



# 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, 21 JANUARY 2025

**Time:** 10.30 am

**Venue:** LIVERY HALL - GUILDHALL

11. **\*MODERNISING PLANNING COMMITTEES - GOVERNMENT CONSULTATION**

Report of the Executive Director, Environment.

**For Information**  
(Pages 3 - 30)

12. **\*NATIONAL PLANNING POLICY FRAMEWORK (NPPF), DECEMBER 2024 UPDATE**

Report of the Executive Director, Environment.

**For Information**  
(Pages 31 - 190)

13. **\*AIR QUALITY STRATEGY 2025 TO 2030**

Report of the Executive Director, Environment.

**For Information**  
(Pages 191 - 330)

14. **\*ENVIRONMENT DEPARTMENT HIGH-LEVEL BUSINESS PLAN 2024/25 – PROGRESS REPORT (MID-YEAR: 1 APRIL – 30 SEPTEMBER 2024)**

Report of the Executive Director, Environment.

**For Information**  
(Pages 331 - 340)

15. **\*MONTHLY PUBLIC LIFT & ESCALATOR REPORT - OCTOBER 2024**

Report of the City Surveyor.

**For Information**  
(Pages 341 - 346)

16. **\*OUTSTANDING ACTIONS**

Report of the Town Clerk.

**For Information**  
(Pages 347 - 348)

## City of London Corporation Committee Report

<b>Committee(s):</b> Planning and Transportation Committee	<b>Dated:</b> 21/01/25
<b>Subject:</b> Modernising Planning Committees – Government Consultation	<b>Public report:</b> For Information
<b>This proposal:</b> <ul style="list-style-type: none"> <li>• <b>provides statutory duties</b></li> </ul>	This report relates to the statutory planning function
<b>Does this proposal require extra revenue and/or capital spending?</b>	No
<b>If so, how much?</b>	
<b>What is the source of Funding?</b>	
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	
<b>Report of:</b>	Katie Stewart – Executive Director, Environment
<b>Report author:</b>	Alex Storey – Planning Policy Officer

### Summary

On the 9<sup>th</sup> December 2024 the Government published a planning reform working paper titled modernising planning committees. The paper includes initial ideas and shows the Government’s direction of travel: they are thinking of introducing a national scheme of delegation and ‘strategic development committees’ to supplement standard planning committees.

Officers have drafted a response to the working paper (see appendix 1), and this committee report provides a brief discussion. It is proposed that the consultation response reflects the successful operation of the City Corporation’s Planning Application Sub-Committee against the performance criteria set out by the Government, and the unique nature of development in the City, and suggests ways in which the reforms could be altered to allow the City Corporation’s committee to continue to function effectively.

## Recommendation

Members of the Planning and Transportation Committee are asked to consider and provide comments on the consultation response at Appendix 1.

Members of the Policy and Resources Committee are asked to:

- consider the comments of the Planning and Transportation Committee
- approve the consultation response at Appendix 1.

## Main Report

### Background

1. On the 9<sup>th</sup> December the Government published a working paper on 'modernising planning committees.' The general direction of travel indicated in this paper is that the Government would like to streamline the committee process by clarifying the types of applications that should be decided by committee, and by introducing 'strategic development committees' that would specialise in the largest, 'strategic' applications that require long term engagement by the LPA and elected members.
2. Any changes would require secondary legislation following the passage of the Planning and Infrastructure Bill, which is due to be introduced to Parliament early this year, and would be fully consulted on in the normal way. The working paper invites views on the Government's initial ideas.
3. The Government is considering a national scheme of delegation to ensure that the number and type of applications that are determined by committee is consistent across LPAs. The Government also wants the national scheme of delegation to empower professional planners to make more decisions, especially on applications that are in compliance with the development plan when read as a whole, or on post-permission matters where the principle of development was accepted in an outline application.
4. This is in the context of some planning committees refusing development on allocated sites, or reserved matters applications on large masterplan sites, against officer advice, only for this to be overturned at appeal and costs awarded against the Local Planning Authority.
5. Alongside a national scheme of delegation, the working paper introduces the idea of 'strategic development committees'. The Government envisages these to be smaller committees of three to five members but acknowledges that where these are already in operation, they often have seven to nine members.
6. All development that is classed as 'strategic' would be considered by the strategic development committee.

## **Current Position**

7. The Planning Applications Sub-Committee (PASC) currently decides applications that are not delegated to officers. The membership of the PASC is the same as the full Planning and Transportation Committee.
8. The current scheme of delegation states that all applications are delegated to officers subject to the 'decision being in accordance with policy, not being of broad interest and there being no more than 9 planning objections.'
9. The Government is clearly targeting LPA's that have a record of refusing development on weak, spurious or illegitimate planning grounds, especially where the site has been allocated in the local plan or is subject to an outline consent, contrary to officer recommendations. This is not the case for the City Corporation; since December 2022, 32 applications<sup>1</sup> have been decided by the Planning Applications Sub-Committee. Of these, officers have recommended 31 for approval and one for refusal.

## **Proposals**

10. On the two major ideas in the working paper – a national scheme of delegation, and strategic development committees – a discussion is below. For the full consultation response please refer to Appendix 1.

### *National Scheme of Delegation*

11. The working paper offers three options for how a national scheme of delegation could work:
  - All applications that comply with the development plan are delegated to officers (option 1)
  - All applications are delegated by default, except for departures from the development plan that are recommended for approval, and for applications by the LPA itself (option 2)
  - All applications are delegated by default, with a prescriptive list of exemptions (eg major residential development not on an allocated site, development that is subject to an Environmental Impact Assessment, development proposals that have received a specified number of objections, etc) (option 3)
12. The City Corporation's current scheme of delegation is similar to option three, although the exemptions are different to the Government's suggestions. Most applications are delegated by default, with only those that do not comply with the development plan or being of 'broad interest' sent to committee.

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<sup>1</sup> Listed building consents that accompany a full application have been discounted

13. Since the current committee structure is thought to work well and this is close to option three, this will be fed back to the Government in the City Corporation's response.
14. It is noted that two of the three options presented rely on the concept of 'compliance with the development plan', and the Government identifies a potential hybrid system where the first stage is whether an application complies with the development plan.
15. At paragraph 13 of the working paper the Government notes that a 'judgement on compliance with the development plan may be complex and need some careful consideration, particularly where an application may not fully meet a specific policy'. Given the emphasis on an officer judgement on accordance with the development plan, clear guidance and processes should be produced by the Government if this framework is taken forward.
16. This would also have a specific impact in the City as it receives several high profile and nationally important applications per year, that often are judged to be in accordance with the development plan. In some of the Government's scenarios these would automatically be approved by officers despite their significance potentially warranting a committee decision.
17. With regards to objections, it is noted that the Government's working paper takes a negative view of having a threshold of objections that would trigger a decision by committee. The Government sees any threshold as an incentive to organised local opposition to meet whatever threshold is set. While the City Corporation usually does not frequently encounter large and organised opposition groups, the removal of this trigger should be carefully considered in light of the additional pressure placed on a judgement of compliance with the development plan. An objection threshold is one potential way to assess the significance of a proposal, even if officers judge it to comply with the development plan.

#### *Strategic Development Committees*

18. The Government is seeking views on requiring LPAs to establish smaller, dedicated committees to focus only on strategic development. These would operate in addition to the main planning committee, although any national scheme of delegation would not apply. Every application that is classed as 'strategic' would be sent to the strategic development committee.
19. The use of strategic development committees may be suitable for some local authorities that are bringing forward a New Town, major urban extension or London Plan Opportunity Area.
20. However, the PASC already operates in a quasi-strategic manner. Only the very largest applications normally go to sub-committee.

21. Therefore, for strategic development committees to be effective the threshold for a 'strategic' application must be carefully set, and given the differential scales and types of development in different places, it should not be set nationally. The criteria for referral to the Mayor of London is a good precedent as it contains specific thresholds for the City of London, distinct from central London and the rest of London<sup>2</sup>. The City of London specific thresholds are:
- floorspace of more than 100,000 sqm
  - height of more than 150 metres
22. It is also noted by officers that the City Corporation does not process the type of applications the working paper suggests a strategic development committee is designed to decide. Due to the relatively small size of all development plots, the City Corporation rarely receives outline applications, and all development is usually brought forward as a single phase, often as a single building. Therefore, the long term strategic oversight that is needed for a new town, urban extension or masterplan does not occur in the City.
23. The City's unique circumstances mean that a strategic development committee is unlikely to have any benefits, especially since the current PASC already works efficiently. In fact, if the threshold is set poorly it may result in a higher volume of applications going to committee, with all of these being decided by the strategic committee. This would protract the decision making process, delay development, and have the opposite effect to the Government's intentions.
24. Consequently, officers are of the opinion that a strategic development committee should not be mandatory if the LPA can demonstrate the effectiveness of its standard planning committee. If the Government proceeds with mandatory strategic development committees, the City of London should have its own threshold for a 'strategic' application, in line with the referral criteria to the Mayor of London. Alternatively, areas subject to a Spatial Development Strategy should be exempt, given that this already provides a layer of strategic insight, with the Mayor of London having the power to call in applications for determination.

#### *Mandatory training*

25. The working paper also seeks views on the introduction of nationwide, mandatory training for planning committee members.
26. The City Corporation provides both in-house and Planning Advisory Service training to planning committee members, and so supports the principle of training for members.

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<sup>2</sup> [The Town and Country Planning \(Mayor of London\) Order 2008](#)

27. A consistent, nationwide scheme of training is supported by the City Corporation, provided this reflects local circumstances and governance arrangements.

### **Corporate & Strategic Implications**

Strategic implications – The planning committee makes decisions on high profile applications that have economic, social and environmental impacts. Its work cuts across several corporate plan objectives including Dynamic Economic Growth, Leading Sustainable Environment and Vibrant Thriving Destination.

Financial implications – none

Resource implications – none

Legal implications – none

Risk implications – none

Equalities implications – none

Climate implications – none

Security implications – none

### **Conclusion**

28. The Government has published a working paper that indicates a direction of travel for planning committees. The Government would like to introduce a national scheme of delegation, small 'strategic development committees', and mandatory training for committee members.

29. The City Corporation believes its planning committee works well, with 94% of decisions being taken in line with officer recommendations.

30. Therefore, while these reforms would likely improve decision making at many committees, they should be carefully applied to ensure that well-functioning committees are not disrupted.

31. It is noted that due to the unique nature of the City, some of the ideas proposed would result in additional applications being decided at committee, the opposite of the Government's intentions. Several additional ideas have been suggested that would ensure any reforms work well in the City context. These are:

- Exempting planning committees that are demonstrably effective and make sound decisions in line with planning policy and law
- To ensure a national scheme of delegation includes some 'safety valves' that cause an application to go to committee even if officers identify compliance with the development plan
- Using the GLA referral criteria to define 'strategic development' in London



- Exempting LPAs from setting up a strategic development committee if they are subject to a Spatial Development Strategy (such as the London Plan).

## **Appendices**

Appendix 1 – Modernising Planning Committees: Consultation Response

Appendix 2 – Planning Reform Working Paper: Modernising Planning Committees

### **Alex Storey**

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## **Appendix 1 – Modernising Planning Committee Consultation Response**

### **Do you think this package of reforms would help to improve decision making by planning committees?**

While the City Corporation appreciates the concerns of Government, we have concerns that the reforms as proposed could undermine the successful operation of those local authorities where a successful balance is being struck between determining applications speedily and predictably, and ensuring decisions on the most high-profile and strategically-significant schemes are given appropriate consideration by elected officials.

The City of London Corporation operates an effective and efficient planning committee. Since December 2022, 32 applications have been decided by committee<sup>1</sup>. Of these, officers recommended 31 for approval and one for refusal. The planning committee refused three: one in line with the officer recommendation and two against officer recommendations. 94% of applications were decided in line with officers' recommendation. The City Corporation considers this to be evidence that the planning committee works well and is not the type of committee that the government is targeting with these reforms.

The City Corporation is unique in both its governance structure and in the type of planning applications it regularly deals with, and its planning committee is set up in response to both these factors. Some of the reforms suggested are already used by the City Corporation, for example all decisions are delegated unless a departure from the development plan is identified (or they are of broad interest or an objection threshold is met).

As detailed in response to the following questions, the blanket application of reforms could have perverse impacts on the City Corporation, including more applications going to committee. Consequently, the City Corporation thinks there should be some mechanism that allows well-functioning planning committee to maintain their current structure. Alternatively, the reforms could apply only to those LPA's that are failing on a specific set of metrics the Government would like to target (for example: rate of decisions against officer recommendations, approvals on allocated sites, reserved matters approvals, number of minor applications refused at committee).

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<sup>1</sup> Listed building consents that accompany a full application have been discounted

**Do you have views on which of the options we have set out in regards to national schemes of delegation would be most effective? Are there any aspects which could be improved?**

The City of London Corporation operates an efficient planning committee that rarely overturns an officer recommendation, and when it does so it has legitimate and robust planning reasons for its decision. Since December 2022, 32 applications have been determined by committee, and only two have overturned the officer's recommendation (in both cases a decision to refuse against an officer recommendation to approve). Both applications raised significant planning concerns and are good examples of a planning committee's ability to decide finely balanced planning judgements.

The City Corporation's current scheme of delegation is similar to option three, although the exemptions are different to the government's suggestions. Most applications are delegated by default, with only those that do not comply with the development plan, being of 'broad interest', or gaining more than nine objections being sent to committee.

It is noted that two of the three options presented rely on the concept of 'compliance with the development plan', and the Government identifies a potential hybrid system where the first stage is whether an application complies with the development plan. The working paper recognises that the judgement on compliance with the development plan is often complex, particularly where a specific policy may not be fully met, or some policies are out of date.

Case law is clear that the legal phrase of 'in accordance with the development plan' does not mean that every policy is rigidly met in full. Policies often pull in different directions, and it is a matter of planning judgement for the decision maker. The relevant test is whether the application accords with the development plan when read as a whole. Again, this is the approach the City Corporation currently uses, and is one of the triggers for an application to go to committee.

Given this emphasis on an officer judgement on accordance with the development plan, clear guidance and processes should be produced by MHCLG if this framework is taken forward. This system works at the City Corporation partly because officers are trusted to make planning judgements, but also because there are two additional provisions in the scheme of delegation that trigger a decision by committee. If the only way for an application to reach committee is for officers to identify it as a departure from the development plan, there needs to be clear guidance on how this should be applied and considered, in order to avoid situations where there is extensive debate and efforts to influence judgement on this matter.

This would also have a specific impact in the City as it receives several high profile and nationally important applications per year, that often are judged to be in accordance with the development plan. In some of the Government's scenarios these would automatically be approved by officers despite their significance potentially warranting a committee determination. The role of strategic development committees is noted, however, due to the unique circumstances of the City Corporation they are unlikely to be a panacea.

Overall, the City Corporation's model is a good example of how option three could work. It is agreed that a departure from the development plan is a useful starting point to trigger a decision by committee, albeit with clear and up to date guidance on how this judgement is made with regard to the plan as a whole. However, there should also be the potential for some other provision, or 'safety valves' to account for local circumstances. This could be as generic as the 'broad interest' used in the City Corporation's scheme of delegation.

**We could take a hybrid approach to any of the options listed. Do you think, for instance, we should introduce a size threshold for applications to go to committees, or delegate all reserved matters applications?**

There should exist the potential to create 'safety valves' that allow for applications to go to committee even if compliance with the plan is identified. As stated in response to the previous question, a planning judgment on accordance with the development plan is an appropriate first criteria for deciding if an application should be decided by committee. The subsequent options listed in the working paper would, in most cases, be redundant due to an officer's identification of compliance with the development plan

There should be some possibility of an application appearing at committee, even if officers identify compliance with the development plan. This is because a planning judgement call is subjective, and in some cases, it can be a finely balanced decision that may benefit from determination by committee.

A hybrid approach could allow for this. By default all applications that comply with the development plan are delegated, and then there are additional 'safety valves' that allow for a committee decision, even if compliance is identified. The City Corporation scheme of delegation allows for any application of 'broad interest' to go to committee. Broad interest is a generic term but works well in a City context . There is a risk to being overly prescriptive since planning is a context driven and subjective activity.

This is particularly important if the direction of travel with regards to objections is maintained (see question below).

**Are there advantages in giving further consideration to a model based on objections?**

It is noted that the working paper takes a negative view of having a threshold of objections that would trigger a decision by committee. While the City Corporation usually does not usually encounter large and organised opposition groups, the removal of this trigger should be carefully considered in light of the additional pressure placed on a judgement of compliance with the development plan. An objection threshold is one potential way to assess the significance of a proposal, even if officers judge it to comply with the development plan.

While it is agreed that any threshold will encourage objectors to meet whatever threshold is set, objections can still be material considerations. There are ways to reduce the importance of objections

without removing them entirely. One option could be to set an objection threshold for major applications only, therefore enabling small developments that sometimes generate severe local opposition but have negligible wider impacts to avoid a committee debate. This would also support SMEs who often develop small sites.

### **Do you agree that targeted planning committees for strategic development could facilitate better decision making?**

The planning committee at the City Corporation already operates in a quasi-strategic manner. Given the average size of the proposals the City Corporation receives, only the very largest go to committee. Therefore, for strategic development committees to be effective the threshold for a 'strategic' application must be carefully set and take into account the geographic variation in type and scale of development. It should not be set nationally. The criteria for referral to the Mayor of London is a good precedent as it contains specific thresholds for the City of London, distinct from central London and the rest of London.

It is also noted that the City Corporation does not process the type of applications the working paper suggests a strategic development committee is designed to decide. Due to the relatively small size of all development plots, the City Corporation rarely receives outline applications, and all development is usually brought forward as a single phase, often as a single building. Therefore, the long term strategic oversight that is needed for a new town, urban extension or masterplan does not occur in the City.

The City's unique circumstances mean that a strategic development committee is unlikely to have any benefits, especially since the current planning committee already works efficiently. In fact, if the threshold is set poorly it may result in a higher volume of applications going to committee, with all of these being decided by the strategic committee. This would protract the decision making process for additional applications, delay development, and have the opposite effect to the Government intentions. Consequently, the City Corporation is of the opinion that a strategic development committee should not be mandatory if the LPA can demonstrate the effectiveness of its standard planning committee. If the Government proceeds with mandatory strategic development committees, the City of London should have its own threshold for a 'strategic' application, in line with the referral criteria to the Mayor of London.

Another option could be to exempt LPAs from the strategic development committee requirement if they are subject to a Spatial Development Strategy. In London, applications of potential strategic importance are already referred to the Mayor of London, who assesses the strategic implications of the proposal. Therefore, there is already a layer of strategic oversight, managed by the authority that specializes in strategic development across London. The Mayor has the power to call in strategic applications. This potentially renders the type of strategic development committee envisaged in the working paper unnecessary in London.

**Do you have a view on the size of these targeted committees?**

The City Corporation does not have substantive comments on the size of a strategic development committee, although it believes that other factors such as commitment, training and engagement are potentially more likely factors that would influence consistent decision-making more than the size of the committee.

The City Corporation is in a unique position where most of its elected members are already politically independent. Its committee includes members with a broad range of expertise in matters related to or that effect planning and the built environment. This likely contributes to the efficiency and quality of committee decisions at the City Corporation.

**How should we define strategic developments?**

As highlighted in response to the earlier question, the definition of 'strategic' is crucially important. A poor definition would lead to more applications being decided by committee given the volume of large and very large applications the City Corporation receives. At the very least the definition of strategic development should be decided in line with the strategic geographies of each area. This would likely mean that each city region has its own definition, as well as other strategic clusters such as the Oxford-Cambridge arc, or regional blocks.

The City Corporation views the criteria for referral to the Mayor of London as a good example of how this could work, especially since this includes different thresholds for different parts of London (the city of London, central London, outside central London).

**Do you think the approach to mandatory training is the right one?**

The City Corporation provides both in house and Planning Advisory Service training to planning committee members. It also runs a continuous program of training on new and evolving planning matters. Therefore, the City Corporation welcomes the Government's thoughts on mandatory training and would support an official, nationwide training provider.

Extending training to more in depth planning matters would also be beneficial, particularly where this relates to new requirements (for example Biodiversity Net Gain). There could be a system of mandatory basic training and then a series of further modules that elected members can do if they wish, with regard to the specific issues that commonly occur in their area.

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*The Government is committed to getting Britain building again. This paper forms part of a series of working papers on different aspects of planning reform, designed to inform further policy development in collaboration with the wider sector.*

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## Summary

This paper invites views on models for a national scheme of delegation, which the Government has committed to introduce to support better decision making in the planning system. It proposes three possible options, designed to facilitate faster delivery of the quality homes and places that our communities need, by bringing greater standardisation over the operation of committees, in turn to give greater certainty to applicants.

In addition, the Government is interested in views on the creation of smaller targeted planning committees specifically for strategic development, as well as the introduction of a mandatory requirement for training for planning committee members.

All three reforms would require changes to primary legislation through the Planning and Infrastructure Bill. A series of questions are posed at the end of the paper, to inform discussions with the sector before determining whether any of these proposals are taken forward.

## Introduction

1. Planning is principally a local activity, because decisions about what to build and where should be shaped by local communities and reflect the views of local residents. That is why the Government is determined to ensure every area has an up-to-date local plan developed through resident engagement, and it is why we believe that planning committees have an integral role in providing local democratic oversight of planning decisions. It is however vital that in exercising that democratic oversight, planning committees operate as effectively as possible, focusing on those applications which require member input and not revisiting the same decisions. That is why, as part of the King's Speech, we announced that we will modernise the way planning committees operate to best deliver for communities and support much needed development.
2. The Government also wants to make sure that skilled planning officers in local authorities are given the appropriate amount of trust and empowerment. Over the last quarter of a decade, there has been an increased focus on delegating decisions to officers, with

committees now usually focusing on the largest or most controversial applications: 96% of decisions were made by officers in Q2 2024 compared to 75% in 2000. However, the number and type of applications committees consider still varies widely between local planning authorities. Some committee decisions are made not in accordance with material planning considerations, while some committees revisit developments which have already been considered by elected members through the local plan process – which can cause unnecessary delays, cost, and uncertainty. Furthermore, to ensure that planning professionals are fully supported in their role and their skills and experience are put to best use there is a strong case for allowing them to resolve more applications more quickly, in service of residents and businesses.

3. Most planning committees, which comprise a number of elected councillors, make well considered and fair decisions most of the time. However, there remain a number of issues with how committees operate that we want to address.
  - a. First, many local schemes of delegation do not provide full clarity on whether or not an application will go to committee, which can cause uncertainty for developers.
  - b. Second, too much time is spent considering applications which are compliant with the local plan or applications for post-permission matters, especially where the development would be on an allocated site and where there are clear policy requirements for the site in the local plan. This delays decisions on schemes which have already been considered through the local plans process, wasting the time of councillors, applicants and delaying good outcomes for places and for communities.
  - c. Third, in some of these instances the development is rejected against officer advice only to be overturned on appeal, delaying appropriate development and wasting taxpayers' money.
  - d. Fourth, there can be insufficient understanding among all committee members of planning principles and law, inhibiting their ability to make decisions in line with these principles and law, in turn making these decisions more vulnerable to being overturned on appeal.
  - e. Fifth, there is a lack of transparency of committee decisions and their consequences – especially if a committee refuses an application and there is a successful appeal with costs awarded against the local planning authority.
4. Box 1 below provides examples of schemes where the development proposal was on an allocated site and in line with policy expectations, but the committee refused the application against officer advice and the subsequent appeal was upheld, creating delays for all.

## **BOX 1: EXAMPLES OF SUCCESSFUL APPEALS TO REFUSALS BY PLANNING COMMITTEES**

**Mixed use development on a vacant brownfield site in London.** This site was allocated in the Local Plan for residential and educational use. In Autumn 2021, an application for planning permission was submitted for a development on the site consisting of approx. 120 residential apartments and a special school for 90 pupils. Planning officers recommended to the planning committee in Summer 2022 that planning permission should be granted. The planning committee decided to refuse it. An appeal was made by the applicant and the Inspector, in early 2024, agreed the appeal should be upheld and granted permission. (London Borough)

**Residential development on allocated greenfield site in Northern England.** The site was allocated in the Local Plan for residential use. In Autumn 2022 an application for planning permission was submitted for a development of approx. 100 dwellings on the site. Planning officers recommended to the planning committee that the application be approved in Autumn 2023. The planning committee decided to refuse it. An appeal was made by the applicant and the Inspector, in Summer 2024, agreed the appeal should be upheld and granted permission. (Northern Borough Council).

**Residential development on allocated greenfield site in East of England.** The site was allocated in the Local Plan for residential use for c.500 dwellings, with the potential to increase to maintain 5-Year Housing Land Supply. In Spring 2020 an application was submitted for development of approx. 660 dwellings on site. Planning officers recommended to the planning committee that the application be approved in Summer 2021. The planning committee decided to refuse it. An appeal was made by the applicant and the Inspector, in Spring 2022, agreed that the appeal should be upheld and granted permission. (East of England District Council).

### **Our objectives**

5. We want to encourage better quality development that is aligned with local development plans, facilitates the speedy delivery of the quality homes and places that our communities need, and gives applicants the reassurance that in more instances their application will be considered by professional officers and determined in a timely manner. This will allow committees and the elected representatives that sit on them to focus their resources on contentious development not aligned with the development plan where local democratic oversight is required. This approach will empower planning professionals to make sound planning decisions on those cases aligned with the development plan and give greater certainty to developers and communities as to how development will be scrutinised by their local planning authority.
6. Tackling these issues means providing greater certainty to applicants that good-quality schemes aligned with the development plan will be approved in a timely manner – while still ensuring that residents know non-compliant or speculative schemes that depart from the development plan will be subject to appropriate democratic scrutiny. In delivering on that objective, we want to:

- a. encourage developers to submit good quality applications which are compliant with plan policies;
- b. allow planning committees to focus their resources on complex or contentious development where local democratic oversight is required and a balanced planning judgement is made;
- c. ensure planning committee members get the training and support they need to fulfil their duties effectively; and
- d. empower planning professionals to make sound planning decisions on those cases aligned with the development plan.

## Our proposals

7. In order to meet these objectives, we are proposing action on three fronts:
  - a. **a national scheme of delegation** – bringing clarity and consistency to everyone about which applications get decided by officers and which by committees;
  - b. **dedicated committees for strategic development** – allowing a dedicated and small group of councillors to dedicate energy to the most significant projects; and
  - c. **training for committee members** – requiring that councillors undertake appropriate training before they can form part of a planning committee.

## National scheme of delegation

8. Under local government law, planning decisions by a local authority must be a committee function, and not a function of the executive. Section 101 of the Local Government Act 1972 provides broad powers for the discharge of committee functions, by either a committee, sub-committee or delegation to an officer. Every council has its own scheme of delegation to identify the circumstances where planning decisions are taken by the planning committee rather than delegated to officers. There are currently no powers for the Secretary of State to set a national standard scheme of delegation for planning committees.
9. We want to change this and establish a national scheme of delegation which will provide a standardised, consistent approach to delegation of decisions in all local planning authorities, recognising where sites have already had democratic approval through the local plan process. We think a national scheme of delegation will make the system easier to navigate and assist in making it more transparent to users and the public. In designing this scheme, we want to work extensively with the sector. As a first step, we have developed several options for early consideration and discussion, which range from resting on a judgement about compliance with the development plan to hard rules based on the type of application. We have also set out a potential hybrid approach at the end of this section, which may combine the best elements of these different options. Box 2 provides a summary of how these options would play out with three illustrative examples.

*Option 1 – Delegation where an application complies with development plan*

10. The first option aims to ensure that planning committees do not spend their time considering planning applications which comply with the development plan. It would require the delegation of decisions to officers where an application for planning permission complies with the development plan – for instance, when the application is for development on an allocated site in line with plan policies or in line with a design guide. Local authority members will have already considered and approved the policies and site allocations in the relevant authority's local plan, on which residents will also have been consulted, and should be confident that professional officers can make decisions on applications which comply with the plan.
11. Where an application for planning permission does not comply with the development plan, it would be for the local planning authority to determine what is appropriate in their area, in the same way that they do currently. A planning committee would not need to consider all applications which did not comply; these could be delegated to officers if the local planning authority so wished.
12. This approach would apply to other types of applications such as reserved matter approvals, discharge of conditions or other special consents. For instance, where applications were made for reserved matters for an outline planning permission, and these applications were compliant with the development plan, these would be delegated to officers, but if they were a departure from the Plan they could be considered by the planning committee.
13. The judgement on compliance with the development plan may be complex and need some careful consideration of the issues, particularly where an application may not fully meet a specific policy which, for instance, could be outdated or there is no up-to-date local plan. We are keen to seek views on how compliance with the development plan could be defined in a clear enough way for both applicants and local planning authorities to determine when an application should or should not be caught by this requirement, including how any published site allocations' development plan document or supplementary planning document should be part of this assessment. In particular, there are already two relevant terms in planning law – 'in accordance with the development plan' and 'departure from the development plan' – which could be used and on which we would welcome views. We are also interested in views on whether there should be different approaches depending on whether a local planning authority has an up to date local plan or not. Where a plan is out of date, and the presumption applies, there will need to be clarity too on how an officer assesses compliance with the development plan.
14. We are also interested in views on who should make this judgement and what information should be provided to justify it. One option could be for the officer's report determining an application which complies with the development plan to confirm that this application

must be delegated to an officer. The report itself should include any assessment of the application against development plan policies which would provide a justification.

*Option 2 – Delegation as default with exceptions for departures from the development plan*

15. Our second option is that a national scheme of delegation should operate by exception, specifically that all applications should be delegated to officers unless specific circumstances apply. This could mean all applications must be delegated to officers unless:
  - a. the application is a departure from the development plan and is recommended by officers for approval; or
  - b. the application has been submitted by the local planning authority, its members or officers.
  
16. This approach would allow for greater delegation to officers of all application types. It sets a hard definition of criteria which must be met for an application to be decided by the planning committee. Its key benefit would be that committees would focus on only those applications which depart from the development plan and officers consider suitable for approval, as well as ensuring for propriety reasons that decisions involving the local planning authority are made transparently.
  
17. There are two aspects of this approach that we are conscious need specific consideration.
  - a. First, it would mean the committee must decide all such 'specific circumstance' applications, and the number of those applications could be significant, especially in large local planning authorities where some applications involving a departure from the development plan may be readily acceptable. This could lead to undesirable pressures on committee business. This could potentially be addressed by giving discretion to the chair of the planning committee to delegate decisions on specific applications back to officers.
  
  - b. Second, it would lead to officers determining applications for locally sensitive or controversial small-scale development where planning merits are finely balanced in terms of the development plan, and historically officers have looked to the committee to make the final decision. Examples include the development of a community asset, changes to a high profile listed building, or the use of an open space. One way of addressing this could be to create a further 'specific circumstance' category, where the head of planning and chair of the planning committee agree for the committee to consider an application by exception. However, this 'specific circumstance' may bring too much discretion back into the national scheme of delegation, and so not provide the intended certainty. Local discretion could, for instance, see ward councillors lobby to secure committee scrutiny of particular developments, even if they do not depart from the

development plan.

*Option 3 – Delegation as default with a prescriptive list of exceptions*

18. The third option would again require all applications to be delegated to officers. However, under this model, the national scheme of delegation would set out a prescriptive list of application types to be determined by committees to provide certainty to applicants from the start.
19. This approach does not focus on whether an application complies or generally departs from the development plan, but replaces it with a more specific approach linked to key common tests in national policy and development plans to provide greater clarity and consistency to applicants.
20. As an illustration, the list of circumstances where a committee could consider an application could include the following circumstances.
  - a. All applications for planning permission must be delegated to officers unless the application is:
    - i. for major residential or commercial development not on an allocated site;
    - ii. for an allocated site and the proposals depart from the policy in the local or neighbourhood plan for that site;
    - iii. for land on the Green Belt which engages the exceptional circumstances test in the NPPF;
    - iv. for development subject to Environmental Impact Assessment or which is likely to have a significant impact on a habitats site;
    - v. for development that would cause substantial harm to a designated heritage asset and there could be exceptional reasons for its approval;
    - vi. submitted by a local planning authority, its members or officers; or
    - vii. subject to over a specified number of objections.
  - b. All applications for other planning consents and approvals must be delegated to officers unless, for applications for listed building consent, the application was for works which would cause substantial harm to a listed building and there could be exceptional reasons for its approval.
21. This option would be the most prescriptive to set centrally. It would have the benefit of providing greater clarity on those application types which must be considered by planning committees in a way that is wholly consistent across the country, providing the greatest certainty to applicants. It would however leave little room for local interpretation, and a common list of required committee applications may miss significant local variations in application types, for example, where there is a particularly controversial listed building

consent application. It would also not provide for as clear a link between compliance with the development plan and the scheme of delegation, reducing the incentives for developers to comply.

22. In relation to the objection threshold, while there are some attractions to this approach, namely that it would more explicitly link an application going to committee with the level of concern it has caused locally, it risks incentivising organised opposition to development in order to meet whatever threshold is set. The Government is therefore less inclined to pursue this but is keen to consider views on it as part of further work on the national scheme of delegation.



## **BOX 2: ILLUSTRATIVE CASE STUDIES OF THE DIFFERENT OPTIONS**

### **Case Studies**

- I. A major development proposal for 100 dwellings complies with the local plan site allocation and policy requirements, including on design, open space and affordable housing provision. Officers have recommended approval.
- II. A minor development proposal for a change of use from a pub to a community centre. There are no specific site allocations in relation to the pub in the local plan, but there is a local plan policy which states that pubs must be protected from development resulting in a change of use or loss of the pub. In exceptional circumstances, development proposals resulting in the loss of a pub will only be permitted where there is no market demand for the pub use. Officers have recommended approval.
- III. A minor development proposal on a windfall site for the demolition of a small office unit and replacement with seven residential dwellings. The site is not allocated for residential use in the local plan, but officers have recommended the proposal for approval.

### **Result under Option 1**

- I. This would automatically be delegated to officers.
- II. As this is not in line with the local plan policy, it would be up to the discretion of the local planning authority to decide whether the application should go to committee in line with their local scheme of delegation (in relation to applications not in accordance with the development plan.)
- III. As this is not in accordance with the local plan, it would be up to the discretion of the local planning authority to decide whether the application should go to committee in line with their local scheme of delegation (in relation to applications not in accordance with the development plan).

### **Result under Option 2**

- I. This would be delegated to officers by default.
- II. Because this is a departure from the development plan and is recommended for approval by officers, this would go to committee.
- III. Because this is a departure from the development plan and is recommended for approval by officers, this would go to committee.

### **Result under Option 3**

- I. This would be delegated to officers by default.
- II. Because this is a departure from the development plan and is recommended for approval by officers, this would go to committee.
- III. Because this is a minor development proposal this application would be delegated to officers.

### *A hybrid approach*

23. The three options outlined above are not mutually exclusive, and it may be that the best approach is in fact one that blends different elements. One potential hybrid option would combine three components:
- a. first, applications which comply with development plan would be delegated, as per option one;
  - b. second, *all* reserved matters applications would be delegated, reflecting the fact that the principle of permission had been achieved and so giving greater certainty for post-permission matters; and
  - c. third, *all* applications for residential development below a certain size would be delegated, for instance using the non-major development threshold of ten units for residential development and 1,000 square meters for non-residential – recognising that consideration would need to be given to the operation of a threshold that works for all areas across the country.
24. Such a hybrid approach could help further focus the efforts of planning committees on the most significant applications, avoid committees looking repeatedly at the same scheme, and support small and medium enterprise (SME) builders.

### **Dedicated committees for strategic development**

25. Many areas of England have strategic development opportunities, often identified in local plans, which will bring long term change to an area. These include individual large scale development proposals, as well as Area Action Plans and proposals for urban extensions. Such strategic development opportunities are often in key locations with significant potential for new housing, jobs and infrastructure. In London, for instance, there are opportunity areas identified in the London Plan, and as part of our wider strategic planning reforms we expect over time more spatial development strategies to identify similar opportunities in their areas.
26. Planning permission for this kind of strategic development is often secured from the outline planning permission following considerable engagement with the local planning authority, and there is significant ongoing consenting on substantive matters as the development evolves. In some instances, development may come forward piecemeal from independent developers, requiring strategic oversight to deliver the vision for the area. This type of strategic development, which will impact on the long-term future of a location, will always be considered by elected members, and not subject to the general approach being proposed for a national scheme of delegation. Such strategic development requires longer term engagement by committee members and can involve consideration of many technical planning matters.

27. There are already successful examples across England of ‘Strategic Planning Committees’ which reflect the ambitions for a targeted focus on strategic development. These include the Ebbsfleet Development Corporation, which was established in 2015 to assist in the development of 15,000 new homes around the HS1 hub. Its planning committee comprises up to eight members, focuses on the strategic development of the Garden City and supports timely decision making in accordance with the plan for the area.
28. We want to test views on requiring local planning authorities to establish smaller, dedicated committees focused only on strategic development where there is such development planned in their area. Such committees would take ownership of strategic development applications and build expertise using local knowledge and understanding of planning issues. These committees would operate in addition to the main planning committee and would focus only on those developments that are critical to supporting local economic development and local housing need, providing long term focus and consistency for the most important schemes.
29. These committees could deal directly with, and have detailed knowledge of, specified strategic development opportunities. They could consider complex issues such as Section 106 agreements, and subsequent post-permission matters such as approval of design codes or reserved matters for key later phases. This could provide for a clearer and more direct decision-making process for developments of critical importance to the growth and economy of an area, while retaining local democratic oversight for such decisions.
30. In addition to their general benefit, there are two specific considerations.
- a. **The appropriate size of these committees.** We think there are considerable benefits in having a small committee of knowledgeable members who can have informed discussions about the strategic development, while recognising that as a committee there will need to be political balance reflecting the overall composition of the local authority. Several strategic development committees have seven to nine members, but we are keen to explore whether three to five members would give adequate scope for careful consideration of all matters.
  - b. **What constitutes strategic development in an area.** One approach could be for the local planning authority to decide what is a strategic development having regard to statutory guidance from the Secretary of State. Another approach could be to define strategic development in regulations based on development thresholds – for example, 500 units for residential development or 50,000 square meters for non-residential.
31. We are also interested in views on whether these focussed committees should include, in addition to elected members, independent expert members who have professional expertise in, for example, regeneration, planning and design. This approach has been taken

at the Old Oak and Park Royal Development Corporation which consists of four independent members, and four elected councillors from the three Boroughs within its area.

32. We do not anticipate that all local planning authorities would need to stand up such a committee, as it would only be required where strategic development was being proposed.

### **Mandatory training for planning committee members**

33. Finally, it is important that planning committee members are sufficiently trained in planning matters before they make decisions. Planning is a complex area – drawing on regulations, caselaw, and policy requirements – and it is important that planning committees which are undertaking a regulatory function are able to make robust decisions. Unfortunately, there are still too many decisions being made where the planning justification is weak, and the decision is overturned on appeal, creating delays and uncertainty.
34. Many local planning authorities in England already train their members, and there is good take-up of the membership training offered by the Planning Advisory Service. However, the approach to membership training is inconsistent and varies across the country. It is also unusual for a regulatory function as complex as planning not to require core training for key decision makers: in other regulatory environments, it would be seen to be a pre-requisite. For instance, in Scotland, elected members who sit on licensing boards are required to undertake mandatory training before they can take up a position on the board. In England, while the Licensing Act 2003 does not specifically include provisions for mandatory training of members, it strongly recommends that such members receive proper training to ensure they understand the complexities of licensing law and policy.
35. We are therefore, considering introducing mandatory training for planning committees to ensure members understand key planning principles, propriety, and new planning issues so that decision making is better informed and decisions are more robust. Specifically, we would require all members of planning committees, together with other key decision makers such as the Mayor of London, to undertake certified training before they could sit on a planning committee and be involved in the decision-making process. This would involve prohibiting members who have not undertaken the training from making decisions.
36. We envisage the training would cover at least the key principles of planning including, but not limited to, planning legislation, the role of the development plan and national planning policy, the planning application process, enforcement, and the code of conduct for planning committees. We are also keen to explore whether the training should be further extended to more in-depth planning matters and the effective operation of a planning committee. In considering the scope of the mandatory training, there is a balance to be struck between

requiring a comprehensive package of training and the practical need to ensure committees can continue to make timely decisions, especially following local elections and the appointment of new members to the committee.

37. We also envisage that the mandatory training and certification would be principally provided online, and to do this, the Government would procure a provider to prepare the training programme. If a decision is made to proceed with mandatory member training, the Government would provide resource for training under the new burdens doctrine. We are interested in how local planning authorities currently provide training for their members and will work with the sector on the detail of any training programme.

38. We are also interested in views on other ways in which we can further professionalise committees, including, for example, the production of a professional code of practice.

### **Conclusion and areas for further work**

39. We may take forward any or all of the above proposals, each of which would require primary legislation through the Planning and Infrastructure Bill. Should proposals set out in this working paper be taken forward, they would be the subject of further detailed consultation in the normal way – in particular where necessary to underpin secondary legislation following passage of the Planning and Infrastructure Bill.

40. In addition, the Government is clear that greater transparency of information on decision making is necessary to build reform. We will therefore be asking local planning authorities through our planning statistics returns to provide us with data on decision making in relation to planning committees, and in particular where refusals have been made against officer recommendation. We will also look to collect data from the Planning Inspectorate on where these applications have been overturned at appeal stage, and the costs awarded as a result.

41. We would welcome views on the options set out in this paper, and in particular on the following questions.

- a. Do you think this package of reforms would help to improve decision making by planning committees?
- b. Do you have views on which of the options we have set out in regards to national schemes of delegation would be most effective? Are there any aspects which could be improved?
- c. We could take a hybrid approach to any of the options listed. Do you think, for instance, we should introduce a size threshold for applications to go to committees, or delegate all reserved matters applications?

- d. Are there advantages in giving further consideration to a model based on objections?
- e. Do you agree that targeted planning committees for strategic development could facilitate better decision making?
- f. Do you have a view on the size of these targeted committees?
- g. How should we define strategic developments?
- h. Do you think the approach to mandatory training is the right one?

<b>Committee(s)</b> Planning and Transportation Committee	<b>Dated:</b> 21/01/2025
<b>Subject:</b> National Planning Policy Framework (NPPF), December 2024 update	<b>Public report:</b> For information
<b>This proposal:</b>  - delivers Corporate Plan 2024-29 outcomes	<b>All</b>
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>No</b>
<b>If so, how much?</b>	<b>n/a</b>
<b>What is the source of Funding?</b>	<b>n/a</b>
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	<b>n/a</b>
<b>Report of:</b>	Katie Stewart, Executive Director of Environment
<b>Report author:</b>	Gudrun Andrews, Head of Planning Policy

### Summary

On 12 December 2024, the government introduced an updated National Planning Policy Framework (NPPF). This is effective immediately for planning decisions, with the implications for plan-making dependent on the stage of development of local plans. While the most notable changes address housing and the Green Belt, other revisions are particularly relevant to the City Corporation's planning function. These changes include a new prioritisation of economic growth and clean energy, cross-boundary co-operation and infrastructure planning.

### Recommendation(s)

Members are asked to:

- Note the changes to the National Planning Policy Framework (2024)

## **Main Report**

### **Background**

1. On 12 December 2024 the government published a new version of the National Planning Policy Framework (NPPF). This replaces the December 2023 version. The most significant changes relate to housing and the Green Belt. This report sets out the main changes to the NPPF, highlighting the changes which are of most relevance to the City Corporation.
2. This new version is valid immediately to be applied to the determination of planning applications. Although the development plan remains the statutory basis for the determination of planning applications, the policies within the new NPPF are a material consideration.

### **Economic Growth**

3. The NPPF gives greater emphasis to economic growth and clean energy, in particular meeting the needs of the modern economy. Paragraph 87 introduces a new requirement for planning decisions to recognise and address the specific locational requirements of different sectors. This also means making provision for the 'expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience'. The City Plan aligns with this approach through promoting economic growth and the expansion of key economic sectors.
4. Paragraph 164 highlights the importance of the benefits of renewable and low carbon energy generation, giving significant weight to proposals that contribute to a net zero future. Paragraph 161 now specifically mentions the need to transition to net zero by 2050. The City Plan 2040 aligns with the City Corporation's Climate Action Strategy, aiming for a net zero Square Mile by 2040 and addressing climate impacts such as overheating, water scarcity, and storm and flood risk. Other additions include specific reference to sustainable drainage systems (Paragraph 164) and expectations that development should comply with development plan policies on decentralised energy, and to take account of design issues to minimise energy consumption (Paragraph 166).
5. Paragraph 109 introduces a new vision-led approach to transport solutions and paragraph 115 has been updated to emphasise the prioritisation of sustainable transport modes.

### **Housing delivery**

6. The majority of changes to the NPPF focus on boosting housing delivery to meet the Government's target of 1.5 million homes over the next five years. Changes reverse the December 2023 version, now requiring local planning authorities to



meet their identified housing needs in full. The City Plan 2040 outlines how these needs will be met, so this change is not significant for the City Corporation. Although changes to housing need calculations and delivery sanctions are important, their impact will be limited in the City due to lower housing targets and limited capacity as a business and financial centre.

7. In London, housing targets are determined by the London Plan (2021) rather than the standard method. The London Plan's housing policies will be considered up-to-date until at least March 2026, by which time the City Plan will be adopted. Therefore, the City Plan target will remain at 146 units per annum (up to 2028/29), rather than the 170 units per annum calculated by the standard method (Paragraph 60). The new London Plan will seek to apportion the total London-wide need of approximately 88,000 units per annum based on each local planning authority's housing capacity, although further work to determine the capital's overall capacity for meeting this need is yet to be completed. Although initial targets will be indicated in late 2025, the City's constrained housing capacity suggests that the new target for the Square Mile will remain similar to the current level. If required, any minor review of the City Plan to reflect updated London Plan housing requirements would come forward following the adoption of the new London Plan.
8. Paragraph 78 of the NPPF requires strategic policies to include a housing trajectory. Amendments now specify that this trajectory should include an 'appropriate' buffer of either 5% or 20%. Previously, a 20% buffer was required for persistent under-delivery against the Housing Delivery Test (HDT). Now, this 20% buffer also applies if the plan is out of date and the existing requirement is below 80% of the Objectively Assessed Need (OAN). Since the City Plan will be examined under the 2023 NPPF, no buffer is needed as the latest HDT (2023) results show 206% delivery of the requirement over the past three years.
9. As the new London Plan approaches publication (anticipated 2027), future housing trajectories will need to demonstrate delivery against the new targets plus a 5% buffer. Given the likely stability of the housing target and the anticipated pipeline of permissions, this should be achievable. Therefore, the 20% buffer is unlikely to apply.

### **Sustainable development**

10. Changes to the presumption in favour of sustainable development now mean that permission should be granted for sustainable development unless there are 'strong' reasons for refusal (Paragraph 11). However, as the City Corporation is not operating within the 'presumption in favour of sustainable development' or 'tilted balance' this is of limited relevance.
11. Amendments to Chapter 12 have removed some references to 'beauty,' instead focusing on well-designed places. The National Model Design Code is now considered a primary tool for preparing local design codes, rather than the main basis for improving design (Paragraph 138). Additionally, there is greater emphasis on using suitable brownfield land within settlements to meet identified needs, with proposals for such use to be approved unless they would cause

substantial harm (Paragraph 125c). This change means that it will be more difficult to justify refusing schemes that meet a clearly identified need.

### **Strategic planning**

12. While the plan-making section remains largely unchanged, Appendix 1 introduces transition arrangements for the examination of plans at differing stages of development. Since the City Plan has already been submitted for examination, it will be reviewed under the 2023 version. Consequently, the significant changes to housing policy mentioned earlier will not apply.
13. Changes at paragraph 24 highlight the importance of effective strategic planning and the duty to cooperate on cross-boundary strategic matters. A new paragraph 27 has been added, requiring plans to ensure a consistent approach to infrastructure planning, meeting unmet development needs, and managing cross-boundary plans or allocations appropriately. These changes are expected to lead to further strategic planning reforms, however, since London is already covered by a Spatial Development Strategy (the London Plan), significant changes in London are unlikely.
14. Paragraph 28 now requires Statements of Common Ground between strategic policy-making bodies to be prepared in line with the Planning Practice Guidance. This will impact future plan reviews and how officers collaborate with other local planning authorities and duty-to-cooperate bodies.

### **Green Belt**

15. The new NPPF presents a significant shift in Green Belt policy, setting out how Green Belt authorities will be required to review their Green Belt boundaries if they are unable to meet their objectively assessed needs otherwise. It also introduces the term 'Grey Belt' for previously developed land in the Green Belt, and a new hierarchy for consideration of Grey Belt land for development behind other previously developed land but ahead of other land in the Green Belt. While the implications for the Square Mile are limited, increasing the availability of land for housing is expected to boost economic growth and the labour supply in London.
16. The City Corporation's response to the NPPF consultation in September 2024 highlighted some concerns in relation to the prioritisation of Grey Belt. It emphasised the need to preserve other designations and ensuring that this change does not conflict with Local Nature Recovery strategies. For example, this Grey Belt designation could lead to the future release of land near the Epping Forest Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI). Officers will continue to work with colleagues within Natural Environment to ensure that they are aware of the changes to Green Belt policy.

### **Corporate & Strategic implications**

17. The City Plan 2040 has been prepared to align with broader corporate objectives and strategies. The City Plan is currently being examined under the 2023 version

of the NPPF. However, a review of the new NPPF has confirmed that the overall objectives remain consistent.

### **Financial implications**

18. None

### **Resource implications**

19. The requirements of the new NPPF will be taken into consideration as part of officer reports on planning applications.

### **Legal implications**

20. None

### **Risk implications**

21. None.

### **Equalities implications**

22. The Government conducted an equalities impact assessment of the new NPPF. There are no equalities issues raised as a result of this report.

### **Climate implications**

23. None

### **Security implications**

24. None

### **Conclusion**

25. This report outlines the significant updates to the NPPF that members need to consider for future decision-making. Since the City Plan is currently under examination, the new NPPF will not be applicable at this stage of the plan-making process.

### **Appendices**

- Appendix 1- NPPF showing tracked changes comparing 2023 and 2004 versions

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Housing & Communities



Ministry of Housing,  
Communities &  
Local Government

## National Planning Policy Framework



December 2024



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# 1. Introduction

1. The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied<sup>1</sup>. It provides a framework within which locally-prepared plans can provide for [sufficient](#) housing and other development in a sustainable manner. Preparing and maintaining up-to-date plans should be seen as a priority in meeting this objective.
2. Planning law requires that applications for planning permission be determined in accordance with the development plan<sup>2</sup>, unless material considerations indicate otherwise<sup>3</sup>. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.
3. The Framework should be read as a whole (including its footnotes and annexes). General references to planning policies in the Framework should be applied in a way that is appropriate to the type of plan being produced, taking into account policy on plan-making in chapter 3.
4. The Framework should be read in conjunction with the Government's planning policy for traveller sites, and its planning policy for waste. When preparing plans or making decisions on applications for these types of development, regard should also be had to the policies in this Framework, where relevant.
5. The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy, and may be a material consideration in preparing plans and making decisions on planning applications.
6. Other statements of government policy may be material when preparing plans or deciding applications, such as relevant Written Ministerial Statements and endorsed recommendations of the National Infrastructure Commission. [This includes the Written Ministerial Statement on Affordable Homes Update \(24 May 2021\) which contains policy on First Homes.](#)

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<sup>1</sup> This document replaces the previous version of the National Planning Policy Framework published in [September/December](#) 2023.

<sup>2</sup> This includes local and neighbourhood plans that have been brought into force and any spatial development strategies produced by combined authorities or elected Mayors (see Glossary).

<sup>3</sup> Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990.

## 2. Achieving sustainable development

7. The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs<sup>4</sup>. At a similarly high level, members of the United Nations – including the United Kingdom – have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection<sup>5</sup>.
8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):
  - a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
  - b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
  - c) **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
9. These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.
10. So that sustainable development is pursued in a positive way, at the heart of the Framework is a **presumption in favour of sustainable development** (paragraph 11).

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<sup>4</sup> Resolution 42/187 of the United Nations General Assembly.

<sup>5</sup> Transforming our World: the 2030 Agenda for Sustainable Development.

## The presumption in favour of sustainable development

11. Plans and decisions should apply a presumption in favour of sustainable development.

For **plan-making** this means that:

- a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;
- b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas<sup>6</sup>, unless:
  - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area<sup>7</sup>; or
  - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

For **decision-taking** this means:

- c) approving development proposals that accord with an up-to-date development plan without delay; or
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date<sup>8</sup>, granting permission unless:
  - i. the application of policies in this Framework that protect areas or assets of particular ~~importance~~importance<sup>7</sup> provides a ~~clear~~strong reason for refusing the development ~~proposed~~proposed; or
  - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination<sup>9</sup>.

<sup>6</sup> As established through statements of common ground (see paragraph [2728](#)).

<sup>7</sup> The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph [487189](#)) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote [7275](#)); and areas at risk of flooding or coastal change.

<sup>8</sup> This includes, for applications involving the provision of housing, situations where: ~~(a) the local planning authority cannot demonstrate a five year supply (or a four year supply, if applicable, of deliverable housing sites (with the appropriate buffer as set out in paragraph 78); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. See also paragraph 227.~~ ~~226) of deliverable housing sites (with a buffer, if applicable, as set out in paragraph 77) and does not benefit from the provisions of paragraph 76; or (b) where the Housing Delivery Test indicates that the delivery of housing was below 75% of the housing requirement over the previous three years.~~

12.—<sup>9</sup> The policies referred to are those in paragraphs 66 and 84 of chapter 5; 91 of chapter 7; 110 and 115 of chapter 9; 129 of chapter 11; and 135 and 139 of chapter 12.

- [12.](#) The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.
- [13.](#) The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.
- [14.](#) In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply:
- a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and
  - b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement (see paragraphs [67-68](#)[69-70](#)).

### 3. Plan-making

15.— The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

16. Plans should:

- a) be prepared with the objective of contributing to the achievement of sustainable ~~development~~<sup>9</sup>development<sup>10</sup>;
- b) be prepared positively, in a way that is aspirational but deliverable;
- c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

#### The plan-making framework

17.— The development plan must include strategic policies to address each local planning authority's priorities for the development and use of land in its ~~area~~<sup>40</sup>area<sup>11</sup>. These strategic policies can be produced in different ways, depending on the issues and opportunities facing each area. They can be contained in:

- a) joint or individual local plans, produced by authorities working together or independently (and which may also contain non-strategic policies); and/or
- b) a spatial development strategy produced by an elected Mayor or combined authority, where plan-making powers have been conferred.

18.— Policies to address non-strategic matters should be included in local plans that contain both strategic and non-strategic policies, and/or in local or neighbourhood plans that contain just non-strategic policies.

19.— The development plan for an area comprises the combination of strategic and non-strategic policies which are in force at a particular time.

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<sup>9</sup><sup>10</sup> This is a legal requirement of local planning authorities exercising their plan-making functions (section 39(2) of the Planning and Compulsory Purchase Act 2004).

<sup>40</sup><sup>11</sup> Section 19(1B-1E) of the Planning and Compulsory Purchase Act 2004.



## Strategic policies

- 20.— Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (~~to ensure outcomes support beauty and placemaking~~), and make sufficient ~~provision~~<sup>11</sup>provision<sup>12</sup> for:
- a) housing<sup>11</sup> (including affordable housing), employment, retail, leisure and other commercial development;
  - b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
  - c) community facilities (such as health, education and cultural infrastructure); and
  - d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to ~~address climate change mitigation and adaptation.~~  
address climate change mitigation and adaptation.
- 21.— Plans should make explicit which policies are strategic ~~policies~~<sup>12</sup>policies<sup>13</sup>. These should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any non- strategic policies that are needed. Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies.
- 22.— Strategic policies should look ahead over a minimum 15 year period from ~~adoption~~<sup>13</sup>adoption<sup>14</sup>, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for ~~delivery~~<sup>14</sup>delivery<sup>15</sup>.
- 23.— Broad locations for development should be indicated on a key diagram, and land-use designations and allocations identified on a policies map. Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non- strategic policies)<sup>15</sup>16.

<sup>44</sup>

<sup>12</sup> In line with the presumption in favour of sustainable development.

<sup>12</sup><sup>13</sup> Where a single local plan is prepared the non-strategic policies should be clearly distinguished from the strategic policies.

<sup>13</sup><sup>14</sup> Except in relation to town centre development, as set out in chapter 7.

<sup>14</sup><sup>15</sup> Transitional arrangements are set out in Annex 1.

<sup>4516</sup> For spatial development strategies, allocations, land use designations and a policies map are needed only where the power to make allocations has been conferred.

## Maintaining effective cooperation

24. — Effective strategic planning across local planning authority boundaries will play a vital and increasing role in how sustainable growth is delivered, by addressing key spatial issues including meeting housing needs, delivering strategic infrastructure and building economic and climate resilience. Local planning authorities and county councils (in two-tier areas) ~~are~~continue to be under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.
25. — Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies including Local Enterprise Partnerships, Local Nature Partnerships, the Marine Management Organisation, county councils, infrastructure providers, elected Mayors and  
combined authorities (in cases where Mayors or combined authorities do not have plan-making powers).
26. — Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.
27. — Once the matters which require collaboration have been identified, strategic policy-making authorities should make sure that their plan policies align as fully as possible with those of other bodies where a strategic relationship exists on these matters, and take into account the relevant investment plans of infrastructure providers, unless there is a clear justification to the contrary. In particular their plans should ensure that:
- a) a consistent approach is taken to planning the delivery of major infrastructure, such as major transport services/projects, utilities, waste, minerals, environmental improvement and resilience; and strategic health, education and other social infrastructure (such as hospitals, neighbourhood health facilities, universities, schools, major sports facilities and criminal justice accommodation);
  - b) unmet development needs from neighbouring areas are provided for in accordance with paragraph 11b; and
  - c) any allocation or designation which cuts across the boundary of plan areas, or has significant implications for neighbouring areas, is appropriately managed by all relevant authorities.
28. — In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning practice guidance, and be made publicly available throughout  
~~the plan-making process to provide transparency.~~

the plan-making process to provide transparency. Plans come forward at different times, and there may be a degree of uncertainty about the future direction of relevant development plans or the plans of infrastructure providers. In such

[circumstances strategic policy-making authorities and Inspectors will need to come to an informed decision on the basis of available information, rather than waiting for a full set of evidence from other authorities.](#)

## Non-strategic policies

~~28.~~—~~29.~~ Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.

~~29.~~—~~30.~~ Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic ~~policies~~<sup>16</sup>[policies](#)<sup>17</sup>.

~~30.~~—~~31.~~ Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently.

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<sup>16</sup> ~~Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area.~~

## Preparing and reviewing plans

- 31.—32. The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.
- 32.—33. Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements<sup>17</sup>. requirements<sup>18</sup>. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).
- 33.—34. Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary<sup>18</sup> necessary<sup>19</sup>. Reviews should be completed no later than five years

<sup>17</sup> [Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area.](#)

<sup>18</sup> [The reference to relevant legal requirements refers to Strategic Environmental Assessment. Neighbourhood plans may require Strategic Environmental Assessment, but only where there are potentially significant environmental effects.](#)

<sup>19</sup> [Reviews at least every five years are a legal requirement for all local plans \(Regulation 10A of the Town and Country Planning \(Local Planning\) \(England\) Regulations 2012\).](#)

-from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.

## Development contributions

~~34.~~ ~~35.~~ Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.  
~~should not undermine the deliverability of the plan.~~

## Examining plans

~~35.~~ ~~36.~~ Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

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~~<sup>17</sup> The reference to relevant legal requirements refers to Strategic Environmental Assessment. Neighbourhood plans may require Strategic Environmental Assessment, but only where there are potentially significant environmental effects.~~

~~<sup>18</sup> Reviews at least every five years are a legal requirement for all local plans (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012).~~

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed [needs<sup>19</sup>](#)[needs<sup>20</sup>](#); and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

~~36.~~ [37.](#) These tests of soundness will be applied to non-strategic [policies<sup>20</sup>](#)[policies<sup>21</sup>](#) in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies for the area.

~~37.~~ [38.](#) Neighbourhood plans must meet certain ‘basic conditions’ and other legal [requirements<sup>24</sup>](#)[requirements<sup>22</sup>](#) before they can come into force. These are tested through an independent examination before the neighbourhood plan may proceed to referendum.

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<sup>19</sup><sup>20</sup> Where this relates to housing, such needs should be assessed using a clear and justified method, as set out in paragraph [64-62](#) of this Framework

<sup>20</sup><sup>21</sup> Where these are contained in a local plan.

<sup>24</sup><sup>22</sup> As set out in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended).



## 4. Decision-making

~~38.~~ 39. Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

### Pre-application engagement and front-loading

~~39.~~ 40. Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.

~~40.~~ 41. Local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage. They cannot require that a developer engages with them before submitting a planning application, but they should encourage take-up of any pre-application services they offer. They should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community and, where relevant, with statutory and non-statutory consultees, before submitting their applications.

~~41.~~ 42. The more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits. For their role in the planning system to be effective and positive, statutory planning consultees will need to take the same early, pro-active approach, and provide advice in a timely manner throughout the development process. This assists local planning authorities in issuing timely decisions, helping to ensure that applicants do not experience unnecessary delays and costs.

~~42.~~ 43. The participation of other consenting bodies in pre-application discussions should enable early consideration of all the fundamental issues relating to whether a particular development will be acceptable in principle, even where other consents relating to how a development is built or operated are needed at a later stage. Wherever possible, parallel processing of other consents should be encouraged to help speed up the process and resolve any issues as early as possible.

~~43.~~ 44. The right information is crucial to good decision-making, particularly where formal assessments are required (such as Environmental Impact Assessment, Habitats Regulations assessment and flood risk assessment). To avoid delay, applicants should discuss what information is needed with the local planning authority and expert bodies as early as possible.

~~44.~~ 45. Local planning authorities should publish a list of their information requirements for applications for planning permission. These requirements should

be kept to the minimum needed to make decisions, and should be reviewed at least every two

years. Local planning authorities should only request supporting information that is relevant, necessary and material to the application in question.

45.—46. Local planning authorities should consult the appropriate bodies when considering applications for the siting of, or changes to, major hazard sites, installations or pipelines, or for development around them.

46.—47. Applicants and local planning authorities should consider the potential for voluntary planning performance agreements, where this might achieve a faster and more effective application process. Planning performance agreements are likely to be needed for applications that are particularly large or complex to determine.

## Determining applications

47.—48. Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.

48.—49. Local planning authorities may give weight to relevant policies in emerging plans according to:

- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)<sup>2223</sup>.

49.—50. However, in the context of the Framework – and in particular the presumption in favour of sustainable development – arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances where both:

- a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and
- b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.

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<sup>23</sup> During the transitional period for emerging plans, consistency should be tested against the version of the Framework as applicable, as set out in Annex 1.





51. Refusal of planning permission on grounds of prematurity will seldom be justified where a draft plan has yet to be submitted for examination; or – in the case of a neighbourhood plan – before the end of the local planning authority publicity period on the draft plan. Where planning permission is refused on grounds of prematurity, the local planning authority will need to indicate clearly how granting permission for the development concerned would prejudice the outcome of the plan-making process.

## Tailoring planning controls to local circumstances

51.—52. Local planning authorities are encouraged to use Local Development Orders to set the planning framework for particular areas or categories of development where the impacts would be acceptable, and in particular where this would promote [economic, social or environmental gains for the area](#).

~~53. [economic, social or environmental gains for the area](#).~~

52.— Communities can use Neighbourhood Development Orders and Community Right to Build Orders to grant planning permission. These require the support of the local community through a referendum. Local planning authorities should take a proactive and positive approach to such proposals, working collaboratively with [community organisations to resolve any issues before draft orders are submitted for examination](#).

54.

~~53.~~—The use of Article 4 directions to remove national permitted development rights should:

- a) where they relate to change from non-residential use to residential use, be limited to situations where an Article 4 direction is necessary to avoid wholly unacceptable adverse impacts (this could include the loss of the essential core of a primary shopping area which would seriously undermine its vitality and viability, but would be very unlikely to extend to the whole of a town centre)
- b) in other cases, be limited to situations where an Article 4 direction is necessary to protect local amenity or the well-being of the area (this could include the use of Article 4 directions to require planning permission for the demolition of local facilities)
- c) in all cases, be based on robust evidence, and apply to the smallest geographical area possible.

54.—55. Similarly, planning conditions should not be used to restrict national permitted development rights unless there is clear justification to do so.

## Planning conditions and obligations

55.—56. Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used

where it is not possible to address unacceptable impacts through a planning condition.

~~56.~~ 57. Planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. Agreeing conditions early

is beneficial to all parties involved in the process and can speed up decision-making. Conditions that are required to be discharged before development commences should be avoided, unless there is a clear [justification](#)<sup>23</sup>; [justification](#)<sup>24</sup>.

~~57.~~ ~~58.~~ Planning obligations must only be sought where they meet all of the following ~~tests~~<sup>24</sup>; ~~tests~~<sup>25</sup>:

- a) necessary to make the development acceptable in planning terms;
- b) directly related to the development; and
- c) fairly and reasonably related in scale and kind to the development.

~~58.~~ ~~59.~~ Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force. All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning [practice](#) guidance, including standardised inputs, and should be made publicly available.

## Enforcement

~~59.~~ ~~60.~~ Effective enforcement is important to maintain public confidence in the planning system. Enforcement action is discretionary, and local planning authorities should act proportionately in responding to suspected breaches of planning control. They should consider publishing a local enforcement plan to manage enforcement proactively, in a way that is appropriate to their area. This should set out how they will monitor the implementation of planning permissions, investigate alleged cases of unauthorised development and take action where appropriate.

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<sup>2324</sup> Sections 100ZA(4-6) of the Town and Country Planning Act 1990 will require the applicant's written agreement to the terms of a pre-commencement condition, unless prescribed circumstances apply.

<sup>2425</sup> Set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010.

## 5. Delivering a sufficient supply of homes

- ~~60.~~ 61. To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet ~~as much of~~ an area's identified housing need ~~as possible~~, including with an appropriate mix of housing types for the local community.
- ~~61.~~ 62. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning ~~guidance. The outcome of the standard method is an advisory starting point for establishing a housing requirement for the area (see paragraph 67 below). There may be exceptional circumstances, including relating to the particular demographic characteristics of an area<sup>25</sup> which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals. In addition to the local housing need practice guidance. In addition to the local housing need~~ figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned ~~for<sup>26</sup>for~~.
- ~~62.~~ The standard method incorporates an uplift which applies to certain cities and urban centres, as set out in national planning guidance. This uplift should be accommodated within those cities and urban centres themselves except where there are voluntary cross boundary redistribution agreements in place, or where it would conflict with the policies in this Framework<sup>27</sup>.
- ~~63.~~ Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing; (including Social Rent); families with children; looked after children<sup>26</sup>; older people (including those who require retirement housing, housing with care and care homes); students; people with disabilities; service families; travellers<sup>28</sup>travellers<sup>27</sup>; people who rent their homes and people wishing to commission or build their own homes<sup>29</sup>homes<sup>28</sup>.
- ~~64.~~ Where a need for affordable housing is identified, planning policies should specify the type of affordable housing<sup>29</sup> required (including the minimum proportion of Social Rent homes required), and expect it to be met on-site unless:
- a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and
  - b) the agreed approach contributes to the objective of creating mixed and balanced communities.
- ~~65.~~ Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of

~~<sup>25</sup> Such particular demographic characteristics could, for example, include areas that are islands with no land bridge that have a significant proportion of elderly residents.~~

~~<sup>26</sup> Transitional arrangements are set out in Annex 1.~~

~~<sup>27</sup> In doing so, strategic policies should promote an effective use of land and optimise site densities in accordance with chapter 11. This is to ensure that homes are built in the right places, to prioritise brownfield and other under-utilised urban sites, to utilise existing infrastructure, and to allow people to live near the services they rely on, making travel patterns more sustainable.~~

~~<sup>28</sup>~~

<sup>26</sup> [Evidence of need for looked after children can be found in the relevant local authority's Children's Social Care Sufficiency Strategy.](#)

<sup>27</sup> Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document.

<sup>29</sup><sup>28</sup> Under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. They are also subject to duties under sections 2 and 2A of ~~the~~[that](#) Act to have regard to this and to give enough suitable development permissions to meet the identified demand. Self and custom-build properties could provide market or affordable housing.

64.—

<sup>29</sup> [Applying the definition in Annex 2 to this Framework.](#)

~~Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required<sup>30</sup>, and expect it to be met on-site unless:~~

- ~~a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and~~
- ~~b) the agreed approach contributes to the objective of creating mixed and balanced communities.~~

~~65. Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount<sup>34</sup> amount<sup>30</sup>.~~

66. ~~\_\_\_\_\_~~ Where major development involving the provision of housing is proposed, planning policies and decisions should expect ~~at least 10% of that~~ the total number of homes to be available for affordable home ownership<sup>32</sup>, unless this would exceed the level ~~mix~~ of affordable housing required in the area, or significantly prejudice the ability to meet the ~~meets~~ identified affordable housing ~~local~~ needs of specific groups. Exemptions to this 10% requirement should also be made where the site or proposed development: across Social Rent, other affordable housing for rent and affordable home ownership tenures<sup>31</sup>.

- ~~a) provides solely for Build to Rent homes;~~
- ~~b) provides specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly or students);~~

67. As part of the 'Golden Rules' for Green Belt development set out in paragraphs 156-157 of this Framework, a specific affordable housing requirement (or requirements) should be set for major development involving the provision of housing, either on land which is proposed to be released from the Green Belt or which may be permitted on land within the Green Belt. This requirement should:

- a) be set at a higher level than that which would otherwise apply to land which is not within or proposed to be released from the Green Belt; and
- b) require at least 50% of the housing to be affordable, unless this would make the development of these sites unviable (when tested in accordance with national planning practice guidance on viability).

68. The affordable housing requirement for land within or released from the Green Belt may be set as a single rate or be set at differential rates, subject to the criteria above.

69.

- ~~e) is proposed to be developed by people who wish to build or commission their own homes; or~~
- ~~d) is exclusively for affordable housing, a community-led development exception site or a rural exception site.~~

67. Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need <sup>331</sup>

(and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant ~~allocations~~<sup>33</sup>~~allocations~~<sup>32</sup>. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.

70. Where it is not possible to provide a requirement figure for a neighbourhood area<sup>33</sup>, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors

<sup>30</sup>~~Applying the definition in Annex 2 to this Framework.~~

<sup>34</sup>

<sup>30</sup> Equivalent to the existing gross floorspace of the existing buildings. This does not apply to vacant buildings which have been abandoned, or to major development on land within or released from the Green Belt, for which the 'Golden Rules' requirements set out in paragraphs 156-157 of this Framework should apply.

<sup>32</sup>~~As part of the overall affordable housing contribution from the site.~~

<sup>33</sup><sup>31</sup> The requirement to deliver a minimum of 25% of affordable housing as First Homes, as set out in 'Affordable Homes Update' Written Ministerial Statement dated 24 May 2021, no longer applies. Delivery of First Homes can, however, continue where local planning authorities judge that they meet local need.

<sup>32</sup> Except where a Mayoral, combined authority or high-level joint plan is being prepared as a framework for strategic policies at the individual local authority level; in which case it may be most appropriate for the local authority plans to provide the requirement figure.  
~~authority plans to provide the requirement figure.~~

circumstances that affects the requirement.

~~68.— Where it is not possible to provide a requirement figure for a neighbourhood area<sup>34</sup>, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body.<sup>33</sup> Because a neighbourhood area is designated at a late stage in the strategic policy-making process, or after~~  
strategic policies have been adopted; or in instances where strategic policies for housing are out of date.

~~This figure should take into account factors~~ such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.

71. Mixed tenure sites can provide a range of benefits, including creating diverse communities and supporting timely build out rates, and local planning authorities should support their development through their policies and decisions (although this should not preclude schemes that are mainly, or entirely, for Social Rent or other affordable housing tenures from being supported). Mixed tenure sites can include a mixture of ownership and rental tenures, including Social Rent, other rented affordable housing and build to rent, as well as housing designed for specific groups such as older people's housing and student accommodation, and plots sold for custom or self-build.

## Identifying land for homes

69.—72. Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

- a) specific, deliverable sites for five years following the intended date of ~~adoption~~<sup>35</sup>adoption<sup>34</sup>;  
and
- b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.

70.—73. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

- a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;
- b) seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing and self-build and custom-build housing;
- c) use tools such as area-wide design assessments, permission in principle and ~~Local Development Orders to help bring small and medium sized sites forward~~;  
Local Development Orders to help bring small and medium sized sites forward;
- d) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and



<sup>34</sup> With an appropriate buffer, as set out in paragraph 78a or 78b. The additional buffer set out at paragraph 78c does not apply for the purposes of plan-making. See Glossary for definitions of deliverable and developable.

- e) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.

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<sup>34</sup> ~~Because a neighbourhood area is designated at a late stage in the strategic policy-making process, or after strategic policies have been adopted; or in instances where strategic policies for housing are out of date.~~

<sup>35</sup> ~~With an appropriate buffer, as set out in paragraph 7774. See Glossary for definitions of deliverable and developable.~~

71.— Neighbourhood planning groups should also give particular consideration to the opportunities for allocating small and medium-sized sites (of a size consistent with paragraph 70a73a) suitable for housing in their area.

72.—75. Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.

73.—76. Local planning authorities should support the development of exception sites for community-led ~~development~~<sup>36</sup> ~~development~~<sup>35</sup> (as defined in Annex 2) on sites that would not otherwise be suitable as rural exception sites. These sites should be on land which is not already allocated for housing and should:

- a) comprise community-led development that includes one or more types of affordable housing as defined in Annex 2 of this Framework. A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding; and
- b) be adjacent to existing settlements, proportionate in size to ~~them~~<sup>37</sup> ~~them~~<sup>36</sup>, not compromise the protection given to areas or assets of particular importance in this ~~Framework~~<sup>38</sup> ~~Framework~~<sup>37</sup>, and comply with any local design policies and standards.

74.—77. The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:

- a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;
- b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the ~~development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;~~

~~c) set clear expectations for the quality of the places to be created and how this~~

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<sup>3635</sup> This exception site policy does not replace the First Homes exception [site](#) policy set out in the Affordable Homes

<sup>3635</sup> Update Written Ministerial Statement, dated 24 May 2021, which remains extant policy.

<sup>3736</sup> Community-led development exception sites should not be larger than one hectare in size or exceed 5% of the size of the existing settlement, unless specific provision to exceed these limits is made in the development plan.

<sup>3837</sup> i.e. the areas referred to in footnote 7.

development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access:

- c) set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community;
- d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations)<sup>3938</sup>; and
- e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.

## Maintaining supply and delivery

~~75.—78. Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should monitor their deliverable land supply against their housing requirement, as set out in adopted strategic policies.~~

~~76. Local planning authorities are not required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing for decision making purposes if the following criteria are met<sup>40</sup> against their housing requirement set out in adopted strategic policies<sup>38</sup>, or against their local housing need where the strategic policies are more than five years old<sup>39</sup>. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:~~

- a) ~~their adopted plan is less than five years old; 5% to ensure choice and~~
- b) ~~that adopted plan identified at least a five year supply of specific, deliverable sites at competition in the time that its examination concluded.~~

~~77. In all other circumstances, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide either a minimum of five years' worth of housing<sup>41</sup>; market for land; or a minimum of four years' worth of housing if the provisions in paragraph 226 apply. The supply should be demonstrated against either the housing requirement set out in adopted strategic policies, or against the local housing need where the strategic policies are more than five years old<sup>42</sup>. Where there has been significant under delivery of housing over the previous three years<sup>43</sup>, the supply of specific deliverable sites should in addition include a buffer of 20% (moved forward from later in the plan period).~~

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<sup>39</sup>b) 20% where there has been significant under delivery<sup>40</sup> of housing over the previous three years, to improve the prospect of achieving the planned supply;  
or

c) From 1 July 2026, for the purposes of decision-making only, 20% where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of this Framework<sup>41</sup>, and whose annual average housing requirement<sup>42</sup> is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance.

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<sup>38</sup> The delivery of large scale developments may need to extend beyond an individual plan period, and the associated infrastructure requirements may not be capable of being identified fully at the outset. Anticipated rates of delivery and infrastructure requirements should, therefore, be kept under review and reflected as policies are updated.

~~<sup>40</sup> Transitional provisions relating to the application of this paragraph are set out in footnote 79.~~

~~<sup>41</sup> For the avoidance of doubt, a five year supply of deliverable sites for travellers—as defined in Annex 1 to Planning Policy for Traveller Sites—should be assessed separately, in line with the policy in that document.~~

<sup>42</sup><sup>39</sup> Unless these strategic policies have been reviewed and found not to require updating. Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning practice guidance.  
~~be calculated using the standard method set out in national planning guidance.~~

~~<sup>43</sup><sup>40</sup> This will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement. For clarity, authorities that are not required to continually demonstrate a 5 year housing land supply should disregard this requirement.~~

~~National planning guidance provides further information on calculating<sup>41</sup> Or the housing land supply, including the circumstances in which past shortfalls or over-supply can be addressed.~~

~~78. — Where the criteria in paragraph 76 are not met, a local planning authority may confirm the existence of a requirement is more than five-year supply of deliverable housing sites (with a 20% buffer if applicable) through an annual position statement which:~~

~~a) has been produced through engagement with developers years old and others who the relevant strategic policies have an impact on delivery, been reviewed and been considered by the Secretary of State; and found not to require updating.~~

~~b) incorporates the recommendation of the Secretary of State, where the position on specific sites could not be agreed during the engagement process.~~

<sup>42</sup> Defined as the total housing requirement, divided by the number of years in the plan period. For joint local plans, the percentage should be applied in aggregate across the joint local plan area.

79. — To maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below the local planning authority's housing requirement over the previous three years, the following policy consequences should apply:
- a) where delivery falls below 95% of the requirement over the previous three years, the authority should prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years;
  - b) where delivery falls below 85% of the requirement over the previous three years, the authority should include a buffer of 20% to their identified supply of specific deliverable sites as set out in paragraph 7778 of this framework, in addition to the requirement for an action plan;
  - c) where delivery falls below 75% of the requirement over the previous three years, the presumption in favour of sustainable development applies, as set out in footnote 8 of this Framework, in addition to the requirements for an action plan and 20% buffer.
80. — The Housing Delivery Test consequences set out above will apply the day following the annual publication of the Housing Delivery Test results, at which point they supersede previously published results. Until new Housing Delivery Test results are published, the previously published result should be used.
81. — To help ensure that proposals for housing development are implemented in a timely manner, local planning authorities should consider imposing a planning condition providing that development must begin within a timescale shorter than the relevant default period, where this would expedite the development without threatening its deliverability or viability. For major development involving the provision of housing, local planning authorities should also assess why any earlier grant of planning permission for a similar development on the same site did not start.

## Rural housing

82. — In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs,



including proposals for community-led development for housing. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this.

83.— To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.

84. — Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:

- a) there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;
- b) the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;
- c) the development would re-use redundant or disused buildings and enhance its immediate setting;
- d) the development would involve the subdivision of an existing residential building;  
or  
or
- e) the design is of exceptional quality, in that it:
  - i. is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and
  - ii. would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area.



## 6. Building a strong, competitive economy

85. — ~~\_\_\_\_\_~~ Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on ~~the need to support economic growth and productivity, taking into account both the need to support economic growth and productivity, taking into account both~~ local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving ~~innovation~~<sup>44</sup>: innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.
86. Planning policies should:
- a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to the national industrial strategy<sup>43</sup> ~~and any relevant~~ Local Industrial Strategies and other local policies for economic development and regeneration;
  - b) set criteria, ~~or~~ and identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
  - ~~e)~~ c) pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics;
  - d) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
  - ~~de)~~ be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices (such as live-work accommodation), and spaces to enable a rapid response to changes in economic circumstances.
87. — ~~\_\_\_\_\_~~ Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for ~~clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.;~~
- a) clusters or networks of knowledge and data-driven, creative or high technology industries; and for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of these industries (including data centres and grid connections);
  - b) storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation; and
  - c) the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience.

<sup>43</sup> [Invest 2035: The UK's Modern Industrial Strategy identifies priority sectors for growth and support as: advanced manufacturing; clean energy industries; creative industries; defence industries; digital and technology businesses; financial services; life sciences; and professional and business services.](#)

## Supporting a prosperous rural economy

88. Planning policies and decisions should enable:
- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, ~~beautiful~~ new buildings;
  - b) the development and diversification of agricultural and other land-based rural businesses;

~~<sup>44</sup>The Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data; clean growth; future mobility; and catering for an ageing society. HM Government (2017) *Industrial Strategy: Building a Britain fit for the future*.~~

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- c) sustainable rural tourism and leisure developments which respect the character of the countryside; and
- d)– the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

89.— Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.

## 7. Ensuring the vitality of town centres

90. — Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:
- a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;
  - b) define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;
  - c) retain and enhance existing markets and, where appropriate, re-introduce or create new ones;
  - d) allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary;
  - e) where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre; and
  - f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.
91. — Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.
92. — When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.
93. — This sequential approach should not be applied to applications for small scale rural offices or other small scale rural development.



94. — When assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500m<sup>2</sup> of gross floorspace). This should include assessment of:
- a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
  - b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).
95. — Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the considerations in paragraph 94, it should be refused.

## 8. Promoting healthy and safe communities

96. ~~\_\_\_\_\_~~ Planning policies and decisions should aim to achieve healthy, inclusive and safe places ~~and beautiful buildings~~ which:

- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;
- b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of ~~beautiful~~, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and
- c) enable and support healthy ~~lifestyles~~ lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

97. Local planning authorities should refuse applications for hot food takeaways and fast food outlets:

- a) within walking distance of schools and other places where children and young people congregate, unless the location is within a designated town centre; or
- b) in locations where there is evidence that a concentration of such uses is having an adverse impact on local health, pollution or anti-social-behaviour.

~~98.~~ 97. ~~\_\_\_\_\_~~ To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;
- b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;
- c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;
- d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and
- e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

99.

~~98.~~— Planning policies and decisions should consider the social, economic and environmental benefits of estate regeneration. Local planning authorities should use their planning powers to help deliver estate regeneration to a high standard.

100.~~99.~~— It is important that a sufficient choice of early years, school and post-16 places ~~is~~are available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

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- a) give great weight to the need to create, expand or alter [early years, schools and post-16 facilities](#) through the preparation of plans and decisions on applications; and
- b) work with [early years, school and post-16](#) promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.

101. ~~100.~~ — To ensure faster delivery of other public service infrastructure such as [further health, blue light, library, adult education colleges, hospitals, university](#) and criminal justice [accommodation facilities](#), local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted. [Significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development.](#)

102. ~~101.~~ — Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:

- a) anticipating and addressing possible malicious threats and [other hazards \(whether natural hazards, or man-made\)](#), especially in locations where large numbers of people are expected to ~~congregate~~<sup>45</sup>[congregate](#)<sup>44</sup>. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security. [The safety of children and other vulnerable users in proximity to open water, railways and other potential hazards should be considered in planning and assessing proposals for development;](#) and
- b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.

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<sup>44</sup> This includes [transport hubs, night-time economy venues, cinemas and theatres, sports stadia and arenas, shopping centres, health and education establishments, places of worship, hotels and restaurants, visitor attractions and commercial centres.](#)

## Open space and recreation

103. ~~402.~~ Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.

104. ~~403.~~ Existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or

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<sup>45</sup> ~~This includes transport hubs, night-time economy venues, cinemas and theatres, sports stadia and arenas, shopping centres, health and education establishments, places of worship, hotels and restaurants, visitor attractions and commercial centres.~~

~~location; or~~

- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

105. ~~104.~~ — Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

106. ~~105.~~ — The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in ~~in~~ sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.

107. ~~106.~~ — The Local Green Space designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- c) local in character and is not an extensive tract of land.

108. ~~107.~~ — Policies and decisions for managing development within a Local Green Space should be consistent with ~~the~~ national policy for Green Belts set out in chapter 13 of this Framework<sup>45</sup>.

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<sup>45</sup> Excluding provisions relating to grey belt and previously developed land set out in chapter 13.

## 9. Promoting sustainable transport

~~109.108.~~ 109.108. Transport issues should be considered from the earliest stages of plan-making and development proposals, ~~so that~~ using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve:

- ~~a) a)~~ making transport considerations an important part of early engagement with local communities;
- ~~b) b)~~ ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places;
- ~~c) c)~~ understanding and addressing the potential impacts of development on transport networks ~~can be addressed;~~
- ~~b) d)~~ realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, ~~are realised~~ – for example in relation to the scale, location or density of development that can be accommodated;
- ~~e) e)~~ identifying and pursuing opportunities to promote walking, cycling and public transport use ~~are identified;~~ and ~~pursued;~~
- ~~d) f)~~ identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure ~~can be identified, assessed and taken into account~~ – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; ~~and.~~
- ~~e) e)~~ ~~patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.~~

110. ~~109.~~ The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

~~110.111.~~ 111. Planning policies should:

- a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;
- b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;

- c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;



- d) provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans);

- e) provide for any large scale transport facilities that need to be located in the area<sup>46</sup>, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements; and
- f) recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the ~~Government's~~ General Aviation Strategy<sup>47</sup>.

~~112.~~ ~~111.~~ — If setting local parking standards for residential and non-residential development, policies should take into account:

- a) the accessibility of the development;
- b) the type, mix and use of development;
- c) the availability of and opportunities for public transport;
- d) local car ownership levels; and
- e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

~~113.~~ ~~112.~~ — Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.

~~114.~~ ~~113.~~ — Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use.

## ~~Considering development proposals~~

~~114.~~ ~~In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:~~

<sup>46</sup> Policies for large scale facilities should, where necessary, be developed through collaboration between strategic policy-making authorities and other relevant bodies. Examples of such facilities include ports, airports, interchanges for rail freight, public transport projects and roadside services. The primary function of roadside services should be to support the safety and welfare of the road user (and most such proposals are unlikely to be nationally significant infrastructure projects).

<sup>47</sup> Department for Transport (2015) *General Aviation Strategy*.

## Considering development proposals

115. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) ~~appropriate opportunities to promote~~ sustainable transport modes ~~can be – or have been – taken up, given~~ are prioritised taking account of the vision for the site, the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users;
- c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code<sup>48</sup>; and
- d) ~~any~~ significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.

~~115.~~ 116. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

~~116.~~ 117. Within this context, applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

~~117.~~ 118. All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.

<sup>48</sup> Policies and decisions should not make use of or reflect the former Design Bulletin 32, which was withdrawn in 2007.

# 10. Supporting high quality communications

119. ~~118.~~ Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).

120. ~~119.~~ The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate.

121. ~~120.~~ Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development. They should ensure that:

- a) they have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and
- b) they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and electronic communications services.

122. ~~121.~~ Applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:

- a) the outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area; and
- b) for an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection; or

- c) for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, International Commission guidelines will be met.

[422123](#). Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.



# 11. Making effective use of land

~~123.~~ 124. Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land<sup>49</sup>.

~~124~~125. Planning policies and decisions should:

- a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;
- b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;
- c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;
- d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)<sup>50</sup>; and
- e) support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions – including mansard roofs – where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers. ~~They should also allow mansard roof extensions on suitable properties<sup>51</sup> where their external appearance harmonises with the original building, including extensions to terraces where one or more of the terraced houses already has a mansard. Where there was a tradition of mansard construction locally at the time of the building's construction, the extension should emulate it with respect to external appearance.~~ A condition of simultaneous development should not be imposed on an application for multiple mansard upward extensions unless there is an exceptional justification.  
~~exceptional justification.~~

126. Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them. This should include identifying opportunities to facilitate land assembly, supported where necessary by <sup>40</sup>



<sup>49</sup> Except where this would conflict with other policies in this Framework, including causing harm to designated sites of importance for biodiversity.

<sup>50</sup> As part of this approach, plans and decisions should support efforts to identify and bring back into residential use empty homes and other buildings, supported by the use of compulsory purchase powers where appropriate.

<sup>51</sup> ~~See glossary for further details.~~



~~Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them. This should include identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers, where this can help to bring more land forward for meeting development needs and/or secure better development outcomes.~~

426.127. Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:

- a) it should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and
- b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.

128.127. Local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular, they should support proposals to:

- a) use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres, and would be compatible with other policies in this Framework; and
- b) make more effective use of sites that provide community services such as schools and hospitals, provided this maintains or improves the quality of service provision and access to open space.

## Achieving appropriate densities

129. ~~128.~~ Planning policies and decisions should support development that makes efficient use of land, taking into account:

- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- b) local market conditions and viability;
- c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- d) the desirability of maintaining an area's prevailing character and setting

(including residential gardens), or of promoting regeneration and change; and  
\_e) the importance of securing well-designed ~~and beautiful~~, attractive and  
healthy places.

429130. Area-based character assessments, design guides and codes and masterplans  
\_can be used to help ensure that land is used efficiently while also creating beautiful and  
sustainable places. Where there is an existing or anticipated shortage of land for

meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:

- a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;
- b) the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range; and
- c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).

~~130. In applying paragraphs 129a and b above to existing urban areas, significant uplifts in the average density of residential development may be inappropriate if the resulting built form would be wholly out of character with the existing area. Such circumstances should be evidenced through an authority-wide design code which is adopted or will be adopted as part of the development plan.~~

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## 12. Achieving well-designed ~~and beautiful~~ places

- 131.— The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local ~~planning authorities and other interests throughout the process.~~  
planning authorities and other interests throughout the process.
- 132.— Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers.
- 133.— To provide maximum clarity about design expectations at an early stage, all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences. Design guides and codes provide a local framework for creating beautiful and distinctive places with a consistent and high quality standard of design. Their geographic coverage, level of detail and degree of prescription should be tailored to the circumstances and scale of change in each place, and should allow a suitable degree of variety.
- 134.— Design guides and codes can be prepared at an area-wide, neighbourhood or site-specific scale, and to carry weight in decision-making should be produced either as part of a plan or as supplementary planning documents. Landowners and developers may contribute to these exercises, but may also choose to prepare design codes in support of a planning application for sites they wish to develop. Whoever prepares them, all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area, taking into account the guidance contained in the National Design Guide and the National Model Design Code. These national documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes.
135. Planning policies and decisions should ensure that developments:
- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
  - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;





- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future [users](#)<sup>52</sup>[users](#)<sup>51</sup>; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

136.— Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-~~lined~~<sup>53</sup>~~lined~~<sup>52</sup>, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.

137.— Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should, where applicable, provide sufficient information to demonstrate how their proposals will meet the design expectations set out in local and national policy, and should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.

138.— Local planning authorities should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development. The National Model Design Code is the primary means of doing so should be throughbasis for the preparation and use of local design codes, ~~in line with the National Model Design Code~~. For assessing proposals there is a range of tools including workshops to engage the local community, design advice and review arrangements, and assessment frameworks such as Building for a Healthy Life<sup>54</sup>Life<sup>53</sup>. These are of most benefit if used as early as possible in the evolution of ~~schemes, and are particularly important for significant projects such as large scale housing and mixed use developments. In~~

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<sup>52</sup><sup>51</sup> Planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified.

<sup>5352</sup> Unless, in specific cases, there are clear, justifiable and compelling reasons why this would be inappropriate.

<sup>5453</sup> Birkbeck D and Kruczkowski S et al (2020) *Building for a Healthy Life*.

schemes, and are particularly important for significant projects such as large scale housing and mixed use developments.

[In](#) assessing applications, local planning authorities should have regard to the outcome from these processes, including any recommendations made by design review panels.

- 139.— Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on [design](#)<sup>55</sup>[design](#)<sup>54</sup>, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:
- a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or
  - b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit [in with the overall form and layout of their surroundings.](#)  
~~[in with the overall form and layout of their surroundings.](#)~~
- 140.— Local planning authorities should ensure that relevant planning conditions refer to clear and accurate plans and drawings which provide visual clarity about the design of the development, and are clear about the approved use of materials where appropriate. This will provide greater certainty for those implementing the planning permission on how to comply with the permission and a clearer basis for local planning authorities to identify breaches of planning control. Local planning authorities should also seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme (for example through changes to approved details such as the materials used).
- 141.— The quality and character of places can suffer when advertisements are poorly sited and designed. A separate consent process within the planning system controls the display of advertisements, which should be operated in a way which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.

# 13. Protecting Green Belt land

142.— The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

143. Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

144.— The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. Any proposals for new Green Belts should be set out in strategic ~~policies, which should:~~ policies, which should:

- a) demonstrate why normal planning and development management policies would not be adequate;
- b) set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
- c) show what the consequences of the proposal would be for sustainable development;
- d) demonstrate the necessity for the Green Belt and its consistency with strategic policies for adjoining areas; and
- e) show how the Green Belt would meet the other objectives of the Framework.

145.— Once established, ~~there is no requirement for~~ Green Belt boundaries ~~to~~ should only be ~~reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries~~ altered where exceptional circumstances are fully evidenced and justified, ~~in which case proposals for changes should be made only~~ through the ~~plan-making process~~ preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.

146. Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework and

propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.

147.

~~146.~~ Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

- a) makes as much use as possible of suitable brownfield sites and underutilised land;
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

148. Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when~~147.~~ When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy determine whether a site's location is appropriate with particular reference to paragraphs 110 and 115 of this Framework. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

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149. When defining Green Belt boundaries, plans should:

- a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;
- b) not include land which it is unnecessary to keep permanently open;
- c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;



- e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and

- f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

150.43

~~149.~~ \_\_\_ If it is necessary to restrict development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.

~~151.~~ ~~150.~~ — Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. [Where Green Belt land is released for development through plan preparation or review, the 'Golden Rules' in paragraph 156 below should apply.](#)

~~152.~~ ~~151.~~ — The National Forest and Community Forests offer valuable opportunities for improving the environment around towns and cities, by upgrading the landscape and providing for recreation and wildlife. The National Forest Strategy and an approved Community Forest Plan may be a material consideration in preparing development plans and in deciding planning applications. Any development proposals within the National Forest and Community Forests in the Green Belt should be subject to the normal policies for controlling development in Green Belts.

## Proposals affecting the Green Belt

~~152. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.~~

153. — When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, [including harm to its openness](#)<sup>55</sup>. ~~Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.~~ 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

154. — ~~A local planning authority should regard the construction of new buildings as inappropriate.~~ [Development in the Green Belt. Exceptions to this are is inappropriate unless one of the following exceptions applies:](#)

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use), [including buildings](#), for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;

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<sup>55</sup> [Other than in the case of development on previously developed land or grey belt land, where development is not inappropriate.](#)

- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and

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- g) limited infilling or the partial or complete redevelopment of previously developed land, (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would:
- ~~not have a greater impact on the openness of the Green Belt than the existing development; or~~
  - ~~not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.~~
- h) Other<sup>155</sup> — ~~Certain other~~ forms of development ~~are also not inappropriate in the Green Belt~~ provided they preserve its openness and do not conflict with the purposes of including land within it. These are:
- a) i. mineral extraction;
  - b) ii. engineering operations;
  - c) iii. local transport infrastructure which can demonstrate a requirement for a Green Belt location;
  - d) iv. the re-use of buildings provided that the buildings are of permanent and substantial construction;
  - e) v. material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and
  - f) vi. development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.

155. The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where:
- a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
  - b. There is a demonstrable unmet need for the type of development proposed<sup>56</sup>;
  - c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework<sup>57</sup>; and

<sup>56</sup> Which, in the case of applications involving the provision of housing, means the lack of a five year supply of deliverable housing sites, including the relevant buffer where applicable, or where the Housing Delivery Tests was below 75% of the housing requirement over the previous three years; and in the case of traveller sites means the lack of a five year supply of deliverable traveller sites assessed in line with Planning Policy for Traveller sites.

<sup>57</sup> In the case of development involving the provision of traveller sites, particular reference should be made to Planning Policy for Traveller Sites paragraph 13.

d. Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157 below.

156. Where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review<sup>58</sup>, or on sites in the Green Belt subject to a planning application<sup>59</sup>, the following contributions ('Golden Rules') should be made:

a. affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below;

b. necessary improvements to local or national infrastructure; and

c. the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.

157. Before development plan policies for affordable housing are updated in line with paragraphs 67-68 of this Framework, the affordable housing contribution required to satisfy the Golden Rules is 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%<sup>60</sup>. In the absence of a pre-existing requirement for affordable housing, a 50% affordable housing contribution should apply by default. The use of site-specific viability assessment for land within or released from the Green Belt should be subject to the approach set out in national planning practice guidance on viability.

158. A development which complies with the Golden Rules should be given significant weight in favour of the grant of permission.

159. The improvements to green spaces required as part of the Golden Rules should contribute positively to the landscape setting of the development, support nature recovery and meet local standards for green space provision where these exist in the development plan. Where no locally specific standards exist, development proposals should meet national standards relevant to the development (these include Natural England standards on accessible green space and urban greening factor and Green Flag criteria). Where land has been identified as having particular potential for habitat creation or nature recovery within Local Nature Recovery Strategies, proposals should contribute towards these outcomes.

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<sup>58</sup> The Golden Rules do not apply to: (i) developments brought forward on land released from the Green Belt through plans that were adopted prior to the publication of this Framework; and (ii) developments that were granted planning permission on Green Belt land prior to the publication of this Framework.

<sup>59</sup> Including where there are variations made to existing permissions (where the existing permission involved development that was subject to the Golden Rules).

<sup>60</sup> The 50% cap does not apply to rural exception sites or community-led development exception sites, or if the local planning authority has a relevant existing policy which would apply to the development which is above 50%.

160.156.— When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.

# 14. Meeting the challenge of climate change, flooding and coastal change

~~161. 157.~~ The planning system should support the transition to ~~a low carbon future in a changing climate, taking net zero by 2050 and take~~ full account of ~~all climate impacts including overheating, water scarcity, storm and~~ flood ~~risk risks~~ and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

## Planning for climate change

~~162. 158.~~ Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating ~~and drought~~ from rising ~~temperatures<sup>56</sup>. temperatures<sup>61</sup>~~. Policies should support appropriate measures to ensure the future ~~health and~~ resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.

~~163. 159.~~ ~~The need to mitigate and adapt to climate change should also be considered in preparing and assessing planning applications, taking into account the full range of potential climate change impacts.~~

~~164.~~ New development should be planned for in ways that:

- a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through ~~the planning of~~ ~~incorporating~~ green infrastructure ~~and sustainable drainage systems~~; and
- b) ~~can~~ help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings ~~in plans~~ should reflect the Government's policy for national technical standards.

~~165. 160.~~ To help increase the use and supply of renewable and low carbon energy and heat, plans should:

- a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, and their future re-powering and life extension, while ensuring that adverse impacts are addressed appropriately (including cumulative landscape and visual impacts);

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<sup>61</sup> ~~In line with the objectives and provisions of the Climate Change Act 2008.~~



- b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and

<sup>56</sup> ~~In line with the objectives and provisions of the Climate Change Act 2008.~~

- c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.

166.

~~161.~~ Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.

~~162.~~ In determining planning applications, local planning authorities should expect new development to:

- a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and
- b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

167. Local planning authorities should also give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights). Where the proposals would affect conservation areas, listed buildings or other relevant designated heritage assets, local planning authorities should also apply the policies set out in chapter 16 of this Framework.

168. ~~163.~~ When determining planning ~~applications~~<sup>57</sup>applications for all forms of renewable and low carbon development energy developments and their associated infrastructure, local planning authorities should:

- a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and ~~recognise that even small-scale projects provide a valuable contribution to significant cutting greenhouse gas emissions~~give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future;
- b) ~~approve the application if its impacts are (or can be made) acceptable~~<sup>58</sup>b) recognise that small-scale and community-led projects provide a valuable contribution to cutting greenhouse gas emissions;
- c) in the case of applications for the repowering and life-extension of existing renewable sites, give significant weight to the benefits of utilising an established site.

169. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas; ~~and,~~

- ~~c) in the case of applications for the repowering and life-extension of existing renewable sites, give significant weight to the benefits of utilising an~~

~~established site, and approve the proposal if its impacts are or can be made acceptable.~~

~~164. In determining planning applications, local planning authorities should give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic (including~~

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~~<sup>57</sup> Wind energy development involving one or more turbines can also be permitted through Local Development Orders, Neighbourhood Development Orders and Community Right to Build Orders. In the case of Local Development Orders, it should be demonstrated that the planning impacts identified by the affected local community have been appropriately addressed and the proposal has community support.~~

~~<sup>58</sup> Except for applications for the repowering and life extension of existing wind turbines, a planning application for wind energy development involving one or more turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan or a supplementary planning document; and, following consultation, it can be demonstrated that the planning impacts identified by the affected local community have been appropriately addressed and the proposal has community support.~~

~~through installation of heat pumps and solar panels where these do not already benefit from permitted development rights). Where the proposals would affect conservation areas, listed buildings or other relevant designated heritage assets, local planning authorities should also apply the policies set out in chapter 16 of this Framework.~~

## Planning and flood risk

170. ~~165.~~ Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).  
Where

development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

171. ~~466.~~ Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.

172. ~~467.~~ All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:

- a) applying the sequential test and then, if necessary, the exception test as set out below;
- b) safeguarding land from development that is required, or likely to be required, for current or future flood management;
- c) using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and
- d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.

173. [A sequential risk-based approach should also be taken to individual applications in areas known to be at risk now or in future from any form of flooding, by following the steps set out below.](#)

174. [Within this context the](#)~~468.~~ [The](#) aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test.~~The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.~~

175. [The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future \(having regard to potential changes in flood risk\).](#)

176. [Applications for some minor development and changes of use<sup>62</sup> should also not be subject to the sequential test, nor the exception test set out below, but should still meet the requirements for site-specific flood risk assessments set out in footnote 63.](#)

<sup>62</sup> This includes householder development, small non-residential extensions (with a footprint of less than 250m<sup>2</sup>) and changes of use; except for changes of use to a caravan, camping or chalet site, or to a mobile home or park

177.169.—If [Having applied the sequential test, if](#) it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3.

178.

~~170.~~ The application of the exception test should be informed by a strategic or site-specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. To pass the exception test it should be demonstrated that:

- a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and
- b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

179. ~~171.~~ Both elements of the exception test should be satisfied for development to be allocated or permitted.

180. ~~172.~~ Where planning applications come forward on sites allocated in the development plan through the sequential test, applicants need not apply the sequential test again. However, the exception test may need to be reapplied if relevant aspects of the proposal had not been considered when the test was applied at the plan-making stage, or if more recent information about existing or potential flood risk should be taken into account.

181. ~~173.~~ When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk ~~assessment~~<sup>59</sup> ~~assessment~~<sup>63</sup>. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
- b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;
- c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;

~~d) any residual risk can be safely managed; and~~

~~e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.~~

home site, where the sequential and exception tests should be applied as appropriate.

<sup>59</sup><sup>63</sup> A site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3. In Flood Zone 1, an assessment should accompany all proposals involving: sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use.

d) any residual risk can be safely managed; and

e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

182. ~~174.~~ Applications for some minor development and changes of use<sup>60</sup> should not be subject to which could affect drainage on or around the sequential or exception tests but should still meet the requirements for site-specific flood risk assessments set out in footnote 59.

~~175.~~ Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should: to control flow rates and reduce volumes of runoff, and which are proportionate to the nature and scale of the proposal. These should provide multifunctional benefits wherever possible, through facilitating improvements in water quality and biodiversity, as well as benefits for amenity. Sustainable drainage systems provided as part of proposals for major development should:

a) take account of advice from the ~~lead local flood authority~~ Lead Local Flood Authority;

b) have appropriate proposed minimum operational standards; and

c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; ~~and.~~

~~d) where possible, provide multifunctional benefits.~~

## Coastal change

183. ~~176.~~ In coastal areas, planning policies and decisions should take account of the UK Marine Policy Statement and marine plans. Integrated Coastal Zone Management should be pursued across local authority and land/sea boundaries, to ensure effective alignment of the terrestrial and marine planning regimes.

184. ~~177.~~ Plans should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast. They should identify as a Coastal Change Management Area any area likely to be affected by physical changes to the coast, and:

a) be clear as to what development will be appropriate in such areas and in what circumstances; and

b) make provision for development and infrastructure that needs to be relocated away from Coastal Change Management Areas.

185. ~~178.~~ Development in a Coastal Change Management Area will be appropriate only where it is demonstrated that:

a) it will be safe over its planned lifetime and not have an unacceptable impact on coastal change;

b) the character of the coast including designations is not compromised;



- c) the development provides wider sustainability benefits; and
- d) the development does not hinder the creation and maintenance of a continuous signed and managed route around the ~~coast~~<sup>64</sup>coast<sup>64</sup>.

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<sup>60</sup> ~~This includes householder development, small non-residential extensions (with a footprint of less than 250m<sup>2</sup>) and changes of use, except for changes of use to a caravan, camping or chalet site, or to a mobile home or park home site, where the sequential and exception tests should be applied as appropriate.~~

<sup>64</sup> As required by the Marine and Coastal Access Act 2009.

186. ~~179.~~ Local planning authorities should limit the planned lifetime of development in a Coastal Change Management Area through temporary permission and restoration conditions, where this is necessary to reduce a potentially unacceptable level of future risk to people and the development.

# 15. Conserving and enhancing the natural environment

187. ~~180.~~ — Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

188. ~~181.~~ — Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this ~~Framework~~<sup>62</sup>Framework<sup>65</sup>; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

189. ~~182.~~ — Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and ~~Areas of Outstanding Natural Beauty~~National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks

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<sup>6265</sup> Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. ~~The availability of agricultural land used for food production~~

~~should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development.~~

|

and the ~~Broads~~<sup>63</sup>~~Broads~~<sup>66</sup>. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

~~190.~~ ~~183.~~ — When considering applications for development within National Parks, the Broads and ~~Areas of Outstanding Natural Beauty~~<sup>64</sup>~~National Landscapes~~<sup>67</sup>, permission should be refused for major ~~development~~<sup>64</sup>~~development~~<sup>67</sup> other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

~~191.~~ ~~184.~~ — Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph ~~182~~<sup>189</sup>), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.

## Habitats and biodiversity

~~192.~~ <sup>192.</sup> To protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for ~~biodiversity~~<sup>65</sup>~~biodiversity~~<sup>68</sup>; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or ~~creation~~<sup>66</sup>~~creation~~<sup>69</sup>; and
- b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

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<sup>66</sup> *English National Parks and the Broads: UK Government Vision and Circular 2010* provides further guidance and information about their statutory purposes, management and other matters.

<sup>64</sup><sup>67</sup> For the purposes of paragraphs ~~182~~<sup>190</sup> and ~~183~~<sup>191</sup>, whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse ~~impact on the purposes for which the area has been designated or defined.~~

~~impact on the purposes for which the area has been designated or defined.~~

<sup>65</sup><sup>68</sup> Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.

<sup>66</sup><sup>69</sup> Where areas that are part of the Nature Recovery Network are identified in plans, it may be appropriate to <sup>62</sup>

| specify the types of development that may be suitable within them.

~~193.186.~~ 193.186.— When determining planning applications, local planning authorities should apply the following principles:

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional ~~reasons~~<sup>67</sup>reasons<sup>70</sup> and a suitable compensation strategy exists; and
- d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

~~487194.~~ 487194. The following should be given the same protection as habitats sites:

- a) potential Special Protection Areas and possible Special Areas of Conservation;
- b) listed or proposed Ramsar ~~sites~~<sup>68</sup>sites<sup>71</sup>; and
- c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

~~195. 488.~~ 195. 488.— The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

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<sup>67</sup>70 For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.

<sup>68</sup>71 Potential Special Protection Areas, possible Special Areas of Conservation and proposed Ramsar sites are sites on which Government has initiated public consultation on the scientific case for designation as a Special Protection Area, candidate Special Area of Conservation or Ramsar site.



## Ground conditions and pollution

~~489~~196. Planning policies and decisions should ensure that:

- a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation);
- b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and
- c) adequate site investigation information, prepared by a competent person, is available to inform these assessments.

197. ~~490.~~ Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.

198.

~~491.~~ Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of ~~life~~<sup>69</sup>life<sup>72</sup>;
- b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
- c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

199.

~~492.~~ Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.

<sup>69</sup>

<sup>72</sup> See Explanatory Note to the *Noise Policy Statement for England* (Department for Environment, Food & Rural Affairs, 2010).

200. ~~193.~~ Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.

201. ~~194.~~ The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.

# 16. Conserving and enhancing the historic environment

~~202.~~ ~~195.~~ Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal ~~Value~~<sup>70</sup>~~Value~~<sup>73</sup>. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future ~~generations~~<sup>74</sup>~~generations~~<sup>74</sup>.

~~196.~~ ~~203.~~ Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- ~~a~~d) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- ~~b~~e) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- ~~c~~) ~~f~~) the desirability of new development making a positive contribution to local character and distinctiveness; and
- ~~d~~g) opportunities to draw on the contribution made by the historic environment to the character of a place.

~~204.~~ ~~197.~~ When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.

~~205.~~

~~198.~~ Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:

- a) assess the significance of heritage assets and the contribution they make to their environment; and
- b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.

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<sup>70</sup>~~206.~~ Local planning authorities should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible.

<sup>73</sup> Some World Heritage Sites are inscribed by UNESCO to be of natural significance rather than cultural significance; and in some cases they are inscribed for both their natural and cultural significance.

<sup>74</sup> The policies set out in this chapter relate, as applicable, to the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to plan-making and decision-making.

~~199. Local planning authorities should make information about the historic environment, gathered as part of policy making or development management, publicly accessible.~~

## Proposals affecting heritage assets

207. ~~200.~~ In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

208. ~~201.~~ Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

209. ~~202.~~ Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

203210. In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

211. ~~204.~~ In considering any applications to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), local planning authorities should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.

## Considering potential impacts

212. ~~205.~~ When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

213.

206.— Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly ~~exceptional~~<sup>72</sup>exceptional<sup>75</sup>.

214. ~~207.~~— Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.

215. ~~208.~~— Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

216. ~~209.~~— The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

217. ~~loss and the significance of the heritage asset.~~

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<sup>72</sup> ~~Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.~~

~~210.~~ Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

~~211.~~ Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly ~~accessible~~<sup>73</sup>accessible<sup>76</sup>. However, the ability to

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<sup>75</sup> Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

<sup>76</sup> Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository.



record evidence of our past should not be a factor in deciding whether such loss should be permitted.

219. ~~212.~~ Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

220. ~~213.~~ Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph ~~207~~214 or less than substantial harm under paragraph ~~208~~215, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

221. ~~214.~~ Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

<sup>73</sup> ~~Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository.~~



# 17. Facilitating the sustainable use of minerals

~~222.~~ ~~245.~~ — It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation.

~~246~~223. Planning policies should:

- a) provide for the extraction of mineral resources of local and national importance, but not identify new sites or extensions to existing sites for peat extraction;
- b) so far as practicable, take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously;
- c) safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation ~~Areas~~<sup>74</sup>~~Areas~~<sup>77</sup>; and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that the resources defined will be worked);
- d) set out policies to encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place;
- e) safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material;
- f) set out criteria or requirements to ensure that permitted and proposed operations do not have unacceptable adverse impacts on the natural and historic environment or human health, taking into account the cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality;
- g) when developing noise limits, recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction; and
- h) ensure that worked land is reclaimed at the earliest opportunity, taking account of aviation safety, and that high quality restoration and aftercare of mineral sites takes place.

~~224.~~ ~~247.~~ — When determining planning applications, great weight should be given to the benefits of mineral extraction, including to the ~~economy~~<sup>75</sup>~~economy~~<sup>78</sup>. In considering proposals for mineral extraction, minerals planning authorities should:

<sup>74</sup>

<sup>77</sup> Primarily in two tier areas as stated in Annex 2: Glossary

~~75~~<sup>78</sup> Except in relation to the extraction of coal, where the policy at paragraph ~~223~~230 of this Framework applies.

~~for mineral extraction, minerals planning authorities should:~~

- a) as far as is practical, provide for the maintenance of landbanks of non-energy minerals from outside National Parks, the Broads, ~~Areas of Outstanding Natural Beauty~~National Landscapes and World Heritage Sites, scheduled monuments and conservation areas;
- b) ensure that there are no unacceptable adverse impacts on the natural and historic environment, human health or aviation safety, and take into account the cumulative effect of multiple impacts from individual sites and/or from a number of sites in a locality;
- c) ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at ~~source~~<sup>76</sup>source<sup>79</sup>, and establish appropriate noise limits for extraction in proximity to noise sensitive properties;
- d) not grant planning permission for peat extraction from new or extended sites;
- e) provide for restoration and aftercare at the earliest opportunity, to be carried out to high environmental standards, through the application of appropriate conditions. Bonds or other financial guarantees to underpin planning conditions should only be sought in exceptional circumstances;
- f) consider how to meet any demand for the extraction of building stone needed for the repair of heritage assets, taking account of the need to protect designated sites; and
- g) recognise the small-scale nature and impact of building and roofing stone quarries, and the need for a flexible approach to the duration of planning permissions reflecting the intermittent or low rate of working at many sites.

~~225.218.~~ 226.219. Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working.

## Maintaining supply

~~226.219.~~ 226.219. Minerals planning authorities should plan for a steady and adequate supply of aggregates by:

- a) preparing an annual Local Aggregate Assessment, either individually or jointly, to forecast future demand, based on a rolling average of 10 years' sales data and other relevant local information, and an assessment of all supply options (including marine dredged, secondary and recycled sources);
- b) participating in the operation of an Aggregate Working Party and taking the advice of that party into account when preparing their Local Aggregate Assessment;
- c) making provision for the land-won and other elements of their Local Aggregate

<sup>76</sup> National planning guidance on minerals sets out how these policies should be implemented.

Assessment in their mineral plans, taking account of the advice of the Aggregate Working Parties and the National Aggregate Co-ordinating Group as appropriate.

[79 National planning practice guidance on minerals sets out how these policies should be implemented.](#)

Such provision should take the form of specific sites, preferred areas and/or areas of search and locational criteria as appropriate;

- d) taking account of any published National and Sub National Guidelines on future provision which should be used as a guideline when planning for the future demand for and supply of aggregates;
- e) using landbanks of aggregate minerals reserves principally as an indicator of the security of aggregate minerals supply, and to indicate the additional provision that needs to be made for new aggregate extraction and alternative supplies in mineral plans;
- f) maintaining landbanks of at least 7 years for sand and gravel and at least 10 years for crushed rock, whilst ensuring that the capacity of operations to supply a wide range of materials is not ~~compromised~~<sup>77</sup>compromised<sup>80</sup>;
- g) ensuring that large landbanks bound up in very few sites do not stifle competition; and
- h) calculating and maintaining separate landbanks for any aggregate materials of a specific type or quality which have a distinct and separate market.

227. ~~220.~~ Minerals planning authorities should plan for a steady and adequate supply of industrial minerals by:

- a) co-operating with neighbouring and more distant authorities to ensure an adequate provision of industrial minerals to support their likely use in industrial and manufacturing processes;
- b) encouraging safeguarding or stockpiling so that important minerals remain available for use;
- c) maintaining a stock of permitted reserves to support the level of actual and proposed investment required for new or existing plant, and the maintenance and improvement of existing plant and ~~equipment~~<sup>78</sup>equipment<sup>81</sup>; and
- d) taking account of the need for provision of brick clay from a number of different sources to enable appropriate blends to be made.

## <sup>77</sup>Oil, gas and coal exploration and extraction

228. Minerals planning authorities should:

- a) when planning for on-shore oil and gas development, clearly distinguish between, and plan positively for, the three phases of development (exploration,

<sup>80</sup> Longer periods may be appropriate to take account of the need to supply a range of types of aggregates, locations of permitted reserves relative to markets, and productive capacity of permitted sites.

<sup>7881</sup> These reserves should be at least 10 years for individual silica sand sites; at least 15 years for cement primary (chalk and limestone) and secondary (clay and shale) materials to maintain an existing plant, and for silica sand sites where significant new capital is required; and at least 25 years for brick clay, and for cement primary and secondary materials to support a new kiln.



## ~~Oil, gas and coal exploration and extraction~~

~~221.~~ Minerals planning authorities should:

- ~~a) when planning for on-shore oil and gas development, clearly distinguish between, and plan positively for, the three phases of development (exploration, appraisal and production), whilst ensuring appropriate monitoring and site restoration is provided for;~~
- b) encourage underground gas and carbon storage and associated infrastructure if local geological circumstances indicate its feasibility;
- c) indicate any areas where coal extraction and the disposal of colliery spoil may be acceptable;
- d) encourage the capture and use of methane from coal mines in active and abandoned coalfield areas; and
- e) provide for coal producers to extract separately, and if necessary stockpile, fireclay so that it remains available for use.

~~229.~~ ~~222.~~ When determining planning applications, minerals planning authorities should ensure that the integrity and safety of underground storage facilities are appropriate, taking into account the maintenance of gas pressure, prevention of leakage of gas and the avoidance of pollution.

~~223~~230. Planning permission should not be granted for the extraction of coal unless:

- a) the proposal is environmentally acceptable, or can be made so by planning conditions or obligations; or
- b) if it is not environmentally acceptable, then it provides national, local or community benefits which clearly outweigh its likely impacts (taking all relevant matters into account, including any residual environmental impacts).

# Annex 1: Implementation

## For the purposes of decision-making

231.

~~224.~~ 224. The policies in this Framework are material considerations which should be taken into account in dealing with applications from the day of its ~~publication~~<sup>79</sup>. ~~publication.~~ Plans may also need to be revised to reflect policy changes which this Framework has made.

232. ~~225.~~ However, existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given). Where a local planning authority can demonstrate a five year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78) and where the Housing Delivery Test indicates that the delivery of housing is more than 75% of the housing requirement over the previous three years, policies should not be regarded as out-of-date on the basis that the most up to date local housing need figure (calculated using the standard method set out in planning practice guidance) is greater than the housing requirement set out in adopted strategic policies, for a period of five years from the date of the plan's adoption.

~~226.~~ 226. From the date of publication of this revision of the Framework, for decision-making purposes only, certain local planning authorities will only be required to identify and update annually a supply<sup>233</sup>. Where a local planning authority has confirmed its housing land supply position for a year through a published Annual Position Statement that has been examined by the Planning Inspectorate against the previous version of this Framework, this position will stand until the Annual Position Statement expires.

## For the purposes of plan-making

234. For the purpose of preparing local plans, the policies in this version of specific deliverable sites sufficient to provide a minimum of four years' worth of housing (with a buffer, if applicable, as set out in paragraph 77) against the the Framework will apply from 12 March 2025 other than where one or more of the following apply:

a. the plan has reached Regulation 19<sup>82</sup> (pre-submission stage) on or before 12 March 2025, and its draft housing requirement set out in adopted strategic policies, or against local meets at least 80% of local housing need where the strategic policies are more than five years old<sup>80</sup>, instead of a minimum of five years as set out in paragraph 77 of this Framework. This policy applies to those authorities which have an emerging local plan that has either<sup>83</sup>:

b. the plan has been submitted for examination or has reached under Regulation 4<sup>82</sup><sup>84</sup> on or before 12 March 2025;

~~<sup>82</sup> Regulation 19 (of the Town and Country Planning (Local Planning) (England) Regulations 2012) stage, including both a policies map and proposed allocations towards meeting housing need. This provision does not apply to authorities who are not required to demonstrate a housing land supply, as set out in paragraph 76. These arrangements will apply for a period of two years from the publication date of this revision. In this context “reached Regulation 19” refers to when Regulation 19 has been complied with (i.e. when the planning authority has made a copy of each of the proposed submission documents and a statement of the representations procedure available, and the statements required in Regulation 19(b) have been sent to consultation bodies).~~

<sup>83</sup> Calculated using the standard method in national planning practice guidance, published on 12 December 2024.

<sup>84</sup> Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

- c. the plan includes policies to deliver the level of housing and other development set out in a preceding local plan (such as a joint local plan containing strategic policies) adopted since 12 March 2020;
- d. the local plan is for an area where there is an operative Spatial Development Strategy and the local plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025; or
- e. the plan deals only with minerals and/or waste matters and has reached Regulation 19 on or before 12 March 2025; or has been submitted for examination under Regulation 22 on or before 12 March 2025.

235. Where paragraph 234a, b, c, d or e apply, the plan will be examined under the relevant previous version of the Framework.

## ~~For the purposes of plan-making~~

~~227. The policies in the original National Planning Policy Framework published in March 2012 will apply for the purpose of examining~~

236. Where paragraph 234b applies, if the housing requirement in the plan to be adopted meets less than 80% of local housing need<sup>85</sup> the local planning authority will be expected to begin work on a new plan, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (as soon as the relevant provisions are brought into force in 2025), in order to address the shortfall in housing need<sup>86</sup>.

~~237. Those local plans, where those plans were submitted that reach Regulation 19 (pre-submission stage) on or before 24 January 2019. Where such plans are withdrawn or otherwise do not~~

March 2025 and whose draft housing requirement<sup>87</sup> meets less than 80% of local housing need<sup>85</sup> should proceed to become part of examination within a maximum of 18 months from 12 December 2024, or 24 months of that date if the development plan has to return to the Regulation 18 stage<sup>88</sup>.

238. For Spatial Development Strategies, the policies contained in this Framework will apply to any subsequent plan produced for the area concerned strategies that reach consultation<sup>89</sup> under section 335(2) of the Greater London Authority Act 1999 after 12 March 2025. Strategies that reach this stage on or before this date will be examined under the relevant previous version of the Framework.

239. For neighbourhood plans, the policies in this Framework will apply for the purpose of preparing neighbourhood plans from 12 March 2025 unless a neighbourhood plan proposal has been submitted to the local planning authority under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) on or before the 12 March 2025.

~~228. For the purposes of the policy on larger-scale development in paragraph 22, this applies only to plans that have had not reached Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre-submission) stage at the point the previous version of this Framework was published on 20~~

~~79-As an exception to this, the policy contained in paragraph 76 and the related reference in footnote 8 of this Framework should only be taken into account as a material consideration when dealing with applications made on or after the date of publication of this version of the Framework.~~

~~80-Unless these strategic policies have been reviewed and found not to require updating. Where local housing need is used as the basis for assessing whether a four year supply of specific deliverable sites exists, it should be calculated~~<sup>85</sup> Calculated using the standard method ~~set out~~ in national planning practice guidance.

, published on 12 December 2024.

<sup>86</sup> This paragraph does not apply in relation to local plans for areas where there is an operative Spatial Development Strategy (SDS) which provides the housing requirement for relevant local areas. In these circumstances the SDS will continue to provide the housing requirement for the relevant emerging local plans.

<sup>87</sup> Set out in the most recent Regulation 19 (pre-submission stage) consultation.

<sup>88</sup> This paragraph does not apply in relation to local plans for areas where there is an operative Spatial Development Strategy (SDS) which provides the housing requirement for relevant local areas. In these circumstances the SDS will continue to provide the housing requirement for the relevant emerging local plans.

<sup>89</sup> In this context “reaching consultation” refers to when parts (a) to (c) of section 335(2) have been complied with (i.e. when a draft Spatial Development Strategy has been prepared and copies have been made available at any prescribed places and sent to the prescribed bodies and persons).

Planning (Local Planning) (England) Regulations 2012 (pre-submission) stage at the point the version of this Framework was published on 20 July 2021 (for Spatial Development Strategies this would refer to consultation under section 335(2) of the Greater London Authority Act 1999).

241. The policies in the original National Planning Policy Framework published in March 2012 will continue to apply for the purpose of examining plans, where those plans were submitted on or before 24 January 2019.

242. ~~229.~~ For the purposes of the policy on renewable and low carbon energy and heat in plans in paragraph 160, this policy does not apply to plans that have reached Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre-submission) stage, or that reach this stage within three months of the date of publication of the previous version of this Framework published on 5 September 2023. For Spatial Development Strategies, paragraph 160 does not apply to strategies that have reached consultation under section 335(2) of the Greater London Authority Act 1999 or that reach this stage within three months of the date of publication of the previous version of this Framework published on 5 September 2023.

~~230. The policies in this Framework (published on 19 December 2023) will apply for the purpose of examining plans, where those plans reach regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre-submission) stage after 19 March 2024. Plans that reach pre-submission consultation on or before this date will be examined under the relevant previous version of the Framework in accordance with the above arrangements. For Spatial Development Strategies, this Framework applies to strategies that have reached consultation under section 335(2) of the Greater London Authority Act 1999 after 19 March 2024. Strategies that reach this stage on or before this date will be examined under the relevant previous version of the Framework in accordance with the above arrangements. Where plans or strategies are withdrawn or otherwise do not proceed to become part of the development plan, the policies contained in this Framework will apply to any subsequent plan or strategy produced for the area concerned.~~

243. ~~231.~~ The Government will continue to explore with individual areas the potential for planning freedoms and flexibilities, for example where this would facilitate an increase in the amount of housing that can be delivered.

# Annex 2: Glossary

**Affordable housing:** housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following ~~definitions<sup>84</sup>~~ definitions<sup>90</sup>:

- a) ~~**Affordable housing for rent**~~ **Social Rent:** meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent ~~or Affordable Rent, or is at least;~~ (b) the landlord is a registered provider; and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision.
- b) **Other affordable housing for rent:** meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).
- ~~b) **Starter homes:** is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.~~
- c) **Discounted market sales housing:** is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.
- d) **Other affordable routes to home ownership:** is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes ~~for sale (at a price equivalent to at least 20% below local market value) and for sale (at a price equivalent to at least 20% below local market value) and~~ rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.

**Air quality management areas:** Areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines.



**Ancient or veteran tree:** A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient, but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage.

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<sup>84</sup>

<sup>90</sup> This definition should be read in conjunction with relevant policy contained in the Affordable Homes Update  
\_Written Ministerial Statement published on 24 May 2021.

[As noted in footnote 31, however, the 25% minimum delivery requirement for First Homes no longer applies.](#)

**Ancient woodland:** An area that has been wooded continuously since at least 1600 AD. It includes ancient semi-natural woodland and plantations on ancient woodland sites (PAWS).

~~**Annual position statement:** A document setting out the 5-year housing land supply position on 1st April each year, prepared by the local planning authority in consultation with developers and others who have an impact on delivery.~~

**Archaeological interest:** There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.

**Article 4 direction:** A direction made under [Article 4 of the Town and Country Planning \(General Permitted Development\) \(England\) Order 2015](#) ~~wwhich~~ which withdraws permitted development rights granted by that Order.

**Best and most versatile agricultural land:** Land in grades 1, 2 and 3a of the Agricultural Land Classification.

**Brownfield land:** See Previously developed land.

**Brownfield land registers:** Registers of previously developed land that local planning authorities consider to be appropriate for residential development, having regard to criteria in the Town and Country Planning (Brownfield Land Registers) Regulations 2017. Local planning authorities will be able to trigger a grant of permission in principle for residential development on suitable sites in their registers where they follow the required procedures.

**Build to Rent:** Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control.

**Climate change adaptation:** Adjustments made to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit ~~beneficial opportunities.~~ [beneficial opportunities.](#)

**Climate change mitigation:** Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.

**Coastal change management area:** An area identified in plans as likely to be affected by physical change to the shoreline through erosion, coastal landslip, permanent inundation or coastal accretion.

**Community forest:** An area identified through the England Community Forest Programme to revitalise countryside and green space in and around major conurbations.

**Community Right to Build Order:** An Order made by the local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a site-specific development proposal or classes of development.

**Community-led ~~developments~~development:** A development ~~instigated and~~ taken forward by , or with, a not-for-profit organisation ~~set up and run, that is~~ primarily for the purpose of meeting the ~~housing~~ needs of its members ~~and/or~~ the wider local community, rather than being a primarily commercial enterprise. The organisation ~~is~~should be created, managed and democratically controlled by its members. ~~It may take any one of various legal forms including a community land trust, housing co-operative and community benefit society. Membership, and membership~~ of the organisation ~~is~~should be open to all beneficiaries and prospective beneficiaries of that organisation. It may take any one of various legal forms including a co-

[operative society, community benefit society and company limited by guarantee](#). The organisation should own, manage or steward the [homesdevelopment](#) in a manner consistent with its purpose, ~~for example~~[potentially](#) through a mutually supported arrangement with a Registered Provider of Social Housing. The benefits of the development to the ~~specified~~ community should be clearly defined and consideration given to how ~~these~~[those](#) benefits can [be protected over time, including in the event of the organisation being wound up](#).  
~~be protected over time, including in the event of the organisation being wound up.~~

**Competent person (to prepare site investigation information):** A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation.

**Conservation (for heritage policy):** The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

**Decentralised energy:** Local renewable and local low carbon energy sources.

**Deliverable:** To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

**Design code:** A set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The graphic and written components of the code should build upon a design vision, such as a masterplan or other design and development framework for a site or area.

**Design guide:** A document providing guidance on how development can be carried out in accordance with good design practice, often produced by a local authority.

**Designated heritage asset:** A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

**Designated rural areas:** National Parks, [Areas of Outstanding Natural Beauty](#)[National Landscapes](#) and areas designated as ~~'rural' under Section 157 of the Housing Act 1985.~~ ['rural' under Section 157 of the Housing Act 1985.](#)

**Developable:** To be considered developable, sites should be in a suitable location for

housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

**Development plan:** Is defined in section 38 of the Planning and Compulsory Purchase Act 2004, and includes adopted local plans, neighbourhood plans that have been made and

published spatial development strategies, together with any regional strategy policies that remain in force. Neighbourhood plans that have been approved at referendum are also part of the development plan, unless the local planning authority decides that the neighbourhood plan should not be made.

[Early years: the provision of childcare \(including education\) for a young child, meaning a child from birth to the September after the child turns 5.](#)

**Edge of centre:** For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

**Environmental impact assessment:** A procedure to be followed for certain types of project to ensure that decisions are made in full knowledge of any likely significant effects on the environment.

**Essential local workers:** Public sector employees who provide frontline services in areas including health, education and community safety – such as NHS staff, teachers, police, firefighters and military personnel, social care and childcare workers.

**General aviation airfields:** Licenced or unlicenced aerodromes with hard or grass runways, often with extensive areas of open land related to aviation activity.

**Geodiversity:** The range of rocks, minerals, fossils, soils and landforms.

**Green infrastructure:** A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.

[Grey belt: For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes \(a\), \(b\), or \(d\) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 \(other than Green Belt\) would provide a strong reason for refusing or restricting development.](#)

**Habitats site:** Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites.

**Heritage asset:** A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

**Heritage coast:** Areas of undeveloped coastline which are managed to conserve their natural beauty and, where appropriate, to improve accessibility for visitors.

**Historic environment:** All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

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~~human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.~~

**Historic environment record:** Information services that seek to provide access to comprehensive and dynamic resources relating to the historic environment of a defined geographic area for public benefit and use.

**Housing Delivery Test:** Measures net homes delivered in a local authority area against the homes required, using national statistics and local authority data. The Secretary of State will publish the Housing Delivery Test results for each local authority in England annually.

**International, national and locally designated sites of importance for biodiversity:** All international sites (Special Areas of Conservation, Special Protection Areas, and Ramsar sites), national sites (Sites of Special Scientific Interest) and locally designated sites including Local Wildlife Sites.

**Irreplaceable habitat:** Habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen.

**Local Development Order:** An Order made by a local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a specific development proposal or classes of development.

**Local Enterprise Partnership:** A body, designated by the Secretary of State for Housing, Communities and Local Government, established for the purpose of creating or improving the conditions for economic growth in an area.

**Local housing need:** The number of homes identified as being needed through the application of the standard method set out in national planning [guidance \(or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 61 of this Framework\)-practice guidance.](#)

**Local Nature Partnership:** A body, designated by the Secretary of State for Environment, Food and Rural Affairs, established for the purpose of protecting and improving the natural environment in an area and the benefits derived from it.

**Local planning authority:** The public authority whose duty it is to carry out specific planning functions for a particular area. All references to local planning authority include the district council, London borough council, county council, Broads Authority, National Park Authority, the Mayor of London and a development corporation, to the extent appropriate to their responsibilities.

**Local plan:** A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community. ~~In law this is described as the development plan documents adopted,~~ under the [Town and Country Planning and Compulsory Purchase Act](#)

[2004.\(Local Planning\) \(England\) Regulations 2012](#). A local plan can consist of either strategic or non-strategic policies, or a combination of the two.

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**Main town centre uses:** Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

**Major development<sup>82</sup>development<sup>91</sup>:** For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m<sup>2</sup> or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

**Major hazard sites, installations and pipelines:** Sites and infrastructure, including licensed explosive sites and nuclear installations, around which Health and Safety Executive (and Office for Nuclear Regulation) consultation distances to mitigate the consequences to public safety of major accidents may apply.

**Mansard roof:** A type of roof that is characterised by two slopes, the lower steep and the upper shallow. It is generally regarded as a suitable type of roof extension for buildings which are part of a terrace of at least three buildings and at least two stories tall, with a parapet running the entire length of the front façade (reference: Create Streets, 2021, *Living Tradition*).

**Minerals resources of local and national importance:** Minerals which are necessary to meet society's needs, including aggregates, brickclay (especially Etruria Marl and fireclay), silica sand (including high grade silica sands), coal derived fly ash in single use deposits, cement raw materials, gypsum, salt, fluorspar, shallow and deep-mined coal, oil and gas (including conventional and unconventional hydrocarbons), tungsten, kaolin, ball clay, potash, polyhalite and local minerals of importance to heritage assets and local distinctiveness.

**Mineral Consultation Area:** a geographical area based on a Mineral Safeguarding Area, where the district or borough council should consult the Mineral Planning Authority for any proposals for non-minerals development.

**Mineral Safeguarding Area:** An area designated by minerals planning authorities which covers known deposits of minerals which are desired to be kept safeguarded from unnecessary sterilisation by non-mineral development.

**National Landscapes:** areas legally designated as areas of outstanding natural beauty under the National Parks and Access to the Countryside Act 1949 and Countryside and Rights of Way Act 2000.

**National trails:** Long distance routes for walking, cycling and horse riding.

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<sup>91</sup> [Other than for the specific purposes of paragraphs 190 and 191 in this Framework.](#)

**Natural Flood Management:** managing flood and coastal erosion risk by protecting, restoring and emulating the natural 'regulating' function of catchments, rivers, floodplains and coasts.

**Nature Recovery Network:** An expanding, increasingly connected, network of wildlife- rich habitats supporting species recovery, alongside wider benefits such as carbon capture, water quality improvements, natural flood risk management and recreation. It includes the existing network of protected sites and other wildlife rich habitats as well as

~~82- Other than for the specific purposes of paragraphs 182 and 183 in this Framework.~~

and landscape or catchment scale recovery areas where there is coordinated action for species and habitats.

**Neighbourhood Development Order:** An Order made by a local planning authority (under the Town and Country Planning Act 1990) through which parish councils and neighbourhood forums can grant planning permission for a specific development proposal or classes of development.

**Neighbourhood plan:** A plan prepared by a parish council or neighbourhood forum for a designated neighbourhood area. In law this is described as a neighbourhood development plan in the Planning and Compulsory Purchase Act 2004.

**Non-strategic policies:** Policies contained in a neighbourhood plan, or those policies in a local plan that are not strategic policies.

**Older people:** People over or approaching retirement age, including the active, newly-retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.

**Open space:** All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

**Original building:** A building as it existed on 1 July 1948 or, if constructed after 1 July 1948, as it was built originally.

**Out of centre:** A location which is not in or on the edge of a centre but not necessarily outside the urban area.

**Out of town:** A location out of centre that is outside the existing urban area.

**Outstanding universal value:** Cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations. An individual Statement of Outstanding Universal Value is agreed and adopted by the UNESCO World Heritage Committee for each World Heritage Site.

**People with disabilities:** People have a disability if they have a physical or mental impairment, and that impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. These persons include, but are not limited to, people with ambulatory difficulties, blindness, learning difficulties, autism and mental health needs.

**Permission in principle:** A form of planning consent which establishes that a site is suitable for a specified amount of housing-led development in principle. Following a grant of permission in principle, the site must receive a grant of technical details consent before development can proceed.

**Planning condition:** A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.

**Planning obligation:** A legal agreement entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.

**Playing field:** The whole of a site which encompasses at least one playing pitch as defined in the Town and Country Planning (Development Management Procedure) (England) Order ~~2015~~  
2015.

**Post-16:** Young people who are over compulsory school age but under 19, or aged 19 or over and for whom an Education, Health and Care (EHC) plan is maintained.

**Previously developed land:** Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) ~~and any associated~~. It also includes land comprising large areas of fixed surface infrastructure. ~~This such as large areas of hardstanding which have been lawfully developed. Previously developed land~~ excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

**Primary shopping area:** Defined area where retail development is concentrated.

**Priority habitats and species:** Species and Habitats of Principal Importance included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006.

**Ramsar sites:** Wetlands of international importance, designated under the 1971 Ramsar ~~Ramsar~~ Convention.

**Reasonable future scenarios (for assessing potential highways impacts):** a range of realistic transport scenarios tested in agreement with the local planning authority and other relevant bodies (including statutory consultees where appropriate), to assess potential impacts and determine the optimum transport infrastructure required to mitigate any adverse impacts, promote sustainable modes of travel and realise the vision for the site.

**Renewable and low carbon energy:** Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon

technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

**Rural exception sites:** Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.

**Recycled aggregates:** aggregates resulting from the processing of inorganic materials previously used in construction, e.g. construction and demolition waste.

**Safeguarding zone:** An area defined in Circular 01/03: *Safeguarding aerodromes, technical sites and military explosives storage areas*, to which specific safeguarding provisions apply.

**Secondary aggregates:** aggregates from industrial wastes such as glass (cullet), incinerator bottom ash, coal derived fly ash, railway ballast, fine ceramic waste (pitcher), and scrap tyres; and industrial and minerals by-products, notably waste from china clay, coal and slate extraction and spent foundry sand. These can also include hydraulically [bound materials](#).



~~bound materials.~~

**Self-build and custom-build housing:** Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act.

**Setting of a heritage asset:** The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

**Significance (for heritage policy):** The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.

**Special Areas of Conservation:** Areas defined by regulation 3 of the Conservation of Habitats and Species Regulations 2017 which have been given special protection as important conservation sites.

**Special Protection Areas:** Areas classified under regulation 15 of the Conservation of Habitats and Species Regulations 2017 which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds.

**Site investigation information:** Includes a risk assessment of land potentially affected by contamination, or ground stability and slope stability reports, as appropriate. All

investigations of land potentially affected by contamination should be carried out in accordance with established procedures (such as BS10175 Investigation of Potentially Contaminated Sites – Code of Practice).

**Site of Special Scientific Interest:** Sites designated by Natural England under the Wildlife and Countryside Act 1981.

**Spatial development strategy:** A plan containing strategic policies prepared by a Mayor or a combined authority. It includes the London Plan (prepared under provisions in the Greater London Authority Act 1999) and plans prepared by combined authorities that have been given equivalent plan-making functions by an order made under the Local Democracy, Economic Development and Construction Act 2009 (as amended).

**Stepping stones:** Pockets of habitat that, while not necessarily connected, facilitate the movement of species across otherwise inhospitable landscapes.

**Strategic environmental assessment:** A procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment.

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**Strategic policies:** Policies and site allocations which address strategic priorities in line with the requirements of Section 19 (1B-E) of the Planning and Compulsory Purchase Act 2004.

**Strategic policy-making authorities:** Those authorities responsible for producing strategic policies (local planning authorities, and elected Mayors or combined authorities, where this power has been conferred). This definition applies whether the authority is in the process of producing strategic policies or not.

**Supplementary planning documents:** Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.

**Sustainable Drainage System:** A sustainable drainage system controls surface water run off close to where it falls, combining a mixture of built and nature-based techniques to mimic natural drainage as closely as possible, and accounting for the predicted impacts of climate change. The type of system that would be appropriate will vary from small scale interventions such as permeable paving and soakaways that can be used in very small developments to larger integrated schemes in major developments.

**Sustainable transport modes:** Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, ultra low and zero emission vehicles, car sharing and public transport.

**Town centre:** Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the

development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.

**Transport assessment:** A comprehensive and systematic process that [considers and](#) sets out transport issues relating to a proposed development-, [in the context of the vision for the scheme](#). It identifies measures required to [improve accessibility and safety for all modes of travel, particularly for support](#) alternatives to the car such as walking, cycling and public transport, and [to promote accessibility and safety, together with](#) measures that will be needed deal with the anticipated transport impacts of the development.

**Transport statement:** A simplified version of a transport assessment where it is agreed the transport issues arising from development proposals are limited and a full transport assessment is not required.

**Travel plan:** A long-term management strategy for an organisation or site that [seeks to deliver details how agreed](#) sustainable transport objectives [are to be delivered](#), and [which](#) is [monitored and](#) regularly reviewed.

**Vision-led approach:** [an approach to transport planning based on setting outcomes for a development based on achieving well-designed, sustainable and popular places, and providing the transport solutions to deliver those outcomes as opposed to predicting future demand to provide capacity \(often referred to as 'predict and provide'\)](#).

**Wildlife corridor:** Areas of habitat connecting wildlife populations.

**Windfall sites:** Sites not specifically identified in the development plan.

# Annex 3: Flood risk vulnerability classification

## ESSENTIAL INFRASTRUCTURE

- Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk.
- Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including infrastructure for electricity supply including generation, storage and distribution systems; and water treatment works that need to remain operational in times of flood.
- Wind turbines.
- Solar farms

## HIGHLY VULNERABLE

- Police and ambulance stations; fire stations and command centres; telecommunications installations required to be operational during flooding.
- Emergency dispersal points.
- Basement dwellings.
- Caravans, mobile homes and park homes intended for permanent residential use.
- Installations requiring hazardous substances consent. (Where there is a demonstrable need to locate such installations for bulk storage of materials with port or other similar facilities, or such installations with energy infrastructure or carbon capture and storage installations, that require coastal or water-side locations, or need to be located in other high flood risk areas, in these instances the facilities should be classified as 'Essential Infrastructure'.)

## MORE VULNERABLE

- Hospitals
- Residential institutions such as residential care homes, children's homes, social services homes, prisons and hostels.
- Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels.
- Non-residential uses for health services, nurseries and educational establishments.
- Landfill\* and sites used for waste management facilities for hazardous waste.
- Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan.

## LESS VULNERABLE

- Police, ambulance and fire stations which are not required to be operational during flooding.

- Buildings used for shops; financial, professional and other services; restaurants, cafes and hot food takeaways; offices; general industry, storage and distribution; non-residential institutions not included in the 'more vulnerable' class; and assembly and leisure.
- Land and buildings used for agriculture and forestry.
- Waste treatment (except landfill\* and hazardous waste facilities).
- Minerals working and processing (except for sand and gravel working).
- Water treatment works which do not need to remain operational during times of flood.
- Sewage treatment works, if adequate measures to control pollution and manage sewage during flooding events are in place.
- Car parks.

### **WATER-COMPATIBLE DEVELOPMENT**

- Flood control infrastructure.
- Water transmission infrastructure and pumping stations.
- Sewage transmission infrastructure and pumping stations.
- Sand and gravel working.
- Docks, marinas and wharves.
- Navigation facilities.
- Ministry of Defence installations.
- Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location.
- Water-based recreation (excluding sleeping accommodation).
- Lifeguard and coastguard stations.
- Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.
- Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan.

\* Landfill is as defined in Schedule 10 of the Environmental Permitting (England and Wales) Regulations 2010.

## City of London Corporation Committee Report

<p><b>Committee(s):</b> Port Health and Environmental Services - For Decision</p> <p>Planning and Transportation – For Information</p>	<p><b>Dated:</b> 19/11/2024</p> <p>21/01/2025</p>
<p><b>Subject:</b> Air Quality Strategy 2025 to 2030</p>	<p><b>Public report:</b> For Decision</p>
<p><b>This proposal:</b></p> <ul style="list-style-type: none"> <li>• <b>delivers Corporate Plan 2024-29 outcomes</b></li> <li>• <b>provides statutory duties</b></li> </ul>	<p><b>Corporate Plan Outcomes:</b> Leading Sustainable Environment. Providing Excellent Services. Diverse Engaged Communities.</p> <p><b>Statutory duties:</b> London Local Air Quality Management.</p>
<p><b>Does this proposal require extra revenue and/or capital spending?</b></p>	<p>No</p>
<p><b>Report of:</b></p>	<p>Katie Stewart, Executive Director, Environment.</p>
<p><b>Report author:</b></p>	<p>Ruth Calderwood, Air Quality Manager, Environment Department.</p>

### Summary

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

The City Corporation delivers air quality improvements through its Air Quality Strategy. A draft Strategy was approved for consultation by the Port Health and Environmental Services (PHES) committee in May 2024. The consultation took place from 3<sup>rd</sup> June to 26<sup>th</sup> July. This report outlines the consultation process, details the responses received and corresponding amendments made to the draft strategy.

Following careful consideration of the consultation comments, relatively minor changes have been made to the draft Strategy and the final version is attached as Appendix 1 to this document. Amendments include: an expanded Glossary; ratified

air quality data for 2023; providing greater clarity in some areas; more measurable actions and further detail on the delivery of some actions. The aims of the Strategy remain unchanged and will deliver air quality that is better than national standards, as supported by the PHES committee at the May meeting.

Delivery of the Air Quality Strategy fulfils the City Corporations statutory obligations and will directly support the Corporate Plan outcomes Leading Sustainable Environments, Providing Excellent Services and Diverse Engaged Communities. It will also provide a robust set of data for the Corporate Plan performance measure 'Progress towards World Health Organisation Air Quality Guidelines.'

## **Recommendation(s)**

Port Health and Environmental Services Committee Members are asked to:

- Approve the final Air Quality Strategy 2025 to 2030.

Planning and Transportation Committee Members are asked to:

- Note the contents of this report and the Appendices.

## **Main Report**

### **Background**

1. The City of London Corporation has a statutory duty to assist the Mayor of London and the UK government in taking action to reduce levels of air pollution. This is to ensure that concentrations of pollutants meet health-based standards as soon as possible. The City Corporation also has a responsibility to protect public health.
2. The City Corporation delivers air quality improvements through its Air Quality Strategy. A draft Strategy was approved for consultation by PHES committee in May 2024. It covers the period 2025 to 2030 and includes new data, new targets, and new responsibilities for helping to reduce emissions of very fine particles (PM<sub>2.5</sub>). The draft Strategy supports the outcomes of the Corporate Plan 2024 to 2029, the Climate Action Strategy, Transport Strategy, City Plan and Procurement Strategy.

### **The Consultation**

3. The draft Strategy was published for consultation from 3<sup>rd</sup> June to 26<sup>th</sup> July. It was sent directly to 30 organisations and placed on the Commonplace citizen engagement web site. Individuals and organisations were invited to submit comments either using Commonplace or directly in writing.
4. The consultation was promoted at the City Residents Meeting on 4<sup>th</sup> June. Three additional in-person events were held during the consultation period. Hard copies of the Strategy were available to view at the Guildhall North Wing



Reception and the City Libraries. A press release was issued on 3<sup>rd</sup> June about the consultation, and it was promoted on social media. It was also promoted in City Resident, the Barbican Estate Office newsletter and in the Air Quality monthly e-newsletter.

5. Further details about the consultation process can be found in Appendix 2.

### **Response to the Consultation**

6. Ten detailed written responses were received, and 63 responses submitted to the Commonplace web site. Several people attended the in-person consultation events and were encouraged to visit the Commonplace web site to submit their views.
7. Appendix 3 contains a table with the detailed responses that were received in writing. A comment has been provided against each point raised, indicating action that has been taken as a result.
8. Appendix 4 provides a summary of the responses received on the Commonplace web site, together with action taken.

### **Amendments to the draft Strategy following Consultation**

9. All consultation comments have been carefully considered and changes made to the draft Strategy where appropriate. The consultation resulted in relatively minor changes to the draft Strategy and include: an expanded Glossary; providing greater clarity in some areas; more measurable actions and further detail on the delivery of some actions. The air quality data in the final Strategy has been updated and some graphs have been amended to include additional information. The aims of the Strategy remain unchanged. A word copy of the draft Strategy with track changes is available in the Members Room.
10. Some of the recommendations made, though useful, are too detailed to include in a Strategy document and will be picked up under existing workstreams. Consequently, they result in no change to the Strategy text, but the recommendation will still be taken forwards. Further details can be found in Appendix 3 and 4.

### **Corporate & Strategic Implications**

#### **Strategic implications**

11. Air quality policy is supported by the Climate Action Strategy, Transport Strategy, Procurement Strategy, and draft City Plan.
12. The Air Quality Strategy 2025 to 2030 aligns with, and will support the delivery of the Corporate Plan 2024-2029. It supports the following outcomes:
  - Leading sustainable environment
  - Providing excellent services

- Diverse engaged communities

The Strategy delivery will also provide a robust set of air quality data for the Corporate Plan performance measure '*Progress towards World Health Organisation Air Quality Guidelines.*'

### **Financial implications**

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

### **Resource implications**

14. The strategy will be delivered using existing resources

### **Legal implications**

15. None

### **Risk implications**

16. Air quality is listed as a Departmental Risk. Department risks are reviewed quarterly by the Environment Department Senior Leadership Team. Annual air quality progress reports and four monthly risk management update reports are presented to the PHES committee.

### **Equalities implications**

17. Action to improve air quality has a positive impact on all sections of the population. The benefit is greatest for children and the elderly as they are more susceptible to the health impacts of air pollution. There is also a positive impact on individuals whose lives are affected by asthma and other respiratory and cardiovascular conditions. An Equalities Impact Assessment for the Air Quality Strategy is attached as Appendix 5.

### **Climate Implications**

18. The Air Quality Strategy closely aligns with the Climate Action Strategy. Many actions to reduce emissions of air pollutants will also reduce emissions of carbon.

### **Security implications**

19. None

## **Conclusion**

20. The City Corporation published a draft Air Quality Strategy 2025 to 2030 for consultation from 3<sup>rd</sup> June to 26<sup>th</sup> July.

21. The responses to the consultation have been carefully considered and the draft Strategy amended where appropriate. Relatively minor changes have been made to the draft and include: an expanded Glossary; providing greater clarity in some areas; more measurable actions and further detail on the delivery of some actions. The air quality data in the final Strategy has been updated and some graphs have been amended to include additional information. The aims of the Strategy remain unchanged.

22. The City Corporation Air Quality Strategy 2025 to 2030 details work that will deliver air quality that is better than national standards. By doing so, it will deliver improved health outcomes and support the Corporate Plan outcomes Leading Sustainable Environments, Providing Excellent Services and Diverse Engaged Communities. It will also provide a robust set of data for the Corporate Plan performance measure 'Progress towards World Health Organisation Air Quality Guidelines.'

## **Appendices**

- Appendix 1 - Air Quality Strategy 2025 to 2030 (final version)
- Appendix 2 - Consultation process
- Appendix 3 - Written consultation comments
- Appendix 4 - Responses received on the Commonplace web site
- Appendix 5 - Equalities Impact Assessment for the Air Quality Strategy

## **Background papers**

- Draft Air Quality Strategy 2025 to 2030, submitted to May 2024 PHES Committee for decision.

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# Foreword

The City of London Corporation has long been at the forefront of tackling air pollution. We have been measuring air quality for over 60 years and in 1954, following the infamous London Smogs, we published our own legislation to ban the production of smoke in the City. This paved the way for the national Clean Air Act of 1956. In 1971, we were also the first authority to obtain powers to stop the burning of sulphurous fuel. The form and source of air pollution has changed over time and, though much improved, remains at a level that impacts on health.

Twenty years ago, levels of air pollution across the Square Mile were almost three times what they are today. Over that time, we have been taking focussed action through a series of action plans and strategies to improve the quality of the air we breathe. This has been achieved with the support of our communities. Our last Air Quality Strategy alone, supported by national and regional action, delivered an average 40% reduction in the pollutants nitrogen dioxide and fine particulate matters (PM<sub>10</sub>). The Bank on Safety scheme, and subsequent All Change at Bank scheme, led to an even greater reduction in local levels of nitrogen dioxide of over 50%. We are able to measure this using our extensive network of monitoring equipment.

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

However, we are not complacent, and I have great pleasure in presenting our fourth Air Quality Strategy. The Strategy, which contains our Air Quality Action Plan, outlines action that we will take to continue to achieve better air quality for our communities. Since the current national air quality standards were set, research has shown that air pollution has an impact on health at lower levels than previously thought. This has been reflected in air quality guidelines issued in 2021 by the World Health Organisation. The aims of the Strategy therefore go beyond the national standards and instead take us on a pathway to meet these guidelines. This goes beyond our statutory obligation.

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

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

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

We look forward to working with you to achieve our vision of having air quality in the Square Mile that is healthy to breathe.



**Mary Durcan CC**  
Chair, Port Health and  
Environmental Services Committee

# Air Quality Strategy 2025 – 2030: Delivering Healthy Air in the City of London

## Our Vision

The Square Mile has air that is healthy to breathe.

## Our definition of healthy air:

Concentrations of nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) that meet national health-based standards and are on a pathway to meet the 2021 World Health Organisation (WHO) Air Quality Guidelines.

## Why us?

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

## Our Aims

- Over 90% of the Square Mile meets an annual average<sup>1</sup> of 30µg/m<sup>3</sup> for nitrogen dioxide by 2030<sup>2</sup>.
- To support national and regional action that leads to the Square Mile meeting an annual average of 15µg/m<sup>3</sup> for PM<sub>10</sub> by 2030<sup>3</sup>.
- To support national and regional action that leads to the Square Mile meeting an annual average of 10µg/m<sup>3</sup> for PM<sub>2.5</sub> by 2030<sup>4</sup>.

## Our Key Outcomes (Corporate Plan 2024-2029)

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

## Demonstrating success:

Annual reports will be published detailing progress with each action and with the Strategy aims.

## Who we will work with:

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

<sup>1</sup> Measured as the mean.

<sup>2</sup> World Health Organisation 2021 2nd interim target

<sup>3</sup> World Health Organisation 2021 Air Quality Guideline

<sup>4</sup> National air quality standard to be achieved by 2040 and World Health Organisation 2021 4th interim target

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## Technical Glossary

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

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

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

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

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

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

**µg/m<sup>3</sup>:** Microgrammes per cubic metre. A measure of concentration in terms of mass per unit volume. A concentration of 1µg/m<sup>3</sup> means that one cubic metre of air contains one microgram of pollutant.

**Nitrogen dioxide, NO<sub>2</sub>:** Nitrogen dioxide is a brown gaseous air pollutant composed of nitrogen and oxygen.

**Nitric oxide, NO:** Nitric oxide is a colourless gas that reacts with other gases in the atmosphere to form nitrogen dioxide.

**Nitrogen oxides, NO<sub>x</sub>:** Nitrogen oxides is a collective term used to refer to nitric oxide and nitrogen dioxide.

**Particulate matter:** Particulate matter is everything in the air that is not a gas. It consists of a huge variety of chemical compounds and materials.

**Fine particulate matter, PM<sub>10</sub>:** PM<sub>10</sub> is particulate matter of a size less than 10µm in diameter.

**Very fine particulate matter, PM<sub>2.5</sub>:** PM<sub>2.5</sub> is particulate matter of a size less than 2.5µm in diameter.

**Ozone, O<sub>3</sub>:** Ozone is a secondary pollutant. In the upper atmosphere ozone absorbs harmful ultraviolet radiation from the sun, however at ground level pollutant ozone is a pollutant that irritates the respiratory system and eyes.

**kW:** Kilowatt, unit of electric power.

**MW:** Megawatt, equal to 1,000kW.

**MWth:** Megawatt thermal, unit of thermal power.

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

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



# Introduction

01

# 1. Introduction

The City of London, also known as the Square Mile, is the historic heart of London. It is home to approximately 8,600 permanent residents with a working population of around 614,500. In addition to workers and residents, each year the City of London welcomes 10 million visitors. The City of London Corporation (City Corporation) is the governing body for the Square Mile. It manages a wide range of functions including 11,000 acres of open space outside of the Square Mile. These provide green lungs for the Capital.

Although much improved, air pollution remains at a level where it impacts on health. The pollutants of current concern are nitrogen dioxide, that is a product of fuel combustion, and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), of which there are a wide range of sources.

The City Corporation is required by statute to monitor these air pollutants through a framework called London Local Air Quality Management (LLAQM). Following detailed air quality monitoring, the whole of the Square Mile was declared an Air Quality Management Area (AQMA) in January 2001 for annual mean concentrations of nitrogen dioxide and PM<sub>10</sub>, and 1-hour concentrations of nitrogen dioxide. This was due to levels in 2001 being higher than the national standards. Once an AQMA has been designated, there is a requirement to develop and

implement an Air Quality Action Plan (AQAP). The national standards were originally set in European Directives and transposed into domestic legislation.

The Environment Act 2021 set new national standards for PM<sub>2.5</sub>. Subsequent guidance has outlined responsibilities for local government to take action to deal with this pollutant. These requirements are reflected in this Strategy.

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

A significant improvement in air quality has been experienced across the Square Mile since the initial AQMA designation in 2001. The current national standards for PM<sub>10</sub> are met across the Square Mile, and the annual mean standard for nitrogen dioxide is only exceeded adjacent to the busiest roads. The new national standard for PM<sub>2.5</sub>, 10µg/m<sup>3</sup> as an annual mean to be achieved by 2040, met for the first time in 2023.

Since 1987, the World Health Organisation (WHO) has issued Air Quality Guidelines (AQGs) for air pollutants that have a damaging impact on health. As evidence about the adverse health impacts of air pollution advances, the AQGs are revised. The guidelines are designed to offer quantitative health-based recommendations for managing air quality. They are not legally binding, but they do provide an evidence-based tool to inform legislation and policy in WHO Member States, of which the UK is one. Table 1.1 presents the 2021 WHO AQGs, with interim targets, for the pollutants covered by this Strategy. The national standard for each pollutant is also included.

**The aims of this Strategy are:**

- **Over 90% of the Square Mile meets an annual mean of 30µg/m<sup>3</sup> for nitrogen dioxide by 2030<sup>5</sup>.**
- **To support national and regional action that leads to the Square Mile meeting an annual mean of 15µg/m<sup>3</sup> for PM<sub>10</sub> by 2030.**
- **To support national and regional action that leads to the Square Mile meeting an annual mean of 10µg/m<sup>3</sup> for PM<sub>2.5</sub> by 2030.**

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

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

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

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

Pollutant	National Standard (annual mean µg/m <sup>3</sup> )	2021 WHO Guidelines (annual mean µg/m <sup>3</sup> )				2021 WHO Guidelines (annual mean µg/m <sup>3</sup> )
		1 Interim Target	2 Interim Target	3 Interim Target	4 Interim Target	
Nitrogen dioxide	40	40	30	20	-	10
PM <sub>10</sub>	40	70	50	30	20	15
PM <sub>2.5</sub>	10*	35	25	15	10	5

\* To be achieved by 2040

<sup>5</sup> Where total area includes roads, pavements and public spaces but excludes building internal area.

# 1.1 Source of Air Pollution in the Square Mile

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

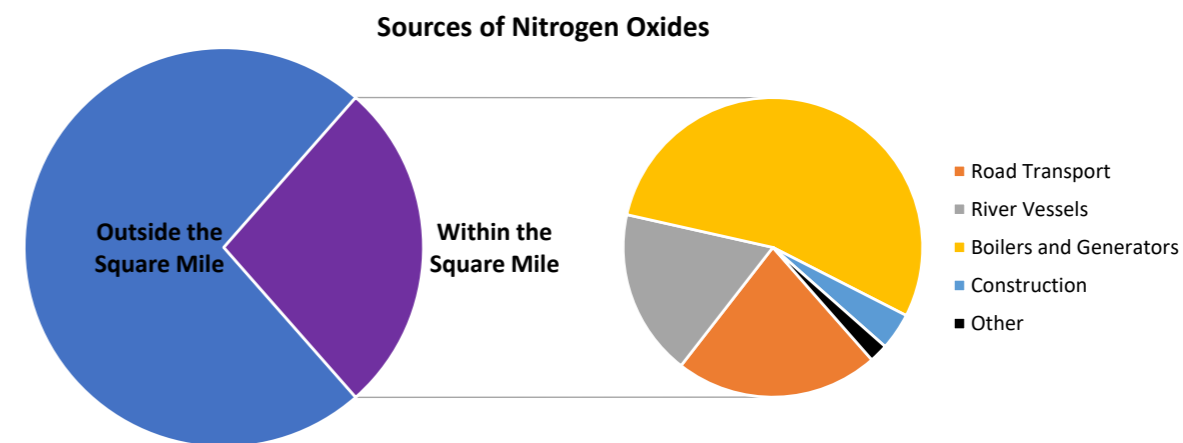
To assist with the development of targeted measures, the Greater London Authority (GLA) and Transport for London (TfL) have developed a database of emission sources across London. This is called the London Atmospheric Emissions Inventory (LAEI)<sup>6</sup>. The data in the inventory is approximate and should not be viewed as absolute. It has been developed as a guide to assist in decision making for tackling the main sources of air pollution. The City Corporation has also undertaken its own research to look in more detail at emissions of air pollutants in the Square Mile<sup>7,8</sup>.

Nitrogen oxides refers to nitric oxide and nitrogen dioxide (NO<sub>2</sub>), both of which are formed during the combustion of fuels. Nitric oxide reacts with other gases in the air to form nitrogen dioxide. These reactions take place quickly and are reversible, so the two gases are referred to together as nitrogen oxides.

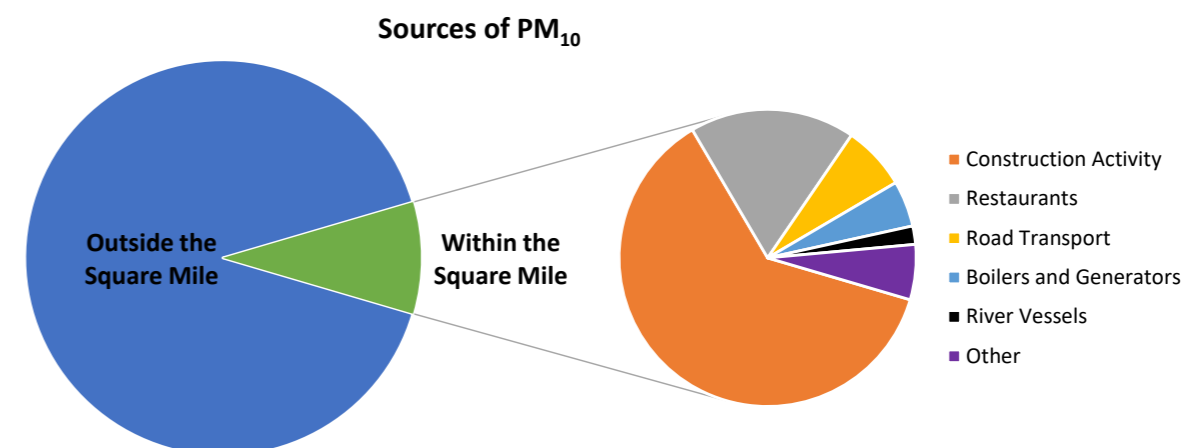
Particulate matter can travel large distances, with up to 33% transported to the UK from continental Europe. Additionally, around 15%, comes from natural sources such as pollen, sea spray and desert dust. The remaining amount, approximately 50%, comes from anthropogenic sources such as solid fuel burning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

Appendix 3 details how emissions sources in the Square Mile have changed over time.

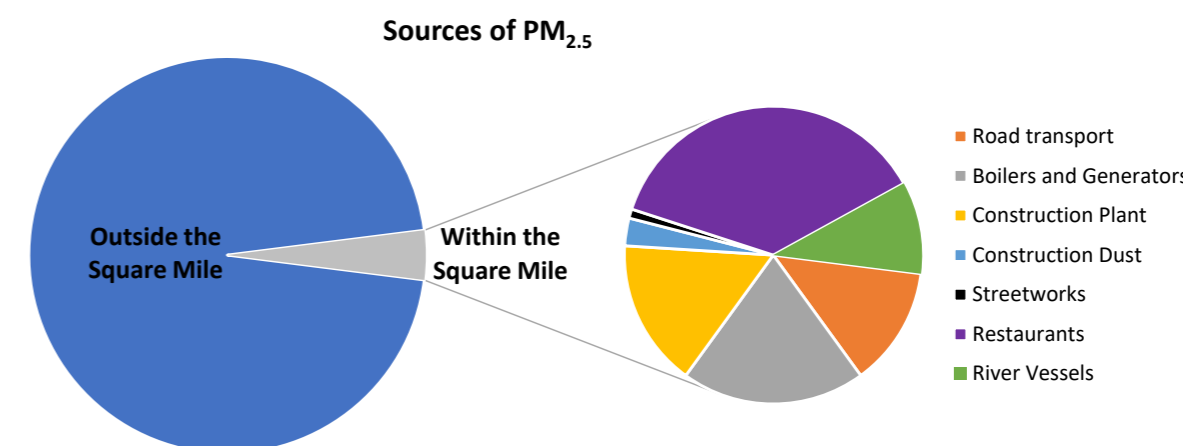
**Figure 1.1** presents approximate emissions of nitrogen oxides that impact on air pollution measured in the Square Mile<sup>9</sup>. Approximately 75% of the nitrogen oxides in the Square Mile come from outside the boundary. The remaining 25% is made up of emissions from combustion plant such as boilers, generators, combined heat and power (CHP) plant, road transport, river vessels and construction activity.



**Figure 1.2** details the approximate origin of PM<sub>10</sub> measured in the Square Mile. Over 90% is generated outside the boundary with the largest source within the Square Mile being associated with construction activity.



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



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

7 Ove Arup & Partners Limited (2023), City of London Corporation – WHO Air Quality Guidelines, 295912

8 Ricardo Energy & Environment (2022), City of London – PM<sub>2.5</sub> Emissions Inventory and Source Apportionment, ED16224

9 Cambridge Environmental Research Consultants (2024), Determination of the area of the City of London exceeding the NO<sub>2</sub> air quality limit value in 2022 using modelling and measurements, FM1424.

## 1.2 Health Impacts of Air Pollution

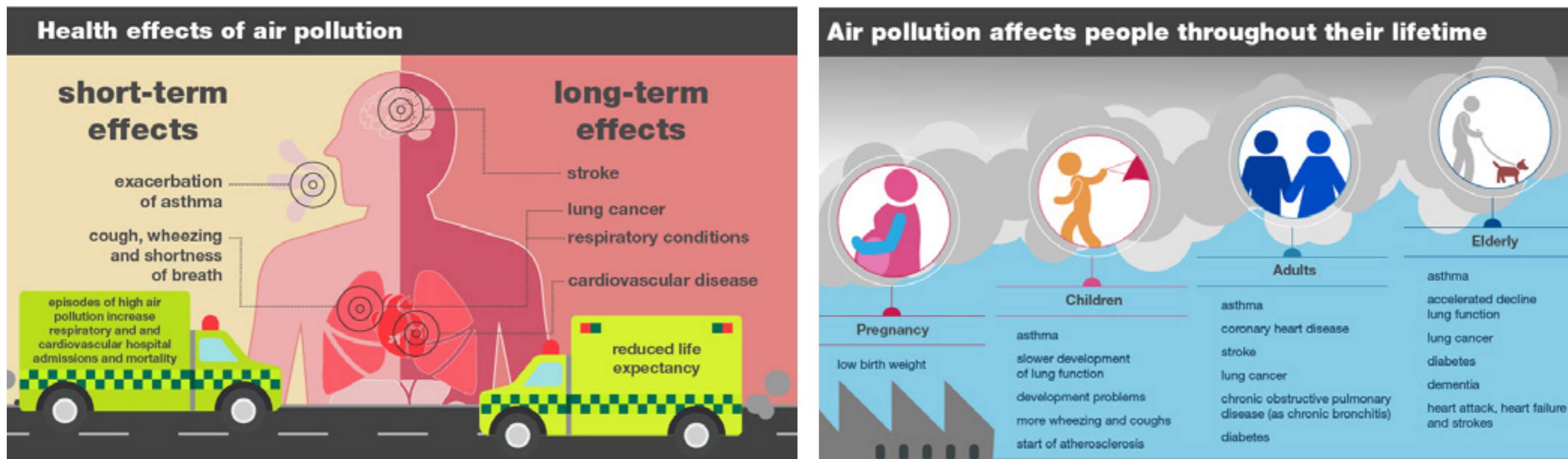


Figure 1.4: Health Effects of Air Pollution<sup>11</sup>

Air pollution is the largest environmental risk to public health in the UK. It is associated with a range of adverse health impacts, with the evidence base strengthening year on year. Elevated concentrations of air pollution particularly affect society's most vulnerable populations; children, the elderly, and those with existing medical conditions. Long-term exposure to air pollution (over years or a lifetime) can cause chronic conditions such as cardiovascular and respiratory diseases as well as lung cancer, leading to reduced life expectancy. It can also reduce the number of years we spend in good health. Long-term exposure to air pollution in early life can have a lasting effect on lung function, including suppressing children's lung function growth.

Short-term acute exposure can impact on lung function, exacerbate asthma, and lead to an increase in respiratory and cardiovascular hospital admissions and mortality.

There is increasing evidence of air pollution having a potential role in causing asthma, especially in people who live near busy roads. In addition, short-term peaks in pollution levels are a trigger that can make asthma symptoms worse, increasing the risk of exacerbations. This is also true for chronic obstructive pulmonary disease (COPD).

The GLA estimated that in 2019 there were between 3,600 and 4,100 premature deaths attributable to air pollution in London. In December 2020, a landmark ruling by a London Coroner concluded that Ella Adoo-Kissi-Debrah died, aged nine in 2013, from a combination of acute respiratory failure, severe asthma, and air pollution exposure. It is the first time in the UK that air pollution has been listed as a medical cause on a death certificate. Currently, there is no clear evidence of a safe level of exposure below which there is no risk of health effects<sup>10</sup>.

<sup>10</sup> Source: Greater London Authority (2022) Air quality in the City of London A guide for public health professionals

<sup>11</sup> Source: UK Health Security Agency (2018), Health matters: air pollution

# Air Quality Monitoring

# 02

## 2. Air Quality Monitoring

### Commitment:

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

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

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

Air pollution monitoring is undertaken across the Square Mile using two methods: automatic analysers and passive monitoring. The pollutants nitrogen dioxide, PM<sub>10</sub>, PM<sub>2.5</sub> and ozone are monitored using automatic analysers. Full details of the automatic monitoring sites are provided in Appendix 4, and their locations are presented in Figure 2.1.

Passive diffusion tube samplers are devices which are exposed to the air for a month and then analysed in a laboratory. They are used to measure nitrogen dioxide and in 2023 there were over 70 monitoring locations, see Figure 2.1. The locations selected for air quality monitoring are reviewed annually.

Full details of past monitoring locations can be found in the City Corporation Annual Status Reports (ASRs). All City Corporation monitoring data, is both automatic and passive available on the City Corporation website.

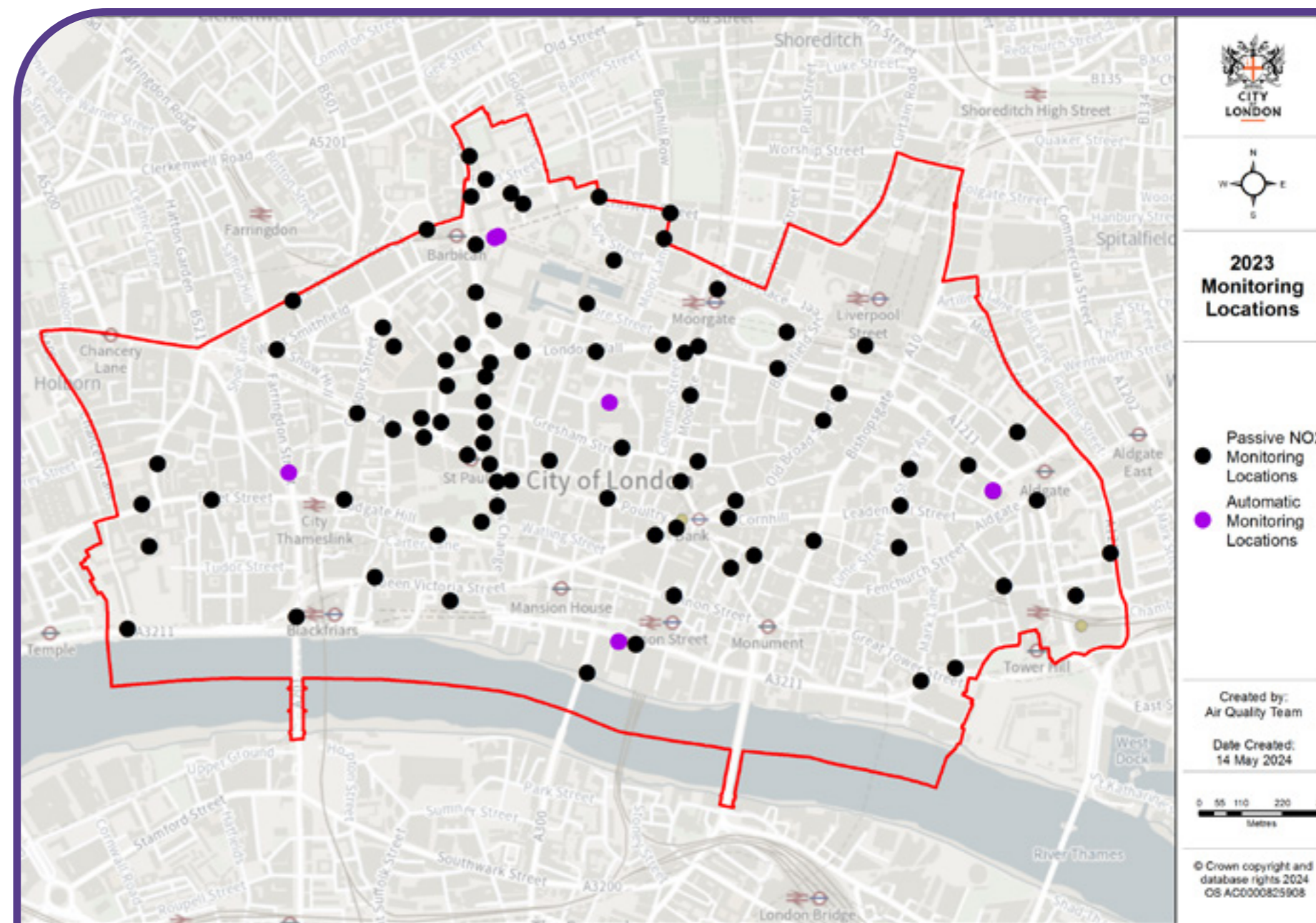


Figure 2.1: City Corporation Automatic Monitoring Sites and Passive Nitrogen Dioxide Monitoring Sites

## 2.1 Nitrogen Dioxide

### 2.1.1 Continuous Monitoring

Figure 2.2 details annual mean nitrogen dioxide concentrations at City Corporation monitoring sites for the past seven years. To see how concentrations have changed over the past 15 years, see Appendix 4.

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

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

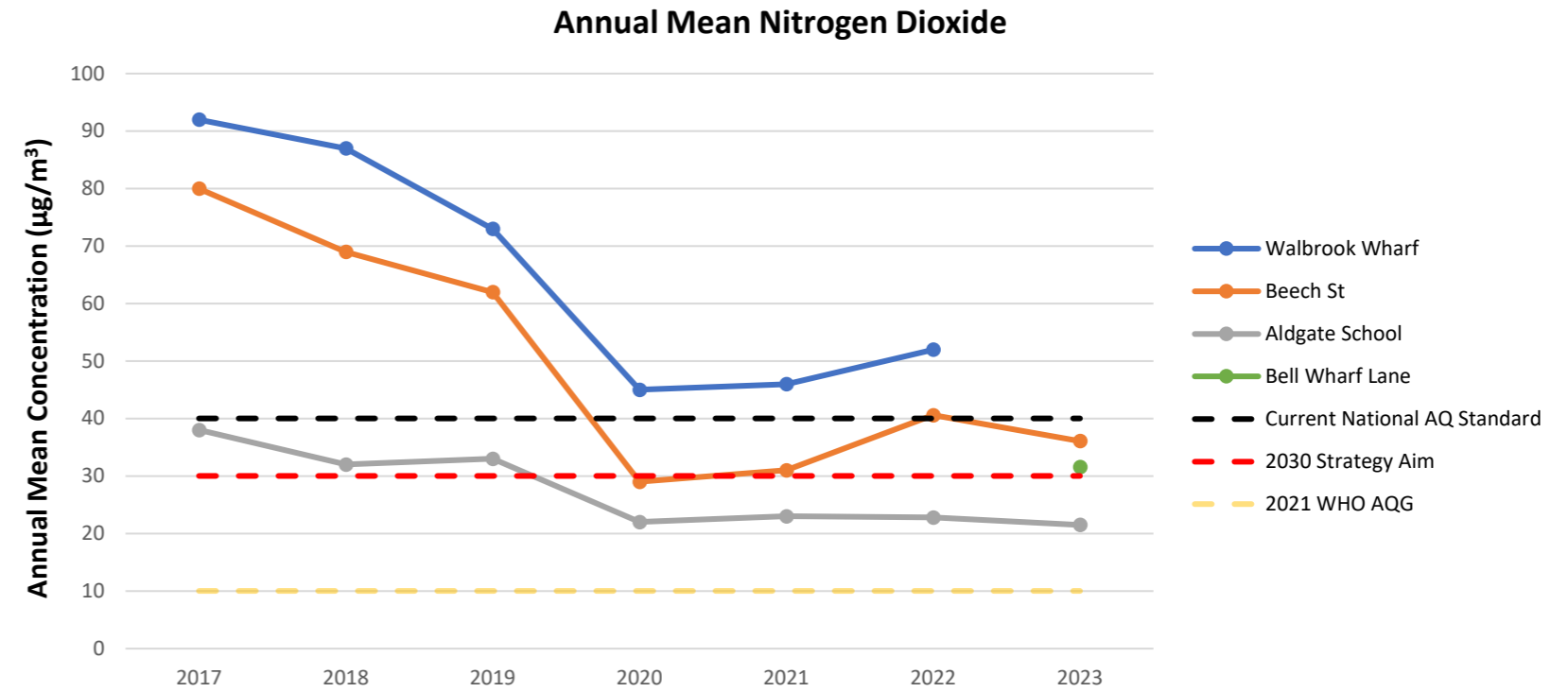


Figure 2.2: Annual Mean Nitrogen Dioxide

### 2.1.2 Non-continuous (Passive) Nitrogen Dioxide Monitoring

Data for five locations where nitrogen dioxide has been measured long-term using passive diffusion tubes is presented in Figure 2.3. All five sites have been compliant with the national annual mean standard since 2020, with three of the sites meeting the Strategy aim for levels below 30µg/m³ in 2023.

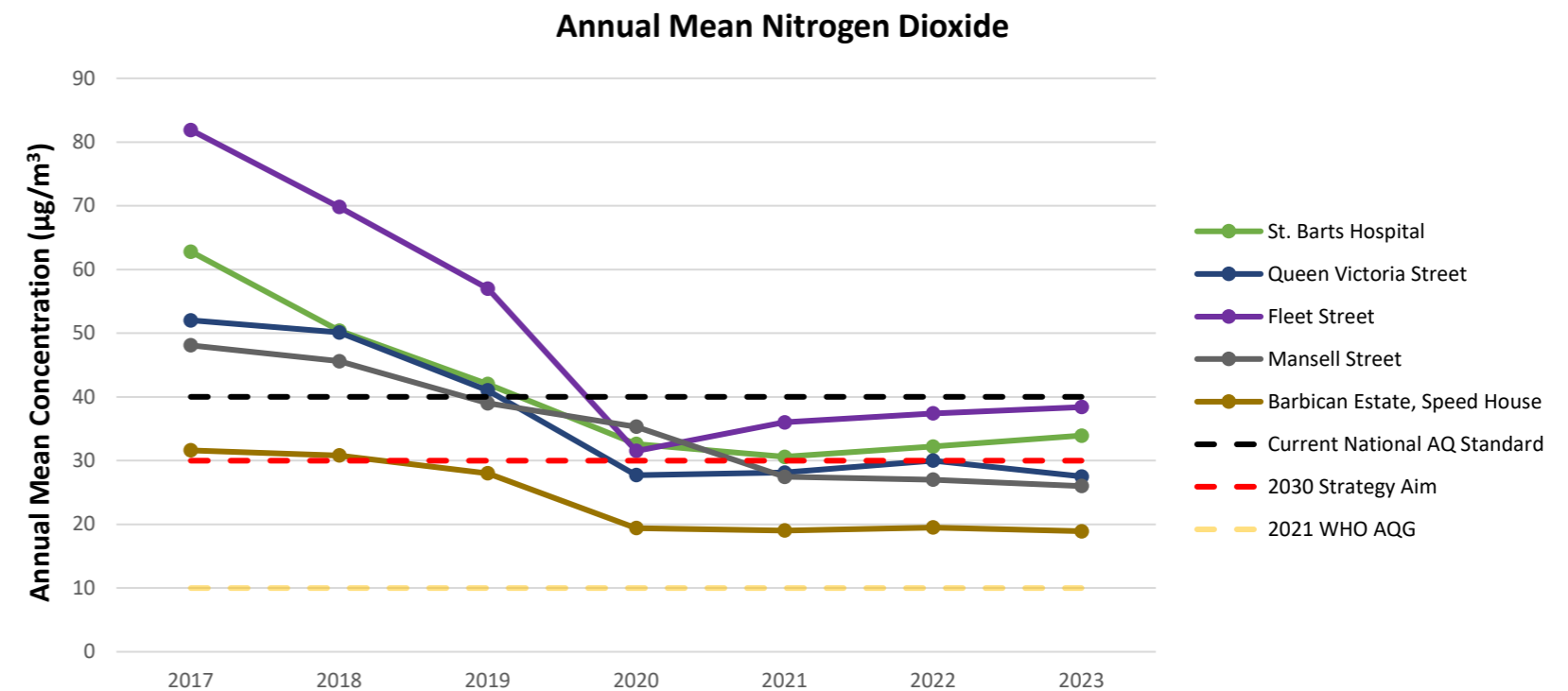


Figure 2.3: Annual Mean Nitrogen Dioxide, Passive Monitoring

## 2.2 Particulate Matter, PM<sub>10</sub>

Annual mean PM<sub>10</sub> concentrations have also reduced. Compliance with the national PM<sub>10</sub> annual mean standard has been achieved at all sites for the past seven years. The aim to achieve an annual mean PM<sub>10</sub> concentration of 15µg/m<sup>3</sup> by 2030 was met at Beech Street in 2021, and at the Aldgate School in 2023.

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

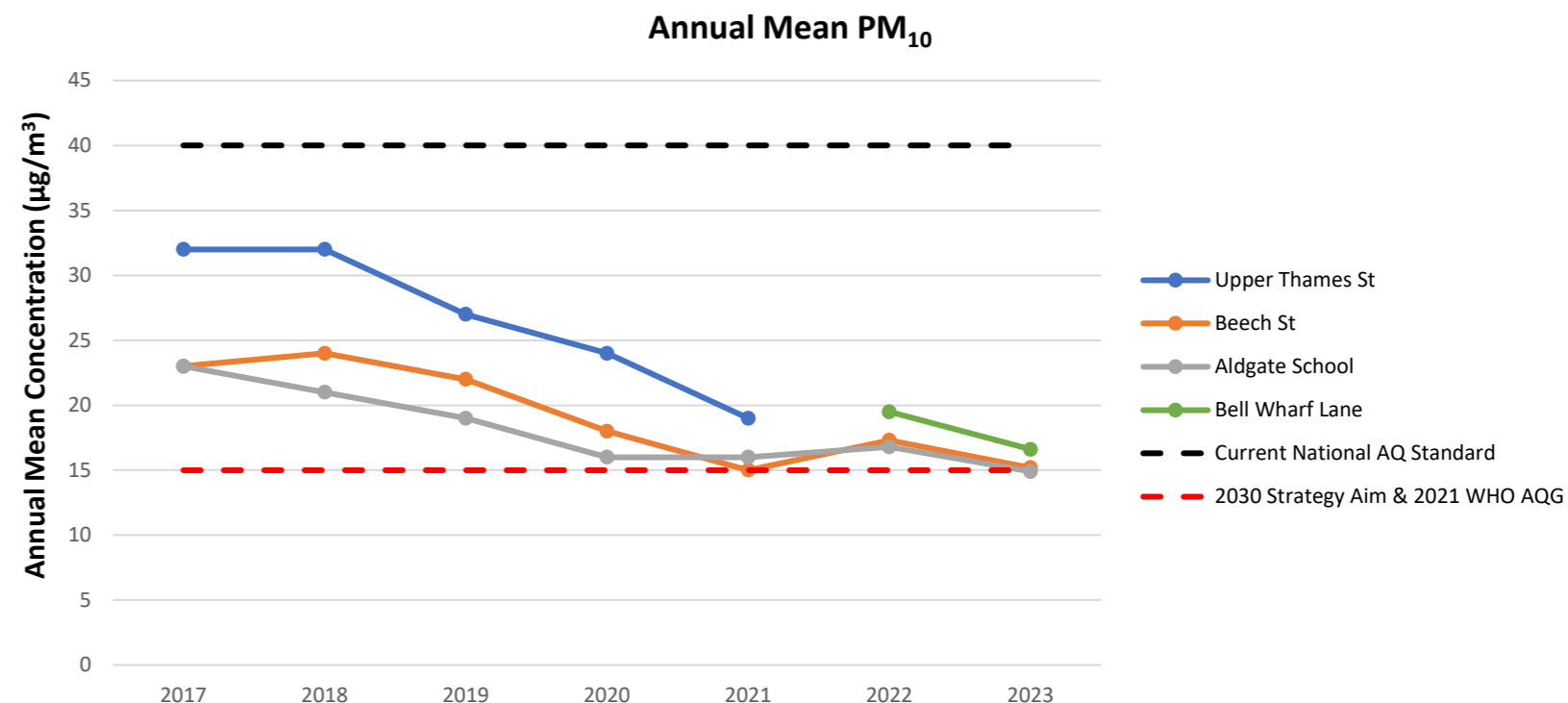


Figure 2.4: Annual Mean PM<sub>10</sub>

## 2.3 Particulate Matter, PM<sub>2.5</sub>

The new national standard for PM<sub>2.5</sub> is 10µg/m<sup>3</sup> measured as an annual mean to be achieved by 2040. It was achieved at both monitoring locations in 2023, largely due to the higher than average amount of rainfall during the year

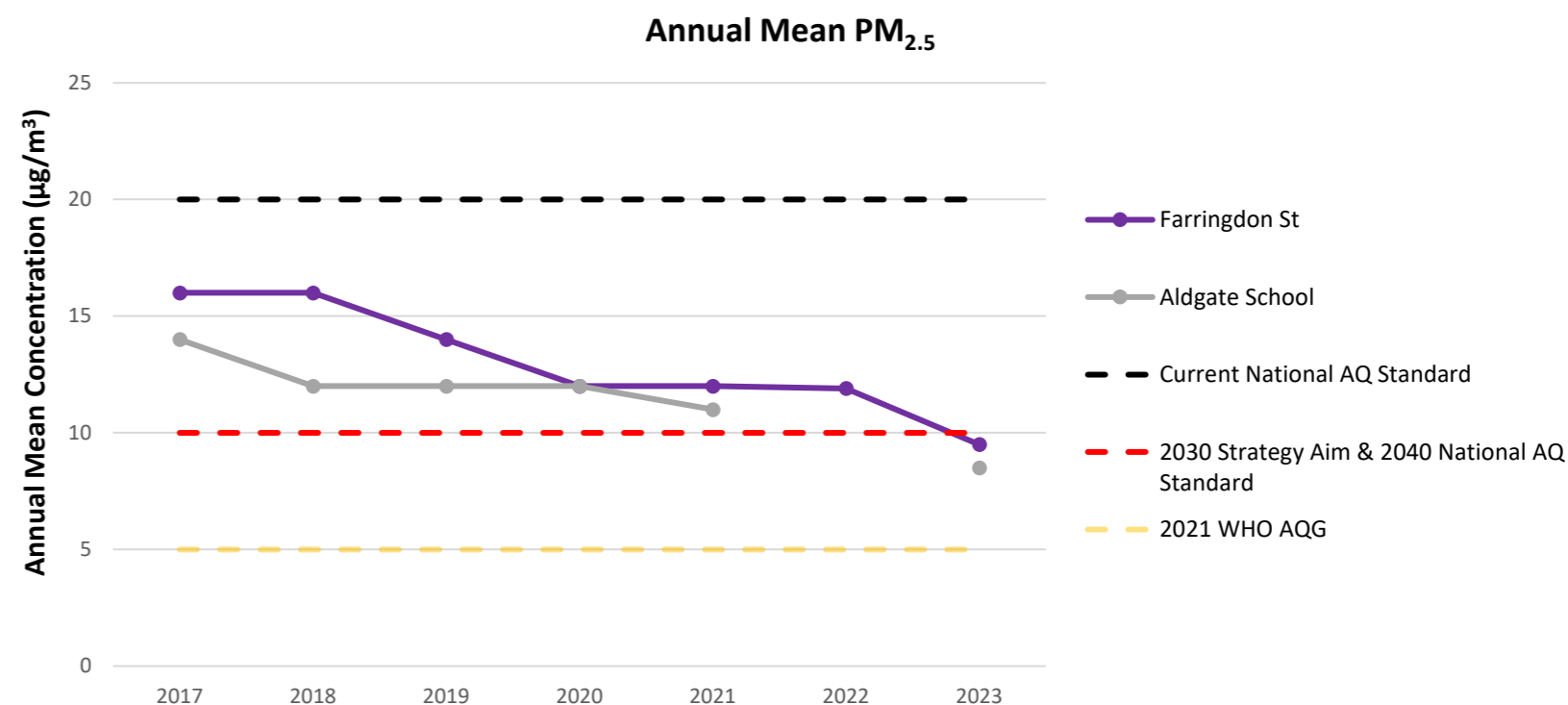


Figure 2.5: Annual Mean PM<sub>2.5</sub>

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



## 2.4 Dispersing Modelling

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

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

### 2.4.1 Demonstrating Success

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

One aim of the previous Strategy was to ensure that the national air quality standard for annual mean nitrogen dioxide ( $40\mu\text{g}/\text{m}^3$ ) was achieved in over 90% of the Square Mile by 2025. An annual assessment has been undertaken since 2018 to track progress. The most recent assessment completed is for 2023. The assessment undertaken also highlights the remaining areas of non-compliance which enables targeted action to be taken to ensure that air quality meets the required standards across the Square Mile. As can be seen in Table 2.1 the target was met ahead of time in 2020.

Table 2.1: Nitrogen Dioxide Assessment Statistics, 2018-2023

Year	Publicly Accessible Area Meeting the Annual Mean Nitrogen Dioxide Standard, $40\mu\text{g}/\text{m}^3$
2018	30%
2019	67%
2020	93%
2021	94%
2022	93%
2023	94%

One of the aims of this Strategy is for over 90% of publicly accessible areas in the Square Mile to meet a nitrogen dioxide annual mean of  $30\mu\text{g}/\text{m}^3$  by the end of 2030. In 2023, 74% of the Square Mile was below  $30\mu\text{g}/\text{m}^3$ .

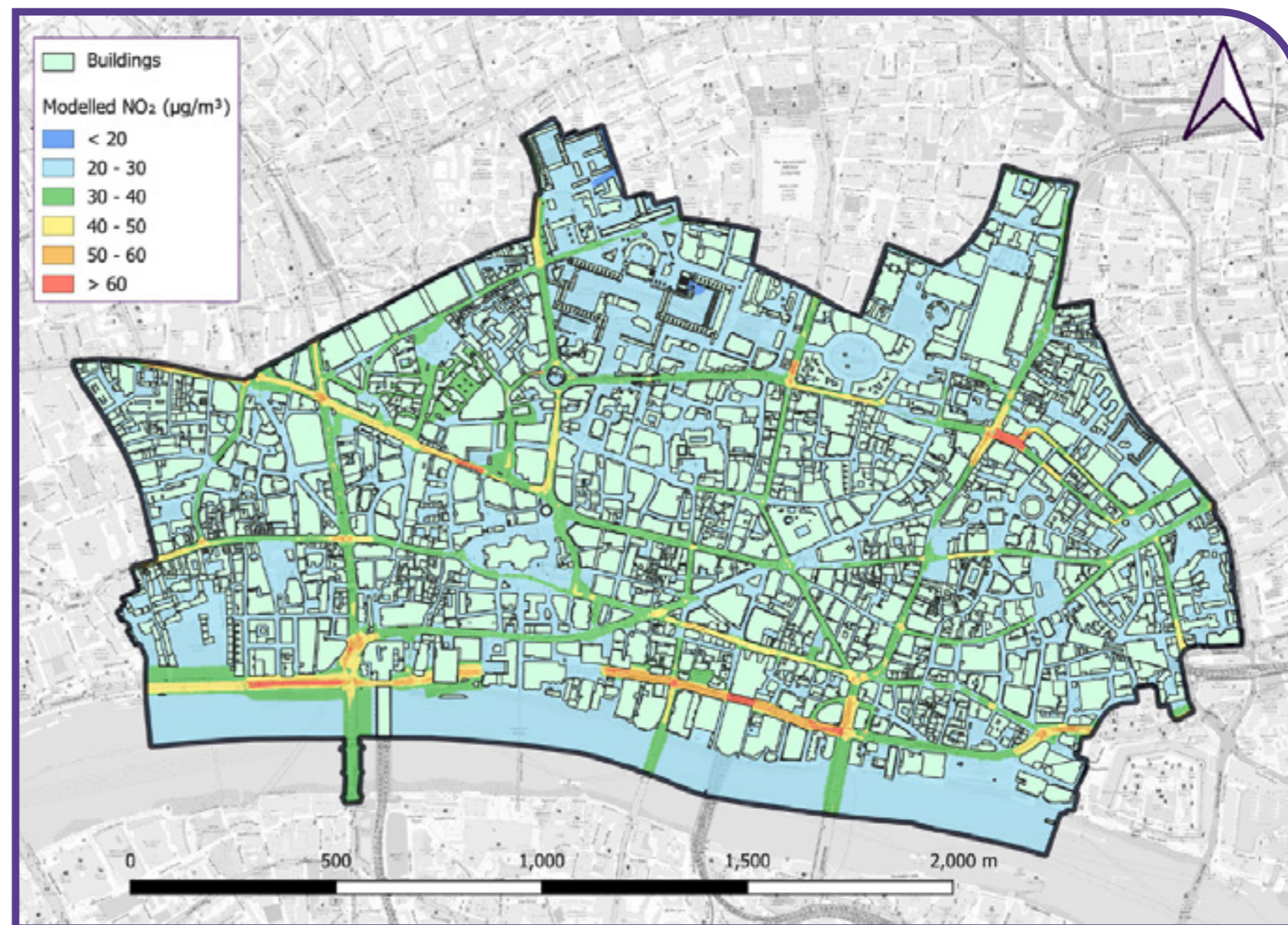
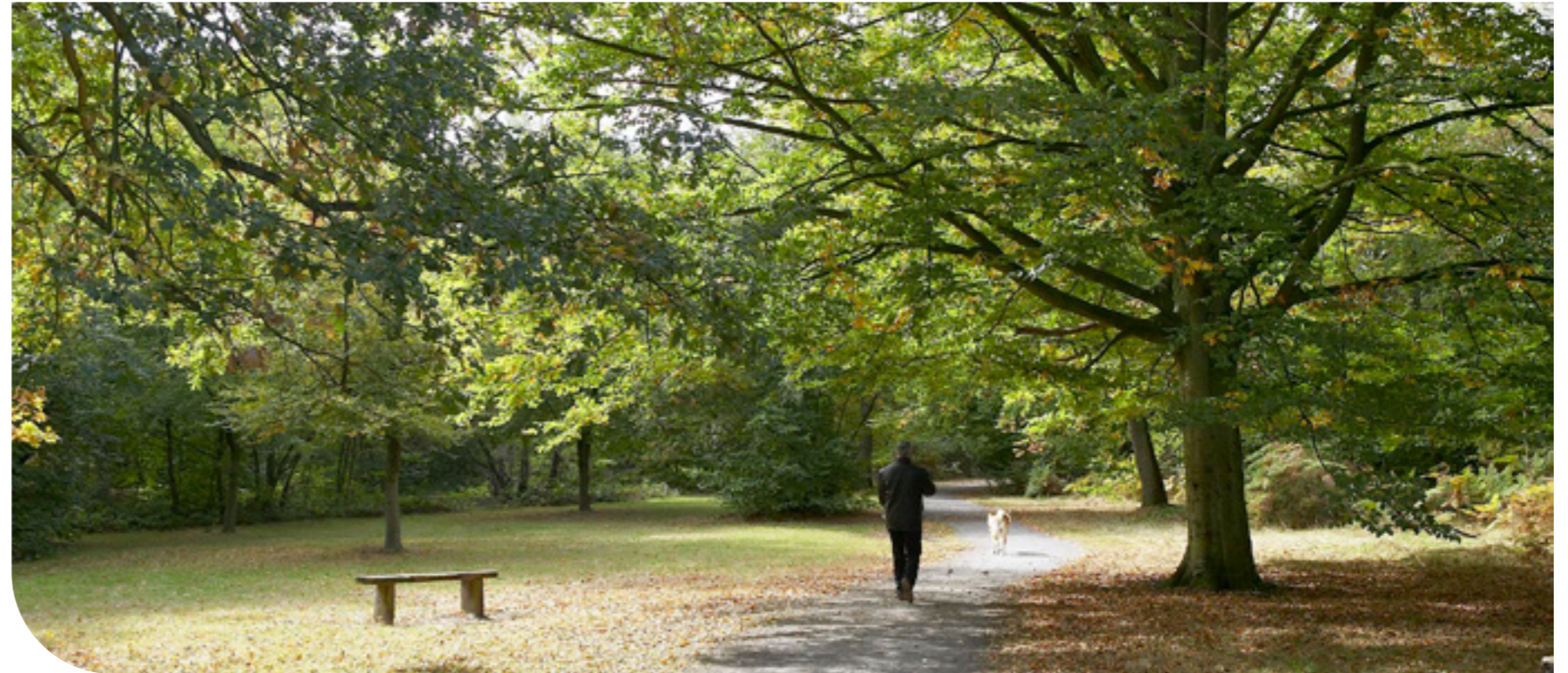


Figure 2.6: Modelled Annual Mean Nitrogen Dioxide, 2023

## 2.5 Air Quality Monitoring on the wider City Corporation Estate

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

Monitoring generally takes place to assess levels of pollution that users of the sites are exposed to. For Open Spaces, it is also done to see how air pollution impacts on ecosystems. In Epping Forest, nitrogen dioxide and ammonia will be measured for 12 months starting in April 2024. These sites are located near roads, in the forest itself and in locations that are sensitive to nitrogen pollutants such as heathlands and sites that are home to vulnerable species of moss. The data will be assessed to see whether levels of pollution might be damaging habitats. A similar study was undertaken in 2004.



### Air Quality Monitoring

#### We will:

- Undertake monitoring of nitrogen dioxide, PM<sub>10</sub>, PM<sub>2.5</sub> and ozone using continuous analysers at a minimum of five locations.
- Ensure all continuous analysers achieve a minimum data capture of 90% over a calendar year.
- Maintain a nitrogen dioxide monitoring network utilising diffusion tubes, ensuring a high degree of spatial coverage.
- Review all monitoring locations annually.
- Ensure the live data from the continuous monitoring network is made available to the public.
- Undertake an annual assessment to demonstrate progress with the aims of this Strategy.

# Leading by Example

# 03

## 3. Leading by Example

### Commitment:

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

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

The City Corporation Corporate Plan 2024 to 2029<sup>12</sup> details the City Corporation's commitment to act as a leader on environmental sustainability. Climate action and resilience, air quality, and sustainability are all aspects of ambitious targets for the entire City to be net zero by 2040.



<sup>12</sup> City Corporation (2024), Our Corporate Plan 2024-2029

### 3.1 City Corporation Fleet

The City Corporation has been reducing emissions from its own fleet for several years. This has been achieved by improved management, a reduction in size of the fleet and the purchase of newer, cleaner vehicles. At the time of writing, the City Corporation owns or leases 122 vehicles, with 40 of these being electric or hybrid. The majority are not used in the Square Mile.

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

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

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

### 3.2 Procurement Strategy

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

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

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

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

### 3.3 Climate Action Strategy

The City Corporation has an ambitious Climate Action Strategy (CAS)<sup>13</sup> supported by a £68 million investment. Annual carbon emissions from the City Corporation's own operations have already been reduced by 66% between 2018/2019 and 2022/2023<sup>14</sup>. Since 2018, 100% of the electricity purchased by the City Corporation has been from renewable sources, and in 2020 the City Corporation became the first UK local authority to sign a 15-year Power Purchase Agreement to purchase electricity from a new solar farm of 49.9MW capacity. At the time of writing, more than half of the City Corporation's electricity comes from this renewable source.

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

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

Measures underway to achieve the aims of the CAS include:

- Transforming the energy efficiency of operational buildings through the adoption of best available technologies.
- Maximising use of renewable energy.
- Accelerating the move to net zero carbon and improving energy efficiency in tenanted buildings.
- Implement the Square Mile Local Area Energy Plan.

### 3.4 Transport Strategy

The City Corporation Transport Strategy<sup>15</sup> has delivered a reduction in the number of motor vehicles in the Square Mile<sup>16</sup>:

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

The focus of the Transport Strategy is:

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

### 3.5 Rewarding Best Practice

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

#### 3.5.1 The Clean City Awards Scheme

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

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

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

#### 3.5.2 Considerate Contractors and Street works Schemes.

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

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

<sup>13</sup> The City of London Corporation (2020), Climate Action Strategy 2020-2027

<sup>14</sup> The City of London Corporation (2024), Taking Climate Action: Our Progress 2023

<sup>15</sup> The City of London Corporation (2019), City Streets: Transport for a changing Square Mile, City of London Transport Strategy

<sup>16</sup> The City of London Corporation (2023), City Streets 2023 summary report

### 3.6 Proposal for New Regulatory Powers

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

Monitoring has revealed that there can be a significant local impact on levels of air pollution from some combustion plant. The City Corporation identified the need for a practical, local authority focused piece of legislation to deal with this form of pollution and put the proposals together in a Private Members Bill. The Emissions Reduction (Local Authorities in London) Bill<sup>17</sup> had its first reading in the House of Lords and then fell when Parliament was dissolved in May 2024. The contents will continue to be used as a basis for pressing for new powers to manage emissions of pollutants from combustion plant.



20 Fenchurch Street Ltd, courtesy of Clive Totman

<sup>17</sup> UK Parliament (2019), Emissions Reduction (Local Authorities in London) Bill

#### Leading by Example

##### We will:

- Fulfil the City Corporation's Climate Action Strategy commitments.
- Reduce emissions from the City Corporation's fleet.
- Deliver the City Corporation Transport Strategy to reduce emissions from vehicles in the Square Mile.
- Encourage the use of zero tailpipe emission vehicles through the City Corporation supply chain.
- Deliver the Clean City Awards and Considerate Contractors Environment Award Schemes to reward exceptional and innovative practice to improve air quality.
- Work with external organisations to promote the proposals in the Emissions Reduction (Local Authorities in London) Bill.

04

# Collaborating With Partners

## 4. Collaborating with Partners

### Commitment:

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

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

### 4.1 Designated Air Quality Partners

The Environment Act 2021 introduced the new concept of designated Air Quality Partners (AQPs) into the Local Air Quality Management (LAQM) framework. An AQP is required to assist a local authority with any reasonable request to work towards reducing air pollution emissions. To ensure ongoing collaboration with each of the AQPs, a schedule of meetings will be established. This will allow updates to be shared between the City Corporation and the AQP, and for ongoing development as new information and ideas are realised throughout the duration of this Strategy.

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

Table 4.1: Designated Air Quality Partners

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



## 4.2 Additional Partnerships

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

Table 4.2: Additional Partnerships

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



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

## Collaborating with Partners

### We will:

- Work with designated and non-designated Air Quality Partners to collaborate on policies and measures to improve air quality across the Square Mile and Greater London.
- Support research into measures to improve air quality and into the health impacts of air pollution.

# Reducing Emissions

# 05

## 5. Reducing Emissions

### Commitment:

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

### 5.1 Transport Emissions

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

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

#### 5.1.1 Idling Vehicles Engines

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

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

Table 5.1: Parking Charges as of 2024

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

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

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

#### 5.1.2 Zero Emission Delivery

As part of the Barbican and Golden Lane Low Emission Neighbourhood programme in 2018, a number of feasibility studies were completed for cycle logistic hubs and micro-consolidation centres within the Square Mile. Cargo and e-cargo bikes were also made available for use by the local community and departments within the City Corporation.

These studies and projects have acted as precursors to the expansion of cargo-bike and e-cargo bike deliveries that are now commonplace within the Square Mile. The Transport Strategy<sup>14</sup> continues to promote the use of cargo and e-cargo bikes by providing accommodating cycle lanes and associated infrastructure. The move to zero emission alternatives for service and delivery vehicles continues to replace more polluting vehicles, reducing emissions of pollutants from transport sources across the City of London roads.

#### 5.1.3 Parking Charges

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

#### 5.1.4 Transport Redevelopment Schemes

Major transport redevelopment schemes can act as a mechanism to greatly improve the environment by reclaiming and creating public space and reducing vehicle emissions through road closures and the re-direction of traffic. Previous schemes have included the closure of Aldgate Gyratory and transformation of Aldgate Square, and the Bank on Safety and subsequent All Change at Bank schemes which have made Bank junction a safer and more pleasant place to travel through and visit.

Improving air quality has been a key objective of major transport schemes and it continues to be a driving factor for future schemes. Between 2016 and 2023, the average nitrogen dioxide annual mean concentration across all monitoring sites associated with the All Change at Bank scheme reduced by over 50%. Additionally, 2023 was the first year since the monitoring began where all monitoring sites were below the nitrogen dioxide national annual mean standard.

## 5.2 Non-Transport Emissions

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

### 5.2.1 New developments

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

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

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

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

### 5.2.2 Construction, Deconstruction and Demolition

At any given time, there are many active construction (which includes construction, deconstruction and demolition) sites in operation in the Square Mile. There are also many short-term street works. The City Corporation has a Code of Practice (CoP) for deconstruction and construction<sup>18</sup>, detailing environmental standards and operational techniques that it expects all contractors to adhere to.

Construction has been identified by the LAEI as the highest source of PM<sub>10</sub> emitted in the Square Mile. Therefore, close management and mitigation of construction emissions is a priority for the City Corporation. The CoP reflects best practice

Table 5.2: NRMM Low Emission Zone Requirements

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

guidance issued by the Mayor of London<sup>19</sup>. Regular on-site checks are completed on all large sites to ensure compliance with the CoP.

### 5.2.3 Non-Road Mobile Machinery

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

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

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

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

### 5.2.4 Commercial Heat and Power

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

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

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

The use of diesel fuelled generators as a back-up energy source in commercial buildings is common across the Square Mile. The generators are installed for emergency life safety use only, but are routinely tested to ensure working capability. Through the planning process, applicants are instructed to consider alternatives where possible. This is in-line with the City of London Planning for Sustainability SPD<sup>20</sup> that prioritises alternatives to diesel backup generators.

<sup>18</sup> City of London Corporation (2019), City of London Code of Practice for Deconstruction and Construction Sites, Ninth Edition

<sup>19</sup> Mayor of London (2014), The Control of Dust and Emissions During Construction and Demolition: Supplementary Planning Guidance

<sup>20</sup> City of London Corporation (2023), Planning for Sustainability Supplementary Planning Document

In 2024, a project to investigate the existing stock of backup generators in the Square Mile commenced. The aim of the project is to work with businesses to reduce emissions from the generators, and to ensure any Environmental Permit requirements managed by the EA are complied with. Our Emissions Reduction (Local Authorities in London) Private Members Bill proposes new powers for London local authorities to set emission limits for all combustion plant, and we will continue to press for new powers which will help us to deal with this form of pollution.

### 5.2.5 Commercial Cooking

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

### 5.2.6 Chimneys

Under the Clean Air Act 1993<sup>21</sup>, a gas boiler with a rating of 366.4 kilowatts or more is required to have its chimney height approved by the local authority. The City Corporation ensures that chimneys of large boilers are sited and operate in a way that leads to maximum dispersal of pollutants.

### 5.2.7 Environmental Permitting Regulations

Local authorities regulate a variety of industrial operations to control emissions to air. In the Square Mile, the only operation subject to this at the time of writing is one dry-cleaning operation.

Larger combustion plant, boilers, generators, and CHP plant, for example St Bartholomew's Hospital, are regulated by the EA. The requirement for a permit depends upon the size of the plant, and in the case of standby generators, how often they are used. All new medium sized plant, put into operation on or after 20<sup>th</sup> December 2018, will have a permit to operate with conditions designed to minimise pollution. All existing plant between 5MWth and 50MWth should have a permit in place by 1<sup>st</sup> January 2024 and all plant above 1MWth by 1st January 2029<sup>22</sup>.

### 5.2.8 Smoke Control

The whole of the Square Mile is a Smoke Control Area (SCA) which means it is an offence to emit smoke from the combustion of fuel from any premises. Exemptions are allowed, for example, for a short period during start-up of an engine. The SCA has been in place since 1954<sup>23</sup>. In a SCA, only fuels that are on the list of authorised fuels or 'smokeless' fuels, can be burnt, unless an 'exempt appliance' is used. Authorised fuels, smokeless fuels and exempt appliances are listed on the Department for Environment, Food and Rural Affairs (Defra) website.

The City Corporation is responsible for enforcing the sale of domestic solid fuels in accordance with domestic solid fuel regulations<sup>24</sup>. Compliance checks are undertaken regularly in shops to ensure only certified solid fuel with the correct labelling is sold.

<sup>21</sup> Clean Air Act 1993. (c.11). London: The Stationery Office.

<sup>22</sup> The Environmental Permitting (England and Wales) (Amendment) Regulations (EPR) 2018 SI 110, the Medium Combustion Plant Directive (MCPD) EU/2015/2193

<sup>23</sup> City of London (Various Powers) Act 1954. (2 & 3 Eliz. 2. c. xxviii). London: HMSO

<sup>24</sup> The Air Quality (Domestic Solid Fuels Standards) (England) Regulations 2020 (SI 2020 No. 1095)

## Reducing Emissions

### We will:

- Assess options for reducing annual average concentrations of nitrogen dioxide on all City Corporation roads to below 40µg/m<sup>3</sup>.
- Take action to discourage unnecessary vehicle idling and enforce anti-idling policies across the Square Mile.
- Ensure City Corporation vehicle parking charges favour low and zero tailpipe emission vehicles.
- Assess planning applications for air quality impact.
- Revise the City Corporation Supplementary Planning Document for Air Quality.
- Ensure emissions from construction sites are minimised.
- Manage and mitigate emissions from non-road mobile machinery.
- Reduce emissions associated with standby power generation across the Square Mile.
- Develop and implement a plan to mitigate emissions of PM<sub>2.5</sub> from commercial cooking.
- Ensure that where possible chimney stacks terminate above the height of the nearest building.
- Ensure that the City Corporation's prescribed processes comply with emission control requirements.
- Promote and enforce the requirements of Smoke Control Areas and regulate the sale of solid fuel.

# Health Promotion and Raising Awareness

# 06

## 6. Health Promotion and Raising Awareness

### Commitment:

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

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

The City of London Joint Health and Wellbeing Strategy<sup>25</sup> has identified improving air quality as a key priority to improve the health and wellbeing of residents and workers.

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



### 6.1 Provision of Information

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

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

Overall levels of air pollution in the Square Mile vary from day to day in response to weather conditions. Levels of air pollution each day are defined as either 'low', 'medium', 'high' or 'very high' which reflects banding devised by the Government<sup>26</sup>. High levels of air pollution occur in the City of London on a small number of days in any year and instances of very high levels of air pollution are now very rare.

Exposure to air pollution varies with location. Concentrations of nitrogen dioxide reduce with an increased distance from a source, such as a busy road. Information is provided, both digitally and physically, on how to reduce personal exposure. Leaflets are distributed with advice such as to step back from the kerb when waiting to cross the road and if possible, avoid road junctions and walking close to busy roads especially during peak traffic periods.

The City Corporation's free Smart Phone App 'CityAir' provides advice to users when pollution levels are high or very high. People can sign up and receive tailored messages to help them avoid high levels of air pollution. The App includes a map of current pollution levels and has a route planning function to guide users along low pollution routes. The City Corporation also supports the provision of the AirText messaging service. AirText is promoted to residents and workers who use the service to receive alerts by email, text, and voicemail.

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



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

<sup>25</sup> The City of London Corporation (2017), Joint Health and Wellbeing Strategy: 2017-2020

<sup>26</sup> Department for environment, Food and Rural Affairs (2013), Update on Implementation of the Daily Air Quality Index: Information for Data Providers and Publishers



## 6.2 National Clean Air Day

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

## 6.3 Working with schools and nurseries

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

## 6.4 Working with businesses

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

## 6.5 Indoor air quality

As concentrations of ambient air pollution improve, attention is turning to indoor air quality. Whilst there is no statutory obligation for local authorities to review and assess indoor air quality, they are encouraged, through government guidance, to provide information to residents. The City Corporation has produced an information leaflet on the sources and health impacts of indoor air pollution.



**Delivering healthy air in  
the City of London**

### Health Promotion and Raising Awareness

#### We will:

- Prepare annual air quality briefings for colleagues and for the Director of Public Health.
- Disseminate information about air quality.
- Run events in support of National Clean Air Day.
- Work with schools and nurseries in the Square Mile.
- Work with businesses to raise awareness of air pollution amongst workers.
- Raise awareness of the health impacts of poor indoor air quality.

# Appendices

# 1-6

# Appendix 1: Actions to deliver the Air Quality Strategy

## Table Key

**Dept.** = Department responsible

CHB = Chamberlain's

Env = Environment

IG = Innovation and Growth

**Cost** = Approximate cost to the organisation per annum:

✓ = <£10,000,

✓✓ = £10,000 - £50,000,

✓✓✓ = >£50,000

		Action	Detail	Timeline	Outcome	Dept.	Cost
Air Quality monitoring	<b>1</b>	Air quality monitoring.	<p>Undertake monitoring of nitrogen dioxide, PM<sub>10</sub>, PM<sub>2.5</sub> and ozone using continuous analysers at a minimum of five locations in the Square Mile.</p> <p>Ensure all continuous analysers achieve a minimum data capture of 90% over a calendar year.</p> <p>Maintain a nitrogen dioxide monitoring network utilising diffusion tubes, ensuring a high degree of spatial coverage across the Square Mile.</p> <p>Review all monitoring locations annually.</p>	Present to 2030	<p>An effective monitoring network providing accurate, trusted, and accessible data.</p> <p>Monitoring data to demonstrate compliance with statutory obligations and assessing the impact of interventions.</p>	Env	✓✓
	<b>2</b>	Air quality data dissemination.	Ensure live data from the continuous monitoring network is made available to the public.	Present to 2030	<p>Monitoring data that is publicly available through several sources. Data accessed via the Air Quality section of the City Corporation website.</p> <p>Better informed public who can make decisions based on available data.</p>	Env	✓✓
	<b>3</b>	Compliance assessment.	Undertake an annual assessment to demonstrate progress with the aims of this Strategy.	Annually	<p>Meet statutory obligations for reporting.</p> <p>Track progress with meeting the aims of this Strategy.</p>	Env	✓✓

	Action	Detail	Timeline	Outcome	Dept.	Cost
<b>4</b>	Fulfil the City Corporation's Climate Action Strategy commitments.	<p>Leased assets to have an Energy Performance Certificate rating of B by 2030.</p> <p>Maximise the use of renewable energy sources across operational buildings.</p> <p>Accelerate the move to net zero carbon and improving energy efficiency in tenanted buildings.</p> <p>Implement the Square Mile Local Area Energy Plan by 2040.</p>	Present to 2030	<p>Reduced emissions from the City Corporation's operations.</p> <p>Monitoring data to demonstrate compliance with statutory obligations and assessing the impact of interventions.</p>	IG	✓✓✓
<b>5</b>	Reduce emissions from the City Corporation's fleet.	<p>Increase the proportion of electric, hybrid and other low emission/zero tailpipe emission vehicles in the fleet.</p> <p>Work to reduce the size of the corporate fleet.</p> <p>Maintain the FORS Gold accreditation.</p>	<p>Present to 2030</p> <p>Annually</p>	Reduced emissions from the City Corporation's fleet.	<p>Env</p> <p>CHB</p>	✓✓✓
<b>6</b>	Deliver the City Corporation Transport Strategy.	<p>Prioritising the needs of people walking and wheeling, making streets more accessible and delivering a high-quality public realm.</p> <p>Making the most efficient and effective use of street space by reducing motor traffic, including the number of delivery and servicing vehicles.</p> <p>Enabling more people to choose to cycle by making conditions for cycling in the Square Mile safer and more pleasant.</p> <p>Encouraging and enabling the switch to zero tailpipe emission capable vehicles.</p>	Present to 2030	<p>Reduced emissions from transport across the Square Mile.</p> <p>Track progress with meeting the aims of this strategy.</p>	Env	✓✓✓

## Leading By Example

	Action	Detail	Timeline	Outcome	Dept.	Cost
<b>7</b>	Encourage the use of zero tailpipe emission vehicles through the City Corporation supply chain.	Apply a menu of options for air quality to reduce air pollution from major contracts.  Review the menu of options every two years.	Present to 2030  Biannually	Reduced emissions associated with the City Corporation's contracts.	CHB  Env	✓
<b>8</b>	Deliver the Clean City Awards, Considerate Contractors Scheme and Considerate Contractors Streetworks Scheme.	Reward businesses that take positive action to improve air quality through an annual award.  Reward building and civil engineering projects that demonstrate exceptional or innovative practice.	Annually	Reduced emissions from City businesses.	Env	✓✓
<b>9</b>	Work with external organisations to promote the proposals in the Emissions Reduction (Local Authorities in London) Bill.	Work with Defra to highlight the need for additional powers for local authorities.  Respond to consultations promoting the proposals in the Bill.	Present to 2030	Closed gap in regulatory powers for tackling sources of pollution from boilers, generator and combined heat and power plant in the Square Mile.	Env	✓✓

## Collaborating With Partners

	Action	Detail	Timeline	Outcome	Dept.	Cost
<b>10</b>	Work with designated and non-designated Air Quality Partners to collaborate on policies and measures to improve air quality across the Square Mile, and Greater London.	<p>Support the activities of the Mayor of London air quality department.</p> <p>Monitor air pollution along the river in at least two locations and support the delivery of Port of London Authority Air Quality Strategy.</p> <p>Support the Environment Agency with the implementation of the Medium Combustion Plant Directive.</p> <p>Work with Cross River Partnership on collaborative projects.</p> <p>Work on at least one joint project with the Central London Air Quality Cluster Group.</p> <p>Chair quarterly meetings of the London Air Quality Steering Group.</p>	Present to 2030	Collaboration and the development and implementation of cross London policies for improving air quality.	Env	✓✓
<b>11</b>	Support research into measures to improve air quality and into the health impacts of air pollution.	<p>Identify priority areas for research to improve air quality and communicate the latest research through membership of APRIL.</p> <p>Investigate the impact of tall buildings on levels of air pollution at street level by 2027, subject to funding.</p> <p>Subject to funding, commission and support research that aids the understanding and improvement of air quality.</p>	Present to 2030	<p>Improved understanding of how air pollution behaves in a complex urban environment.</p> <p>Increased understanding and support for new technologies and other solutions for reducing air pollution.</p>	Env	✓✓

Reducing Emissions		Action	Detail	Timeline	Outcome	Dept.	Cost
12	Assess options for reducing annual average concentrations of nitrogen dioxide on all City Corporation roads to below 40µg/m <sup>3</sup> .	Identify all roads that breach the national standard for nitrogen dioxide.  Assess options for reducing emissions of air pollutants to ensure compliance.  Work with Air Quality Partners to develop and implement plans to reduce pollution.	2025 - 2027	All roads in the Square Mile that meet the annual average national standard of 40µg/m <sup>3</sup> .	Env	✓✓✓	
13	Take action to discourage unnecessary vehicle idling and enforce anti-idling policies across the Square Mile.	Issue Penalty Charge Notices for unnecessary vehicle engine idling.  Respond to complaints within 48 hours and erect signs in hot spot areas.  Provide awareness training to all relevant teams advising drivers to switch off their engines when parked.  Work with London boroughs on pan London action to deal with unnecessary engine idling. Engage with at least five organisations per year in relation to engine idling.	Present to 2030	Reduced emissions from unnecessary vehicle idling in the Square Mile.  Raised awareness amongst drivers and increased support for anti-idling policy.	Env	✓	
14	Ensure City Corporation parking charges favour low and zero tailpipe emission vehicles in the Square Mile.	On-street and off-street parking charges applied based on vehicle emissions.	Ongoing	Parking policies that favour low and zero emission vehicles.	Env	✓	

	Action	Detail	Timeline	Outcome	Dept.	Cost
Reducing Emissions	<b>15</b>	Assess planning applications for air quality impact.				
		Review all relevant planning applications for air quality impact.	Present to 2030	New developments that comply with all relevant policies.	Env	✓
		Require air quality assessments for major developments.		New developments that do not have a negative impact on local air quality.		
		Encourage the use of non-combustion technology. Apply stringent emission standards for combustion plant where non-combustion plant is not feasible.				
	Require all new developments to be Air Quality Neutral as a minimum, and Air Quality Positive where relevant.					
	Require developers to consider alternatives to diesel standby generators through the use of planning conditions.					
	<b>16</b>	Revise the City Corporation Supplementary Planning Document for Air Quality.				
		Update to reflect the City Plan 2040 and London Plan Guidance.		New developments that comply with updated guidance.	Env	✓
		Prepare a draft version.	2025			
		Finalised version and adoption.	2026			
	<b>17</b>	Ensure emissions from construction sites are minimised.				
		Ensure compliance with the CoP for Deconstruction and Construction Sites.	Present to 2030	Reduced emissions from construction activities and plant.	Env	✓
		Monitor all construction sites and respond to on-going complaints within 1 hour.				
	<b>18</b>	Manage and mitigate emissions from non-road mobile machinery.				
		Undertake inspections of all relevant sites to ensure compliance with the NRMM Low Emission Zone.	Present to 2030	Reduced exhaust emissions associated with construction NRMM	Env	✓
		Support the Mayor of London NRMM Beyond Construction project.	2025 - 2026	Improved understanding of emissions from NRMM used for roadworks and licenced events.		



Reducing Emissions						
	Action	Detail	Timeline	Outcome	Dept.	Cost
<b>19</b>	Reduce emissions associated with standby power generation across the Square Mile.	Work with building owners to investigate options for reducing emissions and an alternative means of providing emergency back-up power.	2025 - 2026	Reduced emissions from generators.	Env	✓
<b>20</b>	Develop and implement a plan to mitigate emissions of PM <sub>2.5</sub> from commercial cooking.	Run an awareness raising campaign for mobile food vendors and commercial cooking establishments.  Visit at least 20 food premises each year to advise upon cooking fuel.  Work with neighbouring authorities on proposals to mitigate emissions from commercial cooking operations.	2025 - 2026	Reduced emissions of particulate pollution associated with commercial cooking.	Env	✓
<b>21</b>	Ensure that where possible chimney stacks terminate above the height of the nearest building.	Where combustion plant is installed, good dispersion of emissions will be required.	Present to 2030	Flues from combustion plant that terminate above roof height.  Emissions from chimney stacks have minimal impact on ground level concentrations of air pollution.	Env	✓
<b>22</b>	Ensure that the City Corporation's prescribed processes comply with emission control requirements.	Carry out risk-based inspections of all prescribed processes in the Square Mile.	Present to 2030	Regulated operations that comply with the requirements of the legislation.	Env	✓
<b>23</b>	Promote and enforce the requirements of Smoke Control Areas and regulate the sale of solid fuel.	Enforce smoke control provisions and raise awareness of the requirements across the Square Mile.  Annual inspections of all retail premises that have the potential to sell solid fuel  Engage with food premises to ensure the correct appliances and compliant fuels are used.	Present to 2030	A reduction in the amount of smoke, PM <sub>10</sub> and PM <sub>2.5</sub> emitted in the Square Mile.	Env	✓

	Action	Detail	Timeline	Outcome	Dept.	Cost	
Health Promotion and Raising Awareness	<b>24</b>	Prepare annual air quality briefings for colleagues and for the Director of Public Health.	Annual summary report detailing air quality data and action being taken to tackle air pollution.	Annually	Well informed colleagues leading to better public health outcomes through shared expertise.	Env	✓
	<b>25</b>	Disseminate information about air quality.	Promote the free CityAir Smart Phone App, the AirText service, Air-Aware, and the Mayor of London's air quality alert system at events and through social media channels.  Produce a monthly e-newsletter.  Raise awareness through social media channels.  Bi-monthly community engagement at City of London libraries.  Work with the Public Health team on behaviour change campaigns.	Present to 2030  2025	Better informed public able to take steps to reduce exposure to poor air quality.	Env	✓
	<b>26</b>	Run events in support of National Clean Air Day.	Run at least two events each year.	Annually	Better informed individuals able to take steps to reduce exposure to poor air quality.	Env	✓
	<b>27</b>	Work with schools and nurseries in the Square Mile.	Monitor air pollution at all schools and nurseries.  Provide ongoing advice and support and produce annual information reports for each school and nursery.  In partnership with public health, deliver assemblies, bespoke workshops, set up stalls at summer fayres, making the topic accessible and where appropriate linked into the school curriculum.  Encourage all schools and nurseries to join TfL Travel for Life.	Annually	Reduced the impact of air pollution on the health of children in the Square Mile.	Env	✓

	Action	Detail	Timeline	Outcome	Dept.	Cost	
Health Promotion and Raising Awareness	<b>28</b>	Work with businesses to raise awareness of air pollution amongst workers.	Engage with at least 20 businesses through the CityAir business engagement programme.	Present to 2030	Raised awareness of air pollution amongst workers in the City of London	Env	✓✓
	<b>29</b>	Raise awareness of the health impacts of poor indoor air quality.	Disseminate information about indoor air quality through resident newsletters, at events and social media .	Present to 2030	Improved understanding of how to improve indoor air quality.  Identify sources of air pollution in residential properties.	Env	✓

## Appendix 2: Air Quality Standards and Guidelines

### National Context

In the UK, the responsibility for meeting air quality standards is devolved to the national administrations. The Secretary of State for Environment, Food and Rural Affairs has responsibility for meeting these in England. The Air Quality Standards Regulations 2010 contains the relevant standards and compliance date for different pollutants.

The Environment Act 2021, set additional legally binding national targets for PM<sub>2.5</sub> in England to be achieved by 2040 with interim targets in 2028.

The Air Quality Standards Regulations<sup>1</sup> requires the UK to complete an air quality assessment annually and to report the findings. The annual Air Pollution in the UK report<sup>2</sup> provides a high-level summary of compliance, against the pollutants stated above and many others, alongside background information on the UK's legal and policy framework and how air pollution is assessed.

For further information about national air quality legislation please see footnotes<sup>3</sup> and<sup>4</sup>.

Table A2.1: UK Air Quality Standards

Pollutant	Standard	Averaging Period	Date to be achieved
Nitrogen Dioxide	200µg/m <sup>3</sup> not to be exceeded more than 18 times per year	1-hour mean	1 January 2010
Nitrogen Dioxide	40µg/m <sup>3</sup>	Annual mean	1 January 2010
PM <sub>10</sub>	50µg/m <sup>3</sup> not to be exceeded more than 35 times per year	24-hour mean	31 December 2004
PM <sub>10</sub>	40µg/m <sup>3</sup>	Annual mean	31 December 2004
PM <sub>2.5</sub>	20µg/m <sup>3</sup>	Annual mean	1 January 2020
PM <sub>2.5</sub>	20% reduction in concentrations	Annual mean	Between 2010 and 2020
Ozone	100µg/m <sup>3</sup> not to be exceeded more than 10 times per year	Maximum daily 8-hour mean	31 December 2005

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

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

<sup>1</sup> The Air Quality Standards Regulations 2010 (SI 2010 No. 1001)

<sup>2</sup> Department for Environment, Food and Rural Affairs (2023), Air Pollution in the UK 2022

<sup>3</sup> House of Commons (2024), Air Quality: policies, proposals, and concerns

<sup>4</sup> Department for Environment, Food and Rural Affairs (2023), Air quality strategy: framework for local authority delivery

## Local Authority Context

The statutory process for action by local authorities is the LAQM Framework. The framework sets local limits for air pollution prescribed in the Air Quality (England) Regulations 2000 (as amended in 2002)<sup>5</sup>. Local authorities are required to assess the quality of ambient air. If it does not comply with the relevant concentrations, an AQMA must be declared, and an AQAP published to address the areas of poor air quality. This Strategy fulfils the role of an AQAP.

In London, the GLA provides technical and policy context to all London boroughs plus the City Corporation. This London specific guidance is called LLAQM framework.

## International Context

The above sets out the national context in terms of air quality legislation. On an international scale, the WHO sets AQGs for ambient air pollutants<sup>6</sup>. They are designed to offer quantitative health-based recommendations for managing air quality. They are not legally binding, but they do provide an evidence-based tool to inform legislation and policy in WHO Member States, of which the United Kingdom is one. Current air quality targets in the UK are based on the 2005 guidelines.

As evidence about the harmful health impacts of air pollution advances, the air quality guidelines are revised. The latest set of guidelines were published in September 2021. The 2021 guidelines are more stringent than those set in 2005 for nitrogen dioxide and particulate matter, PM<sub>2.5</sub> and PM<sub>10</sub>. They are presented in Table A2.4 below.

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

<sup>5</sup> The Air Quality (England) (Amendment) Regulations 2002 (SI 2002 No. 3043)

<sup>6</sup> World Health Organisation (2021), WHO global air quality guidelines: Particulate matter (PM<sub>2.5</sub> and PM<sub>10</sub>), ozone, nitrogen dioxide, sulfur dioxide and carbon monoxide

Table A2.3: LAQM Air Quality Standards in England

Pollutant	Standard	Averaging Period
Nitrogen dioxide	200µg/m <sup>3</sup> not to be exceeded more than 18 times a year	1-hour mean
Nitrogen dioxide	40µg/m <sup>3</sup>	Annual mean
PM <sub>10</sub>	50µg/m <sup>3</sup> not to be exceeded more than 35 times a year	24-hour mean
PM <sub>10</sub>	40µg/m <sup>3</sup>	Annual mean
PM <sub>2.5</sub>	Work towards reducing emissions/ concentrations of (PM <sub>2.5</sub> )	Annual mean

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

Pollutant	Averaging Period	2021 WHO Guidelines (µg/m <sup>3</sup> ) Interim Target 1	2021 WHO Guidelines (µg/m <sup>3</sup> ) Interim Target 2	2021 WHO Guidelines (µg/m <sup>3</sup> ) Interim Target 3	2021 WHO Guidelines (µg/m <sup>3</sup> ) Interim Target 4	2021 Guidelines AQG (µg/m <sup>3</sup> )	2005 Guidelines AQG (µg/m <sup>3</sup> )
Nitrogen dioxide	Annual mean	40	30	20	-	10	40
Nitrogen dioxide	24-hour*	120	50	-	-	25	-
PM <sub>10</sub>	Annual mean	70	50	30	20	15	20
PM <sub>10</sub>	24-hour*	150	100	75	50	45	50
PM <sub>2.5</sub>	Annual mean	35	25	15	10	5	10
PM <sub>2.5</sub>	24-hour*	75	50	37.5	25	15	25

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

## Appendix 3: London Atmospheric Emission Inventory

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

### Pollutant Concentrations

The LAEI has provided emission and concentration statistics for air pollutants across London for over 15 years. Figure A3.1 presents the annual mean nitrogen dioxide concentrations within the Square Mile in 2011. The whole of the Square Mile was in exceedance of the annual mean standard of  $40\mu\text{g}/\text{m}^3$ , with a number of the roads showing concentrations in excess of  $100\mu\text{g}/\text{m}^3$ .

When compared to current monitoring and modelling, a significant reduction in nitrogen dioxide concentrations has been achieved. The 2023 compliance assessment demonstrated that 94% of the Square Mile complied with the annual mean standard. This is a substantial improvement since 2011. Although significant progress has been made, due to the health impacts of air pollution there is still a journey to be undertaken to work towards the aims of this Strategy.

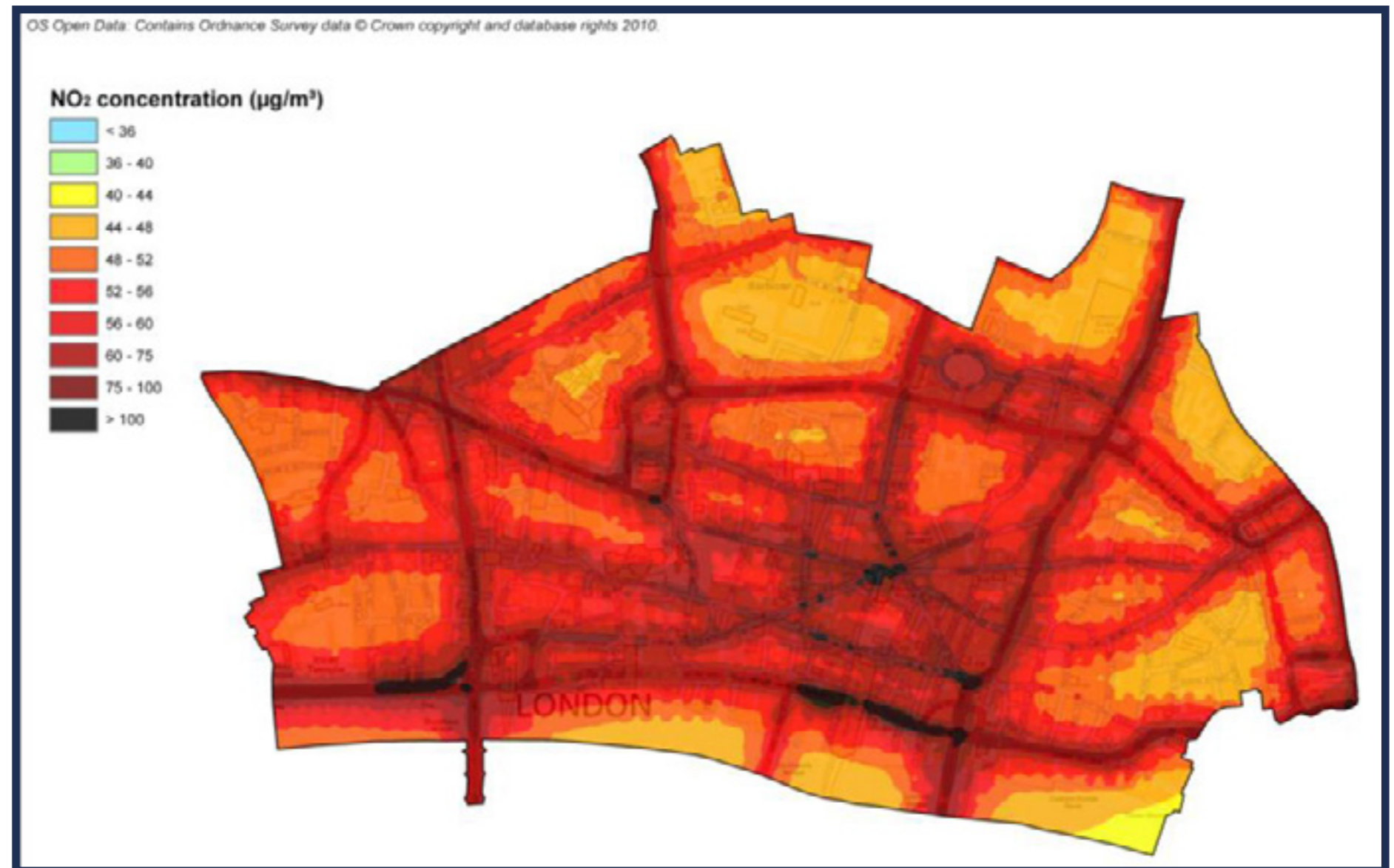


Figure A3.1: Annual Mean Nitrogen Dioxide Concentrations, 2011

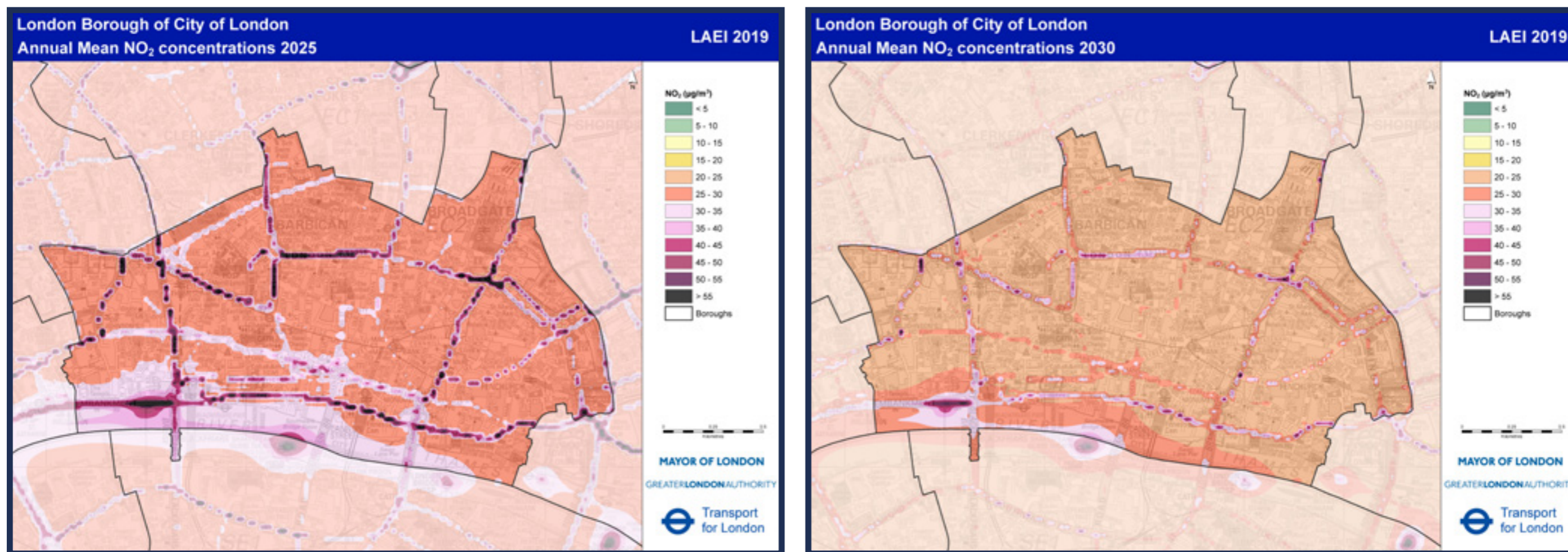


Figure A3.2: Annual Mean Nitrogen Dioxide Concentrations, 2025 and 2030

Figures A3.2-A3.4 present computer modelled concentrations of nitrogen dioxide and particulate matter, across the City of London for 2025 and 2030. Both 2025 and 2030 have been presented as they align with the implementation of this Strategy. The forecasts do not include the measures detailed in Appendix 1.

Figure A3.2 shows that the majority of the Square Mile is predicted to be below the nitrogen dioxide annual mean standard of 40µg/m<sup>3</sup> in 2025. The areas that remain in exceedance are the main road links. Away from the transport sources concentrations are between 25 and 30µg/m<sup>3</sup>. This is confirmed by monitoring data.

When compared to nitrogen dioxide, there is less geographical variation in modelled concentrations of

particulate matter. Figure A3.3 shows that the majority of the Square Mile will have an annual mean concentration for PM<sub>10</sub> in 2025 of between 15 and 20µg/m<sup>3</sup>. This is significantly below the PM<sub>10</sub> annual mean standard of 40µg/m<sup>3</sup>. Slightly elevated concentrations are predicted in the carriageway of busy road links such as Farringdon Street, Bishopsgate, and Upper/Lower Thames Street.

Figure A3.4 shows that the majority of the Square Mile will have an annual mean concentration for PM<sub>2.5</sub> in 2025 of between 10 and 12.5µg/m<sup>3</sup>. Like the PM<sub>10</sub> concentration maps, slightly elevated concentrations of PM<sub>2.5</sub> are expected in the carriageway of the busiest roads.

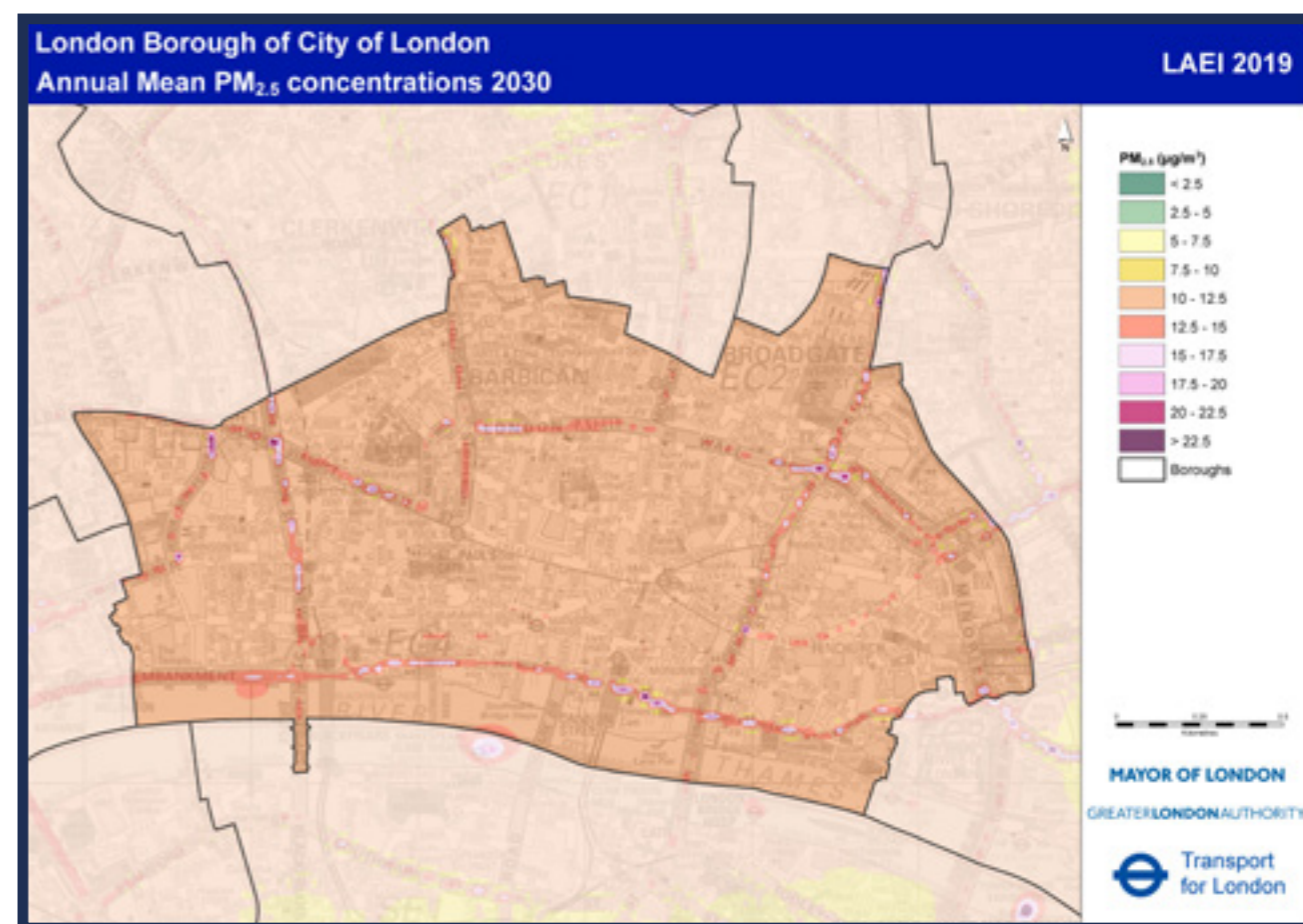
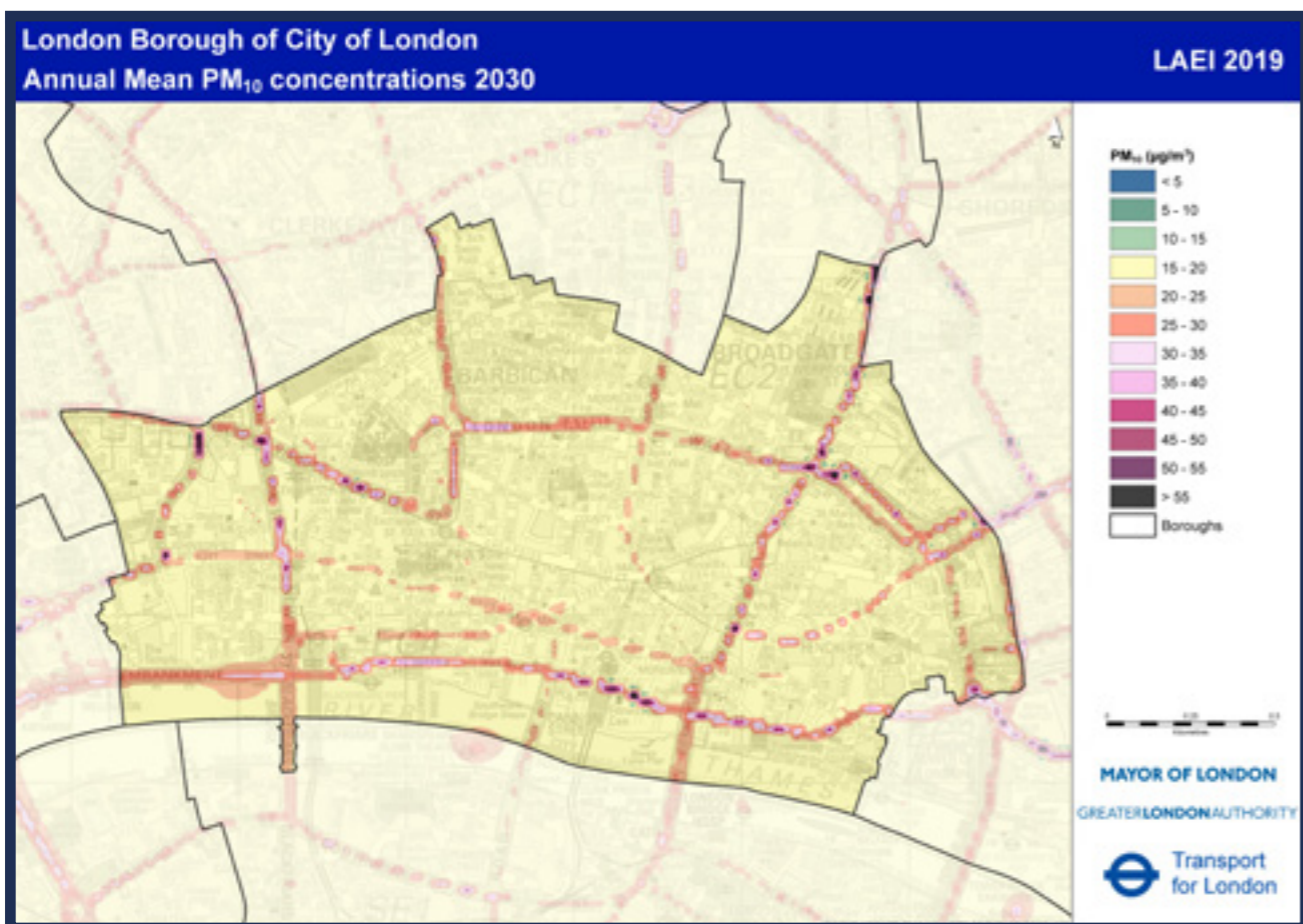
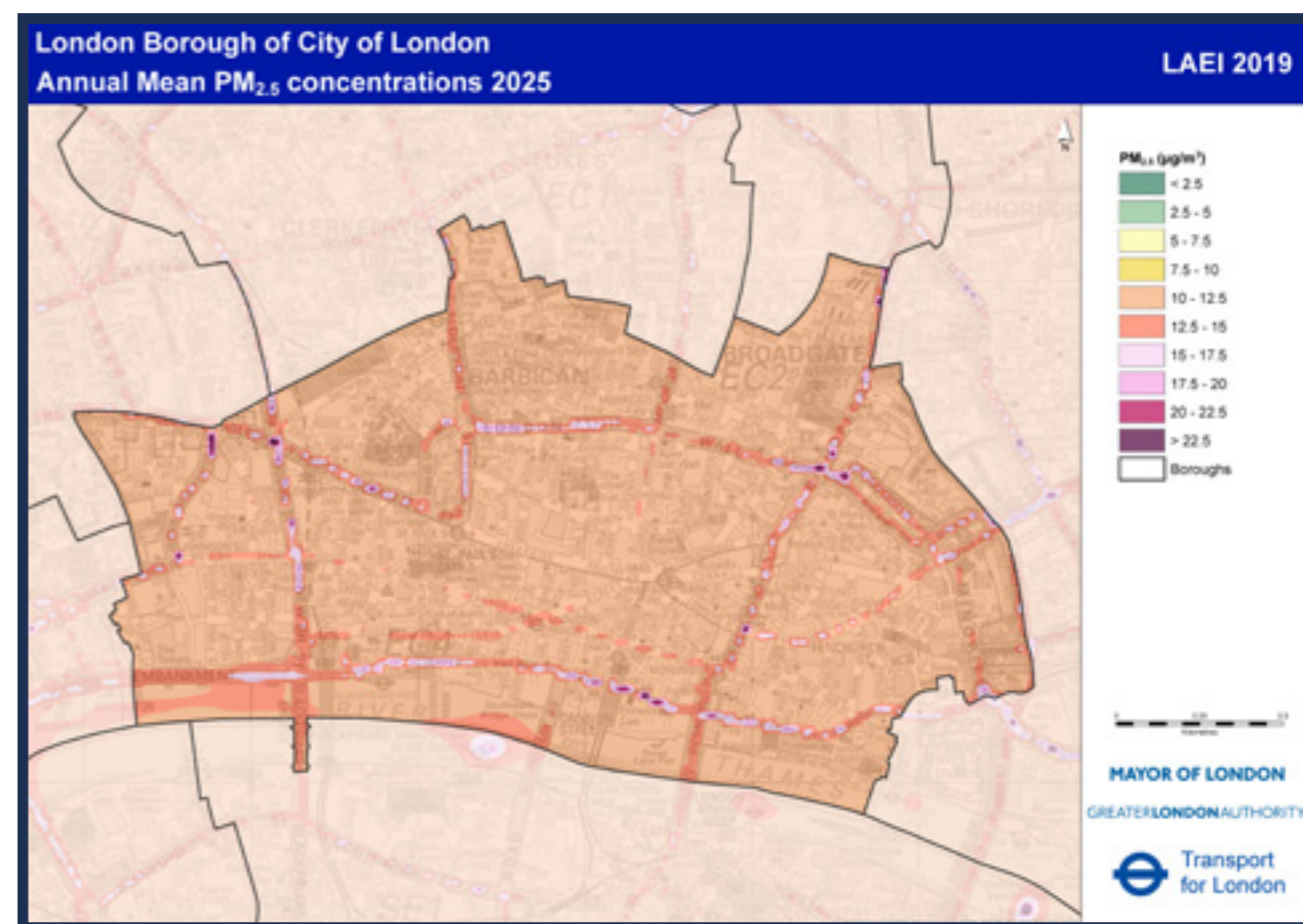
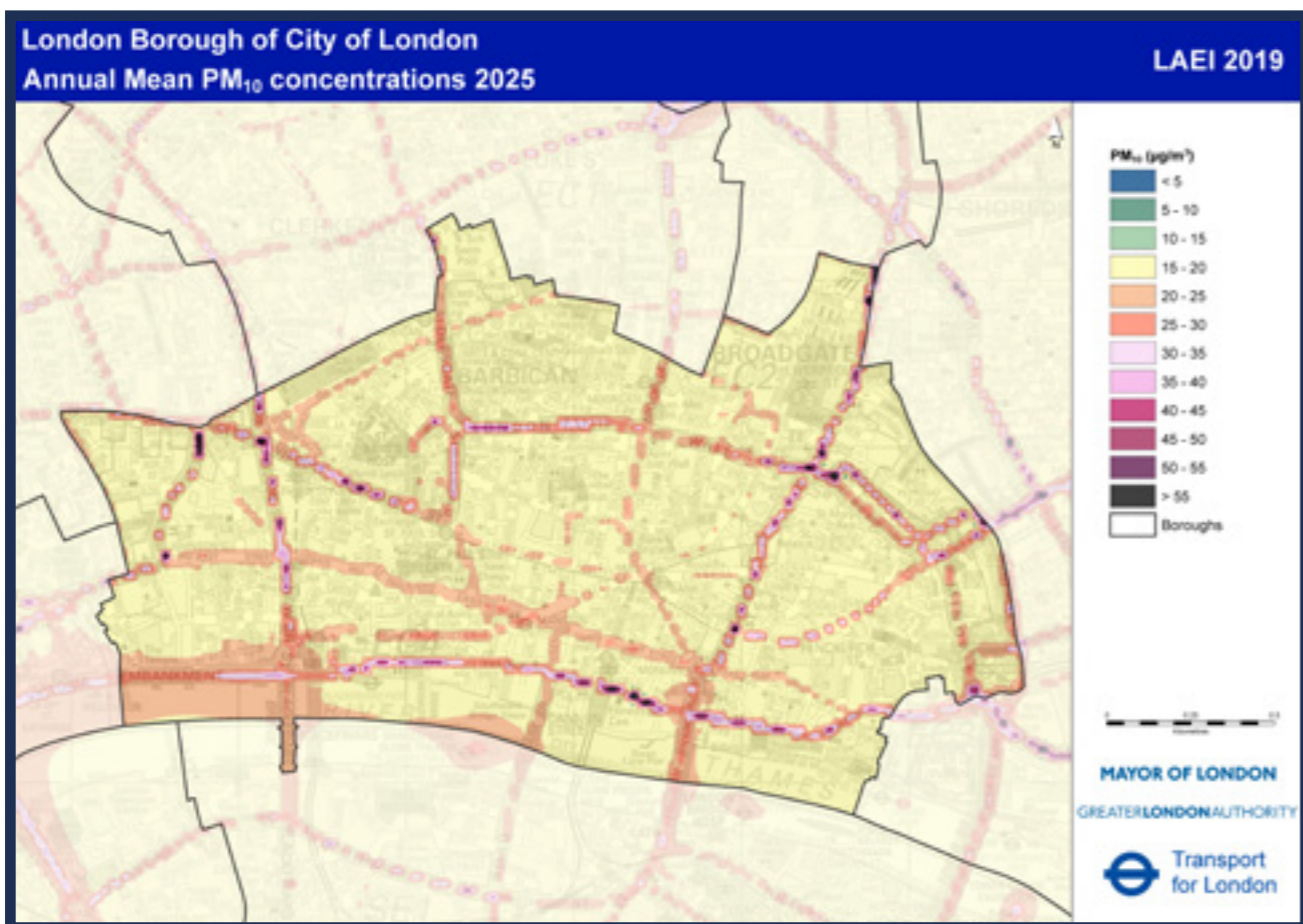


Figure A3.3: Annual Mean PM<sub>10</sub> Concentrations, 2025 and 2030

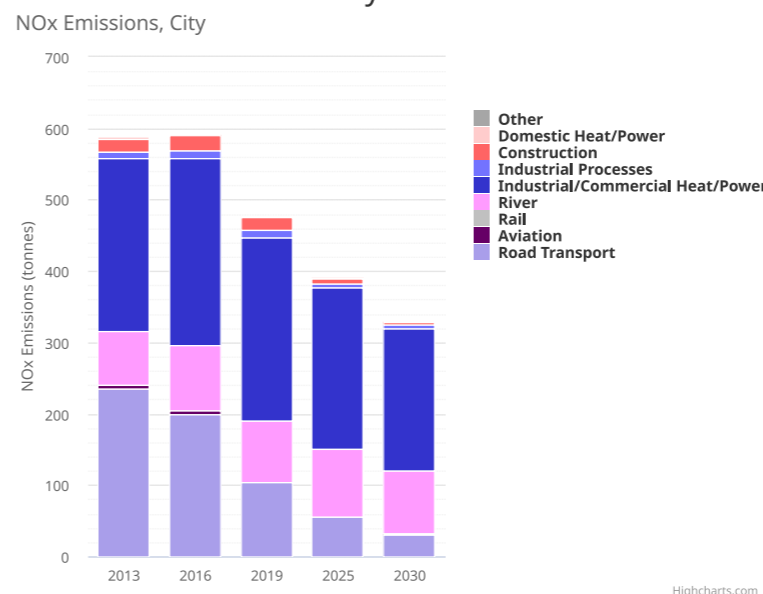
Figure A3.4: Annual Mean PM<sub>2.5</sub> Concentrations, 2025 and 2030



### Pollutant Emissions

Figures A3.5-A3.7 show how pollutant emissions originating in the Square Mile have changed from 2013 to 2019, and are predicted to change by 2030. The data allows identification of areas where targeted improvements can be made and is used as a tool to guide action.

### LAEI - Emissions Trend by Source

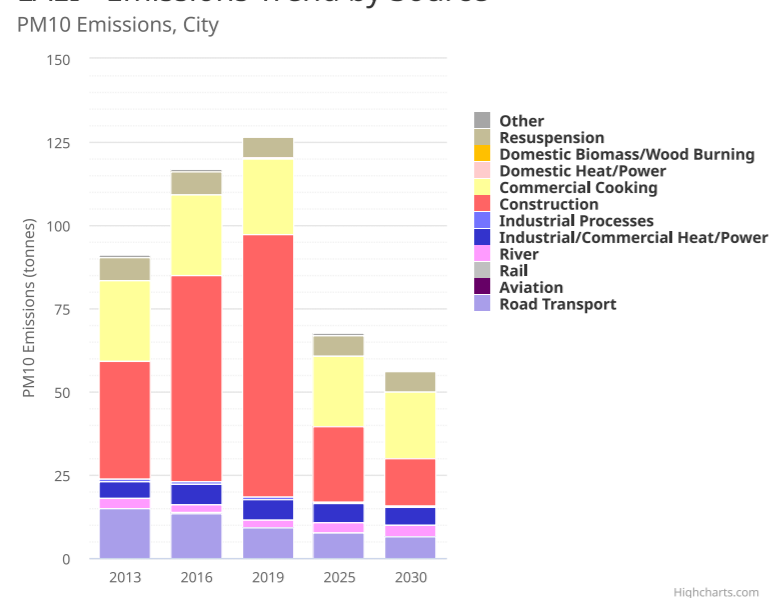


Borough: City					
NO <sub>x</sub> Emissions by Source Type					
Emissions (Tonnes) from	2013	2016	2019	2025	2030
Road Transport	234	199	104	55	31
Aviation	6	6	1	1	1
Rail	0	0	0	0	0
River	77	91	85	94	88
Industrial/Commercial Heat/Power	242	262	257	226	200
Industrial Processes	8	11	11	7	6
Construction	19	22	17	6	3
Domestic Heat/Power	3	2	2	1	1
Other	0	0	0	0	0
<b>Total</b>	<b>589</b>	<b>593</b>	<b>477</b>	<b>391</b>	<b>330</b>

Figure A3.5: LAEI Emissions, Nitrogen Oxides

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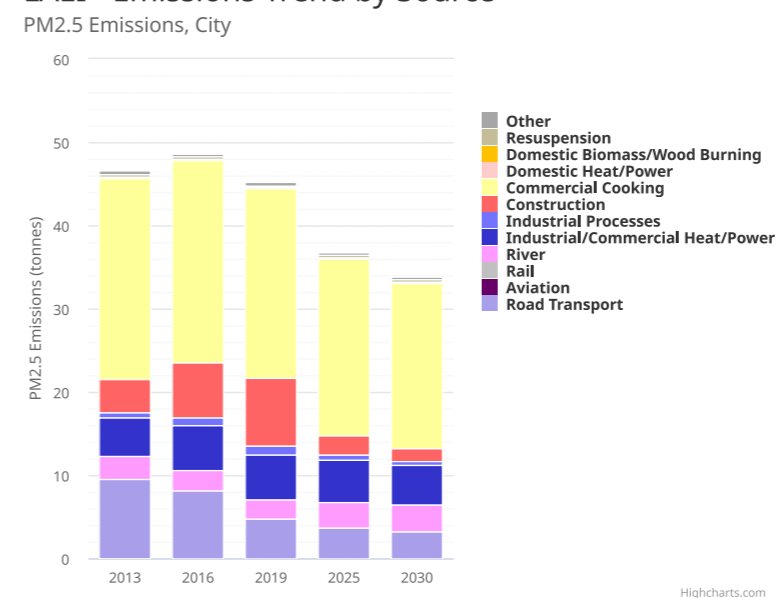
### LAEI - Emissions Trend by Source



Borough: City					
PM <sub>10</sub> Emissions by Source Type					
Emissions (Tonnes) from	2013	2016	2019	2025	2030
Road Transport	15	14	9	8	7
Aviation	0	0	0	0	0
Rail	0	0	0	0	0
River	3	3	2	3	4
Industrial/Commercial Heat/Power	5	6	6	6	5
Industrial Processes	1	1	1	1	0
Construction	35	62	79	22	14
Commercial Cooking	24	24	23	21	20
Domestic Heat/Power	0	0	0	0	0
Domestic Biomass/Wood Burning	0	0	0	0	0
Resuspension	7	7	6	6	6
Other	1	1	0	0	0
<b>Total</b>	<b>91</b>	<b>117</b>	<b>127</b>	<b>68</b>	<b>57</b>

Figure A3.6: LAEI Emissions, Particulates, PM<sub>10</sub>

### LAEI - Emissions Trend by Source



Borough: City					
PM <sub>2.5</sub> Emissions by Source Type					
Emissions (Tonnes) from	2013	2016	2019	2025	2030
Road Transport	10	8	5	4	3
Aviation	0	0	0	0	0
Rail	0	0	0	0	0
River	3	2	2	3	3
Industrial/Commercial Heat/Power	5	5	5	5	5
Industrial Processes	1	1	1	1	0
Construction	4	7	8	2	2
Commercial Cooking	24	24	23	21	20
Domestic Heat/Power	0	0	0	0	0
Domestic Biomass/Wood Burning	0	0	0	0	0
Resuspension	0	0	0	0	0
Other	0	0	0	0	0
<b>Total</b>	<b>47</b>	<b>49</b>	<b>45</b>	<b>37</b>	<b>34</b>

Figure A3.7: LAEI Emissions, Particulates, PM<sub>2.5</sub>

## Appendix 4: Monitoring Data, Further Assessment

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

**Table A4.1: Automatic Monitoring Sites**

Site Name	Site ID	Site Type	Pollutants Monitored
Farringdon Street	CT2	Roadside	PM <sub>2.5</sub>
The Aldgate School*	CT3	Urban Background	Nitrogen dioxide, PM <sub>10</sub> PM <sub>2.5</sub>
Beech Street	CT4	Roadside	Nitrogen dioxide, PM <sub>10</sub>
Walbrook Wharf**	CT6	Roadside	Nitrogen dioxide
Upper Thames Street***	CT8	Roadside	PM <sub>10</sub>
Guildhall	CT9	Urban Background	Ozone
Bell Wharf Lane	CTA	Roadside	Nitrogen dioxide, PM <sub>10</sub>

**Notes:**

\* Previously known as Sir John Cass Foundation Primary School.

\*\* Walbrook Wharf was decommissioned in January 2023 with the NO<sub>x</sub> analyser relocated to Bell Wharf Lane.

\*\*\* Upper Thames Street was decommissioned in September 2021 with the PM<sub>10</sub> analyser relocated to Bell Wharf Lane in May 2022.

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

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

## Nitrogen Dioxide

### Annual Mean Standard

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

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

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

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

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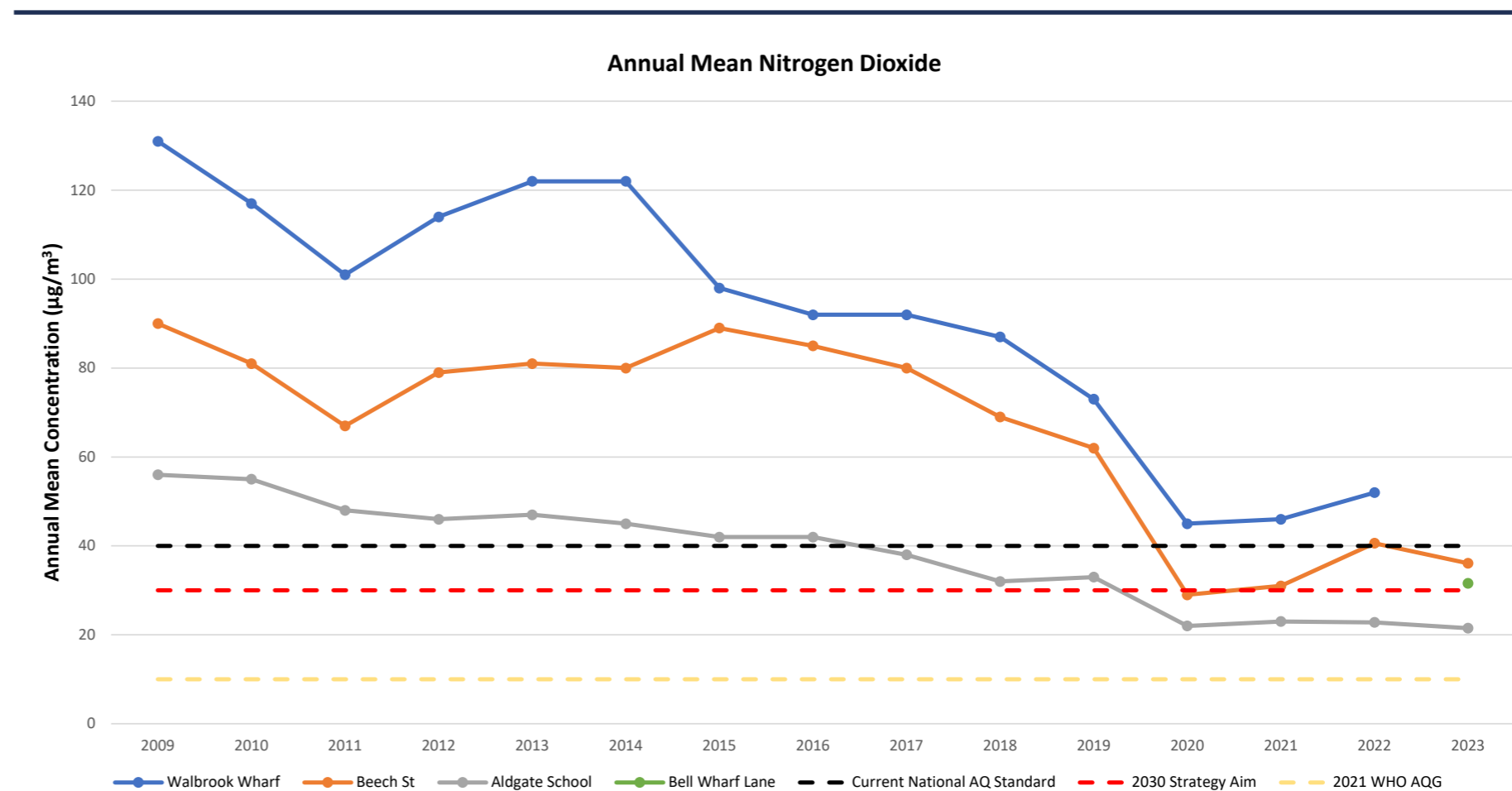


Figure A4.1: Annual Mean Nitrogen Dioxide, 2009 to 2023: Automatic Monitoring Sites

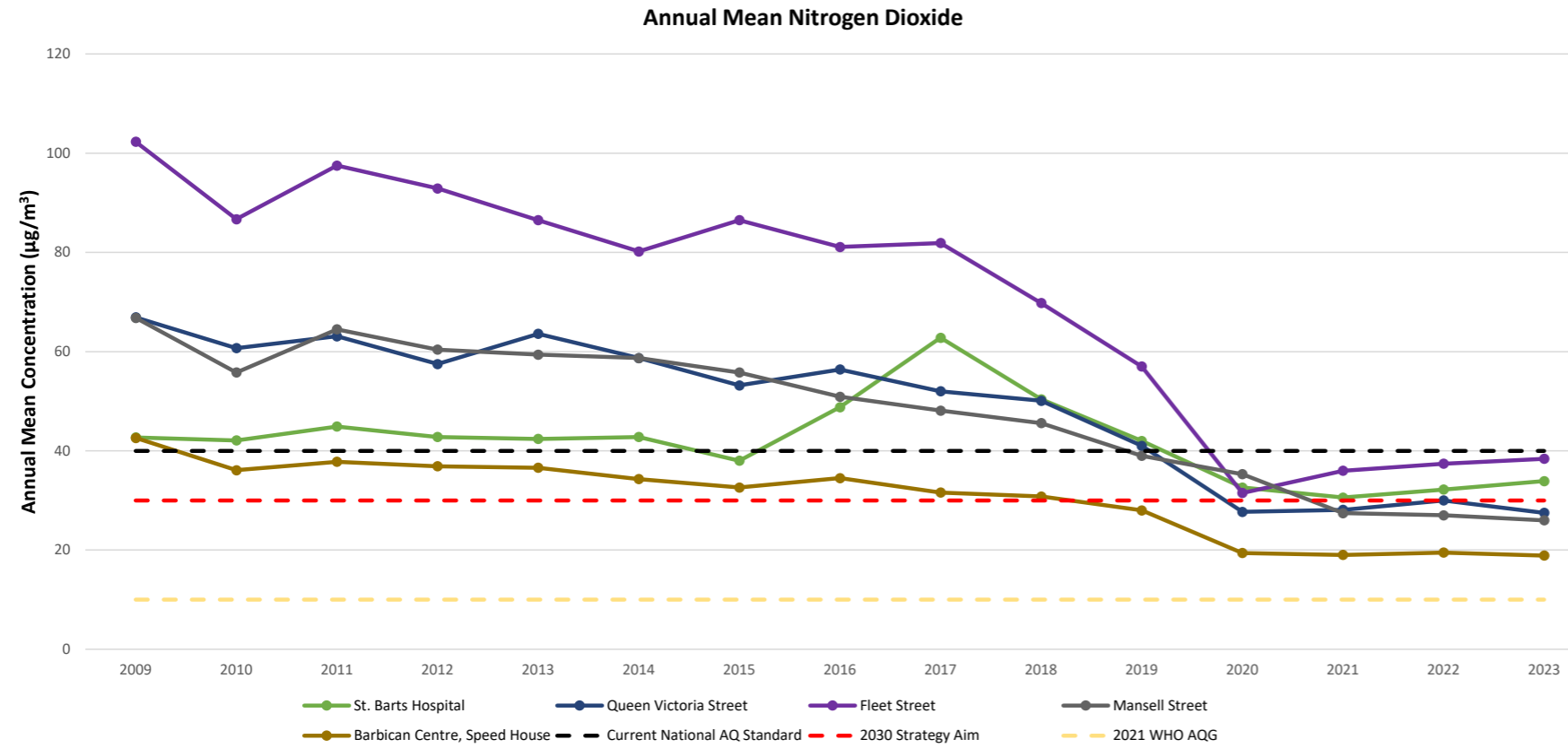


Figure A4.2: Annual Mean Nitrogen Dioxide, 2009 to 2023: Long-term Passive Sites

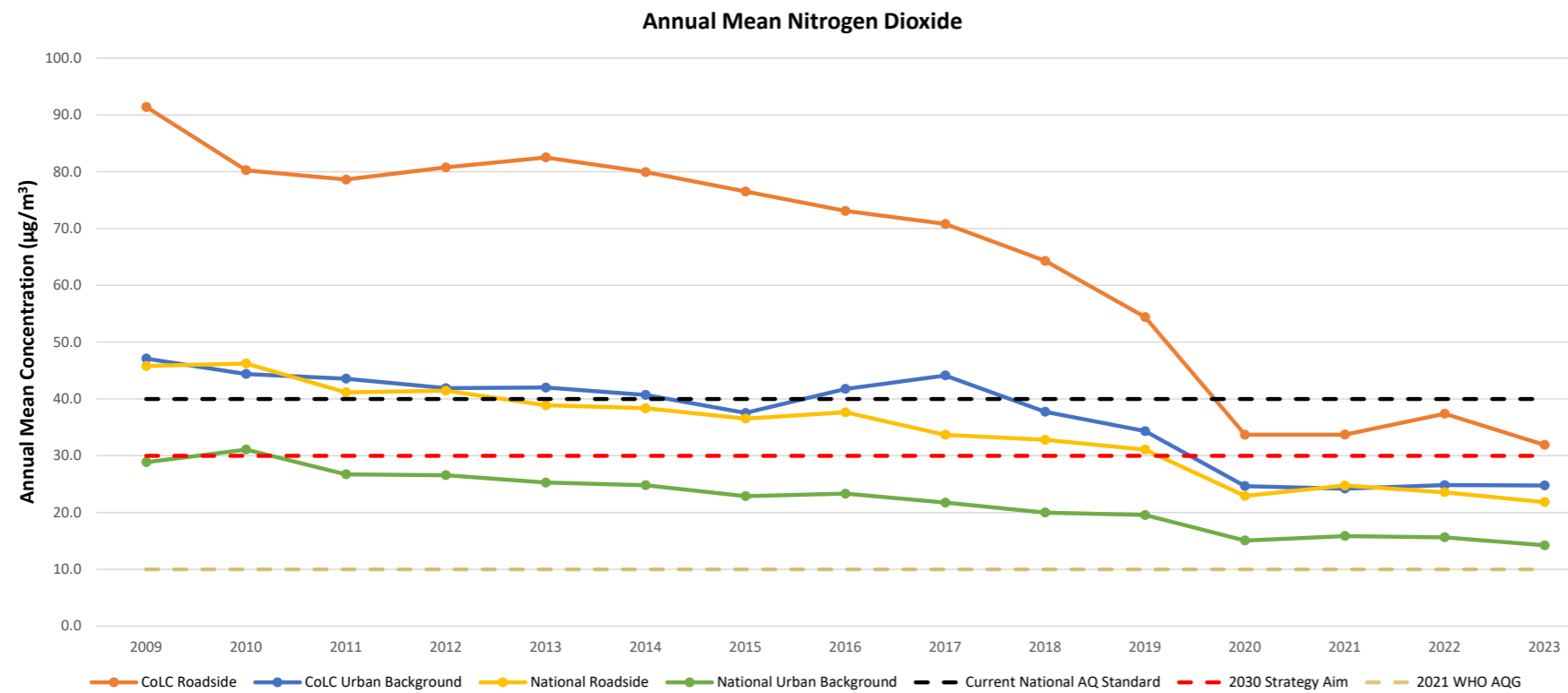


Figure A4.3: Average Annual Mean Nitrogen Dioxide Concentrations, 2009 to 2023: City of London Corporation (CoLC) and National Trends

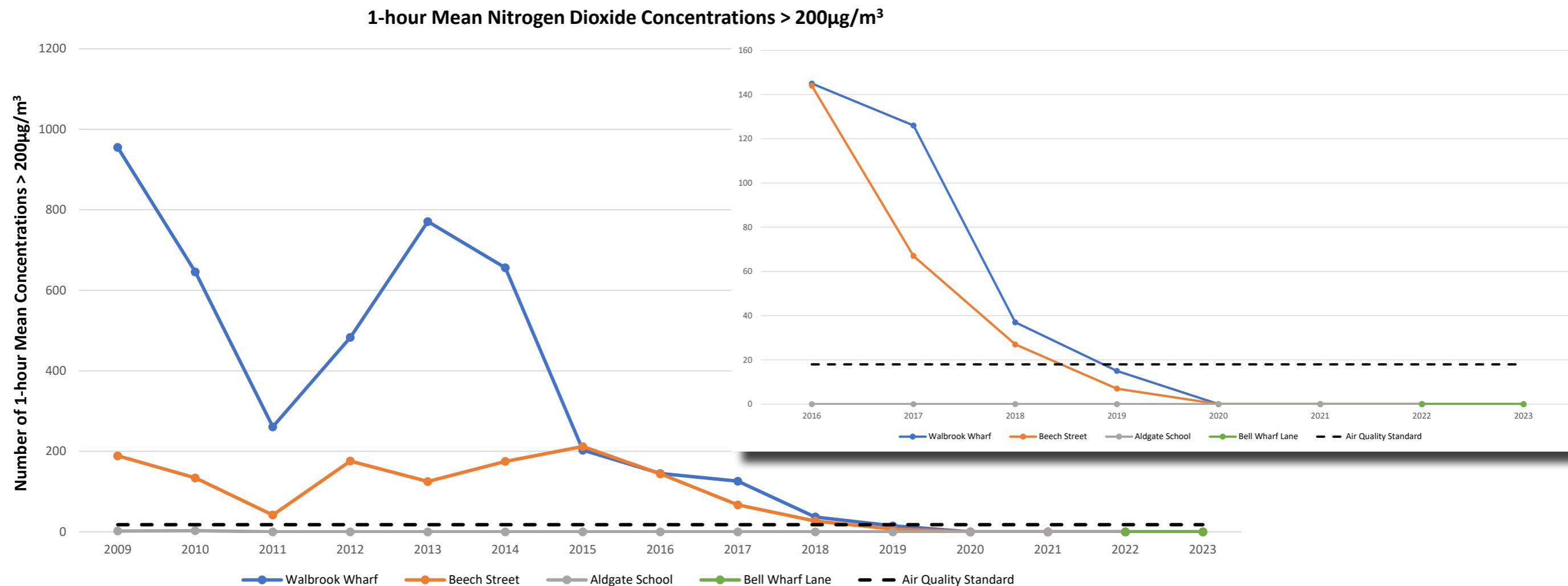


Figure A4.4: 1-hour Mean Nitrogen Dioxide, 2009 to 2023

### One Hour Standard

In addition to the annual mean standard for nitrogen dioxide, the 1-hour air quality standard of 200µg/m³ is also assessed in the Square Mile. To achieve compliance there must be no more than eighteen instances of the 1-hour concentration in a year. To accurately assess compliance against the 1-hour standard, automatic analysers are used to assess hourly monitoring data, but due to their passive nature, diffusion tubes are not. As per LLAQM guidance<sup>1</sup>, a proxy annual mean concentration of 60µg/m³ can be used to predict if there is likely to be an exceedance of the 1-hour standard at a passive nitrogen dioxide monitoring site.

Figure A4.4 details 1-hour mean concentrations greater than 200µg/m³ at the automatic monitoring sites. There has been a significant reduction achieved at both roadside monitoring locations. In 2009 there were almost 1,000 1-hour concentrations greater than 200µg/m³ monitored at Walbrook Wharf, the site achieved compliance in 2019. The Aldgate School has continually reported compliance with the 1-hour standard, and all automatic sites have reported compliance since 2019.

<sup>1</sup> Mayor of London (2019), London Local Air Quality Management (LLAQM): Technical Guidance 2019 (LLAQM.TG (19))

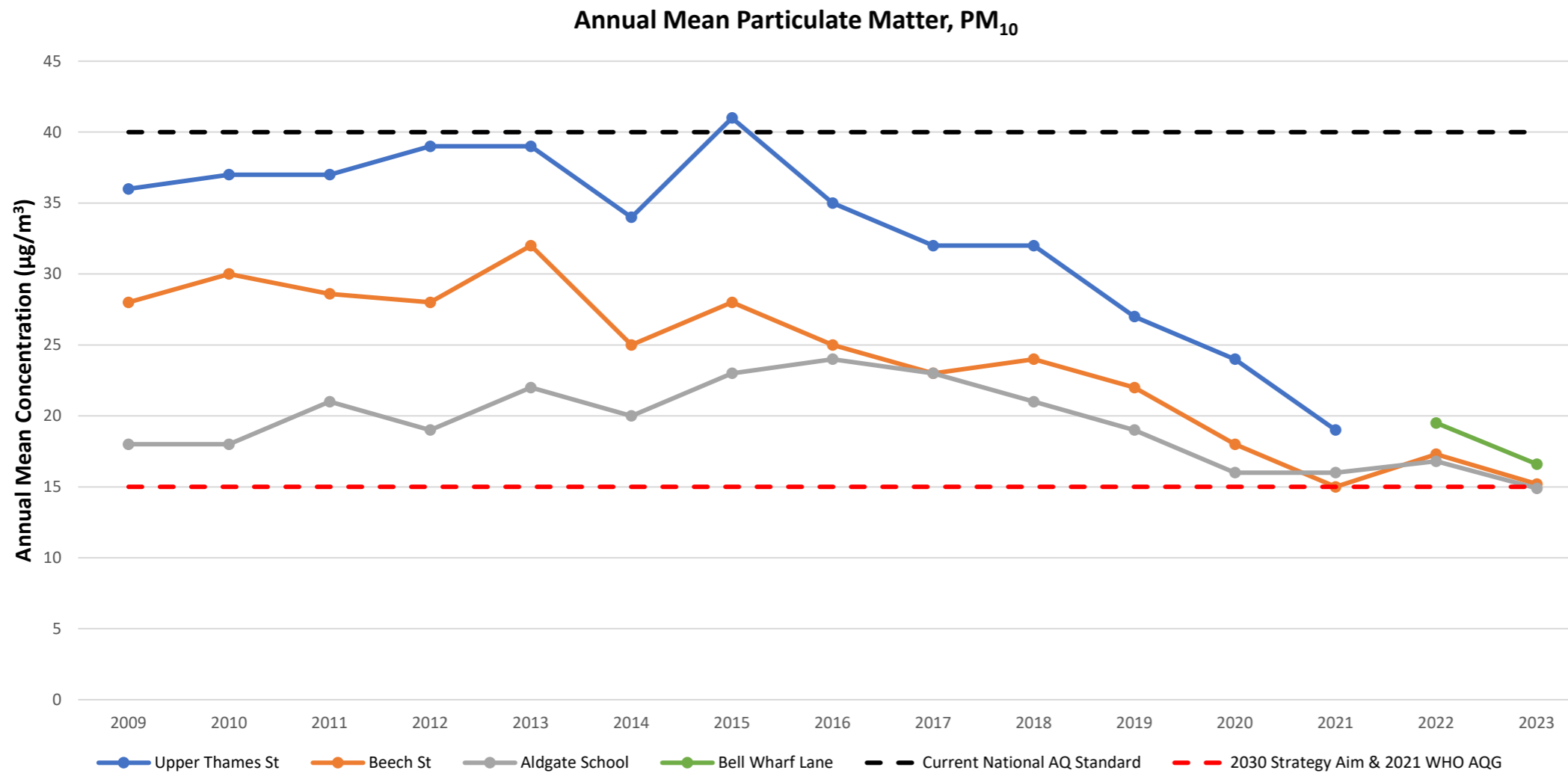


Figure A4.5: Annual Mean PM<sub>10</sub>, 2009 to 2023

## Particulate Matter, PM<sub>10</sub>

### Annual Mean Standard

Over a 15-year period, significant reductions in annual mean PM<sub>10</sub> concentrations have been experienced at all sites, primarily at roadside monitoring locations. Annual mean concentrations at Upper Thames Street and Beech Street have declined by 17µg/m<sup>3</sup> and 13µg/m<sup>3</sup> respectively, and experienced similar percentage reductions of 47% and 46%. The Aldgate School, an urban background monitoring location, experienced a smaller overall reduction in terms of concentration and as a percentage over the 15-year monitoring period of 3µg/m<sup>3</sup> and 17%.

Over the 15-year period, there was only one exceedance of the 40µg/m<sup>3</sup> annual mean air quality standard at Upper Thames Street in 2015. In addition, the aim of achieving an annual mean of 15µg/m<sup>3</sup> was met at Beech Street in 2021 and at The Aldgate School in 2023.

24-hour Mean PM<sub>10</sub> Concentrations > 50µg/m<sup>3</sup>

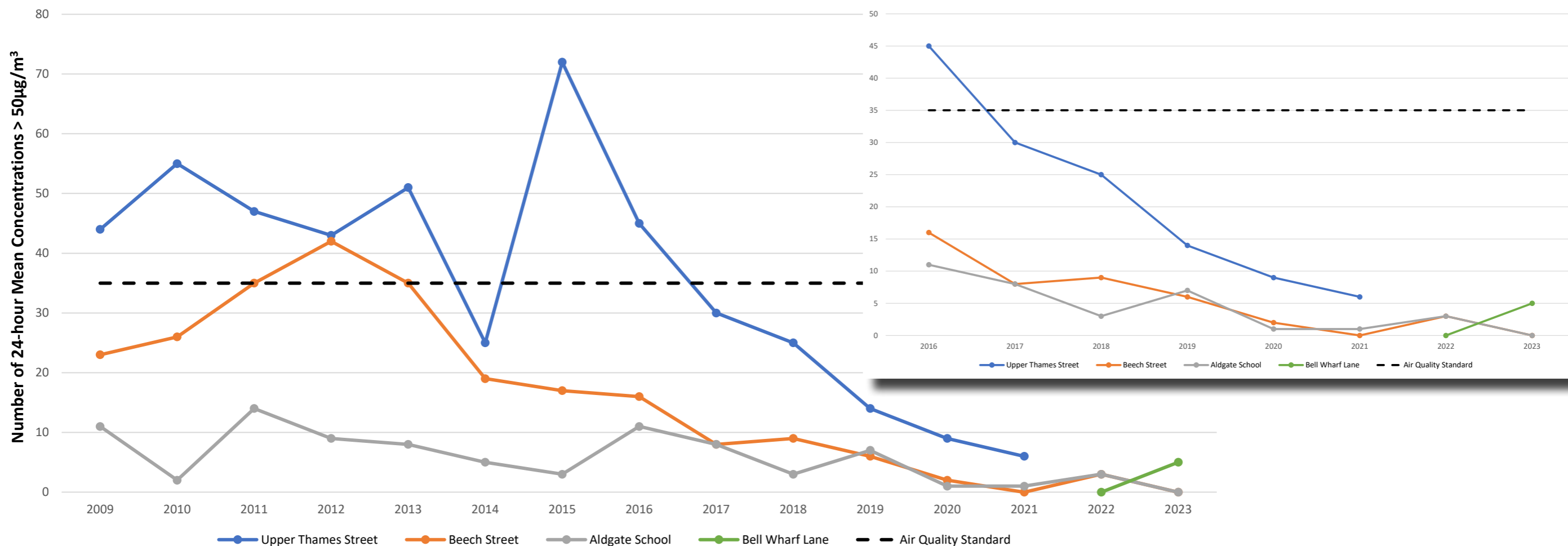


Figure A4.6: 24-hour Mean PM<sub>10</sub>, 2009 to 2023

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**24-Hour Standard**

In addition to the annual mean standard for PM<sub>10</sub>, the 24-hour air quality standard of 50µg/m<sup>3</sup> applies. To achieve compliance there must be no more than thirty-five instances of the 1-hour concentration in a year. Figure A4.6 details instances of 24-hour mean concentrations greater than 50µg/m<sup>3</sup>. There has been a significant reduction at both roadside locations in the time-period, and there have been no instances of non-compliance since 2016. The Aldgate School has continually reported compliance with the 24-hour standard for the 15-year period.

**Particulate Matter, PM<sub>2.5</sub>**

The PM<sub>2.5</sub> analysers at both Farringdon Street and the Aldgate School were installed in 2016, therefore all results for the two sites have been presented in Figure 2.6 in the main report. The annual mean concentrations for the two monitoring sites do not

vary significantly, with the greatest difference between the two sites being 4µg/m<sup>3</sup> in 2018.

Compared to nitrogen dioxide and PM<sub>10</sub>, PM<sub>2.5</sub> has a smaller variation between a roadside and urban background site. This is partly due to concentrations of PM<sub>2.5</sub> being lower than other pollutants, and due to increased dispersion of PM<sub>2.5</sub> rather than a simple source and concentration relationship.

**Ozone**

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

Ozone is primarily a secondary pollutant, therefore there are no major emission sources in the Square Mile. Most of the

ozone is instead formed in the air from reactions between other pollutants. Pollutants photochemically react outdoors in the presence of sunlight to produce ground-level ozone. Similar reactions can occur with nitrogen oxides as a precursor.

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

Table A4.4: Ozone Monitoring Results

	2022	2023
Annual Mean (µg/m <sup>3</sup> )	54	54
100 µg/m <sup>3</sup> not to be exceeded more than 10 times per year	24	19

# Appendix 5: Air Quality Partner Commitments

The Environment Act 2021<sup>1</sup> introduced the concept of AQPs into the LAQM framework. AQPs are public bodies that are required to assist local authorities with reasonable requests and contribute to AQAPs.

## The City Corporation has identified three AQPs:

1. The EA.
2. The PLA.
3. The Mayor of London:
  - a. The GLA; and
  - b. TfL.

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

<sup>1</sup> Environment Act, (c.30). London: The Stationery Office.

## The Environment Agency

We continue to implement the requirements for the MCP Directive and domestic legislation of Specified Generators (SG). These will apply MCP Directive Annex II Emission Limits; applied to new and existing combustion plant depending on the date they are put into operation and the thermal capacity. Compliance with Emission Limit Values for existing MCP with a rated thermal input greater than 5MWth is the 1 January 2025. For existing MCP with a rated thermal input less than 5MWth, which is more likely to be plant located within the City of London and its surrounding, the compliance date is 1 January 2030.

MCP that are also SGs may have stricter Emission Limits than specified in the MCP Directive Annex II or Schedule 25B EPR where they are necessary to ensure Air Quality Standards are met. In the City of London this situation may apply to reciprocating engines providing combined heat and power to residential and commercial premises.

We have implemented Best Available Techniques (BAT) for new standby back-up generation on Part A (1) Installations and may require the use of abatement (beyond BAT) for large arrays of diesel back-up standby, such as Data Centres, to manage short term peak nitrogen dioxide immediately adjacent to these regulated facilities. Implementation of the Waste Incineration BAT conclusions has reduced emissions of nitrogen dioxide from existing waste incineration plant by at least 10% by the end of last year, which will reduce the transboundary contribution from incineration plant within the capital and its surroundings. This work will have less reduction on emissions of PM<sub>2.5</sub> as Waste Incineration Plant are low emitters of particulate matter due to the high capture efficiency of flue gas abatement systems.

## In terms of plant that are regulated by the EA the following is relevant to the Square Mile:

- There are three issued permits for MCP/SG, all of which are standard rules and have been appropriately consulted on.
- There are no new or current MCP applications in our systems located within the City of London boundary or within 800m of it.

- There is one Industrial Emissions Directive Environmental Permitting Regulations installation permit of aggregated MCP to >=50MWth (UBS AG Broadgate EPR/ZP3238DK) which was subject to Best Available Techniques and consultation.

## The Port of London Authority

The PLA has an Air Quality Strategy (Air Quality Strategy for the Tidal Thames: June 2020) which details an action plan for reducing emissions on the Thames. Since the 2018 and 2020 strategies were published, 14 actions have been completed and 13 are still ongoing, with the aim of raising awareness, knowledge sharing and monitoring emissions on the river. More information on the progress of the previous strategy actions will be detailed in the upcoming 2024 strategy update.

The PLA conduct quarterly and annual river-side monitoring of the river from London Gateway to Richmond. This is done via real-time monitoring and passive nitrogen dioxide monitoring. Monitoring allows us to track any improvements in pollutants over time and can be used to help inform local authorities about the contribution of river vessel emissions.

The updated Air Quality Strategy is to be published in 2024 with updated actions that plan to deliver emission reduction river wide.

In 2024 the PLA's Net Zero River Plan was published, which has been created with the input of river operators on the Thames. It is an action plan to facilitate the achievement of net zero ambitions on the river, working in partnership with stakeholders.

The PLA fleet currently consists of 29 vessels which have been involved various trials to demonstrate the effectiveness of certain technologies to reduce emissions to air.

## Recent changes to the PLA fleet include:

- In 2022 a workboat vessel was retrofitted with selective catalytic reduction technology to test pre and post emissions. Results showed a reduction in both NO<sub>x</sub> and PM emissions.



- Following a successful trail in 2021, the whole of the PLA fleet transition to hydrotreated vegetable oil (HVO) fuel in 2022 instead of diesel fuel.

**Future changes to the PLA fleet include:**

- The Director of Marine Operations is currently conducting a fleet review. This review will consider the sustainability of the current fleet.
- Funding has been secured to operate an unmanned hydrogen fuelled survey vessel. It is estimated that this will be part of the fleet by 2025.

Internally, we are exceeding our targets of emission reduction thanks to our transition to HVO in 2022. This transition reduced our scope 1 emissions by 50%, putting us two years ahead of our target schedule. Our river-side monitoring network and newly developed Maritime Emissions Platform (MPE) by RightShip is allowing us to track against our targets more effectively from 2023. Using knowledge gained from the MEP and other sources we will review our targets in 2026. Action plans within the Air Quality Strategy, the Net Zero River Plan, and Thames Vision 2050 will lead us to achieve targets outlined for beyond 2026, by aiding our operators reach their internal net zero targets as well as the overarching government target of net zero by 2050.

**The Greater London Authority and Transport for London**

The Mayor’s Transport Strategy sets the ambitious target of 80% of trips made by sustainable modes such as public transport, cycling and walking by 2041. The Mayor and TfL will continue to invest in making it easier and safer to travel by these modes, which will also have air quality benefits.

Between 2016 and 2020, TfL replaced older buses and new buses, and retrofitted mid-life buses with new exhaust systems meeting Euro VI emissions. Since January 2021, the entire bus fleet has met or exceeded this standard. Upgrading the fleet to meet the latest Euro VI emissions has significantly reduced the contribution from TfL buses to transport-related NO<sub>x</sub> emissions, with the proportion of transport NO<sub>x</sub> emissions coming from TfL’s buses reducing from 15% to around 4%.

TfL has been introducing zero-emission buses from 2016 onwards and there are now over 1,300 zero-emission buses in the fleet that operate across London. TfL has a target of converting the entire bus fleet to zero-emission no later than 2034 or accelerate to 2030 with additional government funding. Most buses operate in London for between 10-14 years. After this time, existing vehicles leave the fleet (once a route contract has ended) and new zero-emission buses will join.

There are 35 current bus routes that pass through the Square Mile. Of these routes, 97% operate a mix hybrid and fully electric vehicles and 17% of routes operate solely fully electric vehicles. Additionally, it is planned for the diesel route and three hybrid routes to become fully electric in 2024/25.

Vehicle Type	Routes
Diesel	1
Hybrid	27
Electric/Hybrid	1
Electric	6

Engine Type	Routes
Euro V+SCRT	5
Euro V+SCRT / Euro VI	2
Euro VI	21
Electric / Euro VI	1
Electric	6

TfL contracted bus operators are responsible for maintaining the vehicles they operate. TfL monitors air quality in London but does not monitor individual bus emissions as buses have been type approved by the Vehicle Certification Agency to the latest Euro standards and have On Board Diagnostics for monitoring in service by the Driver and Vehicle Standards Agency.

Currently 8,419 licensed taxis are ZEC, which accounts for over half of the fleet. Since January 2018, all vehicles new to licencing have been required to be ZEC. As a result of the specified age limits for taxi vehicles, which is set out as a maximum of 15 years

for Euro VI vehicles, by January 2033 at the latest the whole fleet will be ZEC.

For more information regarding the schemes delivered by the Mayor of London, please visit the GLA Air Quality website, Mayors Transport Strategy and London Environment Strategy. These strategies outline the ambitious work delivered by the Mayor to improve air quality across London.




# Appendix 6: Air Quality Policies in the Draft City Plan 2040


## Draft Policy HL2: Air Quality

1. Developers will be required to effectively manage the impact of their proposals on air quality. Major developments must comply with the requirements of the Air Quality SPD for Air Quality Impact Assessments (AQIAs).
2. Development that would result in a worsening of the City's nitrogen dioxide or PM<sub>10</sub> and PM<sub>2.5</sub> pollution levels will be strongly resisted.
3. All developments must be at least Air Quality Neutral. Developments subject to an EIA should adopt an Air Quality Positive approach. Major developments must maximise credits for the pollution section of the Building Research Establishment Environmental Assessment Method (BREEAM) assessment relating to on-site emissions of nitrogen oxides.
4. Developers will be expected to install non-combustion energy technology where available.
5. A detailed AQIA will be required for combustion based low carbon technologies (e.g. biomass, CHP), and any necessary mitigation must be approved by the City Corporation.
6. Developments that include uses that are more vulnerable to air pollution, such as schools, nurseries, medical facilities, and residential development, will be refused if the occupants would be exposed to poor air quality. Developments will need to ensure acceptable air quality through appropriate design, layout, landscaping, and technological solutions.
7. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to fully minimise air quality impacts possible. Impacts from these activities must be addressed within submitted AQIAs. All developments should comply with the requirements of the London Low Emission Zone for NRMM.
8. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest part of the development to ensure maximum dispersion of pollutants and be at least three metres away from any publicly accessible roof spaces.

## City Plan 2040

Shaping the Future City



City of London Local Plan Revised Proposed Submission Draft April 2024

For further information contact:

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

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## **Appendix 2: Consultation process**

The consultation was available on the [Commonplace | Citizen Engagement Platform](#) website from 3<sup>rd</sup> June to 26<sup>th</sup> July.

### **Direct correspondence was sent to:**

- The GLA/TfL
- The Port of London Authority
- London Councils
- The Environment Agency
- UK Health Security Agency
- Association of Directors of Public Health
- Clean Air London
- Hackney and City Public Health Team
- Eastern City Partnership
- Cheapside Business Alliance
- Aldgate Connect
- Fleet Street Quarter
- Culture Mile
- Barbican and Golden Lane Neighbourhood Forum
- Barbican Association
- Golden Lane Residents Association
- Petticoat Square Residents Association
- London Borough of Camden
- Barts Health NHS Trust
- NHS North East London
- London Borough of Islington
- London Borough of Hackney
- London Borough of Lambeth
- London Borough of Southwark
- City of Westminster
- Royal Borough of Kensington and Chelsea
- The Aldgate School
- St Pauls School
- London Borough of Tower Hamlets
- London Borough of Newham

### **In person consultation events were held at:**

- City Residents Meeting: Tuesday 4 June, 5.30pm to 7.30pm
- The Barbican Library: Friday 7 June, 3pm to 5pm
- Artizan Library: Thursday 11 July, 2pm to 4pm
- Guildhall north wing reception: Wednesday 17 July, 10am to 4pm

**Hard copies of the draft Strategy were made available at:**

- Guildhall North Wing Reception
- Artizan Library
- Barbican Library
- Guildhall Library
- Shoe Lane Library

### Appendix 3: Written consultation comments

No	From	Comment Received	Response	Action taken
1	Resident	Could the graphs on pages 11 and 12 have the WHO guideline marked.	Graph design throughout the document has been amended to include the following: <ul style="list-style-type: none"> <li>• Current national standards</li> <li>• 2021 World Health Organisation Air Quality guidelines</li> <li>• 2030 Strategy aims</li> </ul>	Strategy graphs amended.
2		Questioned why river emissions so high compared to road traffic.	Section 1.1 explains that the data used is taken from the London Atmospheric Emission Inventory published by the Greater London Authority, and it is 'approximate and should not be viewed as absolute'.	No change made to the Strategy document.
3		New boats, whether for people transport or pleasure (sightseeing, river cruises, partying) must operate with electric traction between Tower Bridge and Waterloo Bridge as a condition of their operating license	This is not within the control of the City of London Corporation; however, we will include this in discussions with the Port of London Authority.	No change made to the Strategy document.
		Take a few pollution readings from homes on the North side of River, for example those in Queenhithe Ward	Monitoring locations are reviewed annually. This will be included for the start of 2025.	No change made to the Strategy document.
		No specific action listed in this Appendix dealing with River transport.	We will include this with our ongoing collaboration with the Port of London Authority. The City Corporation owns 5 vessels for use on the river. Two are petrol and 3 are diesel. Alternative fuels to diesel are considered when the engines are upgraded.	No change made to the Strategy document.
6	Greater London Authority	Clarify that the document is a combined Air Quality Action Plan and Strategy	This has been clarified by adding text to the 'Foreword' and 'Introduction'.	Strategy text amended.
7		WHO guideline levels added to graphs	Graph design throughout the document has been amended to include the following: <ul style="list-style-type: none"> <li>• Current national standards</li> <li>• 2021 World Health Organisation Air Quality guidelines</li> <li>• 2030 Strategy aims</li> </ul>	Strategy graphs amended.

No	From	Comment Received	Response	Action taken
8		Include an action on: Promoting and delivering energy efficient retrofitting projects in workplaces and homes	<p>This is delivered as part of the Climate Action Strategy workstream where there are two projects relating to energy efficiency in buildings:</p> <ul style="list-style-type: none"> <li>• Decarbonising our operational properties and housing estates</li> <li>• Decarbonising our leased properties</li> </ul>	No change made to the Strategy document.
9		Include an action on: Regular Car Free days/ temporary road closure in high footfall areas	<p>A focus of the City Corporation's updated Transport Strategy is:  <i>Making the most efficient and effective use of street space by reducing motor traffic, including the number of delivery and servicing vehicles</i>  It is delivering a number of pedestrian priority schemes and focuses on the needs of people walking and wheeling.</p>	No change made to the Strategy document.
10	Page 256	Include an action on: Reducing Emissions from Combined Heat and Power (CHP)	<p>The use of Combined Heat and Power is discouraged through the planning process.</p> <p>New plant will continue to be addressed through planning policy and in the update to the Air Quality Supplementary Planning Document.</p> <p>Medium size CHP (above 1MWth) are regulated by the Environment Agency.</p>	No change made to the Strategy document.
11		Include an action on Encouraging schools to joint TfL STARS (now TfL Travel for Life)	This has been added to Action 26.	Strategy text amended.
12		Include an action on: Ensuring adequate, appropriate, and well-located green space and infrastructure is included in new and existing developments.	This is covered in the draft City Plan 2040 - policies S14 and OS1-5.	No change made to the Strategy document.
13		Include an action on: Expanding and improving Green Infrastructure (GI)	This is covered in the draft City Plan 2040 - policies S14 and OS1-5	No change made to the Strategy document.



No	From	Comment Received	Response	Action taken
14		Action 1: Suggested outcome 'no reduction in air quality monitors' and 'monitor downtime does not exceed X'	Action 1 in the Strategy states that continuous analysers will be used at a minimum of five locations in the Square Mile.  Detail added for all continuous analysers to achieve a minimum data capture of 90% over a calendar year.	Strategy text amended.
15		Action 2: Please detail on how it will be made public - if it's a City of London site - could you have a KPI on number of website visits?	Signposting to the location of monitoring data has been added to Action 2.	Strategy text amended.
16		Leading by example outcomes are incorrect – carried over from previous page	This was done in the design stage of the draft document and has been corrected for the final version.	Strategy text amended.
17		Action 4: More detail on improving energy efficiency of buildings – specific action and how it will be measured	For Action 4, the detail has been amended regarding Energy Performance Certificate ratings.	Strategy text amended.
18		Action 4: Add a date to develop Square Mile local area energy plan	The text has been amended to include an implementation date.	Strategy text amended.
19		Action 5: Add a target for reducing size of corporate fleet and date.	There is no specific target date for this as it is subject to operational requirements. All vehicle purchases and leasing are overseen by the Transport Coordination Group and replacement of any vehicle must be fully justified.	No change made to the Strategy document.
20		Action 9: Explain what regulatory powers we are asking for that will signify success	Text has been added to the outcome for Action 9 to clarify what powers are required.	Strategy text amended.
21		Add specific outcomes to action 10 if possible	Updated the detail to include measurable targets.	Strategy text amended.
22		Action 11: Investigate the impact of tall buildings on levels of air pollution at street level – by when	Text has been added to the detail of Action 11.	Strategy text amended.
23		Action 12: All roads in the Square Mile that meet the annual average national standard of 40µg/m3 – by what date	The date is already specified in the document – 2027.	No change made to the Strategy document.
24		Action 13: Respond to complaints and erect signs in hot spot areas. Add response time Provide awareness training to advise drivers to switch off when parked. Add a number of people to be engaged	Response time of 48 hours added.  Annual engagement target added to the action.	Strategy text amended.

No	From	Comment Received	Response	Action taken
25		Action 14: On-street and off-street parking charges applied based on vehicle emissions. – what % of roads and is this from day 1	Text has been amended to clarify that this is ongoing and is 100% of parking bays	Strategy text amended.
26		Action 15: Require air quality assessments for major developments – add all	It is not considered necessary to add the word all.	No change made to the Strategy document.
27		Action 15: Require developers to consider alternatives to diesel standby generators – how will this be done	The text has been updated to explain that this will be done by planning condition.	Strategy text amended.
28		Action 15: Outcome: New developments that do not have a negative impact on local air quality. Can this be changed to All developments will comply with policies	The outcome has been updated to reflect the recommendation.	Strategy text amended.
29		Action 16: Inspect construction sites and respond to complaints. Can this be changed to Respond to complaints within XX days Inspect at minimum XX construction sites per year	The detail has been updated to reflect the recommendation.	Strategy text amended.
30		Action 17 Undertake inspections of all sites to ensure compliance with the NRMM Low Emission Zone. Do you have a commitment to be part of the NRMM enforcement project? Also to check are you committing here to inspect ALL construction sites?	The text has been amended to provide clarity that we are committed to being part of the NRMM enforcement project and do inspect all sites that have NRMM that require regulation.	Strategy text amended.
31		Action 18: Request alternatives to diesel generators in new developments through the planning process. Can you set a target	This detail has been removed from Action 18 as it is provided for Action 15 and so is a duplication.	Strategy text amended.
32		Action 19: Run an awareness raising campaign for mobile food vendors and commercial cooking establishments. Can you please specify how you will monitor success - e.g. number of people engaged / number of tweets / number of food premises visited etc. per year	An engagement target has been added to Action 19.	Strategy text amended.
33		Action 20: Where combustion plant is installed, good dispersion of emissions will be required. How will this be monitored/ measured? e.g. 100% of all new combustion plant to terminate above the height of the nearest building	An outcome has been added to Action 20 regarding flue heights.	Strategy text amended.

No	From	Comment Received	Response	Action taken
34		Action 21: Carry out risk-based inspections of prescribed processes in the Square Mile. How many per year	The number of prescribed processes can vary from year to year as operations close and open. There are currently two operations that are regulated but this may change during the life of the Strategy.  The word 'all' therefore has been added to the detail of Action 21.	Strategy text amended.
35		Action 22: Annual inspections of retail premises that sell solid fuel How many inspected / engaged with	The detail for Action 22 has been amended.	Strategy text amended.
36		Action 23: Better informed colleagues. Outcomes like this could be expanded on. Better informed colleagues and Public Health input into policies and projects (including awareness raising/ behaviour projects) leading to better public health outcomes by sharing expertise	The outcome for Action 23 has been amended.	Strategy text amended.
37		Action 24: Promote the free CityAir Smart Phone App, the AirText service and Air Aware. How will you be promoting it	The detail for Action 24 has been amended to explain how it will be promoted.	Strategy text amended.
38		Action 24: add promoting the Mayor's air quality alert system	This has been added.	Strategy text amended.
39		Action 25: Clean Air Day events - Instead of "up to" - could you please do a minimum number?	A minimum number has been added.	Strategy text amended.
40		Action 26: What specific work is being done with schools?	This has been explained in the detail of Action 26.	Strategy text amended.
41		Action 27: Engage with business through the CityAir business engagement programme. How many per year	An engagement target has been added	Strategy text amended.
42		Action 28: Disseminate a leaflet about indoor air quality. How many, to whom?	Additional text has been added to the detail of Action 28 to explain how it will be disseminated.	Strategy text amended.

No	From	Comment Received	Response	Action taken
43	Port of London Authority	<p>page 51 of the Appendix.</p> <p>The second paragraph currently lists the PLA targets stated in the 2020 Strategy. It would be ideal if these could be removed as these targets are to be reviewed for a 2026 Strategy progress update which means they could be out of date relatively soon within the lifespan of this document. Can I suggest that this reads: “Monitoring allows us to track any improvements in pollutants over time and can be used to help inform local authorities about the contribution of river vessel emissions.”</p> <p>Following from this point, some sentences in the last paragraph should also be amended as follows:  <del>By 2026 we do aim to hit our targets of emission reduction of 20% NOx and PM port wide</del> Using knowledge gained from the MEP and other sources we will review our targets in 2026. Action plans within the Air Quality Strategy, the Net Zero River Plan, and Thames Vision 2050 will lead us to achieve targets outlined for beyond 2026, by aiding our operators reach their internal net zero targets as well as the overarching government target of net zero by 2050.</p>	Text amended as requested	Strategy text amended.
44		the Net Zero River Plan has been published, so the tense in the third paragraph should be changed to reflect this – from “will be published” to “was published”.	Text amended as requested	Strategy text amended.
45		The PLA supports the objectives of the CoLC AQS and is glad to be a partner in its delivery	Noted	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
46	City and Hackney Public Health Team	<p>We commend the City of London for its comprehensive approach to improving air quality, and support alignment with the 2021 World Health Organisation (WHO) Air Quality Guidelines (AQG) interim targets. We believe aligning with these guidelines will lead to significantly better health outcomes for our communities, reducing the burden of non-communicable diseases and adverse health effects linked to poor air quality.</p> <p>The Hackney Public Health team fully supports the City of London's efforts to improve air quality and we continue to support the alignment with the 2021 WHO Air Quality Guidelines interim targets. Aligning with WHO guidelines significantly benefits the health and wellbeing of our communities. We are particularly keen to see strong, collaborative efforts across neighbouring borough boundaries and involvement of all stakeholders in the fight for clean air, and collective ambitions to meet the highest possible standards. We look forward to continued collaboration and partnership in achieving these critical goals for a healthier London.</p>	Noted	No change made to the Strategy document.
		<p>Air Quality Monitoring</p> <p>Public Health supports the proposals made in section 1, particularly the use of live monitoring data being made available to the public.</p> <p>Recommendations:</p> <p>Ensure monitoring includes more localised sites in high-risk areas, such as near schools, dedicated cycle lanes, GP and Pharmacies and high pedestrian traffic areas / densely populated residential zones.</p>	Air quality monitoring locations are reviewed annually. These comments will be taken into account during the next review.	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
48		Actively promote use of the Air Aware tool and guidance to the public in response to live data feeds, ensuring residents and visitors are able to navigate to better air quality areas at times when air quality is particularly poor	Air Aware is actively promoted and detailed in Action 24	No change made to the Strategy document.
49		This should be paired with the ambition to meet WHO guidelines, ensuring data accuracy in detecting when and where these stricter thresholds are achieved.	Noted. We go to great lengths to ensure we have data that is as accurate and precise as possible.	No change made to the Strategy document.
50		Work in partnership with NEL ICB to analyse hospital admissions and respiratory-related health issues related with air quality data to better understand and address the health impacts of air pollution, advocating for WHO guideline targets.	We currently work with North East London Integrated Care Service. We will raise any further opportunities for collaboration with the Integrated Care Board.	No change made to the Strategy document.
51		<p>Leading by Example</p> <p>Public Health supports the proposals made within section 2 and welcomes the adoption of green infrastructure and increased sustainable practices with a move towards a resident- and pedestrian-first approach (i.e. restricting the use of combustible engine vehicles during busy footfall periods.</p>	Noted	No change made to the Strategy document.
52		<p>Recommendations:</p> <p>Consider the use of zero-emission zones in the City to prioritise and encourage active travel.</p>	The Transport Strategy aims for 90% of motor vehicles entering the Square Mile to be zero emission capable by 2030 (Proposal 29).	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
53		Monitor and publish the energy efficiency of operational buildings to demonstrate action against the proposed plans.	As part of monitoring the City Plan, we track how each planning application complies with the London Plan's energy goals i.e. an on-site carbon reduction of at least 35% beyond Part L 2021 of building regulations.  This information will be published through our City Plan monitoring reports and dashboards.	No change made to the Strategy document.
54		Collaborating with Partners  Public Health supports the proposals made in section 3 and believes increased collaboration and partnership with both designated and non-designated Air Quality partners will enhance the delivery of this Strategy.	Noted	No change made to the Strategy document.
55	page 263	Recommendations:  Much of the pollution across the City of London is not generated within the boundary; increased partnership with neighbouring boroughs, perhaps by a sub-regional task force, will help coordinate a pan-London effort to ensure consistency and sharing of best practices to achieve WHO standards.	We work with central London Boroughs through the Central London Air Quality Cluster group. The City Corporation also chairs the London wide Air Quality Steering Group.  Partnership work takes place on various workstreams, current examples include idling vehicle engines and investigating emissions associated with commercial cooking.	No change made to the Strategy document.
56		Partnership working across the City is strong and could be enhanced further by fostering relationships with residents, community groups and local business to ensure the "City Voice" is integral to Strategy and action across the City.	This will be reflected in work with the Business Improvement Districts and wider business engagement, as well as programmes such as AirAware, which resulted in local Air Quality Champions.	No change made to the Strategy document.
57		Partner with local universities or research institutions to conduct feasibility studies on how to move towards the WHO guidelines most effectively and the net economic impact of achieving this, or not.	External consultants undertook this work for us in 2023 and the outcomes of the report were used to set the aims for the draft Air Quality Strategy	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
58		Young people face the potential burden of climate change and inaction - actively involve young people in information awareness, insights gathering and climate action activities.	The following text has been added to the detail of Action 26 covering working with schools and nurseries: 'Deliver assemblies, bespoke workshops, set up stalls at summer fayres, making the topic accessible and where appropriate linked into the school curriculum'.	Strategy text amended.
59		<p>Reducing Emissions</p> <p>Public Health supports the proposals made in section 4 and notes the positive reports of the weekly PM2.5 and PM10 averages recorded within the WHO Air Quality Guidelines on all but two occasions (PM2.5 breached Sept 4th, 2023 and PM10 breached on Aug 22, 2023). Public Health welcomes continued progress towards the WHO AQG and supports alignment with the interim targets.</p> <ul style="list-style-type: none"> <li>○</li> </ul>	Noted	No change made to the Strategy document.
gp page 264		<p>Recommendations:</p> <p>UKHSA has developed a PILOT indicator to represent population level vulnerability to air pollution at LSOA level. This is a ranking of the level of vulnerability from low (1-2) to high (9-10) decile scores. We recommend the use of this tool to protect the most vulnerable populations in the City. Introducing more stringent measures to address engine idling, particularly for users of diesel motors, may aid this.</p> <ul style="list-style-type: none"> <li>○ Around Aldgate, Barbican and Moorgate stations, NO2 vulnerability is high.</li> </ul>	<p>This data was used to inform focussed action for awareness raising as part of a government funded project delivered with the London Boroughs of Hackney, Tower Hamlets and Newham.</p> <p>The City Corporation already takes a wide range of action to deal with unnecessary vehicle engine idling as detailed in section 5.1.1 of the Strategy.</p>	No change made to the Strategy document.
61		Remove annual season parking tickets for diesel vehicles and increase the on- and off-street parking charges for diesel vehicles to disincentive the use of these vehicles within the City.	The City of London has had an 'European Parking Award winning' emissions-based charging approach for several years. Diesel vehicles pay significantly higher charges than electric vehicles.	No change made to Strategy document.



No	From	Comment Received	Response	Action taken
62		Continue the use and application of the principles of behaviour change theory to promote and encourage the use of active travel routes and public transport. Report findings and lessons learned for greater stakeholder engagement and improvement	The Transport Strategy aims for 90% of motor vehicles entering the Square Mile to be zero emission capable by 2030.  Action 6 is included to ensure collaboration and forward thinking between air quality and transport.	No change made to the Strategy document.
63		Collaborate with industrial stakeholders to adopt cleaner technologies and practices, and enforce stricter emissions regulations to meet WHO standards.	We work with a range of organisations and public bodies to influence changes in process. Examples being the construction industry, the Environment Agency, Westminster Commission for Road Air Quality, Port of London Authority, Institute Of Couriers.	No change made to the Strategy document.
64		Following assessment of planning applications for air quality impact, which Public Health welcomes, introduce localised regulations that require construction projects to use cleaner equipment and practices to reduce emissions of PM10 and PM2.5. These regulations could be enforced through permits and inspections to ensure alignment with original planning applications. This has been effective in California, USA following introduction by The California Air Resources Board in 2007	Equipment used on construction sites in the Square Mile is very closely regulated, see section 5.2.3 of the Strategy.	No change made to the Strategy document.
		Public Health and Awareness Raising  Whilst Public Health endorses section 5, arguably, the whole Strategy pertains to public health and the department would welcome a naming update of section 5 to avoid minimisation of stakeholder perceptions to the key role and responsibilities of Public Health. This section is more appropriately named Health Promotion and Raising Awareness.	The title of chapter 6 has been amended as suggested	Strategy text amended.

No	From	Comment Received	Response	Action taken
66		<p>Recommendations:</p> <p>Consult with Public Health on all health promotion campaigns and promotional material to ensure key messages and Strategy are aligned with broader messaging and community Strategy. For example, “reducing your personal exposure to air pollution” messaging may inadvertently place the individual at the centre of the problem, insinuating individual responsibility for the problem, a message we would recommend we move away from.</p>	Noted and will consult on future campaigns and promotional material as suggested.	No change made to the Strategy document.
67		<p>Inclusion of key Public Health Outcomes Framework (PHOF) indicators in all air quality briefings. Including the key PHOF indicators in all air quality briefings is essential to clearly demonstrate the direct link between air quality and health outcomes. Poor air quality is a significant contributor to cardiovascular and respiratory diseases, increasing the mortality rate, especially in vulnerable populations. By incorporating PHOF indicators into reporting, we can provide robust, evidence-based justifications for stringent air quality standards. This approach not only highlights the immediate health benefits of reducing air pollution but also supports the adoption of the WHO AQG. PHOF Indicators may include:</p> <ul style="list-style-type: none"> <li>• Indicator 3.01: Fraction of mortality attributable to particulate air pollution</li> <li>• Indicator 3.07: Age-standardised rate of mortality attributable to particulate air pollution</li> <li>• Indicator 1.15: Statutory homelessness (prolonged exposure in people rough-sleeping)</li> <li>• Indicator 2.04: Under 75 mortality rate from cardiovascular diseases (including heart disease and stroke)</li> <li>• Indicator 2.24: Emergency hospital admissions for asthma (under 19 years)</li> </ul>	Noted. This will be addressed in future air quality briefings.	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
68		Ensure air quality is consistently included and measured in all rapid and full health impact assessments in line with the City Plan 2040	Air quality is included in the City Corporation Health Impact Assessment Guidance Note, 2021, under Healthy Environment and Design and Healthy Housing.	No change made to the Strategy document.
69		In partnership with Public Health, develop educational programmes for schools and communities to raise awareness about air pollution and encourage behaviour change in the next generation.	The following detail has been added to Action 26: 'In partnership with public health, deliver assemblies, bespoke workshops, set up stalls at summer fayres, making the topic accessible and where appropriate linked into the school curriculum'	Strategy text amended.
70		Monitor and publicise live air quality data at all healthcare and educational sites across the City of London	Monitoring takes place at schools and nurseries, though, apart from at the Aldgate School, the data is not live due to budget constraints.  Pollution alerts are sent to all schools and health care sites. Annual reports including monitoring data is given to all schools and nurseries.	No change made to the Strategy document.
71		In partnership with Public Health, develop comprehensive, year-round, behaviour change campaigns that encourage the public to adopt low-emission lifestyles, such as using public transport, cycling, and reducing energy consumption at home, all aimed at meeting WHO guidelines.	Additional detail has been added under Action 24 to confirm that we will collaborate with Public Health regarding behaviour change campaigns.	Strategy text amended.

No	From	Comment Received	Response	Action taken
72	Barbican Association	<p>The City had flurry of activity a few years ago, but not much seems to have happened by way of improvement recently. For example, there seems to be little action on stopping drivers idling their engines, little attempt to make consolidation and last mile delivery a reality – in that delivery lorries and vans still clog the City’s streets – and little attempt to stop the use of diesel generators.</p>	<p>The City Corporation takes a wide range of action to deal with unnecessary vehicle engine idling as detailed in section 5.1.1 of the Strategy</p> <p>The City Corporation has no authority to ban diesel generators. There is an action in the Strategy to work with building owners to investigate options for reducing emissions, and use an alternative means of providing emergency back-up power.</p> <p>The Transport Strategy seeks to reduce the number of freight vehicles within the Square Mile by 15% by 2030. The Air Quality Supplementary Planning Document is scheduled to be updated, emissions from both service and delivery vehicles and generators will be included in the document.</p>	No change made to Strategy document
73	7p page 268	<p>The Barbican Association, representing the residents of the Barbican Estate, as people who live in the City have a keen interest in improving air quality. And while the proposed Strategy includes good words, we think it is not ambitious enough.</p> <p>We think that it should adopt a tougher set of standards and a wider set of pollutants: greenhouse gases; those considered by the United Nations to cause adverse impacts to the natural environment; and particles and gases considered by the World Health Organisation (WHO) to be harmful to human health</p>	<p>Greenhouse gases are covered by the Climate Action work stream.</p> <p>The Strategy focuses on pollutants that are, or have been, at a level that is considered to be harmful to health. This reflects our statutory obligations.</p>	No change made to the Strategy document.
74		<p>The Strategy should also include indoor air quality indoor and ensure that it complies with the latest WHO guidelines for short and long term air quality including particulate matter (PM2.5 and PM10), nitrogen dioxide (NO2 ), carbon monoxide (CO), formaldehyde and volatile organic compounds (VOCs), and carbon dioxide (CO2 ) concentrations in indoor air.</p>	<p>There is no statutory obligation, and no authority, for local authorities to deal with indoor air quality. However, the Strategy recognises the potential impact on health and contains an action to raise awareness of the health impacts of poor indoor air quality.</p>	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
75		We also think that it is disappointing that the Strategy does not focus more on local actions and targets rather than national ones – though we accept that much of the air pollution in the City comes from outside.	The Strategy contains a number of actions that will be delivered locally as well as a range of collaborative action reflecting the fact that most of the pollution measured in the Square Mile comes from outside the boundary.	No change made to the Strategy document.
76		Nevertheless, a considerable amount of air pollution comes from van and lorry traffic in the City – and we would expect to see more action to enforce consolidation and reduced deliveries to office buildings. For example, Moor Lane sits alongside residential flats yet it sees a constant flow of deliveries to the new Deutsche Bank building at 21 Moorfields. Not only did the City allow the developer to change the original proposal to site deliveries in Fore Street Avenue, where they would not have impacted residents so much. But also there is no sign of consolidated deliveries and last mile delivery by small electric vehicles. There is nothing in this Strategy to reassure us that that will change.	The Supplementary Planning Document is scheduled to be updated, emissions from service and delivery sources will be included.	No change made to the Strategy document.
77		Another source of obvious and major air pollution is construction sites – yet we are told that commercial kitchens are the biggest source of air pollution for particulates in the City. That seems hard to credit to anyone who lives next to one of the City's many many large demolition and construction sites.	According to the London Atmospheric Emissions Inventory and City specific research, commercial cooking is the largest sources of PM <sub>2.5</sub> emitted in the Square Mile whereas construction is the largest source of PM <sub>10</sub>	No change made to the Strategy document.
78		We would propose some local actions that would have an effect:  No demolition work at weekends in residential areas	This has previously been considered and consulted upon, Members agreed to allow the hours of 9am to 2pm on Saturdays only.	No change made to the Strategy document.
79		A reduction in freight traffic on City streets by challenging and enforcing traffic management plans for office developments and enforcing consolidation – so as to result in far fewer journeys	The Supplementary Planning Document is scheduled to be updated, emissions from service and delivery sources will be included.	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
80		A bar on diesel generators when power can be supplied from the grid	The City Corporation has no authority to ban diesel generators. There is an action in the Strategy to work with building owners to investigate options for reducing emissions, and use an alternative means of providing emergency back-up power. Diesel fuelled generators in new developments are discouraged where possible.	No change made to the Strategy document.
81		All measures to reduce the urban heat island effect – because that would in turn reduce air pollution. Most urban realm plans in the City are completely unambitious in terms of greening and the planting of mature trees. Witness the paucity of trees in the Bank junction remodelling and in the proposed public realm for King Edward Street.	This is covered by the Climate Action workstream	No change made to the Strategy document.
82		Such measures should also include retrofitting rather than wholesale demolition	This is addressed in the Planning for Sustainability Supplementary Planning Document and the Carbon Options Planning Advice Note 2023.	No change made to the Strategy document.
83		Finally, improved monitoring is necessary – for a wider variety of pollutants (most of the City’s monitors are for NO2) – and more prominent publication of the data. This should also focus on sensitive receptors such as residences, hospitals, schools.	Data is available on <a href="https://airqualityengland.co.uk">Air quality in England (airqualityengland.co.uk)</a> and in annual reports on the Corporation web site. Schools and nurseries receive tailored reports with data.  Monitoring takes place at Barts Hospital, schools and nurseries and main residential areas. Air quality monitoring in the Square Mile is reviewed annually.	No change made to the Strategy document.
84	Clean Air in London	CAL wishes to thank you and your predecessors on the Committee and officers in the City of London Corporation (the “City”) for engaging so positively with CAL on air quality policy matters over 15 years. The City’s leadership on action to improve air quality has been exemplary for over 70 years	Noted	No change made to the Strategy document.
85		There is much misunderstanding, even among international policy makers, of words such as ‘net zero’, ‘carbon neutral’, ‘air quality neutral’ and ‘air quality positive’. Instead, please focus on achieving ‘zero air emissions’ throughout the City in your AQS.	The Air Quality Strategy addresses emissions of air pollutants and the Climate Action Strategy addresses the emissions of carbon.	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
86		<p>The European Union is likely to set new limit values for nitrogen dioxide (NO<sub>2</sub>) and fine particulate matter (PM<sub>2.5</sub>) of 20 µg/m<sup>3</sup> and 10 µg/m<sup>3</sup> respectively to be achieved by 1 January 2030 with no unconditional time extensions and a pathway to achieving the new WHO air quality guidelines.</p> <p>The AQS should align fully with any such EU environmental rules as a minimum. The UK's national air quality targets are hopelessly out of date and the previous government's Environment Act 2021 air quality targets for PM<sub>2.5</sub> of 10 µg/m<sup>3</sup> by 2040 are risible. Please also align fully to the recent G7 commitments on air quality in paragraph 14 on page 24 of their communique<sup>2</sup></p>	<p>The Strategy sets a pathway for ongoing improvements and working towards the WHO 2021 Air Quality Guidelines. These are tighter than the current UK national standards. If the aims are achieved before 2030 work to improve air quality will not cease.</p> <p>Any new targets set at a European level will be reviewed once published, and due regard taken of the recent G7 commitments to air quality.</p>	No change made to the Strategy document.
87	Page 271	<p>Much has changed since the City proposed its Emissions Reduction (Local Authorities in London) Bill. CAL encourages you to make clear in your AQS that things have moved well beyond the ambitions set out in that Bill and that you need specific powers now to achieve zero and ultra-low emissions from all combustion plant throughout the City by 1 January 2030 including boilers, commercial cooking, generators, non-road mobile machinery ("NRMM") and combined heat and power plant ("CHP").</p> <p>Please share with the new Government and CAL by 31 October 2024 the precise legislative and regulatory details of the changes you need to achieve this outcome</p>	Noted and to be considered as part of the workstream for the proposals set out in the Bill.	No change made to Strategy document
88		All regulated pollutants are important. Please therefore extend your AQS to include all key pollutants and commit to publish annual status reports on PM <sub>2.5</sub> . Ozone is especially important	PM <sub>2.5</sub> and ozone data are both reported in our annual status reports and available on the Air quality England web site.	No change made to the Strategy document.
89		Please expand and join up the air quality monitoring and alerts network including increased monitoring of black carbon and ultra fine particulate matter (PM <sub>0.1</sub> ).	Consideration will be given to measuring black carbon and ultra fine particulates as part of the annual review of monitoring. This will be subject to funding.	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
90		The WHO 2021 air quality guidelines apply outside and indoors except in occupational settings (where other regulations apply). Please therefore set out clear delivery plans for tackling indoor air quality within the City including within the surface level of major transport hubs. CAL set out the position in 20233. The subsequently published British Standard BS 40102-1:20234 should be taken as the benchmark for air quality in all developments and planning permissions.	The draft City Plan 2040 contains the following policy: <i>Developments that include uses that are more vulnerable to air pollution, such as schools, nurseries, medical facilities and residential development, will be refused if the occupants would be exposed to poor air quality. Developments will need to ensure acceptable air quality through appropriate design, layout, landscaping and technological solutions</i>  Monitoring on the London Underground is undertaken by TfL.	No change made to the Strategy document.
91		CAL recommends that the City's Policy and Resources Committee have an explicit oversight role in ensuring that air quality delivery plans are reviewed and consulted upon when national limits are exceeded. This would be consistent with calls from the Office for Environmental Protection.	The governance pathway has been agreed to be the Port Health and Environmental Services Committee.	No change made to the Strategy document.
Page 272		The quickest, simplest, cheapest and most effective way to achieve zero air emissions throughout the City by 2040 or earlier is to require every development and significant refurbishment to be 2040-ready before it is occupied. Otherwise, you will be permitting combustion plant that is likely to have an economic life beyond 2040 or make it necessary to strip out a whole building at a later date to install equipment that could easily have been installed now while other work is underway. The Mayor of London's aim of 'net zero' by 2030 makes this the more likely date than 2040. We need all-electric buildings now which will require major investment in local infrastructure	Most large developments have air source heat pumps, and the only on-site combustion is back up diesel generators. Developers are required to assess alternatives to diesel.  This will be reflected in the revised Air Quality Supplementary Planning Document	No change made to the Strategy document.



No	From	Comment Received	Response	Action taken
93		In planning decisions, please ensure that compliance with legal limits and guidelines is measured to at least one decimal point (e.g. 40.1) and that exceedances are judged absolutely or by City officers not 'dismissed' as 'negligible' or 'insignificant' by third parties acting for developers. For example, strict 'limit values' apply almost everywhere. Cumulative air quality impacts, taking full account of all permitted development, must be taken into account in every planning decision.	<p>The focus of planning policy is to minimise on site combustion for managing both air pollution and emissions of carbon</p> <p>The draft City Plan 2040 includes the following policies:</p> <p><i>Developers will be expected to install non-combustion energy technology where available</i></p> <p><i>Development that would result in a worsening of the City's nitrogen dioxide or PM10 and PM2.5 pollution levels will be strongly resisted</i></p>	No change made to the Strategy document.
94	Page 273	It is vital that emissions from outside the City are reduced sharply to protect public health and achieve climate targets. Ammonia and methane emissions from agriculture are a serious problem. Please therefore encourage the adoption of culturally sensitive plant-based menus by default by all public institutions in the City by 2030. New York hospitals have shown what can be done	<p>We collaborate with a high number of external stakeholders and our Air Quality Partners to ensure that emission reductions are experienced on a regional and national scale.</p> <p>Emission controls are in place nationally for methane, and national action for controlling ammonia is set out in the national Clean Air Strategy 2019.</p> <p>Our Climate Action Strategy has a target to achieve net zero throughout the value chain by 2040 and has established a Purchased Goods and Services project to deliver this. This project collaborates with suppliers to reduce emissions and deliver low carbon products and services, including our food suppliers and subsequent supply-chains.</p>	No change made to the Strategy document.
95		CAL urges the City to require zero air emissions from all river traffic and the use of onshore electric power for ships in all of its ports by 2030.	This is not within the control of the City Corporation. However, we will include it with our ongoing discussions with the Port of London Authority	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
96		Last but not least, CAL urges the City to put greatest emphasis in its AQS on achieving zero air emissions within the City by 2030 together with clarity for the Mayor and the new Government on what powers its needs to achieve that. Other lobbying and similar initiatives may be of little value.	The Climate Action Strategy commits the CoL to achieve net zero by 2027 across the City Corporation's operations.	No change made to the Strategy document.
97	An individual	It is wrong to charge parked vehicles scaled charges as while they are parked they do not emit any pollutants. This is effectively an unfair and discriminatory tax on the poorer people in Society that can't afford to upgrade their car and that have already paid £27.50 per day in other taxes: Congestion Charge and ULEZ.	The City discourages all private motor vehicle traffic but particularly wants to discourage the more polluting vehicles from driving in the Square Mile. Emissions-based on and off-street parking tariffs are one method we use to do that.  The City's emissions based charging is separate from Transport for London's ULEZ and Congestion Charge schemes.	No change made to the Strategy document.

98	UK Health Security Agency	<p>UKHSA's position is that some pollutants, such as nitrogen dioxide and particulate matter (PM), are non-threshold – i.e. there is no known level of exposure below which health impacts don't occur. This means that any improvement in air quality, even below Air Quality Objective Levels and Standards, is associated with benefits to people's health. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as by increasing active travel and physical exercise or improving access to and quality of greenspaces). As outlined in our 2019 <a href="#">review of interventions to improve outdoor air quality and health</a>, we recommend that evaluation is embedded in the design of interventions from their outset and to systematically gather evidence of their impact and effectiveness. We suggest that it is beneficial to seek the implementation of the evaluation methods at the planning stage.</p> <p>It is important that local authorities keep working to reduce levels of air pollution not only in Air Quality Management Areas (AQMAS) but across the wider local authority area. The evidence around the role of fine and ultrafine fractions in the health effects of air pollution is growing. As identified within the Draft Air Quality Strategy, in 2021 the World Health Organization reduced their guideline level for fine PM (PM<sub>2.5</sub>) from 10 µg/m<sup>3</sup> to 5 µg/m<sup>3</sup>. In January 2022, the Committee on the Medical Effects of Air Pollutants (COMEAP), an expert committee of the Department of Health and Social Care, published updated <a href="#">guidance</a> on the health evidence relevant to setting PM<sub>2.5</sub> targets. This was intended to inform the Department for Environment, Food and Rural Affairs (Defra's) development of air quality targets under the Environment Act 2021. The advice included that reducing concentrations below the WHO guideline value of 5 µg/m<sup>3</sup> would benefit public health.</p> <p>UKHSA supports measures to reduce sources of air pollution and people's exposure, such as those outlined in the revised AQS, as well as measures targeting defined areas where elevated levels of pollution have been observed, such as on areas of the A3211 with modelled</p>	Noted	No change made to the Strategy document.
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No	From	Comment Received	Response	Action taken
		annual nitrogen dioxide (NO <sub>2</sub> ) exceeding the standard of 40 µg/m <sup>3</sup> in 2022. The actions proposed to reduce emissions by reducing vehicular use may additionally benefit public health through physical activity and increased levels of pedestrian street activity and social interaction. There are also indirect health co-benefits from reduced congestion, noise, and improved road safety, which are mentioned within the aims of the Strategy.		
99		Chapter 1, section 1 – there is no reference to Table 1.1 in the main body of text. We also suggest that the AQS includes detailing the objectives for NO <sub>2</sub> , PM <sub>2.5</sub> , and PM <sub>10</sub> that are to be achieved, alongside ambitions that have been chosen by the City Corporation.	Text has been added to reference Table 1.1.  The objectives are included in this table.	Strategy text amended.
100	Page 276	Air pollution particularly affects the most vulnerable in society and often has a strong correlation with equalities issues because less affluent areas are often those with poorest air quality. There is potential for the Climate Action Strategy, as detailed in Chapter 3, to disproportionately affect some groups of people. Without support, action on air quality may have the perverse impact of increasing inequalities, and we would encourage that sensitivity analysis procedures be used to explore and quantify the impact.	An Equalities Impact Assessment has been completed for the Air Quality Strategy.	No change made to the Strategy document.
101		Chapter 5, section 5.1.2 reports that there are efforts to, “promote the use of cargo and e-cargo bikes by providing accommodating cycle lanes and associated infrastructure”. We advise that with any implementation of electric vehicle promotion, or electric vehicle charging points, the potentially hazardous nature of lithium ion battery fires is considered, and where necessary the fire brigade are informed with strategies in place to respond to potential lithium ion battery fires.	To be noted when any promotion is to take place, ensure any health and safety implications are clearly explained.	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
102		Chapter 5, section 5.2.2 states that, "Construction has been identified by the LAEI as the highest source of PM <sub>10</sub> emitted in the Square Mile". We recommend the AQS include more detail on how the City Corporation aims to bring forward measures to tackle emissions caused by construction and demolition including time frames of implementations, and whether existing construction works will require changes to their mode of operations to reduce air pollution emissions.	A revised Code of Practice will be published in the next 12 months. These comments will be taken into account in the update.	No change made to the Strategy document.
103		Chapter 5, Section 5.2.5 notes that, "Commercial cooking is the largest source of PM <sub>2.5</sub> emissions at 37%. Work is underway to consider how emissions from this sector can be reduced". We would recommend that further details are included on what work is being conducted to reduce emissions from this sector as this is not currently detailed.	The Strategy details the work that will be undertaken.	No change made to the Strategy document.
104		The revised AQS provides detailed information about current exposure to air pollution in The City of London. In summary, interventions that are aimed at reducing air pollution can contribute to increased life expectancy and also help reduce premature deaths from cardiovascular and respiratory disease. We encourage a focus on improving air quality as a whole including interventions that reduce emissions, whilst also embracing measures that can be adopted at an individual level such as promoting active travel and awareness of the effects of air pollution on health. We also encourage evaluation strategies to be put in place where possible to monitor the effectiveness and share wider learning. UKHSA recognises and agrees with the evidence-based information provided by the City Corporation on the chronic and acute health impacts of air pollution, particularly on the most vulnerable human receptors.	Noted. The actions in the Strategy reflect these comments  We measure the impact of interventions through the extensive air quality monitoring network. This information is shared with London boroughs	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
105		<p><b>Editorial notes</b></p> <ul style="list-style-type: none"> <li>Chapter 4, Table 4.1 -there is no visible white bottom border between 'The Environment Agency' and 'The Port of London Authority'.</li> <li>Chapter 2, section 2.4 – please write out the abbreviation 'LAEI' in full when using it for the first time.</li> <li>The revised AQS may benefit from providing a glossary for the acronyms mentioned throughout. Notably, the terminology “Commercial Heat and Power” is used within section 5.2.4 and abbreviated to CHP; which may be confused with the commonly used abbreviation 'CHP' for 'Combined Heat and Power'.</li> </ul>	<p>A technical glossary is already included and has been expanded following consultation.</p> <p>A thorough review of the Strategy has been completed to ensure consistency regarding terminology.</p>	<p>Strategy text amended.</p>

106	Barbican & Golden Lane Neighbourhood Forum	<p>Air quality in the City of London has improved through the efforts of the Corporation and the Mayor of London. Despite this, and especially for residents who breathe it all day, every day, the City’s air is still not clean. Nor is it healthy.</p> <p>Because the City has, traditionally, taken a lead in this area we would like to see an ambitious set of commitments in the coming five years of this new Strategy and the Action Plan. We urge the City to;</p> <ol style="list-style-type: none"> <li>1. Adopt targets that reflect the WHO guidance on what is “healthy air”</li> <li>2. Do more than simply “support regional and national efforts” to bring air pollution down</li> <li>3. Immediately – stop demolition and polluting construction at weekends, reduce freight traffic, reduce the current number of diesel generators</li> <li>4. Over the longer term – reduce urban heat island, improve greening at street level (especially trees), ensure that retrofit rather than wholesale demolition is the norm</li> <li>5. Improve monitoring – focussing on sensitive receptors (residents, hospitals, schools) as well as roadside locations</li> <li>6. Publish all background and budget information and progress.</li> </ol>	<p>The Strategy recognises the WHO guidance on what is healthy air, which goes beyond national standards. The Strategy’s aims are to work towards, the WHO guideline levels.</p> <p>The actions in the Strategy detail that we are taking a range of specific local action to reduce levels of air pollution, in addition to supporting wider national efforts.</p> <p>This has previously been considered and consulted upon, Members agreed to working hours 9am to 2pm on Saturdays only</p> <p>This is covered City Corporation Whole Lifecycle Carbon Options Planning Advice Note 2023 and the Planning for Sustainability SPD 2023.</p> <p>Monitoring takes place close to all schools, Barts Hospital and main residential areas</p> <p>The overall departmental budgets have been reported to PHES quarterly although these do not show specific AQ spend. The budget for 24/25 is £373k. External funding opportunities will be explored to support the delivery of the Strategy.</p> <p>Annual progress reports are available on the City Corporation web site.</p>	No change made to the Strategy document.
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No	From	Comment Received	Response	Action taken
			The London Atmospheric Emissions Inventory, which contains data on all emission sources, is available on the GLA web site	
107		The WHO Air quality guidelines recommend levels and interim targets for common air pollutants: PM, O3, NO2, and SO2. The targets set within the draft City Air Quality Strategy falls well below the level deemed “healthy” by the WHO, refers to fewer pollutants and do not go far enough to meet the City’s stated “Vision” of a “Square Mile has air that is healthy to breathe”. Small particulates (PM2.5 and below) are especially harmful to health and the City’s target is twice the WHO guideline, for example (see below).	<p>The aims of the Strategy are to have air quality that is better than national standards.</p> <p>SO<sub>2</sub> was monitored at Senator House, Queen Victoria Street from 2001 to 2013. During this time there were no exceedances of the three SO<sub>2</sub> national objectives, or of the 2021 WHO Air Quality Guideline.</p>	



No	From	Comment Received	Response	Action taken
108		<p>In the UK it has been estimated that the mortality burden of long-term exposure to particulate matter (PM 2.5) in 2008 was equivalent to nearly 29,000 premature deaths in those aged 30 or older. "It is likely that removing exposure to all PM 2.5 would have a bigger impact on life expectancy in England and Wales than eliminating passive smoking or road traffic accidents"<sup>5</sup> according to the Institute of Air Quality Management.</p> <p>The City's AQS is not ambitious enough on small particulates and does not cover all the pollutants in the WHO 2021 guidance. It also ignores pollutants such as carbon monoxide (CO), formaldehyde and volatile organic compounds (VOCs) which may be found indoors.</p> <p>In order to make a meaningful difference to air quality the targets also need to reflect the degree of Population Exposure so that measures are focussed on improving air quality where people are. This includes recognising that local City residents cannot escape the local air pollution at the end of a working day.</p> <p>More ambitious and more relevant targets (and monitoring) are needed to make the AQS a credible policy.</p> <p>As Public Health England says "Poor air quality is the largest environmental risk to public health in the UK, as long-term exposure to air pollution can cause chronic conditions such as cardiovascular and respiratory diseases as well as lung cancer, leading to reduced life expectancy"<sup>6</sup></p>	<p>There is no statutory obligation, and no authority, for local authorities to deal with indoor air quality. However, the Strategy recognises the health impacts and contains an action to raise awareness of the health impacts of poor indoor air quality.</p> <p>Annual reports are produced detailing progress with actions and air quality data that demonstrates improvements in air quality due to the implementation of policy.</p> <p>Carbon monoxide at roadside was monitored in the Square Mile at roadside a few years ago. Concentrations were very low and consistently met national standards.</p> <p>The focus of the Air Quality Strategy is to improve air quality across the whole of the Square Mile.</p>	<p>No change made to the Strategy document.</p>

Creating healthy air has to involve collaboration at regional and national level. However, the City's strategic goal should also include direct local action. It should also seek to target the sources of pollution from existing buildings and not just when new development is proposed.

The City's AQS says "We will manage emissions of pollutants from construction sites; ensure new developments are low emission; tackle unnecessary vehicle engine idling and reward the best practice of our partners" and yet there is little evidence of firm, effective policy action to back up this claim. The Forum agrees with the City's intention, and we would like to see the following action in support of it.

Immediate action – stop demolition and polluting construction at weekends, reduce freight traffic, stop diesel generators

- i) Demolition and construction account for high levels of air-borne pollutants, including the direct release of small particulates (PM10, PM2.5 and PM1). Other London Boroughs ban dust-generating demolition work at weekends – the City of London should do the same;
- ii) All demolition sites should be required to monitor for construction dust (according to the City's annual AQ monitoring report, 2023, only 8 planning applications were required to);
- iii) The City's aim to "consider how we can help to manage pollutants associated with diesel standby generator plant" is far too tentative. There are around 200 generators operating in the City, with around 600 further residual generators, and 76 filming events a year probably also using temporary generators<sup>7</sup>.

This has previously been considered and consulted upon. Members agreed to the working hours of 9am to 2pm on Saturdays only.

The Code of Practice states: Continuous air quality monitoring will normally be required on large sites adjacent to sensitive premises such as residential properties, schools and St Bartholomew's hospital. This may include dust slides for assessing nuisance dust and real time monitoring to assess PM2.5 and PM10.

We have no powers to regulate the use of diesel generators in existing buildings so need to work with Facilities Managers to minimise emissions where possible.

No	From	Comment Received	Response	Action taken
		<p>The City's Strategy needs to include action to reduce the reliance on diesel-powered generators in <i>existing</i> buildings and to ban the use of temporary diesel-powered generators for filming;</p> <p>iv) Require Air Quality Impact Assessments in all major planning applications and any schemes generating more than 25 additional servicing vehicles a day (according to the City's annual AQ monitoring report, 2023, only 19 planning applications had an air quality impact assessment which was reviewed for air quality impacts)</p>	<p>We have started looking into generators used in filming and have been gathering information on diesel generator use. We have been investigating options to encourage cleaner forms of energy and will be continuing this work over the next year.</p> <p>We review all relevant planning applications for air quality impacts and make recommendations for mitigation. Not all applications will have a formal air quality impact assessment, they may instead have an Air Quality Neutral Assessment or Air Quality Positive Assessment. Details can be found in the Air Quality Supplementary Planning Document which is due to be updated in 2025.</p>	
170 Page 283		<p>As the National Centre for Earth Observation says "In cities, urban heat islands occur where the land surface is densely covered with roads, pavement, buildings, and other surfaces that absorb and retain heat. This effect increases energy costs, air pollution levels, and heat-related illnesses and fatalities." It is a significant environmental problem in the City of London.</p> <p>The Air Quality SPD must be updated to bring in an Air Quality Positive approach to all development, including measures to reduce the damaging Urban Heat Island Effect, full retrofit-first to avoid damaging demolition wherever possible, much greater emphasis on providing ground-level greening and street trees, and an Air Quality Impact Assessment for all major and medium-sized schemes</p> <p>Since the City planners had previously announced an intention not to produce any new SPDs, the Forum would like confirmation that both the Air Quality SPD and the City's Code of Deconstruction and Construction will be updated within 12 months to implement much-needed air quality improvements.</p>	<p>A revised Code of Practice will be published in the next 12 months and these comments considered.</p> <p>Work has commenced on a review of the Air Quality Supplementary Planning Document.</p>	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
111		<p>The City needs a monitoring and analysis system that collects the right data, in the right locations. There are currently very few monitors of anything other than NO2, and most of these are roadside.</p> <p>The City has a very high workday population, a static residential population, a hospital, several schools and millions of visitors annually. The concentrated release of pollutants in the City of London, therefore, has widespread impact. The density of demolition and construction work, for example, and the intensity of polluting delivery vehicles and through traffic, are squeezed into a small area geographically, and affect a very high number of people.</p> <p>A review of monitoring stations and data is needed, followed by an expansion of monitoring stations to collect more information on PM2.5 (and smaller) and other pollutants, given the weight of evidence that these are the really serious ones.</p> <p>Ignoring data on demolition needs to stop. It is a major source of very damaging air pollution, and requires proper monitoring.</p>	<p>Nitrogen dioxide is measured at the greatest number of locations as it varies spatially much more than PM10, PM2.5 and ozone.</p> <p>Monitoring locations are reviewed annually, the next review is due in November 2024.</p>	<p>No change made to the Strategy document.</p>
112		<p>The City analysis of “activities that emit relatively high levels of very fine particles (PM2.5)” done by Ricardo uses a model that does not include demolition data. Its conclusion about “commercial cooking” is based on a desktop model which applies a nested set of assumptions to a single twenty-five year-old study of short order cooking in the USA. No wonder the report’s author describes the result as “surprising”.</p> <p>Such modelling is not a robust basis for policy-making. Accurate data needs to be collected from sensitive receptor sites such as residential areas, schools and hospitals, where the most vulnerable people breathing the air are, and from demolition and construction sites.</p>	<p>A computer model is just one tool that we use for decision making. We have also made two unsuccessful bids for funding to measure PM2.5 associated with commercial cooking as there is a lack of good data available. We will continue to seek opportunities for funding to conduct research into this area.</p>	<p>No change made to the Strategy document.</p>

No	From	Comment Received	Response	Action taken
113		Finally, admirable progress has been made by the City in making timely NO2 data available by a variety of means. We would like to see such transparency extended to the modelling used by the City and the financial data that informs policy implementation. As we understand it no planning applications had S106 agreements which included requirements to improve air quality, nor were there any planning applications requiring CIL payments that include a contribution to improve air quality in 2023.	The overall departmental budgets have been reported to Port Health and Environmental Services Committee quarterly The Air Quality budget for 24/25 is £373k. External funding opportunities will be explored to deliver aspects of the new Strategy.	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
114		<p>In 2016, the Mayor of London awarded the City of London Corporation £990,000 over three years to implement a Low Emission Neighbourhood (LEN). This was to be matched by the City, creating a budget of £1.98m. The intention was to focus on three areas: Barbican, Guildhall and St Barts to make “improvements to Beech Street and the cultural hub, support the Barbican Estate’s plans for freight consolidation and electric charge points and build on previous air quality engagement projects with Barts Health NHS Trust, Barbican residents and local businesses.”<sup>9</sup></p> <p>At the time the annual average nitrogen dioxide concentration in Beech Street was 85 g/m<sup>3</sup> (down slightly from 2015 when it was 89 g/m<sup>3</sup>) . In 2017 it was 85g/m<sup>3</sup>. In 2017 the annual average nitrogen dioxide concentration in Fore Street was 41g/m<sup>3</sup> and in Silk Street, 42 g/m<sup>3</sup>.</p> <p>By 2018 the City was running out of time to implement the traffic reduction element of the Low Emissions Neighbourhood (funding having been granted on a “transformational” scheme), either in Beech Street or Moor Lane, which was proposed by officers as an alternative.</p> <p>In 2020, without consultation, the City implemented a zero-emission traffic scheme for the short, tunnelled section of Beech Street, at a cost of £2.4m sourced from CIL/OSPR10. The legality of this was challenged in the High Court and in July 2023 the City closed the project</p> <p>Earlier in 2024, the City started work on a “Healthy Neighbourhood” scheme which would, on the face of it, be an area-based approached as was promised in 2016. Subject to Committee approval a consultation on this is due in the autumn of 2024, meaning that it is unlikely that work will start before 2025, nine years on from the original plan.</p> <p>Improving the air quality in the Barbican and Golden Lane neighbourhood Area, in which the majority of the City’s residents live, is a priority and needs to be planned properly and implemented without further delay.</p>	<p>Delivery of the Strategy will improve air quality everywhere in the Square Mile and the aim is to go beyond national health-based standards.</p>	<p>No change made to the Strategy document.</p>

No	From	Comment Received	Response	Action taken
115	Resident (Air Quality Champion)	A full glossary of the terms etc used would be helpful.	The glossary has been expanded to include extra items.  A thorough review of the Strategy from draft to final has been completed to ensure consistency with terminology.	Strategy text amended.
116		City Corporation's 2019 decision to introduce a 15mph speed limit throughout the Square Mile, subject to approval by the Department for Transport, should be resurrected.	The 2019 proposal was rejected by the Department for Transport due to challenges relating to enforcement and the accuracy of speedometers at lower speeds.  In terms of vehicle emissions, a reduction of speed from 20mph to 15mph does not guarantee a reduction of tailpipe emissions (NOx, PM10, PM2.5).	No change made to the Strategy document.
117	Page 287	The recent decision to allow black cabs – Hackney Carriages but not private hire EVs - to use the Bank junction, whether or not rejected by TfL, should be reversed. Although over fifty percent of the black cabs may be zero tailpipe emission enabled, there doesn't appear to be any evidence as to how often that ability is used in the Square Mile. The loss of the Beech Street Zero Emission Scheme isn't even mentioned despite its success in reducing emissions there. Unfortunately, any replacement scheme will almost certainly mean an increase in pollution on the roads forming its boundaries.	Members voted to allow taxis unrestricted access through the Bank junction for a trial period. Dependant on TfL approval this trial is set to start in Spring 2025 and run for a maximum period of 18 months.  NO <sub>2</sub> monitoring will continue at the junction regardless of the decision made by TfL. Any additional monitoring will be assessed following the TfL decision.	No change made to the Strategy document.
118		Although air quality control comes under the oversight of Port Health & Environmental Services, (PHES), its implementation is the responsibility of a Division of the Environment Department. As a result, the air quality team officers appear to be principally engaged in enforcement rather than determining policy, particularly in relation to development. For instance, the need to constantly enforce the Deconstruction and Construction Code of Conduct is the result of planning policy supporting development rather than the environment.	Enforcement is only part of the function of the Air Quality Team. The team also develops policy e.g. the Air Quality Strategy and the Air Quality SPD.	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
119		Whatever the Port of London Authority's policies, the need to reduce air pollution from craft using the Thames doesn't appear to be a concern of the Strategy. The Uber Boat by Thames Clippers' fleet has three hybrid powered boats but the other 18 are solely diesel powered. The 22 boats operated by the Marine Policing Unit all appear to be powered by fossil fuels and, of course the tugboats used to pull the barges serving Walbrook Wharf are similarly powered. What proposals are there to eliminate the use of boats powered by fossil fuels on the Thames controlled by the PLA and that includes cruise ships?	Emissions from Walbrook Wharf tug boats and viable alternatives are to be investigated under Action 10.  These points will be considered as part of our ongoing collaboration with the Port of London Authority.	No change made to the Strategy document.
120		My revisions include the use of abbreviations throughout after the relevant word/phrase/tile etc has been abbreviated.	A thorough review of the Strategy has been completed to ensure consistency with terminology.	Strategy text amended.
121	Page 288	Woodburning shouldn't be a problem within the Square Mile, unless there are bar-bques or from boats moored on the Thames. However, that will not be the case in the 11,000,000 acres of land outside the City and, may be, not on the other HRA estates. What measures are City Corporation implementing to eradicate this source of pollution?	The Strategy covers air pollution in the Square Mile, which is our statutory responsibility.  A workstream for the Climate Action Strategy is looking into decarbonising our operational properties and housing states. This work will have a positive impact on air quality.  Where open space works are completed through Habitat Grant funding, any burning is strictly prohibited. For tree works, where possible all arisings are left on site as standing/fallen deadwood or woodchip rather than being burnt.	No change made to the Strategy document.
122		"Nitrogen dioxide" – The chemical formula is NO <sub>2</sub> , and this is shown in parenthesis as an abbreviation but "nitrogen dioxide" is used almost entirely throughout. The abbreviation/formula should replace "nitrogen dioxide". This is also the case with both Nitric Oxide (NO) and Nitrogen Oxides (NO <sub>x</sub> ). Although "particulate matter" is abbreviated to "PM <sub>10</sub> " and "PM <sub>2,5</sub> " and these abbreviations are used virtually throughout, "particulate(s)" and "particulate matter" are also used.	A thorough review of the Strategy has been completed to ensure consistency with terminology.	Strategy text amended.



No	From	Comment Received	Response	Action taken
123		<p>The Strategy appears to be out of date in several respects. Obviously, the loss of the Emissions Reductions (Local Authorities in London) Bill came too late for mention, but the lack of movement through Parliament, since December 2021, is ignored. Again, the proposed part reversal of the very effective “All Change at Bank” scheme came too late to be acknowledged. Additionally, City Corporation approved the Local Area Energy Plan in October 2023.</p>	<p>Parliament was dissolved on 30<sup>th</sup> May 2024, so the Bill fell. The text has been updated to reflect this in section 3.6, the action remains the same.</p> <p>Members voted to allow taxis unrestricted access through the Bank junction for a trial period. Dependant on TfL approval this trial is set to start in Spring 2025 and run for a maximum period of 18 months.</p> <p>Confirmation has been added that the LAEP has been adopted.</p>	Strategy text amended.
124	Page 289	<p>In “Foreword”, “the”, “the draft” and “this” are all used before “Strategy”. The self serving use of “ambitious” in respect of City Corporation’s policies does nothing to improve the outcomes of the same.</p> <p>The claim that “the majority of the pollution comes from beyond our boundary” requires evidencing.</p> <p>Turning attention to “relatively high” PM2.5, although obviously welcome, seems to be rather late in the day. Again, very welcome but where health is being affected, is there any excuse for not trying to eliminate the problem? Going beyond “statutory obligation” in such circumstances should be a given.</p>	The Foreword has been updated to reflect that it is a final version	Strategy text amended.
125		The Strategy is 2025-2030 but “Delivering Healthy Air in the City of London” – shows it as 2025-30. This page has the first mentions of the World Health Organisation (WHO), the Greater London Authority (GLA) and Transport for London (TfL).	A thorough review of the Strategy has been completed to ensure consistency with terminology.	Strategy text amended where required.
126		The “Technical Glossary” on page 4 has “μ” unnecessarily in bold; mis-spells both “Micrometre” and “metre”; and uses both “Microgram” and “Microgrammes”, as well as “gram”. Also, the “s” on “Kilowatt” is contradictory.	A thorough review of the Strategy has been completed to ensure any spelling mistakes have been corrected.	Strategy text amended where required.

No	From	Comment Received	Response	Action taken
127		Under 1, "Introduction", "people" is unnecessary. Again, "micrometers" but should be "µm" anyway and "the pollutant" is also unnecessary. The aims of the Strategy, "Reducing emissions" is only "4" of the five areas of delivery and should be "1".	A thorough review of the Strategy has been completed to ensure any spelling mistakes have been corrected.  The five areas of delivery are not listed in terms of hierarchical importance.	Strategy text amended where required.
128		Under 1.1, "Source of Air Pollution in the Square Mile", GLA and TfL should be abbreviated as per 2.4. The abbreviation of both Nitrogen Oxide and Nitric Oxide isn't repeated. There appears to be no evidence to confirm the sources of pollution either in the text or the graphics.	A thorough review of the Strategy has been completed to ensure consistency with terminology.  The references are provided in the footnotes of the page.	Strategy text amended where required.
129		Under 1.2, "Health Impacts of Air Pollution", as air pollution has an effect on health, what is the relevance of "elevated concentrations"? "London" is superfluous in the description of the "Coroner". If there is "no clear evidence of a safe level of exposure", isn't City Corporation being complacent in not accelerating pollution reduction?	Comments noted.  The aims of the Strategy are to improve air quality beyond current national standards.	No change made to the Strategy document.
130		Under 2, "Air Quality", there is a reference to ozone monitoring. However, according to the information in Appendix 4, ozone is only monitored at the Guildhall, not even at The Aldgate School. If the data in the Strategy is provisional, why is it being consulted on now?	Ozone is only monitored at one location, Guildhall. Ozone is a regional pollutant, and concentrations will not vary measurably across the Square Mile.  Ratified (final) monitoring data for 2023 is now available and included in the Strategy.	Final data for 2023 added to the Strategy document.
131		Under 2.5, "Air Quality Monitoring on the Wider City Corporation Estate", the stated intention is to monitor ozone at a minimum of five sites, why is this not presently the case?	The stated intention is not to monitor ozone at five locations. This is not necessary as ozone is a regional pollutant and concentrations will not vary measurably across the Square Mile.	No change made to the Strategy document.
132		Under 3, "Leading by Example", why is it only "large contracts" that include a "no vehicle engine idling policy"? "Unnecessary" engine idling is illegal. The Corporate Plan commitment would be welcome were it translated into practice.	Removed the word large.  For any contract, both for the Square Mile and other City Corporation sites, engines must be switched off when vehicles are stationary for longer than one minute.	Strategy text amended.

No	From	Comment Received	Response	Action taken
133		Under 3.3, "Climate Action Strategy", as the CAS came into effect in March 2021, the 66% reduction between 2018 and 2021 preceded the CAS. If 100% of electricity purchased by City Corporation since 2018 has been from renewable sources, what was the point of the 15-year PPA, even if over 50% of City Corporation's electricity "comes" from that source? There is a reference to the Emissions Reduction (Local Authorities) Bill in the commitment box but that will need to be removed.	<p>The PPA was procured to reduce carbon emissions and also costs to the City Corporation It supports the national transition to renewable energy and securing long-term energy supply.</p> <p>The date in section 3.3 has been changed from 2021/2022 to 2022/2023 as per Taking Climate Action: Our Progress 2023.</p> <p>Parliament was dissolved on 30<sup>th</sup> May 2024, so the Bill fell. The text has been updated to reflect this in section 3.6, the action remains the same.</p>	Strategy text amended.
134		Under 5.1, "Transport Emissions", "unnecessary" isn't defined. From experience, this would include black cabs at ranks, refrigerated vans, security vans and emergency vehicles but there is some doubt as to whether, in the case of the latter, idling engines are necessary when parked.	Comments noted.	No change made to the Strategy document.
135		Under 5.2.1, "New developments" the statement that "planning policy" is "an important mechanism for improving air quality" requires justification, at least. The Air Quality SPD is now over seven years old and requires updating. The CoP's title is the "Code of Practice for Deconstruction and Construction Sites". The current, Ninth Edition, dates from 2019.	<p>Air quality is a material consideration in planning and there is policy in place to reduce any impacts from development.</p> <p>Work is underway to update the Supplementary Planning Document, and there is a specific action in the Strategy for this.</p> <p>A revised Code of Practice will be published in the next 12 months</p>	No change made to the Strategy document.
136		Under 5.2.3, "Non-Road Mobile Machinery", limiting the power rating between an arbitrary range of outputs appears counterproductive. Why can't all NRMM be regulated?	<p>37-560kW was specified by the Greater London Authority when the NRMM LEZ was originally implemented in 2015.</p> <p>A revised Code of Practice will be published in the next 12 months.</p>	No change made to the Strategy document.
137		Under 5.2.4, "Commercial Heat and Power", using "planned" heat networks -1 may be difficult. 3 refers to using low-emission CHP "only where there is a case for it". What does this mean as 4, "use ultra-low nitrogen oxide gas boilers" has no such qualification?	<p>Comment noted.</p> <p>Emission limits for Combined Heat and Power Plant and boilers are specified in the current Supplementary Planning Document. These will be reviewed as the SPD is updated.</p>	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
138		Under 5.2.7, “Environmental Permitting Regulations” – shouldn’t this be “Controlling” instead of “Permitting”? – what is the relevance of “to air”? It would be more encouraging if “minimise” was replaced with “prevent” pollution. As 1st January 2024 was six months age, does all the relevant plant have permits?	<p>The regulations are called the Environmental Permitting Regulations (EPR), and these are not solely for emissions to air, they also cover aspects such as waste, water and flood risk.</p> <p>The Environment Agency is the regulatory body for the EPR and associated regulations.</p>	No change made to the Strategy document.
139		In the box at the end of 5.2, “Reducing Emissions”, surely, the further action shouldn’t stop at reducing NO2 concentrations simply below 40µ/m3 but towards 30µ/m3? There should be more than mitigating NRMM emissions and reducing emissions from standby power generation. If Chimney stacks are lower than adjoining buildings, dispersion will affect those buildings. Promoting and enforcing Smoke Control areas etc should be a given.	<p>The aim of the Strategy is to achieve 90% compliance with the WHO 2<sup>nd</sup> interim target (30µg/m<sup>3</sup>). If this achieved within the timeframe of the Strategy efforts will continue to improve concentrations further. The highest concentrations of annual mean NO<sub>2</sub> remain at roadside locations, therefore a further action has been added to achieve compliance with 40µg/m<sup>3</sup>.</p> <p>Emissions from NRMM are regulated through the London-wide NRMM Low Emission Zone, and the required stage for NRMM will be tightened in 2030.</p> <p>Backup generators are assessed through planning and will be a focus of the revised Supplementary Planning Document.</p> <p>Dispersion of pollution is assessed through the planning process and for larger appliances, through the Clean Air Act 1993.</p>	No change made to the Strategy document.
140		Under 6, “Public Health and Raising Awareness”, the actions to increase public awareness of, and understanding about, air pollution is only relevant because pollution levels are dangerous to health. Surely more effort to reduce air pollution further than the intentions of the Strategy must be a priority. This is even more essential with the higher-than-average mortality rate from particulate air pollution in the City. The advice offered in leaflets has the semblance of desperation rather than ambition.	Comments noted.	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
141		Under 6.1, "Provision of Information", there seems to be a conflict. According to the third paragraph, "high levels of air pollution occur in the City of London on a small number of days in any year and instances of very high levels of air pollution are now very rare". However, according to the fifth paragraph, the "CityAir" App "provides advice to users when pollution levels are high or very high" but if that's all, there seems to be little point in it!	Comments noted.	No change made to the Strategy document.
142		City Corporation may have no statutory obligation re indoor air quality. However, that can't apply in respect of its safeguarding obligations to children in City nurseries and schools, as well as its HRA estates both within and without the Square Mile.	<p>Monitoring of air pollution is undertaken at schools and nurseries in the Square Mile. Action Plans and reports are completed for the schools and nurseries, and they include monitoring results and relevant information for each location.</p> <p>Pollution alerts are sent to all schools and health care sites.</p> <p>The Strategy is for air pollution in the Square Mile, as this is where our Air Quality Management Area applies.</p> <p>A workstream for the Climate Action Strategy is to decarbonise our operational properties and housing states. This will have a positive impact on air quality.</p>	No change made to the Strategy document.
143		In the box at the end of 6, "Public Health and Raising Awareness", the Director of Public Health is part of the City Corporation/LB Hackney partnership which "works to improve the health and wellbeing of both the resident population of the City of London and more than 400,000 people working in the Square Mile" ("About the Public Health Team", City Corporation, website 03/06/2024). However, the partnership also works within LB Hackney and that should be acknowledged. In what way and how will City Corporation "work with schools and nurseries in the Square Mile"? Although raising awareness of the health impacts of poor indoor air quality is to be appreciated, there needs to be action to improve it.	<p>Comment noted.</p> <p>Additional text has been added to the detail of Action 26.</p>	Strategy text amended.

No	From	Comment Received	Response	Action taken
144		Action 1: Will ozone levels be monitored at all five sites? If so, from when?	Ozone is monitored at the Guildhall. There are no plans to increase the number of ozone monitoring sites in the Square Mile.	No change made to the Strategy document.
145		Action 4: Wasn't the Square Mile Local Energy Plan introduced in October 2023?	It has been confirmed in the Strategy that the Local Area Energy Plan has been adopted.	Strategy text amended.
146		Action 7: "Require" would be preferable to "encourage" under "Action". Under the "Detail", "reduce" is preferable to "assist in reducing".	Zero emission capable vehicles are promoted rather than required as there are not always zero emission vehicles available to fulfil a specific function e.g. in our Open Spaces.  The text has been altered to be more succinct.	Strategy text amended.
147		Action 9: The Bill, under "Action", needs both re-introduction and progressing through Parliament. Presumably the "Details" will be implemented with the 32 London Boroughs and not in isolation to them.	Parliament was dissolved on 30 <sup>th</sup> May 2024, so the Bill fell. The text has been updated to reflect this in section 3.6. The action remains the same.  Collaboration will continue with London boroughs through Air Quality Cluster and Steering Groups.	Strategy text amended.
148		Action 10: "Air Quality Partners" should be "AQP".	A thorough review of the Strategy has been completed to ensure consistency with terminology.	Strategy text amended
149		Action 11: Presumably City Corporation has the expertise needed in respect of the first "Detail", but this doesn't seem feasible in isolation from the third "Detail". The investigation envisaged in the second "Detail" should have been carried out before the construction of tall buildings was promoted by City Corporation.	Comment noted.	No change made to the Strategy document.
150		Action 12: Surely, the "Action": should be "reduce" and not "assess options for reducing"? The first "Detail" suggests there are roads other than those currently being monitored. How will these be identified? The second "Detail" seems quite straightforward in implementation.	Roads are identified by a combination of air quality monitoring and modelling.  Detail has been added to explain we will work with Air Quality Partners to develop and implement plans to reduce pollution.	Strategy text amended.

No	From	Comment Received	Response	Action taken
151		Action 13: The “Action” should be “prevent” rather than “discourage” and be implemented already. The first “Detail” is frustrated by government failure to produce statutory restriction signage, thus requiring a verbal warning before a valid PCN can be issued. The second “Detail” requires prominent signs along the lines of those used by Sheffield City Council. I recently sent the Chair of PHES a copy of those notices as well as a link to the engine idling page of that council’s website. The third and fourth “Details” have merit like the now abandoned volunteer sessions. These were effective – whether solely or with other London Boroughs - in getting the message across. The difference in attitude of drivers over the five years being a positive change and it’s good to know that funding may have been secured to re-start voluntary monitoring. Notably, the Strategy omits reference to City Corporation’s 2020 Traffic Management Order with its £80 fine, supported by the intention to lobby the Department for Transport for new signage. What was the outcome of that lobbying?	<p>The wording has been reviewed and no changes have been made.</p> <p>A specific design for anti-idling signs has been approved by the City Corporation. If there are any further changes, from the City Corporation or from DfT, these will be implemented when relevant.</p> <p>Funding from the Mayor’s Air Quality Fund has been secured for a 4<sup>th</sup> round of London wide work to tackle unnecessary engine idling. We are part of this project and will be implementing actions in 2025.</p> <p>Action 13 refers to the issuing of Penalty Charge Notices for unnecessary vehicle engine idling. Further information, including the escalation to an £80 fine, is available on the air quality section of the City Corporation website.</p>	No change made to the Strategy document.
152		Action 14: Surely there should be a policy of reducing available parking spaces, if only for offending vehicles. This also applies to the “Detail”.	As of 28 <sup>th</sup> October 2024, emissions-based charges will be introduced in car parks.	No change made to the Strategy document.
153		Action 15: Who will implement the “Action” and how? The same question applies to the first and second “Details”. The first sentence of the third “Detail” should be deleted unless “encourage” is replaced by “require”. In the fifth “Detail”, “consider” should be replaced by “use available”. As mentioned above, the updating of the Air Quality SPD is long overdue.	<p>Officers will continue to review all relevant planning applications with regards to air quality.</p> <p>These comments will be considered further during the update to the Air Quality Supplementary Planning Document.</p>	No change made to the Strategy document.
154		Action 16: This is welcomed but there must be effective sanctions for breaches of the first “Detail”. Inspection under the second “Detail” also needs responses with teeth to breaches of regulations.	<p>Comments noted.</p> <p>A revised Code of Practice will be published in the next 12 months.</p>	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
155		Action 17: Again the “Action” is welcomed but the mitigation must have teeth. The first “Detail” should be practised already. The second “Detail” requires more than understanding.	We ensure that any construction site with NRMM is audited periodically.  The ‘Beyond Construction’ is a GLA led project to document NRMM used across London outside of standard construction settings, e.g. in street works.	No change made to the Strategy document.
156		Action 18: Another welcome “Action” but which also needs teeth.	Backup generators are assessed through planning and will be a focus of the revised Supplementary Planning Document.	No change made to the Strategy document.
157		Action 19: Again, a welcome “Action” but surely ascertaining which part of the commercial cooking process is responsible for the emissions should be the first step. The two “Details” should then follow.	We have made two unsuccessful bids for funding to measure PM <sub>2.5</sub> associated with commercial cooking to understand which parts of the cooking process contribute most to PM2.5 emissions. We will continue to seek opportunities for funding to conduct research into this area.	No change made to the Strategy document.
158		Action 20: If chimney stacks aren’t above the adjoining buildings, where are the emissions dispersed to?	Any combustion flue should terminate above the roof height of the development. The location of surrounding buildings is considered when the planning application is reviewed.	No change made to the Strategy document.
159		Action 22: Surely, this is a statutory obligation for City Corporation?	It is a statutory obligation to ensure the Smoke Control Area is enforced. We work to ensure food premises are aware of the restrictions in terms of fuel and appliances.	No change made to the Strategy document.
160		Under Appendix 4 “Monitoring Data, Further Assessment”, there’s a specific reference to “ozone” and the fact that it has been measured at the Guildhall since 2024 - despite not being required through the LLAQM Framework - because ozone “has an impact on health at high levels”. However, the claims that ozone is a “primarily a secondary pollutant, therefore there are no major emission sources in the Square Mile”; “most of the ozone is instead formed in the air from reactions between other pollutants”; “pollutants photochemically react outdoors in the presence of sunlight to produce ground-level ozone”; and “similar reactions can occur with nitrogen oxides as a precursor” all require both explanation and evidencing.	This document is an overarching Strategy, therefore detailed definitions and explanations of technical aspects are considered unsuitable for the average reader.	No change made to the Strategy document.



No	From	Comment Received	Response	Action taken
161		Under Appendix 5: "Air Quality Partner Commitments": The EA: What is "BAT" an abbreviation for? No evidence is produced to support the claim that flue gas abatement systems have a "high capture efficiency" which means "Waste Incineration Plant are low emitters of particulate matter". What proof is there that there are no new or existing MCP within 800 metres of the City boundary and why is that distance significant?	Table A5.1 summarises the responses received from our Air Quality Partners These have been written by the AQPs therefore are contextualised from their point of view.  The Environment Agency has provided details on all Medium Combustion Plant, Specific Generator or Environmental Permits in the Square Mile, and within a reasonable distance of our boundary. The response received included the 800m buffer.  <i>BAT is Best Available Technique</i>	No change made to the Strategy document.
162		The PLA: The final paragraph appears to be written by the PLA.	Table A5.1 summarises the responses received from our Air Quality Partners. These have been written by the AQPs therefore are contextualised from their point of view.	No change made to the Strategy document.
163	Page 297	The GLA and TfL: Is it the buses or the fleet that operates across London? The periods "10-14 years" and "once a route contract has ended" may not coincide, so the introduction of new zero-emission buses may be delayed. It would be helpful if the diesel only route was identified. That seven routes still operate Euro V+SCRT and Euro V+SCRT/Euro VI presumably means that six routes operate hybrids that require replacement but only three of these will become fully electric in 2024/25 with the diesel only route. When will the other three routes become electric?	We will continue to collaborate with the GLA and TfL on a range of issues including emissions from buses that operate in the Square Mile.	No change made to the Strategy document.
164		Under Appendix 6: "Air Quality Policies in the Draft City Plan", as the Plan hasn't been adopted yet, any comment now would be premature.	Comment noted.	No change made to the Strategy document.
165		Under "Air Quality Strategy 2025-30: Delivering Healthy Air in the City of London" – "Our Vision", surely "aim" is better than "vision"? Under "Why us?", the Corporate Plan should be irrelevant to what must be a humane policy. Under "Our Aims", the first target seems to have been achieved already; and "before" should replace "by" in the other two. The changes under "Who we will work with" should be self-explanatory.	The aim of the previous Strategy (2019-2024) was for 90% of the Square Mile to meet an annual average of 40 µg/m <sup>3</sup> for NO <sub>2</sub> . The revised Strategy has updated this aim to 90% of the Square Mile to meet an annual average of 30 µg/m <sup>3</sup> . In 2022 76% of the Square Mile was below 30 µg/m <sup>3</sup> therefore this aim has currently not been met.  All other comments noted.	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
166		Under "Technical Glossary", the additions are to complete the definitions.	The Technical Glossary has been reviewed and updated.	Strategy text amended.
167		Under 1, "Introduction", there is a growing population of students in the City, which is often ignored. The 11,000 acres are outside the Square Mile. "United Kingdom" seems more professional. The change in the following paragraph and correction in the next one should be self-explanatory. Hopefully, the ozone comment is self-explanatory.	Text updated following comments received.  Ozone is not part of the LAQM statute and is assessed at a national level.	Strategy text amended.
168		Under 1.1, "Source of Air Pollution in the Square Mile", the questions require answers.	The references for the sources of information are detailed in the footnotes of the page.	Strategy text amended.
169		Under 2.1.1, "Continuous Monitoring", an explanation as to why there was a change of site seems necessary to justify it.	As stated in the Strategy the monitoring site had to be relocated due to changes in office accommodation.	No change made to the Strategy document.
170		Under 2.1.2, "Non-continuous (Passive) Nitrogen Oxide Monitoring", an explanation for the increases is required.	Detailed trend analysis is not part of the Strategy as it is an overarching document. Commentary on trends is provided in the annual status reports.	No change made to the Strategy document.
171		Under 2.2, "Particulate Matter, PM10", the level for Bell Wharf Lane at the beginning of 2023 is higher than the level for Upper Thames Street at the end of 2021, so it's reasonable to assume that the level for the latter at the beginning of 2023 would have been higher than the one for Bell Wharf. This questions the reason for change of site.	The Upper Thames Street (PM <sub>10</sub> ) and Walbrook Wharf (NO <sub>2</sub> ) monitoring sites were amalgamated into a single site on Bell Wharf Lane in 2022/23 due to access restrictions and changes in office accommodation.  Continuation of monitoring at the previous two locations would have been preferable. The new location was chosen for longevity and the site has been designed to house the two analysers.	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
172		Under 2.3, "Particulate Matter, PM2.5", an explanation would be appreciated for there being different sites.	<p>The air quality data for 2023 is now final and has been included in the final version of the Strategy.</p> <p>The PM2.5 analyser at The Aldgate School experienced a number of mechanical faults in 2022 that caused the annual data capture to be lower than usual.</p> <p>Monitoring of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> is not completed at every monitoring site. The current network includes a roadside and background site for each of the three pollutants.</p>	No change made to the Strategy document.
173		Under 2.5, "Air Quality Monitoring on the wider City Corporation Estate", as these sites are outside the Square Mile, the logical question is why the relevant London Borough isn't doing the monitoring. This question also extends to City Corporation's HRA estates other than Golden Lane and Middlesex Street. The ammonia point is obvious, but confirmation would be appreciated.	<p>Monitoring on the City Bridges is undertaken for the City Bridge Foundation.</p> <p>The Strategy is for air pollution in the Square Mile. The Climate Action Strategy has a workstream to look at decarbonising our operational properties and housing states. This will have a positive impact on air quality.</p> <p>Ammonia is primarily emitted during storage and spreading of manures, slurries and fertilisers. It reacts in the atmosphere to form particulate matter. The 2019 UK Air Quality Strategy includes a summary of ammonia as an air pollutant.</p>	No change made to the Strategy document.
174		Under 3.1, "City Corporation Fleet", as it's not clear, confirmation of the number of City Police vehicles included in the 122 vehicles and the type of propulsion should be stated.	City police vehicles are not included in the 122 vehicles owned or leased by the City Corporation.	No change made to the Strategy document.
175		Under 3.2, "Procurement Strategy", my comment re the FM Conway fleet is from observation. As far as NRMM are concerned, there is no evidence that any attempt to require zero emission ones is made. The final bullet point isn't understood.	<p>The current Highways Construction and Maintenance contractor for the City of London has zero emission targets to report against.</p> <p>The potential options are not limited to those listed. If innovative approaches are proposed, these would be evaluated individually.</p>	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
176		Under 3.3, "Climate Action Strategy", how is the effect of inflation being addressed? The insertion of "reducing" is necessary.	The impact of inflation has been detrimental to the delivery programme and, though it was considered, inflation remains as 'unforeseen' at the inception of the Climate Action Strategy. Mitigatory actions are being taken and we have been successful at securing funding grants that supplement the £68 million, such as the Public Sector Decarbonisation Scheme.	No change made to the Strategy document.
177		Under 3.6, "Proposal for New Regulatory Powers", the need for a new Bill is essential.	Parliament was dissolved on 30 <sup>th</sup> May 2024, so the Bill fell. The text has been updated to reflect this in section 3.6. The action remains the same.	Strategy text amended.
178		Under "Designated Air Quality Partners", the need for the correction should be obvious. "LAQM" has been abbreviated previously.	A thorough review of the draft Strategy has been completed to ensure consistency with terminology.	Strategy text amended.
179		Under 4.2, "Additional Partnerships", the need for the correction should be obvious.	Comment noted.	No change made to the Strategy document.
180		Under 5.1.1, "Idling Vehicles' Engines", the various questions require answers.	The organisation completes the range of actions detailed in the Strategy.  Funding from the Mayor's Air Quality Fund has been secured for a 4 <sup>th</sup> round of London wide work to tackle unnecessary engine idling. We are part of this project and will be implementing actions in 2025	No change made to the Strategy document.
181		Under 5.2, "Non-Transport Emissions" "has" should replace "had".	Text has been amended as stated.	Strategy text amended.
182		Under 5.1.4, "Transport Redevelopment Schemes", the successful but aborted Beech Street Zero Emissions Scheme warrants mention, for its success, at least.	The number of schemes mentioned was deemed sufficient for the overarching nature of the Strategy. Further detail is available in the Transport Strategy.	No change made to the Strategy document.
183		Under 5.2.2, "Construction and Demolition", "deconstruction" should replace "demolition". If the ninth edition of the CoP is the latest, a new one is required.	A revised Code of Practice will be published in the next 12 months.	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
184		Under 5.2.3, "Non-Road Mobile Machinery", not only is there a need for zero emission NRMM, but there is also no excuse for not having a universal requirement for Stage V now.	<p>The NRMM Low Emission Zone was developed by the Greater London Authority, with London Boroughs and the City of London delivering it on the ground.</p> <p>The current GLA timeline is presented in Table 5.2. The Square Mile is within the Central Activity Zone therefore the current requirement is for at least Stage IV. Stage V is set to be implemented on 1 January 2030.</p>	No change made to the Strategy document.
185		Under "5.2.4, Commercial Heat and Power", the "CHP" abbreviation is missing. The "periodical" use of the generators by Linklaters in Silk Street is completely unacceptable, even if powered by HVO as its reduction in pollutants over pure diesel may be insignificant and sustainability questionable. Hydrogen is a suitable – and available – alternative, as is battery storage.	<p>Error in design document (but not base document). Thorough review to be completed prior to publishing the final version.</p> <p>Backup generators for new developments are assessed through planning. Developers are required to explain why alternatives to a diesel generator have not been utilised. Backup generators will be a key focus of the revised Supplementary Planning Document.</p> <p>The events at One Silk Street in 2024 have been reviewed and new processes discussed for similar cases in the future.</p>	No change made to the Strategy document.
186		Under 5.2.5, "Commercial Cooking", evidence of the actual source of the particulates should be provided as not all catering establishments are likely to emit PM2.5.	Reference is made to the London Atmospheric Emissions Inventory under Section 1.1, where charts of all sources are available.	No change made to the Strategy document.
187		Under 5.2.7, "Environmental Permitting Regulations, "St Bartholomew's Hospital" seems more professional.	Text updated.	Strategy text amended.

No	From	Comment Received	Response	Action taken
188		Under 5.2.8, "Smoke Control", an answer to the questions would be appreciated.	Officers inspect potential suppliers of solid fuel to log any locations, and to confirm any fuel solid conforms to solid fuel regulations.  Manufactured Solid Fuels (MSF) must meet the following emission limits in order to be certified for use in domestic premises in England: - contain less than 2% sulphur (by dry ash weight with a 95% confidence limit) - have an average smoke emission rate of less than 5 g/hr	No change made to the Strategy document.
189		Under 6, "Public Health and Raising Awareness", how can high levels of air pollution be avoided in order to reduce impact on health?	The overarching actions presented have been chosen to raise awareness and reduce exposure to air pollution.	No change made to the Strategy document.
190		Under 6.5, "Indoor Air Quality", the answer to my question will be informative as regards safeguarding.	Monitoring of air pollution is completed externally at schools and nurseries in the Square Mile. Action Plans and periodic reports are completed that include monitoring results and relevant information.  Pollution alerts are sent to all schools and health care sites and annual reports including monitoring data given to all schools and nurseries	No change made to the Strategy document.
191		Under Appendix 1, "Actions to deliver the Air Quality Strategy", the fourth "Detail" in "Action 24" requires amendment, as does the "Detail" under "Action 28".	Comment noted	No change made to the Strategy document.
192		Under Appendix 2, "Air Quality Standards and Guidelines several abbreviations etc are required.	A thorough review of the Strategy has been completed to ensure consistency with terminology.	Strategy text amended.
193		Under Appendix 3, "London Atmospheric Emissions Inventory", hopefully, my amendments are self-explanatory. Although Bishopsgate is mentioned as a busyroad, there is no evidence of any automatic air quality monitoring there.	Comments noted.  We currently monitor NO <sub>2</sub> using passive diffusion tubes at two locations on the A10. All monitoring locations are reviewed annually.	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
194		<p>Under Appendix 5, Air Quality Partner Commitments”, several abbreviations are required. The need for my other amendments should be obvious. My changes under “PLA” hopefully make sense. Presumably “our” in the following paragraph refers to City Corporation. A reply to my question re SO2 would be appreciated. Also, hopefully my changes under “The GLA and TfL” also make sense.</p>	<p>A thorough review of the Strategy has been completed to ensure consistency with terminology.</p> <p>Table A5.1 summarises the responses received from our Air Quality Partners. We contacted them for information on how they can support our efforts to improve air quality locally. The text has been written by the AQPs therefore are contextualised from their point of view.</p> <p>SO<sub>2</sub> was monitored at Senator House from 2001 to 2013. During this time there were no exceedances of the three SO<sub>2</sub> LAQM objectives, or of the 2021 WHO AQG. This is in line with national reporting on SO<sub>2</sub> where compliance has been reported since 2008 with the Air Quality Standards Regulations (2010).</p>	<p>Strategy text amended.</p>

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## Appendix 4: Responses Received on the Commonplace Citizen Engagement Website

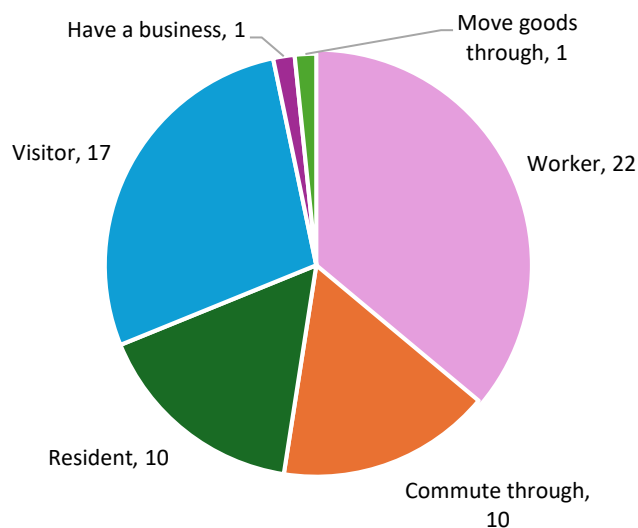
The consultation was placed on the Commonplace citizen engagement web site from 3<sup>rd</sup> June to 26<sup>th</sup> July. Sixty-three responses were received, though not all 63 answered every question.

The pie charts presented show a breakdown of responses received for each question. The numbers in the pie charts are the number of people who gave that particular response.

### 4.1 Connection to the Square Mile

Respondents were asked to state their connection to the Square Mile. Most (64% in total) were visitors or workers.

#### What is your connection to the Square Mile



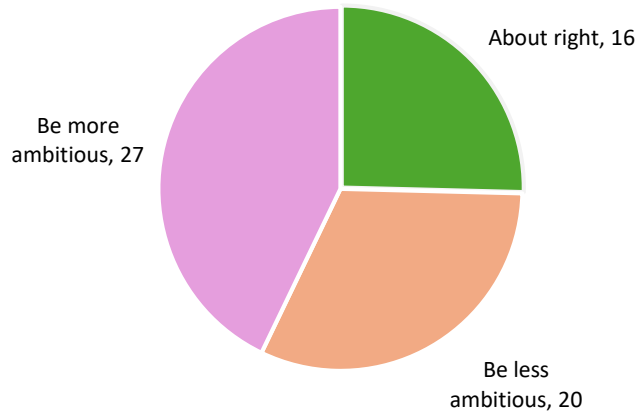
### 4.2 Strategy aims

Respondents were asked whether they agreed with the aims of the draft strategy which are:

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

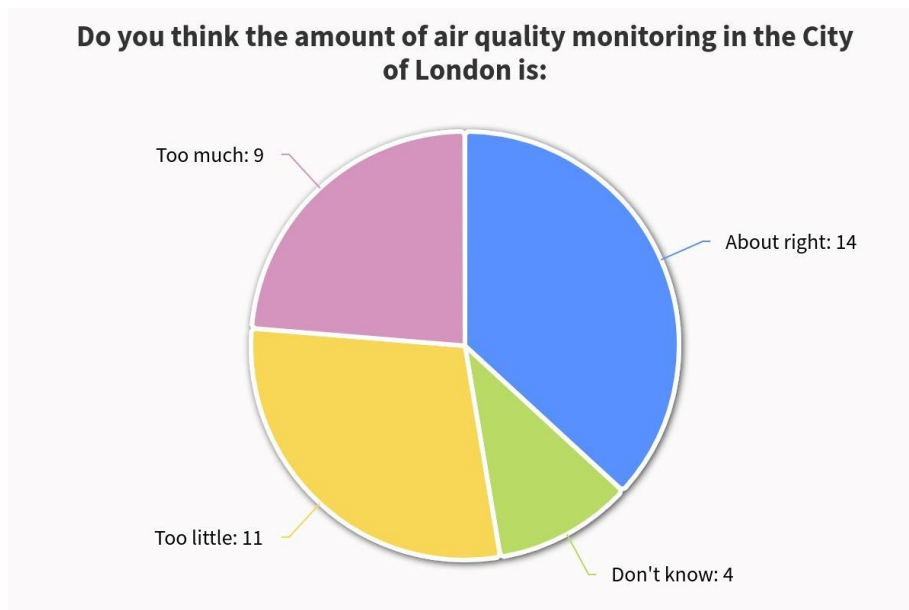
There was a mixed response with 25% saying the aims were about right, 32% thought they were too ambitious and 43% not ambitious enough.

### How do you feel about the aims of the Strategy



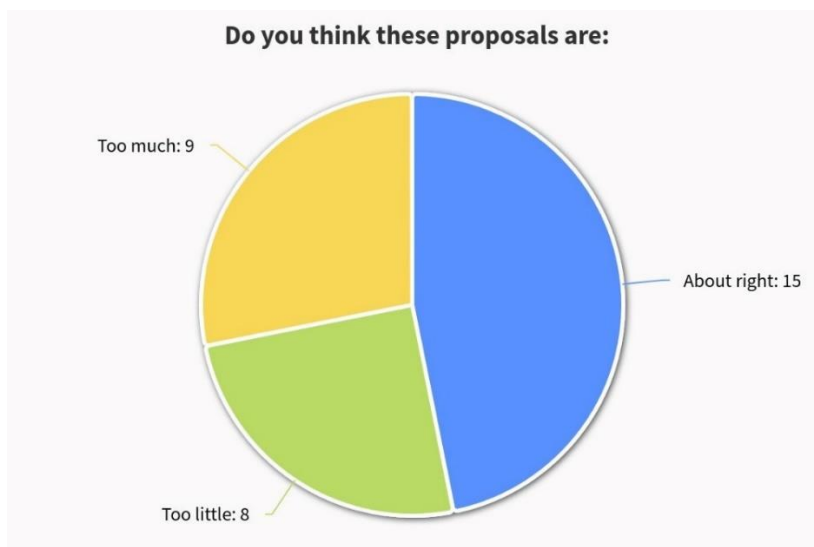
### 4.3 Air Quality Monitoring

Respondents were asked about the extent of air quality monitoring across the Square Mile with a mixed response, as shown below. Additional air quality monitoring locations were suggested. These will be considered in the air quality monitoring annual review scheduled for mid November.



#### 4.4 Leading by example

Respondents were asked about overall proposals for leading by example, with a mixed response as shown below.



#### 4.5 Collaboration

Respondents were asked to recommend other organisations that we could work with to deliver the Air Quality Strategy.

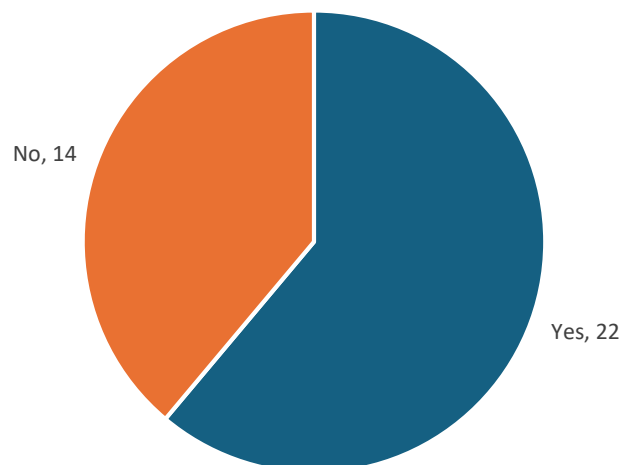
Suggestion	Comment
The British Medical Council and NHS respiratory departments	We currently work with North East London Integrated Care Service. We will raise any further opportunities for collaboration with the recommended groups with the Integrated Care Board.
Cycling and walking groups, Living Streets	Engagement with these groups is led by the Transport Team and supported by the Air Quality Team.
Islington Council	We already work closely with Islington Borough Council.
Business Improvement Districts	We already work closely with BIDs in the Square Mile.
Extinction Rebellion	The focus of this group is climate and nature.
Ride for their Lives / Climate Acceptance Studios	The focus is on climate and nature.
Vehicle manufacturers	We liaise with vehicle manufacturers when purchasing vehicles, for example to trial zero emission options.

London Taxi Drivers Association	Liaison takes place as part of the Transport Strategy workstream.
Airscape	This is a type of air quality sensor. We test new sensors that come on the market against our established monitoring equipment to gauge accuracy and precision.

#### 4.6 Reducing emissions

Respondents were asked if there are any additional actions we should take to reduce emissions of pollution other than those listed in the draft Strategy.

#### Are there any additional actions we should be taking to reduce emissions of air pollutants?



Additional actions suggested in the table below. The comments have been grouped into themes:

Suggestion	Comment
<b>Traffic management:</b> Car free days, banning vehicles at weekend, discourage motorised vehicles, trial a zero emission zone, limit access to combustion vehicles, keep traffic moving, close roads / stop blocking off roads, improve cycle infrastructure, work with Mayor of London to give priority to smaller vehicles, encourage sustainable / active travel, lobby for an all-electric black cab fleet, promote	<p>Policy for traffic management in the Square Mile is detailed in the Transport Strategy <a href="#">Transport strategy - City of London</a>.</p> <p>Overall aims of the Transport Strategy include:</p> <ul style="list-style-type: none"> <li>- Prioritise the needs of people walking and wheeling</li> <li>- Make the most efficient and effective use of street space by significantly</li> </ul>

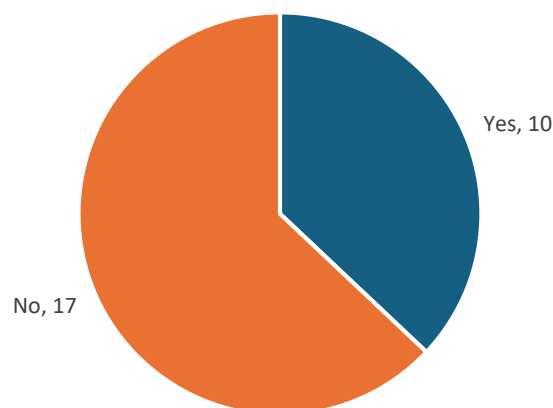
<p>cargo bikes, zero emission delivery vehicles</p>	<p>reducing motor traffic, including the number of delivery and servicing vehicles in the Square Mile</p> <ul style="list-style-type: none"> <li>- Enable more people to choose to cycle by making conditions for cycling in the Square Mile safer and more pleasant</li> <li>- Improve air quality and reduce noise by encouraging and enabling the switch to zero emission capable vehicles</li> </ul>
<p><b>Idling vehicle engines:</b> Prioritise action to deal with vehicle engine idling including pressing for powers to issue a PCN without a warning</p>	<p>We take a wide range of action to deal with unnecessary vehicle engine idling as detailed in section 5.1.1 of the Strategy.</p>
<p><b>Cycle Lane:</b> Reroute the cycle lane from Upper Thames Street to Cannon Street / reduce cycle lanes</p>	<p>The cycle lane on Upper Thames Street is managed by Transport for London. There are proposals for a new cycle route to run from Aldgate to Blackfriars going along St Botolph Street, Aldgate Square, Leadenhall Street, Cornhill, Bank Junction and Queen Victoria Street.</p>
<p><b>Businesses:</b> Help businesses reduce car use</p>	<p>This will be considered as part of our business engagement workstream.</p>
<p><b>Street vendors:</b> Close regulation of street vendors</p>	<p>Further opportunities will be considered through liaison with the Licencing Team.</p>
<p><b>Combined Heat and Power:</b> Discourage / ban combined heat and power in new buildings</p>	<p>Combined Heat and Power is discouraged through the planning process.</p>
<p><b>Construction:</b> Reduce the amount of construction, mandate zero emission Non-Road Mobile Machinery, do more to deal with emissions associated with construction and set emission targets, more detail on how emissions from construction are managed</p>	<p>The Code of Practice for Construction and Deconstruction will be updated within the next 12 months and these comments considered.</p>
<p><b>Generators:</b> Standby generators should use HVO or hydrogen, provide funding for diesel generators to be replaced by electric</p>	<p>We cannot mandate the use of Hydrogenated Vegetable Oil, though we have put a proposal together for new powers to be able to set emission limits on combustion plant in the Square Mile. Through the planning process we ask</p>

	for alternatives to diesel generators to be considered.
<b>Noise:</b> Deal with noise pollution	This is dealt with in the Noise Strategy.
<b>London Underground:</b> Trap and filter the air from London Underground	This is dealt with by Transport for London.

#### 4.7 Raising awareness

Respondents were asked if there is any additional action we should be taking to raise awareness of air pollution.

#### Are there any other actions we should be taking to raise awareness?



Additional actions suggested:

Suggestion	Comment
Provide information about indoor air quality	There is an action in the Strategy to raise awareness of the health impacts of poor indoor air quality.
Provide quarterly briefings	We disseminate a monthly e-newsletter which contains air quality data for the previous month and information about ongoing action to improve air quality in the Square Mile.
Raise awareness of noise	This is covered by the Noise Strategy.
Interactive billboards / digital signposts to provide local instant air quality	A campaign to promote the real time air quality data site Air-Aware <a href="#">Air Aware –</a>

<p>information, information on buses and the tube.</p>	<p><a href="https://www.air-aware.co.uk">Transforming Air Quality Awareness Across London (air-aware.co.uk)</a> was live in May and June 2024. Further campaigns will be considered, subject to funding. Digital displays are permanently available in the Barbican and Artisan libraries.</p> <p>We are involved in a London wide project to deal with unnecessary engine idling, this will include messaging on billboards across London.</p>
<p>Encourage only eco vehicles to enter the City and discourage driving on days of poor air quality</p>	<p>Traffic management is delivered through the Transport Strategy which includes an aim to:</p> <p>Improve air quality and reduce noise by encouraging and enabling the switch to zero emission capable vehicles</p>
<p>Air quality reports for all London Underground stations</p>	<p>This is within the remit of Transport for London.</p>

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# Equality Impact Assessment

EIA FORM

CITY OF LONDON

**Appendix 5 - Equality Impact Assessment Form**

<b>Directorate:</b> Environment <b>Service Area:</b> Air Quality	<b>Lead Officer:</b> Ruth Calderwood <b>Date completed:</b> 01/7/2024
<b>Service / Function / Policy / Procedure to be assessed:</b> City Corporation Air Quality Strategy 2025 to 2030	
<b>Is this:</b> New / Proposed <input checked="" type="checkbox"/> Existing/Review <input type="checkbox"/> Changing <input type="checkbox"/>  (Please tick appropriate box)	<b>Review date:</b> annually, 2025 to 2030 in line with the strategy

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**Part A – Initial Equality Impact Assessment to determine if a full Equality Impact Assessment is required.**

**What are the aims and objectives/purpose of this service, function, policy or procedure?**

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

The City Corporation has had an air quality action plan in place since 2002. In 2011, the action plan was incorporated into an Air Quality Strategy. The current strategy is for the period 2019 to 2024. This draft strategy covers 2025 to 2030 and includes new data, new targets, and new responsibilities for helping to reduce emissions of very fine particles (PM<sub>2.5</sub>).

The aims of the new strategy are to go beyond our statutory obligations and work towards achieving air quality guidelines that have been set by the World Health Organisation. These are tighter than the national standards so this approach will have a positive impact on the health of all of our communities

**Please indicate its relevance to any of the equality duties (below) by selecting Yes or No?**

	Yes	No
Eliminating unlawful discrimination, victimisation and harassment	x	
Advancing equality of opportunity		x
Fostering good community relations		x

**If not relevant to any of the three equality duties and this is agreed by your Head of Service, the Equality Impact Assessment is now complete - please send a copy to the Equality Team. If any of the three equality duties are relevant, a Full EIA will need to be undertaken (PART B below).**

**PART B: Full Equality Impact Assessment.**

**Step 1 – Identifying outcomes and delivery mechanisms (in relation to what you are assessing)**

<b>What outcomes are sought and for whom?</b>	Improved air quality for all communities. Air quality that is better than that set by national standards and instead complies with the latest guidelines from the World Health Organisation.
<b>Are there any associated policies, functions, services or procedures?</b>	The strategy is supported by the Corporate Plan, Transport Strategy, Climate Action Strategy, Procurement Strategy, City Plan, Clean City Awards and Considerate Contractors Award
<b>If partners (including external partners) are involved in delivering the service, who are they?</b>	Internal: Climate Action, Transport Policy, Highways, Recycling, Procurement, Planning, Public Health. External: Residents, workers, schools and nurseries, businesses and Business Improvement Districts, North-East London NHS Trust and Barts Health NHS, the Greater London Authority, Transport for London, London Councils, London Boroughs, the UK Government, the Environment Agency, London’s Universities, Charities, Port of London Authority, Cross River Partnership

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**Step 2 – What does the information you have collected, or that you have available, tell you?**

**What evidence/data already exists about the service and its users?** (in terms of its impact on the ‘equality strands’, i.e. race, disability, gender, gender re-assignment, age, religion or belief, sexual orientation, maternity/pregnancy, marriage/civil partnership and other socially excluded communities or groups) and **what does the data tell you?** e.g. are there any significant gaps?

Publicly available data is used by the City Corporation to provide an understanding of the demographics and protected characteristics of the communities impacted by the draft Air Quality Strategy. The following section gives a summary of the 2021 Census by protected characteristics.

The analysis in this summary has informed the overall development of the work involved in delivering the strategy, and the planning of external engagement with residents, workers, visitors, and service users.

## Population

According to the 2021 Census, the City of London has a population of 8,600 residents (to the nearest 100), an increase of 16.4% from 7,400 in the 2011 Census. This population growth, whilst small in numeric size, is significantly higher as a percentage increase than the 7.7% increase across London and 6.6% increase across England.

## Age

The median age of residents was recorded in the 2021 Census as 37 years, down from 39 in 2011. The aged 20 to 24 years bracket saw the largest increase (3.8 percentage points), unlike the London and national trends, which all saw decreases. The aged 35 to 49 years bracket saw the largest decrease (-3.5 percentage points), in line with the national trends, but opposed to London, which saw a small increase. The below table shows the full percentage breakdown.

Area name	Aged 4 years and under		Aged 5 to 9 years		Aged 10 to 15 years		Aged 16 to 19 years		Aged 20 to 24 years		Aged 25 to 34 years		Aged 35 to 49 years		Aged 50 to 64 years		Aged 65 to 74 years		Aged 75 to 84 years		Aged 85 years and over	
	2011	2021	2011	2021	2011	2021	2011	2021	2011	2021	2011	2021	2011	2021	2011	2021	2011	2021	2011	2021	2011	2021
City of London	3.2	2.5	2.5	1.9	2.7	2.4	2.2	2.2	7.4	11.2	24.1	25.8	24.7	21.2	19.1	18.8	8.0	8.3	4.5	4.3	1.6	1.4

## Equality Impact Assessment

<b>London</b>	7.2	6.0	5.9	6.0	6.7	7.2	4.6	4.4	7.7	6.7	19.9	18.1	22.4	22.7	14.4	16.9	5.8	6.5	3.8	3.8	1.5	1.6
<b>England</b>	6.3	5.4	5.6	5.9	7.0	7.2	5.1	4.6	6.8	6.0	13.5	13.6	21.3	19.4	18.1	19.4	8.6	9.8	5.5	6.1	2.2	2.4
<b>England and Wales</b>	6.2	5.4	5.6	5.9	7.0	7.2	5.1	4.6	6.8	6.0	13.4	13.5	21.3	19.3	18.1	19.5	8.7	9.9	5.6	6.2	2.2	2.4

### Disability

The percentage of non-disabled residents of the City of London increased slightly between 2011 and 2021 and is higher than London and national levels. The ONS advises that responses may have been affected by perceived health status and activity limitations during the COVID-19 pandemic, as well as advising caution when making comparisons between 2011 and 2021, as the question wording and response options were changed. The below table shows the full percentage breakdown.

Area name	Disabled under the Equality Act: Day-to-day activities limited a lot		Disabled under the Equality Act: Day-to-day activities limited a little		Not disabled under the Equality Act	
	2011	2021	2011	2021	2011	2021
<b>City of London</b>	5.6	3.9	8.2	7.9	86.3	88.2
<b>London</b>	9.4	7.1	9.8	8.5	80.8	84.3
<b>England</b>	9.1	7.5	10.2	10.2	80.7	82.3
<b>England and Wales</b>	9.3	7.6	10.2	10.2	80.5	82.2

### Sex

The City of London has fewer female residents than male, by a factor of ten percentage points, though the proportion of female residents did increase by half a percentage point between 2011 and 2021. This is contrary to wider London and national trends. London saw a slightly higher percentage point shift towards the female population between 2011 and 2021, retaining a higher

proportion of female residents. The national breakdown also shows a higher proportion of females, but with a more limited increased between census years. The below table shows the full percentage breakdown.

Area name	Female		Male	
	2011	2021	2011	2021
City of London	44.5	45.0	55.5	55.0
London	50.7	51.5	49.3	48.5
England	50.8	51.0	49.2	49.0
England and Wales	50.8	51.0	49.2	49.0

**Race**

The City of London saw a decrease in its White residential population of 9.2 percentage points between 2011 and 2021, with concomitant rises in its Asian, Asian British or Asian Welsh, Mixed or Multiple ethnic groups, and Other ethnic group populations. These changes were larger than those at a London and national level, but in line with overall trends.

The City of London shows higher levels of non-White ethnic groups than the national breakdown, but below those seen for London overall, particularly the Black, Black British, Black Welsh, Caribbean, or African population, where the proportion is 10.8 percentage points lower than London. The below table shows the full percentage breakdown.

Area name	Asian, Asian British or Asian Welsh		Black, Black British, Black Welsh, Caribbean or African		Mixed or Multiple ethnic groups		White		Other ethnic group	
	2011	2021	2011	2021	2011	2021	2011	2021	2011	2021
City of London	12.7	16.8	2.6	2.7	3.9	5.5	78.6	69.4	2.1	5.6
London	18.5	20.7	13.3	13.5	5.0	5.7	59.8	53.8	3.4	6.3
England	7.8	9.6	3.5	4.2	2.3	3.0	85.4	81.0	1.0	2.2
England and Wales	7.5	9.3	3.3	4.0	2.2	2.9	86.0	81.7	1.0	2.1

**Religion or Belief**

In the 2021 Census, the most common response from City of London residents was No Religion, at 43.8%, an increase of 9.6 percentage points from 2011. The most common response in 2011 was Christian, which saw a concomitant fall of 10.6 percentage points in 2021. This is in line with national trends, though the decrease was smaller than the overall national trend (13.1 percentage points), but higher than London (8 percentage points). Unlike the City of London, Christian remained the largest response group nationally and in London. However, the ONS advises caution when making comparisons between years and areas when looking at religion as the question is voluntary and has varying response rates. The below table shows the full percentage breakdown.

Area name	No religion		Christian		Buddhist		Hindu		Jewish		Muslim		Sikh		Other religion		Not answered	
	2011	2021	2011	2021	2011	2021	2011	2021	2011	2021	2011	2021	2011	2021	2011	2021	2011	2021
City of London	34.2	43.8	45.3	34.7	1.2	1.1	2.0	2.4	2.3	2.1	5.5	6.3	0.2	0.1	0.4	0.6	8.8	8.9
London	21.0	27.1	48.7	40.7	1.0	0.9	5.0	5.1	1.8	1.7	12.6	15.0	1.5	1.6	0.6	1.0	7.7	7.0
England	24.8	36.7	59.4	46.3	0.5	0.5	1.5	1.8	0.5	0.5	5.0	6.7	0.8	0.9	0.4	0.6	7.1	6.0
England and Wales	25.2	37.2	59.3	46.2	0.4	0.5	1.5	1.7	0.5	0.5	4.9	6.5	0.8	0.9	0.4	0.6	7.1	6.0

**Gender Reassignment**

The 2021 Census did not collect any data with respect to Gender Reassignment. Instead, it featured for the first time a question on Gender Identity. The question was voluntary and was only asked of people aged 16 years and over. The City of London broadly follows the national trend. The percentage breakdown for 2021 is displayed below, but with no comparable data for 2011.

Area name	Gender identity the same as sex registered at birth	Gender identity different from sex registered at birth but no specific identity given	Trans woman	Trans man	Non-binary	All other gender identities	Not answered
	2021	2021	2021	2021	2021	2021	2021
City of London	92.1	0.1	0.1	0.1	0.1	0.0	7.4
London	91.2	0.5	0.2	0.2	0.1	0.0	7.9
England	93.5	0.2	0.1	0.1	0.1	0.0	6.0



England and Wales	93.5	0.2	0.1	0.1	0.1	0.0	6.0
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## Pregnancy and Maternity

The 2021 Census did not collect any data with respect to Pregnancy and Maternity. Whilst NHS England does produce annual data on maternity, including the number of births, this data is categorised by Commissioning Region and NHS Foundation Trust, rather than local authority, so will not provide specific data on City of London residents.

As an alternative, NHS England is now producing experimental data on maternity as part of the Maternity Services Dashboard, which can provide us with some of the relevant information - [Maternity Services Monthly Statistics, Final July 2023, Provisional August 2023, experimental statistics - NHS Digital](#) . The most recently published confirmed dataset breaks down the number of women booking antenatal appointments in July 2023. Antenatal appointment bookings by City of London residents were evenly split between the three age categories between 30 and 44. Whilst the proportion of women aged 30 to 34 is in line with London and national trends, women aged 35 to 39 and 40 to 44 are overrepresented, with the latter 26.7 percentage points higher than the London value. However, as the sample size is very small, we should treat these findings with caution.

Area name	Age of Women with an Antenatal Booking Appointment - July 2023							Value Outside Report Parameters
	Under 20	20 to 24	25 to 29	30 to 34	35 to 39	40 to 44	45 or over	
City of London	0.0	0.0	0.0	33.3	33.3	33.3	0.0	0.0
London	1.5	9.8	22.7	34.0	24.8	6.6	0.7	0.0
England	3.2	12.6	26.7	33.5	19.1	4.5	0.4	0.0

## Sexual Orientation

The 2021 Census featured for the first time a question on Sexual Orientation. The question was voluntary and was only asked of people aged 16 years and over. 7.6% of City of London residents identify as Gay or Lesbian, a much higher percentage than seen in London and nationally (5.4 and 6.1 percentage points respectively). A higher percentage also identified as Bisexual, with a resultant lower proportion identifying as Straight or Heterosexual. The percentage breakdown for 2021 is displayed below, but with no comparable data for 2011.

Area name	Straight or Heterosexual	Gay or Lesbian	Bisexual	Pansexual	Asexual	Queer	All other sexual orientations	Not answered
	2021	2021	2021	2021	2021	2021	2021	2021
City of London	79.3	7.6	2.3	0.3	0.1	0.1	0.0	10.4
London	86.2	2.2	1.5	0.4	0.0	0.1	0.0	9.5
England	89.4	1.5	1.3	0.2	0.1	0.0	0.0	7.5
England and Wales	89.4	1.5	1.3	0.2	0.1	0.0	0.0	7.5

### Marriage and Civil Partnership

According to ONS analysis, the City of London saw England's third largest percentage point rise in the proportion of people aged 16 years and over who had never been married or in a civil partnership (from 50.8% in 2011 to 57.4% in 2021). The City of London is now the English local authority area with the sixth-highest percentage of adults who had never been married or in a civil partnership. The City of London is in line with wider London with Never married and never registered a civil partnership as the most common response, compared to nationally where Married or in a registered civil partnership remains the most common response, despite falling between census years. The below table shows the full percentage breakdown.

Area name	Never married and never registered a civil partnership		Married or in a registered civil partnership		Separated, but still legally married or still legally in a civil partnership		Divorced or civil partnership dissolved		Widowed or surviving civil partnership partner	
	2011	2021	2011	2021	2011	2021	2011	2021	2011	2021
City of London	50.8	57.4	34.8	30.4	2.6	2.1	7.8	7.0	4.0	3.0
London	44.1	46.2	40.2	40.0	3.2	2.3	7.4	7.3	5.0	4.2
England	34.6	37.9	46.8	44.7	2.7	2.2	9.0	9.1	6.9	6.1
England and Wales	34.6	37.9	46.8	44.6	2.6	2.2	9.0	9.1	7.0	6.1

### **Health**

Health: 56.6% of City of London residents described their health as "very good", increasing from 55.0% in 2011. Those describing their health as "good" rose from 31.1% to 31.2%.

### **Workers:**

The working population of the City is approximately 615,000 people. The City Statistics Briefing, produced annually by the City Corporation's Innovation and Growth Department, compiles some demographic information about the workforce population, particularly on the FPS sector. In the most recent release, published in July 2023, the following insights were drawn:

- Females are underrepresented in the City workforce, making up 36% of employees.
- 61% of the City workforce is aged between 22 and 39 years, higher than the equivalent group for England and Wales (40%).
- 37% of the City's workforce identify as Black, Asian or of Minority Ethnic Origin.

The full briefing can be found here: [City statistics briefing - City of London](#)

### **Air quality data**

We measure air pollution at 90 locations across the Square Mile. Air pollution has an impact on the health of everyone, though children and the elderly are the most vulnerable. There is a wealth of evidence and research about the health impacts of air pollution, which we refer to when delivering our programme to improve air quality.

The protected characteristics most impacted by the health impacts of air pollution are children and the elderly, along with people with certain health conditions like heart and lung disease. Action to support these communities is reflected in the action plan attached to the Air Quality Strategy.

Some communities may be at a disadvantage when trying to access information about how to manage the impact of air pollution on their health so we have worked with our neighbouring boroughs of Tower Hamlets, Hackney and Newham on a specific programme to work with hard to reach communities, training pharmacists to deliver health messages.

**Has there been any consultation with, or input from, customers / service users or other stakeholders?** If so, with whom, how were they consulted and what did they say? If you haven't consulted yet and are intending to do so, please list which specific groups or communities you are going to consult with and when.

The draft strategy is out for consultation for 8 weeks. The consultation closes on 26<sup>th</sup> July 2024. It is being hosted on the Common Place web site, which is fully accessible, and has been widely distributed. We will also be holding five drop-in events across the Square Mile.

**Are there any complaints, compliments, satisfaction surveys or customer feedback that could help inform this assessment? If yes, what do these tell you?**

No satisfaction surveys have been undertaken. The work programme is a statutory function, much of what we deliver is prescribed by the government / Greater London Authority. As part of the consultation, stakeholders have been invited to recommend areas for additional air quality monitoring and additional actions to improve air quality.

### Step 3 – Identifying the negative impact.

a. Is there any negative impact on individuals or groups in the community?

Equality Themes	Positive Impacts	Negative Impacts identified	Solutions (ways in which you could mitigate the negative impact)
<p><b>Age</b> (including children, young people and older people)</p>	<p>Improving air quality has a positive impact on everyone</p>	<p>Air pollution has the greatest impact on the health of children and the elderly</p>	<p>We measure air pollution at all schools and nurseries in the Square Mile. We provide annual reports for the schools/ nursery and support them with activities to educate children and their parents about air pollution. We have undertaken 3 x year-long citizen science programmes with residents to help them understand how to avoid high levels of air pollution. We make current air quality data available on line at <a href="http://airqualityengland.co.uk">Air quality in England (airqualityengland.co.uk)</a> and support a London wide air pollution alert service administered by the Greater London Authority.</p>
<p><b>Disability</b> (including carers)</p>		<p>Air pollution can aggravate some health conditions.</p>	<p>We have trained health practitioners and</p>

		<p>Differential parking charges based on emissions from vehicle has the potential to impact negatively on disabled drivers.</p> <p>Decisions around traffic management can impact on people with a disability</p>	<p>pharmacists so they can advise patients who are vulnerable on steps they can take to minimize the impact of air pollution on their health.</p> <p>We make current air quality data available on line at <a href="http://airqualityengland.co.uk">Air quality in England (airqualityengland.co.uk)</a> and support a London wide air pollution alert service administered by the Greater London Authority.</p> <p>Parking charges are dealt with by Highways and we expect that team to undertake an EIA for their service area as required</p> <p>Traffic management decisions are managed and delivered through the Transport Strategy. and we expect the Transport teams to undertake an EIA for their service area as required</p>
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<p><b>Gender</b> (men and women)</p>			<p>No specific impact</p>
<p><b>Race</b> (including Gypsies &amp; Travelers and Asylum Seekers)</p>		<p>Some communities can be at a disadvantage when trying to access information to help them manage their exposure to air pollution</p> <p>Some communities could be at a disadvantage when applying for a Clean City Award for best practice as they do not have the right resources</p>	<p>We have delivered a programme with LB Hackney, Newham and Tower Hamlets to deliver messages about air pollution to some hard-to-reach communities.</p> <p>A new Air Quality Information web site has been designed with our communities, to be user friendly and contain appropriate, easy to understand information. It is called <a href="#">Air Aware</a> . It is fully accessible and the information on the web site is available in 18 different languages.</p> <p>The Clean City Awards have been running since 1994 are managed by the Recycling Team and we expect that team to undertake an EIA for their service area as required</p>

## Equality Impact Assessment

<b>Religion or belief</b> (including people of no religion or belief)			No specific impact
<b>Gender Re-assignment</b> (those that are going or have gone through a transition: male to female or female to male)			No specific impact
<b>Pregnancy and Maternity</b>		Air pollution can have a pre-natal impact on health	High levels of air pollution can result in low birth weight. We have trained health practitioners and pharmacists so they can advise pregnant women on steps they can take to minimise the impact of air pollution on their health
<b>Sexual orientation</b> (including gay, lesbian, bisexual and heterosexual)			No specific impact
<b>Marriage and Civil Partnership</b>			No specific impact
<b>Human Rights</b>			No specific impact



### Step 4 – Changes or mitigating actions proposed or adopted

**Having undertaken the assessment are there any changes necessary to the existing service, policy, function or procedure?  
What changes or mitigating actions are proposed?**

As part of the air quality programme, we will continue to consider the varying impact of air pollution and access to information of different City of London communities. This will be reported on annually.

### Step 5 – Monitoring

**How are you going to monitor the existing service, function, policy or procedure?**

An annual report will be produced and submitted to PHES committee and the Health and Wellbeing Board to track progress with actions in the Air Quality Strategy. This report is a statutory requirement and will also be submitted to the Greater London Authority and the government.


### Part C - Action Plan

Barrier/s or improvement/s identified	Action Required	Lead Officer	Timescale
Groups that are more vulnerable to the health effects of air pollution have already been identified and action taken to ensure that they have good quality data and	Continue to consider the varying impact of air pollution and access to information of different City of London communities.	Ruth Calderwood	2025 to 2030

## Equality Impact Assessment

<p>information to help them to avoid high levels of air pollution.</p> <p>The aims of this strategy are to go beyond national statutory targets and deliver better air quality that will have a positive health outcome on all of our communities</p>	<p>This will be delivered as part of the Air Quality Strategy and reported on annually</p> <p>Check census data as it is updated over time and ensure there are no barriers to different communities in delivery of the Air Quality Strategy</p>		
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### Equality Impact Assessment approved by:

<p>Head of Service:</p> 	<p>Date: 14<sup>th</sup> October 2024</p>
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Please send an electronic copy of the Equality Team

# Agenda Item 14

<b>Committee(s):</b> Planning and Transportation Committee	<b>Dated:</b> 21/01/2025
<b>Subject:</b> Environment Department high-level Business Plan 2024/25 – Progress Report (Mid-Year: 1 April – 30 September 2024)	<b>Public report:</b> For Information
<b>This proposal:</b> <ul style="list-style-type: none"><li>• <b>delivers Corporate Plan 2024-29 outcomes</b></li><li>• <b>provides statutory duties</b></li><li>• <b>provides business enabling functions</b></li></ul>	<ul style="list-style-type: none"><li>• Diverse engaged communities</li><li>• Vibrant thriving destination</li><li>• Providing excellent services</li><li>• Flourishing public spaces</li><li>• Leading sustainable environment</li></ul>
<b>Does this proposal require extra revenue and/or capital spending?</b>	No
<b>If so, how much?</b>	N/A
<b>What is the source of Funding?</b>	N/A
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	N/A
<b>Report of:</b>	Katie Stewart, Executive Director Environment
<b>Report author:</b>	Joanne Hill, Environment Department

## Summary

This report provides a mid-year update on the progress made against the high-level Business Plan 2024/25 by the service areas of the Environment Department which fall within the remit of your Committee.

The report summarises the progress that has been made against major workstreams and performance measures during the first two quarters of 2024/25. An update on the financial position to the end of Quarter Two was presented to the Committee’s November meeting in a report of the Chamberlain.

## Recommendation

Members are asked to:

- Note the content of this report and its appendices.

## Main Report

### Background

1. The Environment Department’s high-level Business Plan for 2024/25 provides a strategic overview of the key areas of work that will be undertaken across the whole department during the year. In March 2024, the Planning and Transportation Committee approved the content of the Business Plan that relates to the service areas within its remit

2. To ensure your Committee is kept informed, progress made against the high-level Business Plan is reported to you on every six months. This approach allows Members to ask questions and have a timely input into areas of particular importance to them.

## **Current Position**

### **Key workstreams**

3. The high-level Business Plan set out the following priority workstreams for all service areas that report to your Committee. All workstreams support delivery of the Corporate Plan 2024-29 outcomes and other cross-cutting strategies and programmes.
4. During the first six months of the year, teams have made good progress against all workstreams. An update on this progress is provided at Appendix 1.

### **Key Performance Indicators**

5. Each of the key workstreams has one or more associated Key Performance Indicators to measure progress against the target. Many of these indicators have annual targets, but for those where data is available at mid-year, this is provided at Appendix 2. Overall, the results show that progress towards achieving the workstreams objectives is on track.

## **Corporate and Strategic Implications**

**Strategic implications** – The monitoring of key improvement objectives and performance measures links to the achievement of the aims and outcomes set out in the Corporate Plan 2024-29.

**Financial implications** – An update on the financial position to the end of Quarter Two 2024/25 was presented to the Committee's November meeting in a report of the Chamberlain.

**Resource implications** – None.

**Legal implications** – None.

**Risk implications** – Risks to achieving the objectives set out in the Business Plan of each service area are identified and managed in accordance with the City of London Risk Management Framework. Risk Registers are reported to this Committee on a regular basis.

**Equalities implications** – None.

**Climate implications** – Delivery of the Climate Action Strategy is a key workstream for the Environment Department and an update on progress is provided within this report.

**Security implications** – None.

**Appendices**

- Appendix 1 – Progress against key workstreams
- Appendix 2 – Progress against key performance indicators

**Background Papers**

'Draft High-Level Business Plan 2024/25 – Environment Department' (P&T Committee, 5 March 2024)

'Finance Progress Report (Q2 July – September) 2024/25' (P&T Committee, 5 November 2024)

**Contact**

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**Progress against key workstreams**  
**Mid-Year 2024/25: 1 April 2024 – 30 September 2024**

Ref:	Workstream	Mid-Year (1 April 2024 – 30 September 2024)
1.	<p><b>City Plan</b>            Adopt the City Plan (By Autumn 2025).</p>	<ul style="list-style-type: none"> <li>• Once the City Plan is implemented, new development in the Square Mile will reflect the priorities of the City Corporation, informed by the views of stakeholders. The City Plan was submitted to the Secretary of State in August.</li> <li>• This workstream is currently on track although it seems likely that the next milestone (examination hearings) will be held in early spring 2025 rather than autumn/winter 2024. This is due to delays by the Planning Inspectorate.</li> </ul>
2.	<p><b>Development Management</b>            Secure, review and revise PPA income annually to meet the needs of the planning service. (2024-29).            Delivery, post-decision, of floor space projections to meet the business City, 'Destination City' and economic development objectives as developments come online.            Negotiation of cultural, visitor and heritage uses within major developments to meet Destination City objectives (2024-29).</p>	<ul style="list-style-type: none"> <li>• Planning Performance Agreement (PPA) income has remained strong for the first half of the year, for both pre-application and application stage PPAs. This has allowed for the provision of additional staff resource across the service, maintaining strong performance which significantly contributes to the internal and external reputation of the City as a place to work, develop and invest.</li> <li>• At the Building London Planning Awards, the Planning Team won the awards for Best Heritage or Culture Project (Vine Street Roman Wall exhibition) and the Best Project for Sustainable Planning (8 Bishopsgate development). The Lighting SPD was also highly commended.</li> </ul>
3.	<p><b>Building Control</b>            Adapt the Building Control service to meet the requirements of the Building Safety Act 2022.            Embed the new London District Surveyors' Association (LDSA) HUB.            Adopt the new performance targets set by the Building Safety Regulator (BSR) and adapt the Quality Management System accordingly</p>	<ul style="list-style-type: none"> <li>• The process of fully converting to the new legislation is underway.</li> <li>• Registration of Building Control Surveyors with their necessary validation continues.</li> <li>• The Quality Management System (QMS) has passed its external audit and has been certified for a further three years. A move to the Local Authority Building Control (LABC) QMS is being considered.</li> <li>• The LDSA HUB is working well; positive feedback has been received from the BSR and other London Building Control Teams.</li> <li>• Data for most of the BSR's new Key Performance Indicators are being recorded in advance of their implementation in January 2025. In order to</li> </ul>

Ref:	Workstream	Mid-Year (1 April 2024 – 30 September 2024)
		<p>extract all necessary data, some adaptations need to be made within the building control case management software (Ilox). This is a problem faced by building control services across the UK, and officers are working with other London Boroughs and the LDSA to resolve the issue.</p>
4.	<p><b>Climate Action Strategy</b> Cool Streets and Greening Programme (CS&amp;GP) (completion March 2026). Mainstreaming Climate Resilience Programme (MCRP) (Completion March 2027). Square Mile Programme (SqMP).</p>	<p><b>Cool Streets and Greening Programme</b></p> <ul style="list-style-type: none"> <li>• The programme has progressed with three projects going through to the next stage of the Gateway Process.</li> <li>• The Greening Cheapside launch took place in July, providing an opportunity to acknowledge the partnerships involved. The project has opened up a busy corner of the City and is an exemplar project for sustainability, including carbon conscious procurement, biodiversity enhancement and circular economy reuse of fallen wood and Thames Embankment granite.</li> <li>• Construction as the Finsbury Circus Western Arm began in August, and preparations for the next construction programme and Gateway reports commenced.</li> <li>• The Programme was highlighted in an Evening Standard article about the London Open Gardens Weekend.</li> <li>• Interviews with Alderman Alison Gowman about climate resilience and the Cool Streets and Greening Programme featured in the Financial Times and on BBC Radio 4.</li> </ul> <p><b>Mainstreaming Climate Resilience Programme</b></p> <ul style="list-style-type: none"> <li>• Interviews were held with internal experts from across the organisation on pests and disease. The information obtained has been mapped, highlighting how the excellent services we run (such as at the Heathrow Animal Reception Centre and London Port Health Authority) are already responding to this climate risk, and enabling identification of ways to make these functions even more resilient.</li> <li>• Quarter two saw the final stages of development of the Environment Department's Climate Adaptation Action Plan.</li> </ul>



Ref:	Workstream	Mid-Year (1 April 2024 – 30 September 2024)
Page 337		<ul style="list-style-type: none"> <li>• Horizon scanning work continued with the systems map SWOT analysis; the project is progressing toward an adaptive pathways report.</li> <li>• Work continues to coordinate a staff-led forum of 'Climate Champions' with new lead nominations and a series of events to engage staff, including the International Day for World's Indigenous Peoples webinar and a volunteer day at Burnham Beeches.</li> </ul> <p><b>Square Mile Programme</b></p> <ul style="list-style-type: none"> <li>• Officers commenced development of an Outline Business Case on heat zoning in the Square Mile through Phase Two of the Government's Advanced Zoning Programme.</li> <li>• Two heat network feasibility studies, for the North East of the City and cross-border with Hackney, were completed</li> <li>• A final draft of an Embodied Carbon Action Plan for the Square Mile was produced.</li> </ul>
	<p><b>Transport Strategy</b> 25 year strategy adopted in May 2019. Sets out how the City Proposes to design and manage its streets to ensure the Square Mile remains a great place to live, work, study and visit. Forms part of a Local Implementation Plan for our delivery of the Mayor of London's Transport Strategy. Updated annually, the strategy includes a rolling 5-year delivery plan.</p>	<ul style="list-style-type: none"> <li>• Feedback from the public consultation on the proposed changes to the Transport Strategy was reviewed and incorporated as appropriate. The updated Strategy was approved by the Planning and Transportation Committee in July and will be published on the City's website in early 2025.</li> <li>• Projects currently in development and delivery include All Change at Bank; St Paul's Gyrotory Transformation; the Pedestrian Priority Programme; the City Cluster Programme; New Change Gardens; and Healthy Streets Minor Schemes. These projects, alongside changes delivered through s278 agreements for new developments, are delivering accessibility, walking, wheeling and cycling improvements across the City.</li> <li>• The 4<sup>th</sup> 'London Walking and Cycling Conference', held jointly with the London Borough of Hackney, was hosted at Guildhall in September. Attendee numbers were the highest recorded to date, and included the Deputy Mayor of Paris, Thomas Chevandier, as the keynote speaker.</li> </ul>

Ref:	Workstream	Mid-Year (1 April 2024 – 30 September 2024)
7.	<p><b>Parking Service</b>            Deliver an effective, compliant and accessible Parking Service in accordance with Statutory guidelines and regulations.</p>	<ul style="list-style-type: none"> <li>• The Parking Ticket Office has exceeded its target for responding to challenges within 15 days, with an average response time of 10 working days.</li> <li>• The Team reviewed signage and other parking-related issues for Chancery Lane and Cheapside which have both been subject to short notice closure to facilitate events and works. These locations have also been under regular review for signage in response to discussions with motorists.</li> <li>• Officers continued to work with colleagues in the Transport Strategy Team to support their work around traffic order reviews and other important policies and initiatives.</li> </ul>
8.	<p><b>Highways Management</b>            Deliver an effective, high quality, Highways Management Service.            Ensure Highways, footways and carriageways are well maintained.            Reduce carbon emissions by improving lighting efficiency and use.</p>	<ul style="list-style-type: none"> <li>• The Highways Service continued to undertake all mandatory duties to a suitable and sufficient level. All reactive and planned maintenance is meeting required standards.</li> <li>• The corporate contract is achieving all KPI targets.</li> <li>• All projects are designed, supervised and built which helps to meet their objectives in line with the Transport Strategy and Climate Action Plan.</li> <li>• Event management is operating to the required levels to support Destination City and the Sport Strategy.</li> </ul>

## Progress against Key Performance Indicators 1 April 2024 – 30 September 2024

Performance Measure	Performance 2023/24	Target 2024/25	Performance Mid-Year Result 2024/25
Adopt the City Plan – Submission to Secretary of State	N/A	<b>Aug/Sept 2024</b>	Achieved: 29 August 2024
Parking Service - Respond to 95% of PCN correspondence within 15 working days	18 working days	<b>15 working days</b>	10 working days
Parking Service - Car Park – EV Charging Utilisation	10%	<b>12%</b>	5.36%*1
Parking Service - Parking contract management – adherence across all five contracts	N/A (new KPI)	<b>95%</b>	100%
Building Control Full plans assessed (or extension of time agreed) within 5 weeks	100%	<b>95%</b>	96%
Climate Action Plan - Number of pilot projects completed (CS&GP).	4 projects	<b>4-7 Projects</b>	3 projects
Climate Action Plan - Number of resilience measures incorporated (CS&GP).	5 measures	<b>6-8 measures</b>	5 measures
Climate Action Strategy - Number of upskilling sessions run (MCRP).	100 hours	<b>4-6 sessions</b>	12 sessions
Climate Action Strategy - Number of projects completed (sqMP)	N/A (new KPI)	<b>7 Projects</b>	1 project completed. (6 in progress)
Climate Action Strategy - Number of engagement sessions with Square Mile stakeholders (sqMP).	N/A (new KPI)	<b>10 sessions</b>	7 sessions
*1 12% Target has not been met at mid-year due to there being no further uptake on usage			

Performance Measure	Performance 2023/24	Target 2024/25	Performance Mid-Year Result 2024/25
Development Management - Planning Performance Agreement Income	£1.6m	<b>£1.7m</b>	Measured annually
Development Management - Square metres of office floorspace in the City	9.38m sqm	<b>100,000 sqm</b>	Measured annually
Development Management - Cultural and community floorspace secured	1 scheme	<b>10,000 sqm</b>	Measured annually
Transport Strategy - Number of people killed and seriously injured (KSI) on our streets, baseline 54 in 2017	42 (2023 calendar year)	<b>16 (max) by 2030 0 by 2044</b>	Measured annually (calendar year)
Transport Strategy - Number of kilometres of pedestrian priority streets, baseline 25km (25%) in 2017.	27.8km / (28%)	<b>35km / (35%) by 2030 55km / (55%) by 2044</b>	Measured annually
Transport Strategy - Reduction in all-day motor vehicle traffic volumes, baseline 185K in 2017.	n/a	<b>139k / (-25%) by 2030 93k / (-50%) by 2044</b>	Measured annually
Highways Management - Street lighting energy usage (kWh).	1.85m kWh	<b>1.8m kWh</b>	Measured annually
Highways Management - % of insurance claims awarded.	5%	<b>=&lt;5%</b>	Measured annually
Highways Management - of carriageway in need of repair.	12%	<b>=&lt;10%</b>	Measured annually

<b>Committee(s):</b> Planning and transportation committee – For Information	<b>Dated:</b> 21 January 2025
<b>Subject:</b> Monthly Public Lift & Escalator Report - October 2024	<b>Public</b>
<b>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</b>	Shape outstanding Environments – Our spaces are secure, resilient, and well-maintained
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>N</b>
<b>If so, how much?</b>	<b>n/a</b>
<b>What is the source of Funding?</b>	<b>n/a</b>
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	
<b>Report of:</b> City Surveyor	<b>For Information</b>
<b>Report author:</b> 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 1 October 2024 to 31 December 2024.

In this reporting period, publicly accessible lifts and escalators were available for **94%** of the time.

### Main Report

1. There are 16 public lifts/escalators in the City of London portfolio, which are monitored and maintained by City Surveyor’s. A location map is provided as an annex to this document. Table 1.0 provides a breakdown of availability during the reporting period of 1 October 2024 to 31 December 2024.

**Table 1.0**

<b>Asset Reference</b>	<b>Name</b>	<b>Quarterly</b>
SC6458959	London Wall Up Escalator	100%
SC6458958	London Wall Down Escalator	100%
SC6462771	Blackfriars Bridge	100%
SC6458963	Tower Place Scenic Lift	100%
CL24	Duchess Walk Public Lift	100%
SC6458970	Wood Street Public Lift	99%
SC6459244	Glass South Tower	99%
SC6459146	Speed House Glass/Public Lift	99%
SC6458964	London Wall East	98%
SC6458966	Atlantic House	97%
SC6458962	Tower Place Public Lift	96%
SC6458965	London Wall West	92%
SC6462850	33 King William Street	91%
SC6458967	Little Britain	89%
SC6458969	Pilgrim Street Lift	81%
SC6458968	Moor House	67%

2. Moor House. This lift could not be moved and was blocking access to the faulty lift controller and drive unit in November. Significant/In depth works were required to rectify which needed surveying and quoting. Works were completed in December and now back in service.
3. London Wall West. Downtime in December due to electrical fault out of hours. Rectification required specialist visit resulting in extended downtime. Back in service with no faults.
4. Little Britain/Pilgrim Street/33 King William Street. All sites experienced issues with faulty emergency phone sim cards in November, therefore lifts taken out of service due to safety reasons. Equipment manufacturer attended to investigate and found their network provider blocking the sim cards due to perceived low use. This issue has now been rectified with the network provider. All lifts back in service.
5. Table 3.0 categorises the causes of faults/outages in this quarterly reporting period. Please note that reported faults do not necessarily result in downtime.

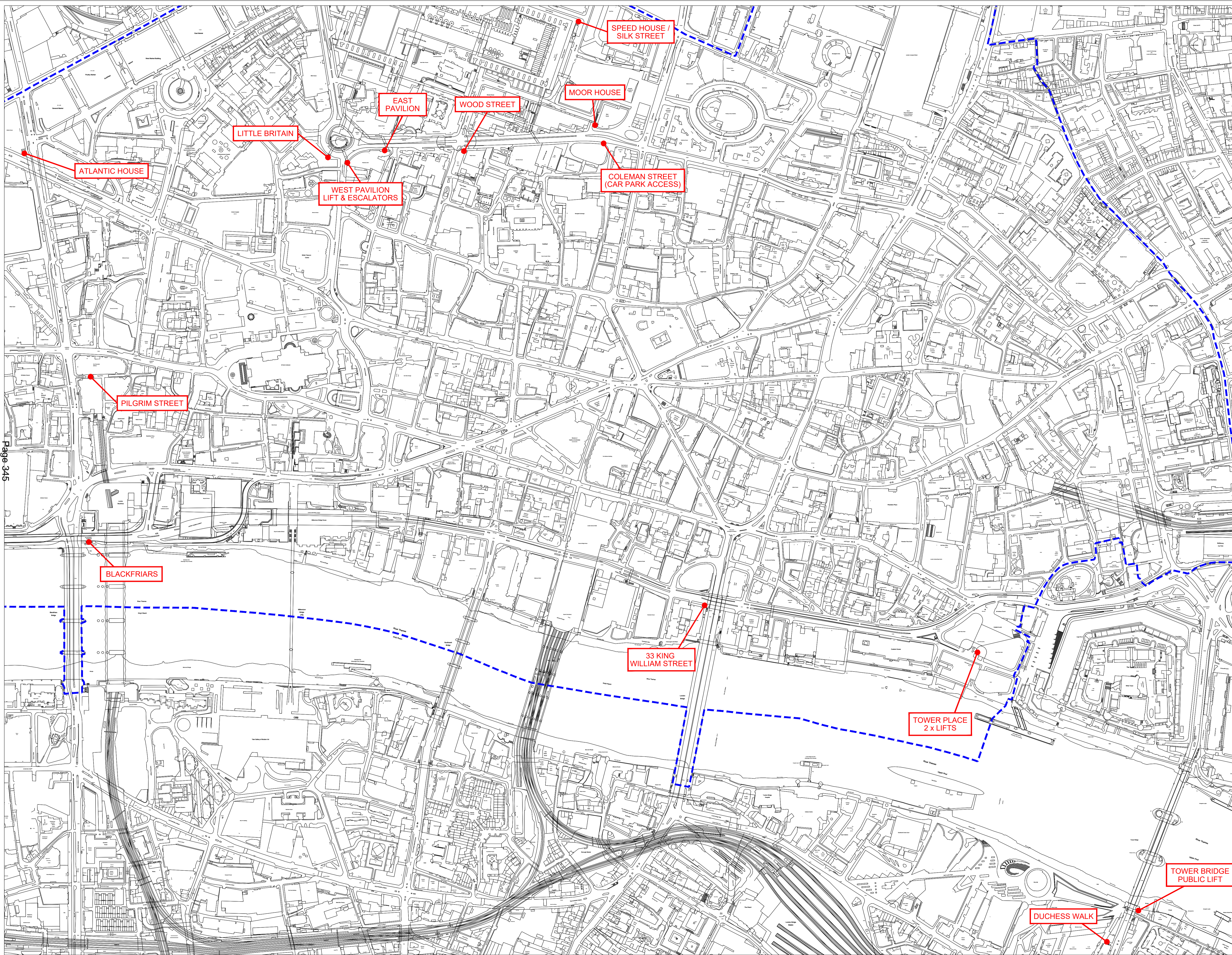
**Table 3.0**

<b>Category</b>	<b>No of call outs</b>
External/Environmental factors	3
Equipment faults/failure	15
Planned Repairs	1
Resets following emergency button press or safety sensor activation	4
Damage/misuse/vandalism	2
Autodialler faults	3
<b>Total</b>	<b>28</b>

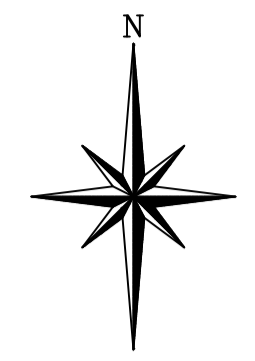
6. There are currently no projects being conducted on public lifts or escalators.

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Notes  
Do not scale. All dimensions to be checked on site.  
Errors to be reported to supervising officer.



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Rev	Drawn	Date
E	LIFT INFO UPDATED	S.B. 05/22
D	LIFT INFO UPDATED	S.J.C. 07/18
C	LIFT INFO UPDATED	S.B. 08/17
B	LIFT INFO UPDATED	D.M. 05/14
A	LIFT INFO UPDATED	S.B. 02/13



**CITY OF LONDON**  
*P.G. Wilkinson BSc MSc MRICS*  
City Surveyor  
CITY SURVEYOR'S DEPARTMENT  
Corporate Property Group  
Plans & Records Section

Project :	CITY OF LONDON
Drawing :	PUBLIC LIFT LOCATIONS
Scale at A1 :	NTS
Des :	JJ
Date :	MAR 2011
Drawing No. :	1-C-40132 (Formerly PLL\05\01)
Revision :	A B C D E

Drawn by :	DRF
App :	
Pro code :	UPRN

12/05/2022 15:38:10 Baynes, Scott H:\Projects\New Structure\CAD\Citymaps\All General Citymap Plans\Citymap Public Lifts - LU - Carparks Etc\1-C-40132 - City Map - Public Lifts - Rev D.dwg

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**PLANNING AND TRANSPORTATION COMMITTEE – OUTSTANDING ACTIONS**

Item	Date	Action/ Responsible Officer	Progress Update and Date to be progressed/completed
1	17 Nov 2020, 15 Dec 2020, 5 Jan 2021, 26 Jan 2021, 16 Feb 2021, 24 Feb 2021 9 March 2021, 30 March 2021, 22 April 2021, 12 May 2021 8 June 2021, 29 June 2021, 20 July 2021, 7 Sept 2021, 21 Sept 2021, 26 Oct 2021, 16 Nov 2021, 14 Dec 2021, 11 Jan 2022 1 Feb 2022, 22 Feb 2022, 26 April 2022, 17 May 2022, 7 June 2022 1 July 2022, 19 July 2022, 20 Sept 2022 11 Oct 2022, 1 Nov 2022, 10 Jan 2023 7 March 2023, 11 May 2023, 18 July 2023 3 October 2023 21 November 2023 12 December 2023, 31 January 2024, 5 March 2024, 14 May 2024, 23 July 2024, 4 October 2024	<p style="text-align: center;"><b><u>Member Training</u></b></p> <p style="text-align: center;"><b>Chief Planning Officer and Development Director / Director of the Built Environment</b></p> <p>A Member questioned whether there would be further training provided on Daylight/Sunlight and other relevant planning matters going forward. She stated that she was aware that other local authorities offered more extensive training and induction for Planning Committee members and also requested that those sitting on the Planning Committee signed dispensations stating that they had received adequate training.</p> <p>The Chair asked that the relevant Chief Officers consider how best to take this forward. He also highlighted that the request from the Town Clerk to all Ward Deputies seeking their nominations on to Ward Committees states that Members of the Planning &amp; Transportation Committee are expected to undertake regular training.</p>	<p><b>UPDATE: ( 21 JANUARY 2025):</b>                      New Committee Members are provided with training on key aspects. A programme of wider Member training was implemented in 2023. A Carbon Options Guidance (COG) PAN 2023 training session for Planning &amp; Transportation Committee Members took place on 5 November 2024.</p>

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