upon existing conditions whereby servicing currently took place on Haydon Street with vehicles typically having to reverse out of this location onto Minories. Conditions were recommended to restrict the hours of servicing so that these were not permissible during night-time or peak hours – at present this was unrestricted.

The proposed upper ground-floor plan depicted a new, open-plan reception hub within the centre of the building which would contain various flexible meeting and working spaces for the whole building, level access to the new side entrances along with the main frontage to the building would be provided by the scheme. This would improve accessibility to the site where none currently existed. It was reported that the extension to the south off of Portsoken Street

would be dedicated to a new, publicly accessible café which would help to activate passive surveillance to Portsoken Street and the public garden opposite. In the bottom left-hand corner was a proposed cultural, learning and exhibition space. The unit would occupy a prominent location on the corner of Minories and Portsoken Street and would be fitted with an ancillary café/bar area. It was envisioned to accommodate various exhibitions, events and workshops within this historically significant building. Officers reported that the applicant had been engaging with prospective occupiers and that initial meetings had occurred between a local art and architecture-based charity organisation named 'Store' who had now also visited the site to confirm that the size, layout and proposed fit out would be suitable for their needs and discussions on affordable lease terms had begun. It was highlighted that the cultural offering aligned with Destination City which sought to enable the City's communities to access a range of arts, heritage and cultural experiences. Officers confirmed that specific occupier details alongside a detailed Operational Management Plan and Culture Plan would be procured at a later date as part of the Section 106 agreement.

The Sub-Committee were shown existing and proposed images of the northern elevation of the site from Portsoken Street looking west. This depicted the appearance of the ground-floor addition which would be designed to sensitively reinterpret the streamline, modern features of the main building with cradle glazing, curved corners and black fenestration. It was highlighted that the proposals were amended in October following extensive negotiations with Officers. Some of the key changes included a reduction to the size of the ground floor extensions, refinement of their design and a reduction to the extent of fabric removal. It was noted that Historic England had raised concern with the original iteration of the proposal but, since reviewing the amendments to the scheme, had withdrawn these comments. Officers underlined that this particular image also depicted some of the public realm improvements proposed by the scheme including resurfacing works to the footway, construction of a raised table to slow traffic and provide level access across Portsoken Street and the proposal to replace the existing, partly solid brick wall on the northern side of Portsoken Street Garden – all with a view to improving visual and physical connectivity between the street and the garden.

Members were shown further existing and proposed visuals of the ground floor additions on Haydon Street as well as images depicting the alterations to the façade of The Peacock public house. It was reported that the alterations would open up the appearance of the pub on the main Minories frontage through the insertion of clear glazing, making it more outward facing and improving vibrancy at this key corner location. Existing eighth floor plans indicated the extent of fabric removal proposed which largely related to terrace surfaces and the roof slab. A proposed eighth floor plan showed that the extensions would be built around the eastern and western core of the building with new amenity terraces surrounding these and with refurbished office space in the centre. Proposed ninth floor plans showed the infill extension proposed in the centre which would sit between the two existing western and eastern cores with new, Class E office floorspace. On the sides of each core, new terraces and urban greening was proposed.

The Committee were shown existing and proposed visualisations of how the roof extensions would wrap around the service cores, tidying up their current appearance. It was clarified that the roof extensions would not extend beyond the maximum height of the existing building and would, in fact, sit below this by over one metre. Officers referred to the fact that the site was within the London View Management Framework (LVMF) protected vista corridor to the Tower of London but that the modest nature of the roof extensions proposed and their virtually indiscernible appearance on the skyline would preserve the ability to recognise and appreciate the Tower as a strategically important landmark.

The Sub-Committee were informed that the proposal considered sustainability standards and targeted BREEAM 'excellent'. It would be adopting circular economy and whole-life carbon principles. Dedicated areas for planting and greening would be incorporated through green roofs, greening on terraces and new, southern winter gardens where possible, increasing the biodiversity of the site.

Members were informed that fourteen representations and objections to the application had been received across the two applications with thirteen of these having been lodged against the original iteration of the proposal advertised in 2021. The main concerns raised by nearby residents concerned existing light pollution, daylight and sunlight impacts, noise and constriction impacts. Officers reported that a daylight and sunlight analysis was submitted with the application and demonstrated that the immediately surrounding residential properties would continue to receive levels of daylight and sunlight in accordance with BRE guidelines with the exception of a very minor and negligible no skyline variation associated with a student accommodation room located at 52-56 Minories. With regard to lighting, a condition was recommended to be included on the planning permission requiring the submission of a full Lighting Strategy. The applicant had also confirmed that sensors were currently being installed within levels 1-7 as part of the refurbishment works. With regard to the terraces, it was recommended that use of these be restricted by conditions limiting hours of use to between 9am-9pm and no use on Sundays or Bank Holidays. Recommended conditions would also restrict the use of amplified music. A scheme of protected works was also recommended to be required as a condition as this would help to mitigate against construction related impacts to surrounding residential and commercial occupiers.

Officers concluded by sharing a number of images of existing and proposed verified views and reporting that the proposed development was underpinned by an overarching objective to revitalise and celebrate Ibex House as an iconic and unique building and to reclaim its prominence and presence within the City of London with increase public access, repairs and refurbishment. The scheme would help to lift the office accommodation from Grade B to Grade A quality, bringing the building back to optimal use and enabling it to compete with newer build office stock in the City. The proposed scheme would revitalise this historic building which also delivering a number of environmental, social and economic

benefits. The applications for planning permission and listed building consent were therefore recommended for approval.

The Chairman explained that there were no registered objectors to address the meeting on this occasion and he therefore invited the applicant to speak.

Mr David Whittington, planning consultant for the applicant spoke first setting out a number of fundamental drivers behind the application. He reiterated that this application represented phase two of substantial investment, an upgrade and refurbishment of this iconic building. Phase one had been approved by the City last year and involved the full refurbishment of the building and, importantly, its services on floors 1-7, providing major benefits to the condition of the building including the internal fit out and the replacement of all windows with highly detailed new replacement cradle windows. Overall, this investment significantly lifted the building from Grade B to Grade A category floor space and combined, the two phases would offer a sensitive reimagining of the listed building. It was also hoped that this demonstrated how historic buildings could make a very positive contribution to the City stock as a whole by offering genuinely market-leading, Grade A office accommodation within period and older buildings. The current scheme now submitted for approval sought to provide relatively modest extensions at ground and upper floor levels as well as significant works at the lower ground and mezzanine levels to ensure that Ibex House will provide contemporary, post-pandemic workspace. By refurbishing, adapting and extending the application, the applicant was promoting a highly sustainable and carbon positive form of development, delivering better stock from within the existing stock of the City. He added that the EPC rating of the building would be significantly uplifted from 'D' to 'B' and would target a BREEAM rating of 'excellent' – a significant achievement for an existing, listed building. He underlined that the works now proposed were key to unlocking a multitude of benefits for the building, its surroundings and public realm and, importantly, its neighbours. At this point, Mr Whittington took the opportunity to reiterate the point previously made by Officers in that these proposals presented no material harm to any neighbours or residents surrounding the site. Indeed, substantial revisions had been made to the application in October 2022 in part to respond to a number of the comments made by residents relating to servicing and traffic arrangements at the base of the scheme. He reiterated that no harm would be caused to residents in terms of daylight and sunlight or overlooking and reported that the application would now fall under the control of the City for the first time in terms of servicing hours and the size of vehicles that would service the building. The applicant was of the view that the conditions proposed, and additional controls would provide additional benefits and safeguards for local residents.

Mr Whittington went on to state that the applicant was pleased to use lightweight timber

Construction methods so that heavy demolition and piling would not be a feature at this site – meaning less noise and a shorter construction period for residents. He added that the applicant was pleased to be able to respond positively to concerns around light spillage via the installation of light sensors throughout the building as part of the current refurbishment works. He added

that another major benefit was to be the inclusion of the learning and cultural gallery at ground floor level with the objective of this space being to provide a celebration of the streamlined modern nature of Ibex House as it heads to its first century of its existence. It would be a place to learn of and celebrate the building as well as the rich architectural pedigree of the City. Mr Whittington underlined that the applicant was committed to the delivery of this space with these matters being controlled via the Section 106 agreement in due course.

Mr Philip Turner, lead architect from AHMM Architects, spoke on some of the key design and architectural components of the scheme. He reported that this was a Grade II listed building, built and completed in 1935, a genuinely iconic building that had worn relatively well on the outside despite some bomb damage and some repairs carried out most recently in the 1990s. He commented that this was originally a state-of-the-art building and one of the first air-conditioned buildings in London. However, the interior had worn less well than the exterior and had been less sympathetically treated over time. Crucially, the 1990s refurbishment had resulted in a 'muddled' ground floor offering and a compromised entrance arrangement. The servicing of the building had also been ad hoc over time with the bin stores and cycle parking facilities all currently situated on-street within the original forecourts.

Mr Turner went on to underline that the existing building was very energy inefficient. The ongoing refurbishment works to levels 1-7 included the replacement of 1990s aluminium windows, complete with internal secondary glazing, with new, steel-framed double-glazed, high-quality windows as well as a complete refurbishment of both cores including lift replacement and new fit out to all of the office spaces in a way that was sympathetic to the character of the original building. It was reported that the client had spent £8 million on these works to date and expected to spend a total of £20 million on the middle floors alone. As part of the applicant's commitment to maintaining this building, it was reported that these proposals would bring forward the proper treatment to its exterior.

From an architectural point of view, the ground floor plans were a key element of the proposal and Mr Turner explained that the recent vacation of the basement by a commercial gym during the pandemic had allowed the opportunity to address the lower ground and upper ground floors and plant in one go. These plans would achieve a number of significant improvements that would provide level access on Minories for the first time in this building's life and breathe new life into this historic building and to Portsoken Street opposite the site. All bin and cycle storage facilities would be removed from the street and located within the building with the cycle parking and associated facilities meeting the London Plan requirements for a new building.

The building would be upgraded from an EPC 'D' to an EPC 'B' rating with the insulation of the outside walls. Carbon emissions would also be reduced by 38% with BREEAM 'excellent' targeted by the applicant. The proposed café on Portsoken Street opposite the gardens and associated public realm improvements that were part of a Section 278 agreement would be very positive and in line with the Aldgate BID Public Realm Strategy document.

Finally, it was reported the cultural facility on the corner of Minories and Portsoken Street would be a real 'window' for the scheme and was in line with City initiatives such as Destination City and London recharged.

The Chair thanked the applicant team for their contributions and invited any questions that the Sub-Committee might now have of them. The Chair began by seeking to understand more about the proposed cultural space within the building. He questioned what sort of partnerships had been explored with other stakeholders to date and asked how the applicant saw this space being used as well as the square footage assigned for this. Mr Whittington responded to state that the applicant's architects had given a great deal of thought to the functionality and usability of the space taking into account matters such as storage capacity, provision of WCs and disabled access. He added that the applicant had also been in dialogue with a number of bodies including the RIPA and Studio Makers as curators working with the City in terms of Destination City. Discussions had also taken place with Open House and other educational providers. Whilst the curation of this space had not yet been finalised and an operating partner was yet to be selected, it was recognised that this was to be controlled via the Section 106 agreement with the Operational Management Plan to be formulated in due course should the application be approved today. Mr Whittington added that the space would be multifaceted – a space for students, the public and local residents and principally a space to celebrate not only this building but also a design idiom in terms of streamline modern.

A Member referred to proposals around consolidation yet noted that the dashboard presented to the Sub-Committee suggested no change to the number of vehicle movements in terms of deliveries and questioned why this was the case. With regard to the building's BREEAM rating he also questioned what its current status was.

The applicant's transport consultant, Mr Stuart Davies stated that the Servicing Strategy revised a lot and that it was intended that a Service Plan limiting hours would be introduced for motorised vehicles. Servicing would be allowed at all times (aside from overnight) for zero-emission/non-motorised vehicles. There was also a move towards consolidating the last mile of a building's delivery needs into a pedicab style cargo bike. There may therefore be an increase in delivery trips to the building overall but, nevertheless, there would be a decrease in motorised vehicles and goods vehicles. There would also be no need for heavy goods vehicles to service the building as was currently the case. Mr Davies added that, based on the current building's servicing demands, the increase in floorspace pro rata would lead to 3 extra vehicles daily but, as moves were made to consolidate deliveries, the presence of fewer goods and motorised vehicles would manifest itself over time. Deliveries would be managed by an on-site Deliveries Manager and via the Delivery and Servicing Plan so as to avoid multiple companies/occupants ordering similar supplies from the same source but on different days of the week for example. It was underlined that the Plan would be a live document that would be continually monitored and reviewed alongside the tenant and staff profile of the building. The Member responded to state that he would expect to see an ambition around reducing the number of deliveries to the building.

In terms of the current BREEAM rating of the building, the applicant reiterated that the current Energy Performance Certificate rating was 'D'. In terms of how the applicant could affect the building's environmental performance, it was explained that this was two-pronged and could be done via both the work undertaken but also via the way in which the building's use was programmed. The building would be naturally ventilated and mixed mode, it would move from a building that used gas to heat it to one that used electricity. Tenants would be encouraged to use low carbon vehicles or cycles to travel to work and the site also benefitted from excellent public transport links. Increasing the biodiversity of the site with the addition of green roofs would also be important in terms of enhancing ecological value.

Another Member stated that there was much to commend this application but focused on the Construction Management Plan which stated that no diesel, mobile machinery would be used anywhere on site - he questioned whether this would indeed be the case. He also spoke on the Lighting Strategy which it was recognised would not comply fully with the Lighting SPD. He stated that he hoped that the applicant would, however, sign up to the Considerate Lighting Charter. Thirdly, he questioned whether the stand-by power generation in the building would also be non-diesel and a sustainable source. The applicant team confirmed that this was the case in terms of the Construction Management Plan undertaking and also confirmed that they would be happy to sign up to the Charter. They added that they felt in a very positive position to be able to overcome resident concerns relating to lighting spill with the installation of things such as motion timers which would be a real benefit and improvement upon the current situation. In terms of the standby generator, these would also involve no diesel generators to ensure continuity in the event of any power outage.

Another Member stated that he too felt that there was much to commend here. He stated that he was particularly pleased that motion sensors for lighting control were to be installed throughout the building. He went on to question the proposed hours of usage for the open terrace on the roof. He commented that he felt that 9pm was a reasonable terminal hour on weekdays but felt that this may have the potential to be disruptive to local residents on a Saturday. He therefore asked whether the applicant might be amenable to introducing a terminal hour of 5.30pm to the area on Saturdays. The applicant team responded to state that this was in the hands of the Sub-Committee on this matter. They went on to underline that the terraces were an important part of the offering to tenants.

A Member questioned, in relation to the proposed café space, whether this could be signed up to the City's Public Toilet Scheme. Secondly, in terms of cycle spaces, she stated that those currently situated externally might arguably have a wider public benefit and therefore questioned whether these were currently used exclusively by tenants of the building. Under proposals to relocate these internally, she also queried whether there would be an opportunity for these to be used by those who were passing by or using the café facilities for example. In terms of cycle spaces, the applicant responded to state that the existing 89 spaces were not publicly available and were clearly

insufficient for a building of this size. There would be a number of short-stay cycle spaces at street level, external to the café which would be for the general use of those visiting the building. With regard to the café facilities, the applicant reported that this was to be a relatively small space but that the arrangements for the WCs here would be linked to the WC provision for the cultural and learning centre located on the Minorities entrance. They added that they would be happy to consider signing up to the Public Toilet Scheme should that be the wish of the Sub-Committee.

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

A Member questioned what might be enforced upon the applicant via the Delivery Management Plan in terms of reducing the number of fossil fuel vehicles accessing the site for deliveries and servicing. He also asked again for clarification as to the building's current BREEAM rating. In terms of deliveries, Officers reported that they would be securing a final Delivery and Servicing Plan as part of the Section 106 agreement. Within this, a range of measures would be negotiated to encourage fewer polluting vehicles, methods of consolidation, restricted timings, use of smaller vehicles and the limiting of empty miles. The 33 vehicles noted within the report were representative of a worse-case scenario and did not account for consolidation – a lower number would be expected in due course and with the introduction of the measures incorporated within the Delivery and Servicing Plan. The Member encouraged Officers to be as ambitious as possible here in terms of reducing the number of vehicle movements.

A Member commented on the height of the railings on the terraces as well as the presence of 'mini ladders' here which were a concern in terms of suicide prevention. Officers confirmed that the applicant had considered suicide prevention methods as part of the proposal and that the balustrade height on the terraces would be raised to 1.2m. In addition, the terraces would be passively surveyed from the newly refurbished office spaces at the eighth and ninth floors. The existing terraces could also be surveyed at the sixth and seventh floor levels. CCTV cameras were also to be installed in those areas that were more difficult to view from the office spaces. Finally, it was noted that the stepping of the building would be beneficial in terms of suicide prevention. It was also highlighted that there was a condition relating to balustrades on the planning application and that this would be used specifically to look at measures for reducing opportunities for suicide such as the inclusion of glass panels.

Another Member stated that reference to the Lighting SPD would also be a helpful addition. Officers stated that they would undertake to revise Condition 10 to include specific reference to this and, as an informative, also make reference to the Lighting Charter. They also undertook to make reference to no diesel generation within the conditions.

In terms of the hours of servicing, a Member noted that the proposed area of servicing on Haydon Street was almost opposite a residential block. She

therefore asked whether the terminal hour for this might be 22:00 as opposed to 23:00. She also referred to the hours of use proposed for the terraces, noting once more that there were residential blocks nearby. She questioned whether these could be reduced in line with office hours and terminate at 6pm on weekdays. The Chairman commented that this would be possible on both counts should it prove to be the wish of the Sub-Committee.

The Chairman commented that, whilst no objectors had registered to address the meeting today, their concerns were primarily around being protected from disturbance during construction and around light impact. The applicant had outlined their mitigations for this, and the Chairman therefore questioned whether, from an Officers perspective, they too were content with the provisions proposed. Officers stated that, through the Scheme of Protective Works that would be required as a condition and the Construction Logistics Plan, they were satisfied that disruption to residents through construction would be appropriately safeguarded. They added that there was also an additional condition around the need for a Technical Lighting Strategy.

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

MOTION - A Motion was put and seconded around the alteration of Condition 18 and the use of the roof terraces and proposed that the following wording be added here 'or after 17:30 on Saturdays'.

The Motion was put and passed with 12 votes in favour, 1 against and 1 abstention.

A Member questioned whether it was possible to revise the hours of usage for the roof terraces downwards for Monday-Friday and recollected that similar revisions had been made for other recent applications of this sort. She questioned whether there should therefore be some uniformity of approach. Officers commented that different conditions often needed to be applied in different circumstances around matters such as proximity of residential dwellings but underlined that this was very much within the hands of the Committee.

MOTION – A second motion was proposed suggesting that, during the working week (Mon-Fri) use of the roof terraces be amended downwards to a terminal hour of 18:00.

The Motion was not seconded.

MOTION - Another Member moved that a more sensible approach might be to permit roof terrace access until 21:00 for two days per week from Monday-Friday only with other working days limited to 17:30 or 16:00.

The motion was seconded, put to the vote but not carried with 2 votes in favour, 11 against and 1 abstention.

A Member highlighted that there was a policy in place to deal with noise nuisance should use of the terraces become an issue at any point.

A Member highlighted that these terraces were intended for office use only and cautioned against the unnecessary micromanagement of this aspect of the application.

A Member spoke to state that this was an admirable scheme for this beautiful, listed building whereby the changes proposed would enhance the appearance of this both internally and externally. He also praised the sustainability credentials of the scheme and stated that he would therefore be pleased to vote in favour of it.

Another Member commented that this appeared to be a masterpiece of cooperation between the applicant and the Planning officers. He went on to refer to both location and the needs of the occupier and commented on the applicant's immense sensitivity to the qualities of this building, its context and the needs of occupiers today within the design proposal. In terms of location, the Member commented that the business City was no longer monocultural and centred purely around banking and insurance. It now incorporated the tertiary industries who had traditionally thought of Shoreditch as their natural office location. This building seemed to him to have more in common with recent Shoreditch buildings than with those traditionally associated with the City. From the point of view of potential occupiers of the building, it appeared that the City had begun to diversify its offer and to broaden its appeal for the benefit of its ambitions as a Destination City. He concluded by praising the application as sensitive, clever and relevant to what was needed today.

A Member commented that the scheme was testament to the fact that, where objections were received, these could be adequately addressed with proposals amended. She stated that, as such, she would be supporting the application.

The Chair summed up the points made and stated that he felt that the application addressed an important piece as to the responsible and sympathetic activation of the ground floor of this building.

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

Votes were cast as follows: IN FAVOUR – 14 Votes
OPPOSED – None
There were no abstentions.

The recommendations were therefore carried unanimously.

RESOLVED -

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

a) 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 notices not to be issued until the Section 106 obligations have been executed;

2. that Officers be 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.

5. IBEX HOUSE 42 - 47 MINORIES LONDON EC3N 1DY - LISTED BUILDING CONSENT

The Sub-Committee considered a report of the Planning and Development Director regarding Ibex House, 42-47 Minories London EC3N 1DY – Listed Building Consent – specifically, alteration and extension to the existing building at ground and lower ground floor on Haydon Street and Portsoken St with the incorporation of courtyard garden areas, an on-site servicing bay and blue badge parking areas adjacent; Roof level extensions at the 8th and 9th floors; Alterations to the ground floor Minories facade, including level access provision; Alteration and creation of roof terraces and green roofs; replacement / upgrade of balustrades on all elevations; internal reconfiguration of lower levels to incorporate a new mezzanine level, internal cycle storage, and refuse store; creation of a new learning / cultural centre at the ground floor corner of Portsoken Street and Minories; and retention of existing public house at ground floor / lower ground corner of Haydon Street and Minories including elevational alterations.

The Committee voted on these recommendations alongside those set out under Agenda Item 4.

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

Votes were cast as follows: IN FAVOUR – 14 Votes
OPPOSED – None
There were no abstentions.

The recommendations were therefore carried unanimously.

RESOLVED –

1. That listed building consent be granted for the above proposal in accordance with the details set out in the attached schedules subject to:

a) 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 notices not to be issued until the Section 106 obligations have been executed;

2.that Officers be 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. **VALID PLANNING APPLICATIONS RECEIVED BY DEPARTMENT OF THE BUILT ENVIRONMENT***

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

RESOLVED – That the report be noted.

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

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

RESOLVED – That the report be noted.

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

22 Bishopsgate Visit – A Member thanked the Chair and Officers for organising the recent Committee visit to 22 Bishopsgate and stated that it was interesting to see the success of the consolidated logistics on site which they had reported had reduced deliveries here by over 90%. Other important takeaways from the visit were around the demand for the sort of flexible accommodation that they are providing such as the public roof viewing gallery. The Member stated that it was disappointing that this particular visit had been so poorly attended and therefore questioned whether it might be possible to arrange a repeat of this in the near future given the number of questions on these types of matters raised at recent meetings?

The Chair undertook to arrange this ahead of the building opening in Spring 2023.

A Member requested that these visits be considered outside of working hours going forward.

65 Fleet Street and reopening of the Tipperary public house

A Member referred to the refurbishment of 65 Fleet Street which was thought to have now been delayed by at least a year. He noted that this might have a knock-on effect as to the reopening of the Tipperary public house which was an Asset of Community Value (ACV). He therefore asked whether the Chair might consider writing to the owners of the building in conjunction with the Chair of the Fleet Street Quarter (FSQ) BID to see if any pressure could be applied as to the earlier opening of this. The Chair commented that this was not really a planning matter but added that he would be happy to lend his support and construct a letter jointly with the FSQ BID Chairman as suggested.

Post-Construction Information

A Member commented that she had previously requested this information as to sustainability targets and recounted that a report had been submitted to the Committee pre-pandemic which promised to bring forward a future report as to those buildings that had been constructed had met their BREEAM and other targets. She requested that the original report be recirculated to all current members of the Committee and queried when the updated report would now be forthcoming.

The Chairman asked that this be reported into the next meeting of the grand Committee.

Office Space

A Member queried where the City were in terms of its targets on Office floorspace and how much had been approved/constructed or was already in construction.

The Chairman asked that this also be reported to the next meeting of the grand Committee.

Officers clarified that this was a key priority for them and would also form a key part of the evidence base in terms of data being collected for the Local Plan.

9. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

Awayday

The Chairman commented that all Members should now have received an invitation to and information on a planned January Awayday for the Planning Committee which would offer the opportunity to look at a number of important strategic streams in a more informal setting. The Awayday would be moderated by Professor Peter Sharratt.

The meeting ended at 11.48 am

Chairman

Contact Officer: Gemma Stokley
gemma.stokley@cityoflondon.gov.uk

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PLANNING APPLICATIONS SUB-COMMITTEE
Tuesday, 31 January 2023

Minutes of the meeting of the Planning Applications Sub-Committee held at Old Library on Tuesday, 31 January 2023 at 10.30 am

Present

Members:

Deputy Shravan Joshi (Chairman)
Deputy Alastair Moss (Deputy Chairman)
Deputy Randall Anderson
Emily Benn
Deputy Michael Cassidy
John Edwards
Anthony David Fitzpatrick
Deputy Edward Lord
Alderman Ian David Luder
Antony Manchester
Alderman Bronek Masojada
Deborah Oliver
Deputy Graham Packham
Deputy Henry Pollard
Luis Felipe Tilleria
Shailendra Kumar Kantilal Umradia

Officers:

Zoe Lewis	-	Town Clerk's Department
Gemma Stokley	-	Town Clerk's Department
Deborah Cluett	-	Comptroller and City Solicitor's Department
Tim Fletcher	-	Media Officer
Gwyn Richards	-	Planning and Development Director
Phillip Carroll	-	Environment Department
Catherine Evans	-	Environment Department
David Horkan	-	Environment Department
Iain Steele	-	Environment Department
Peter Wilson	-	Environment Department
Kerstin Kane	-	Environment Department

1. APOLOGIES

Apologies for absence were received from Brendan Barns, Deputy Keith Bottomley, Deputy John Fletcher, Deputy Marianne Fredericks, Martha Grekos, Jaspreet Hodgson, Alderman and Sheriff Alastair King, Deputy Natasha Lloyd-Owen, Alderwoman Susan Pearson, Judith Pleasance, Ian Seaton, Deputy James Thomson, William Upton KC and Alderman Sir David Wootton.

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

There were no declarations.

3. **MINUTES**

The Committee considered the public minutes of the Planning Applications Sub-Committee meeting held on 13 December 2022 and approved them as a correct record.

4. **FLEET HOUSE, 8-12 NEW BRIDGE STREET**

The Sub-Committee considered a report of the Planning and Development Director concerning 8 - 12 New Bridge Street London EC4V 6AL – specifically partial demolition of Fleet House and full demolition of St Bride's Tavern Public house (retention of basement levels) and the erection of a part replacement building with roof extension to provide an 8 storey building for office use (Class E) at levels 1-8, with office lobby (Class E) and commercial space (Class E) at ground floor and mezzanine level, and public house (sui generis) at ground floor level and part basement level; new pedestrian and servicing route from St Brides Lane to Bridewell Place.

The Town Clerk referred to those papers set out within the main agenda pack as well as the Officer presentation slides and an addendum that had been separately circulated and published. Officers advised that the addendum included two additional representations, a stopping up plan, amendments to the report and conditions and a corrected factsheet.

Officers presented the application, highlighting that the application site was bounded by New Bridge Street to the east, Bride Lane to the north and Bridewell Place to the south. It was reported that the site was within the Fleet Street Conservation Area, adjacent to the Whitefriars Conservation Area and that the Fleet House was built in the late 1950s.

Officers shared visuals of the planning permission that was granted for the redevelopment of the site in 2015 and had been implemented. This planning permission was for the total demolition of the building and the redevelopment of the site. This building would accommodate two flexible retail units; one that could be used as a public house and office space.

In relation to the scheme before members, images of the retention strategy were shown to the Sub-Committee. These showed the large part of the existing structure, which was to be retained, the area to be demolished and the proposed new structure. The eastern half of the existing structure would be maintained, along with the basement. The western half, including St Bride's Tavern, would be demolished along with the top floor of the building. The additional structure included two new floors.

Members were shown a visual of the proposed massing. One additional storey would be added to the top of the building, resulting in the height of the building increasing by 3.2 metres. The envelope of the building would fill out towards the

centre, increasing the amount of floorspace on the site. The image showed the stepping back at the top of the building which provided roof terraces for the office tenants and the location of these roof terraces was outlined.

The Sub-Committee were shown an existing ground floor plan. Along New Bridge Street there is retail space at ground floor level. There is a betting shop on the corner of Bridewell Place and New Bridge Street, a restaurant in the middle of the New Bridge Street frontage and an office entrance on the corner. St Bride's Tavern sits on the southwest corner on Bridewell Place next to the vehicular access point to the courtyard. The elevation on Bride Lane is very inactive and the façade is defensive offering little intervention with the public realm. The ground floor slab is raised above street level and there is stepped access into the public house, retail units and office, with no level access.

Members were shown the proposed ground floor plan. The proposed public house would have prominent frontages facing Bridewell Place and New Bridge Street. The public house would also have space in the basement. The office entrance would be positioned in a visually prominent location at the centre of the building on New Bridge Street. Steps and a ramp would make the lobby accessible. A retail unit was proposed in the north-east corner in a prominent location on New Bridge Street and Bride Lane which would create an active frontage.

It was reported that a new route was proposed which would be known as Bridewell Passage and this would link Bride Lane and Bridewell Place. It would be both a servicing route and a pedestrian route. The entrance to cycle parking in the basement would be from the Bride Lane end of the passageway.

Officers reported that vehicular servicing would predominantly take place from Bridewell Passage. Vehicles larger than 7.5 tonnes would continue to service the site from the loading bays on New Bridge Street. An offsite consolidation site would be used and there would be a maximum of 12 deliveries per day. The existing site when fully occupied had 24 deliveries per day.

Members were shown images of the existing mezzanine level and the proposed mezzanine level. The proposed retail unit would be at two levels.

Officers reported that terraces were proposed for office tenants on level 4 on the southwest corner of the building with climbing planters for vertical greening. Terraces were proposed on levels 7 and 8 which would wrap around the building and a roof terrace was proposed on the roof which would have substantial landscaping with trees and low-level planting.

Members were shown a number of images of existing and proposed elevations. Officers reported that the proposed elevations to Bridewell Passage included proposed art boards, the contents of which would be designed in collaboration with the St Bride's Foundation through the cultural plan. This would be secured through the Section 106 agreement.

It was reported that the building would be finished in pigmented, masonry panels with light coloured concrete lintels and columns, glazed bricks and anodised bronze metal work for the fenestration. The colour of the pigmented masonry panels would turn to a red tone towards the west of the building.

Members were shown the existing view from Ludgate Circus and the proposed view. The building line stepped out in this view. In the consented and implemented scheme the façade line protruded further into the street. The scheme had a curved façade which would have appeared more prominent as a result of its form in views up and down New Bridge Street. The proposed scheme would stay within that façade line and would sit more comfortably on the street.

Members were shown the existing and proposed views from New Bridge Street and Blackfriars Station and were advised that in the view of officers, the proposal would cause no harm to the character or appearance of the conservation areas, existing buildings or views. Members were also shown computer generated images of the proposal.

Officers reported that the public house was designed so that it would be integrated into the office building but would also be a distinct public house. The design made reference to existing public houses in the wider area. It would have attractive brickwork, details, planters and signage which would capture the essence of the public house façade design. The new public house would wrap around the corner of Bridewell Place and Bridewell Passage. Overall, the proposed public house would be 23 square metres larger than the existing public house in terms of gross internal area and 132 square metres larger in terms of net internal area. The ground floor frontage would be approximately 24 metres longer and would face two streets instead of one.

Officers concluded that the proposed building would result in the aesthetic enhancement of the dated 1950s building, the addition of one additional storey and the increased massing would all sit well in its context and a significant proportion of the existing structure would be retained. The proposals would add approximately 1,800 square metres of floor space and double the occupancy of the building. They would provide enhanced public realm at ground floor, offer vibrant active frontages and would provide a new pedestrian route. The public house was considered to be high quality with a distinct character and appearance and would make a positive contribution to the surrounding area. The application would secure development that was environmentally responsible. The application for planning permission was therefore recommended for approval.

The Chairman explained that there were no registered objectors to address the meeting on this occasion and he therefore invited the applicant to speak.

Eoin Conroy, speaking on behalf of Atenor UK, the owner of the applicant advised that Atenor is a pan-European developer and investor in real estate. Atenor's business model is investment in sustainable development both social and environmental. Fleet House was Atenor's first investment in the City of

London. It was acquired on a leasehold basis in February 2022. Fleet House came with existing planning consent but following acquisition, it was decided that there was an opportunity to improve the scheme by applying the sustainable principles and modern workplace principles to reflect the new lifestyles and workplace environments. The revised proposal adopted Atenor's in-house principles of sustainable development and tried to apply that to the design development of the project. Members were shown images of the consented and proposed schemes.

David Weatherhead, Design Director for the applicant's architect explained that the proposed building would be sensitive in its location and acknowledge the conservation area and looked to enhance the area in a positive way. The site had a heritage in publishing from the 16th century to the 20th century. It was important to provide long term benefits. A sustainable strategy had been embedded into the proposals. Embodied carbon was an important consideration as was attracting people back to the City post pandemic. The passageway would create improved connectivity. Some people's values had changed since the pandemic and it was important to provide a building which was sustainable and encouraged natural daylight, views and positive distraction.

An optimisation strategy had been produced to ascertain the greatest amount of carbon that could be kept in the building while also having safe on-site servicing and a modern building with efficient cores and a safe design. Adding a new area would make the building more adaptable for the next 75 years. 80% of the usable office structure and 73% of the existing building were being retained and 3,428 square metres of new structure would be added. A storey would be added to the building but this would be set back and the main frame of the building would be retained.

Members were advised that the ground floor would have new and vibrant uses and provide a building which was safe, sustainable and active. The existing ground floor has a public house, betting shop and a food and beverage outlet. It has a total of nine entrances all of which are stepped. The proposed scheme would provide level access to every use in the building, the servicing and stairways. The service yard of the existing building can not be used for many large vehicles. A service layby on Bridewell Place was used until it was removed in 2015 to provide a two-way street.

The provision of a new pedestrian passageway would link Bridewell Place to Bride Lane, would provide on-site servicing and also help to increase footfall to other attributes around the city including Bridewell Theatre and St Bride's Church. This would increase the network of passageways in the conservation area enforcing character and would also be the safest approach for the site.

The proposed building would be unique in terms of a ground floor that could be accessed on all sides and provide an active frontage on every corner. It would be an inviting building and it had been possible to retain the southern staircase in order to further enhance the embodied carbon of the building.

Ian Anderson from Litchfield's Planning and Development Consultancy, stated that the new scheme would provide tangible benefits and the new passageway would provide improved connectivity, safe off-street servicing and would enhance the quality of the conservation area. He stated that the development reflected green credentials with a prominent cycle parking entrance on Bride Lane as well as showers and changing rooms. The scheme would contribute to a vibrant economy delivering enhanced employment space supporting the aspirations of the Fleet Street Business Improvement District through the activation of ground floor space and enhanced inclusive and accessible public house.

The sustainable strategy retained 72% of the structure which meant there would be a shorter build time and disruption to neighbours.

The public house had been subject to significant discussions with Officers in terms of its design. The proposed public house would provide a modern interpretation and be inclusive and accessible providing double height space in a welcoming environment. The use of bricks and glazing was modern, however, the design acknowledged the location in the Conservation Area and other public houses in the locality. The pub windows were canted adding to the character of the pub. Flowerbox planters, solid banding, signage and hanging baskets would add to the character. Sash windows would lower to give an outside feel when the weather permitted.

Mr Anderson stated that the development had the full support of the Fleet Street BID who had noted that the predevelopment of Fleet House demonstrated a practical and necessary proposal that could invigorate and stimulate the local area with the potential to reinvigorate streetscapes, public spaces and economic prospects that were welcome and celebrated. It was hoped that the City of London Corporation would approve the application and continue to support the ongoing regeneration enhancements of the wider Fleet Street quarter area. The introduction of a new highly sustainable office building would drive the economic viability of the city as well as deliver tangible benefits to the local area through the provision of public realm, accessibility improvements, new public art, a cultural strategy and extensive greening and planting aligning with the ambitions of the BID.

The Chairman thanked the applicant team for their contributions and invited questions of them from the Sub-Committee.

A Member asked how long the public house would be closed during the demolition and construction works and was advised that there would be an approximate two-year construction period during which the pub would be closed. It was anticipated that construction would begin in 2023. The Member asked if the intention was for the public house to be reopened for the Christmas 2025 trade and was advised this was the developer's aspiration although there were many factors outside of the developer's control. The aim was to start and finish the construction as soon as possible.

A Member asked for more information about the mezzanine floor, where it would be located and how it would be used. Officers advised that the ground floor height was 5.8m high and the site further dipped down on Bridewell Place another 850mm. Therefore it was possible to put in a mezzanine floor along part of Bridewell Place and include a mezzanine height above the retail space to fit within the ground floor at double height volume.

A Member commented that servicing using Bride Lane could be problematic as there were residents living there. He stated that there were no residents living in Bridewell Place. He was advised that although vehicles would access the passage via Bride Lane, no servicing would take place on Bride Lane so there should not be any nuisance to residents.

A Member asked for clarification on the vehicular access proposed on Bridewell Passage. He was advised that there was an overnight servicing strategy to avoid vehicles using the passage during the day so pedestrians could freely use the passageway during the day. The passageway would be closed to vehicles during the day through the use of bollards. To promote the safety of pedestrians, there would be gates in the passage which would be closed during servicing. They would remain open at all other times.

A Member asked for details of the measures that would be taken to discourage anti-social behaviour. The applicants advised that there would be a robust passive surveillance and active surveillance strategy including a lighting strategy which would discourage anti-social behaviour. There would also be an active frontage with visibility of the lane at all times.

Members asked questions about the name of the new public house. The applicants stated that they were amenable to working with a third-party operator to discuss naming options but the applicant was unable to impose a name on a third-party operator. The applicants were willing to work on a good faith basis to have a public consultation about name options. Officers stated it was not considered reasonable or appropriate to impose a name but the matter could be included in the cultural management plan and be part of the legal agreement.

Seeing no further questions of the applicant, the Chair sought out any remaining questions of Officers.

A Member raised concern that if the application was approved, construction was likely to take place at the same time as the Salisbury Square development construction. He stated that there was already significant disruption in the Whitefriars area with heavy goods vehicles being parked on Tudor Street. He asked that officers work to ensure that construction of the two developments in parallel did not disrupt businesses and residents in the immediate vicinity. Officers stated that a construction and traffic management plan would be required for this development. The Salisbury Square development and other sites in the area also had construction traffic management plans.

A Member asked about the cultural plan, the link with St Bride's Foundation, how this would link with any art and naming and whether there was a connection with policy in recognising the pub as a heritage asset. Officers advised that there had been initial discussions about the use of advertising boards for the Bridewell Theatre and details would be agreed at a later date. The public house had been assessed as a non-designated heritage asset but fell short of the requirements to be listed as such.

The Sub-Committee then moved to debate the application.

A Member stated that the proposal was a positive reuse of the vast majority of the building, was an improvement on the consented scheme and would sit comfortably on New Bridge Street. The scheme would replace the 1950s block and the additional permeability with the new passageway was welcomed. Along with other passageways and footways being constructed through the Salisbury Square development to St Bride's Church, this would enhance the area and accessibility of the church. The importance of having a public house in this location was acknowledged. Although the existing pub was the Bride's Tavern, previous names were The White Friar and White Bear. If the public house was given one of these names it would be welcomed but it was not for the Sub-Committee to dictate the name. It was vital that the construction process was tied in with the development on Salisbury Square to minimise disruption.

A Member stated that this proposal was a major upgrade on the consented scheme and the submission from the BID was welcomed.

A member commented on the accessibility of the site and underlined the transport links including Blackfriars Station, nearby Crossrail Station which would have 140 trains an hour passing through, bus routes passing the site as well as a busy cycle lane. He welcomed the scheme which was more relevant to today's potential occupants than the previous consented scheme. The continued trend of close co-operation between architects, designers and planning officers was welcomed. The design of the scheme was sensitive to the location and its likely future use as part of the legal district Fleet Street had become with the new courts nearby.

A Member commended the work that had taken place in relation to sustainability since the previous scheme was approved in 2015.

The Chairman summed up the points made and stated that the sustainability improvements included the retention of embodied carbon, over 70% of the existing building being retained, the use of air source heat pumps and photovoltaic cells. This was a good exemplar of sustainability in the city. The inclusion of a public house double the size of the existing one was welcomed and it was hoped this would attract more business. The ground floor activation was important as was looking at the overall project.

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

Votes were cast as follows: IN FAVOUR – 16 votes
OPPOSED – None
There were no abstentions.

The recommendations were therefore carried unanimously.

RESOLVED -

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

(a) Planning obligations and other agreements being entered into under Section 106 of the Town and 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;

(2) That Officers be 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.

(3) That it be agreed in principle that the land affected by the building which is currently public highway and land over which the public have right of access may be stopped up to enable the development to proceed and, upon receipt of the formal application, officers be instructed to proceed with arrangements for advertising and (subject to consideration of consultation responses) making of a Stopping-up Order for the area shown marked on the Stopping-up Plan annexed to this report under the delegation arrangements approved by the Court of Common Council.

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

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

RESOLVED – That the report be noted.

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

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

RESOLVED – That the report be noted.

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

Committee Visit to Wren Church with newly installed Air Source Heat Pumps

A Member commented that the Sub-Committee had recently been offered the opportunity to visit a church where air source heat pumps had been installed to

replace the heating system for economical reasons rather than for environmental reasons. The building had single glazing which could not be changed as they were stained glass windows and the walls could not be insulated. Only the roof could be insulated. The building had to be heated all the time as it was used seven days a week. The prices of electricity and gas had been considered before installing an air source heat pump system. He asked how this could be encouraged across the City of London.

An Officer advised that this could be included in the Climate Action work stream as a positive example along with another church where photovoltaic panels and a green roof had been installed on the roof. The city had many sensitive assets for which it was more difficult to include measures that could be used in an office building.

Thavies Inn

A Member asked a question about the inclusion in the delegated decisions report of the demolition of Thavies Inn House as this had been approved by the Sub-Committee. Officers advised that it was presumed that it had been issued as the Section 106 had been signed. The Member asked that in the future where this was the case, it was explained in the report.

8. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT **Awayday**

The Chairman thanked officers for their work and requested that Members and Officers complete the feedback questionnaire that had been sent to them.

The meeting ended at 11.25 am

Chairman

Contact Officer: Zoe Lewis
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