



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, 8 JULY 2025

Time: 1.45 pm, or at the rising of the Planning Applications Sub-Committee meeting, whichever is later

Venue: LIVERY HALL - GUILDHALL

7. *** DISTRICT SURVEYORS ANNUAL REPORT**

Report of the Executive Director, Environment.

For Information
(Pages 3 - 14)

8. *** ENVIRONMENT DEPARTMENT HIGH-LEVEL BUSINESS PLAN 2024/25 - YEAR-END PROGRESS REPORT**

Report of the Executive Director, Environment.

For Information
(Pages 15 - 24)

9. *** REVENUE OUTTURN 2024/25**

Report of the Executive Director, Environment & the Chamberlain.

For Information
(Pages 25 - 36)

10. *** RISK MANAGEMENT UPDATE REPORT**

Report of the Executive Director, Environment.

For Information
(Pages 37 - 56)

11. *** QUARTERLY PUBLIC LIFT & ESCALATOR REPORT - APRIL TO JUNE 2025**

Report of City Surveyor.

For Information
(Pages 57 - 60)

13. *** REPORT OF ACTION TAKEN**

Report of the Town Clerk.

For Information
(Pages 61 - 100)

18. *** CITIGEN AND HEAT NETWORK ZONING – PREFERRED WAY FORWARD**

Report of the City Surveyor and Executive Director of Property.

For Information
(Pages 101 - 196)

19. *** DEBT ARREARS - ENVIRONMENT DEPARTMENT - (P&T) COMMITTEE**

Report of the Executive Director, Environment.

For Information
(Pages 197 - 206)

City of London Corporation Committee Report

Committee(s): Planning & Transportation Committee – For information	Dated: 8 th July 2025
Subject: District Surveyors Annual Report	Public report:
This proposal: <ul style="list-style-type: none"> • delivers Corporate Plan 2024-29 outcomes • provides statutory duties • Delivers projects under the Climate Action Strategy 	Providing excellent services. Flourishing public spaces. Leading sustainable environment.
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Executive Director Environment	Katie Stewart
Report author: District Surveyor	Gordon Roy

Summary

The purpose of this report is to update Committee on the workings of the District Surveyor's office which reports to it for the purposes of building control, engineering services for the City's major infrastructure and to provide resilience to buildings and businesses within the square mile that maybe affected by climatic and environmental risks. To provide Members with a better understanding of the work of the District Surveyor it was agreed to submit annual reports to the committee for information.

Recommendation(s)

Members are asked to:

- Note the report for information.

Main Report

Background

1. The principal role of the District Surveyor's Building Control Service is to ensure that all building work complies with the requirements of the Building Act 1984 and the Building Regulations 2010. Building Regulations are minimum standards laid down by Parliament to secure the health and safety of people in or about

buildings with an increasing emphasis on improving energy efficiency, sustainability and accessibility. The building control section is also responsible for notices submitted under Section 30, London Building Act (Amendment) Act 1939 for temporary demountable structures.

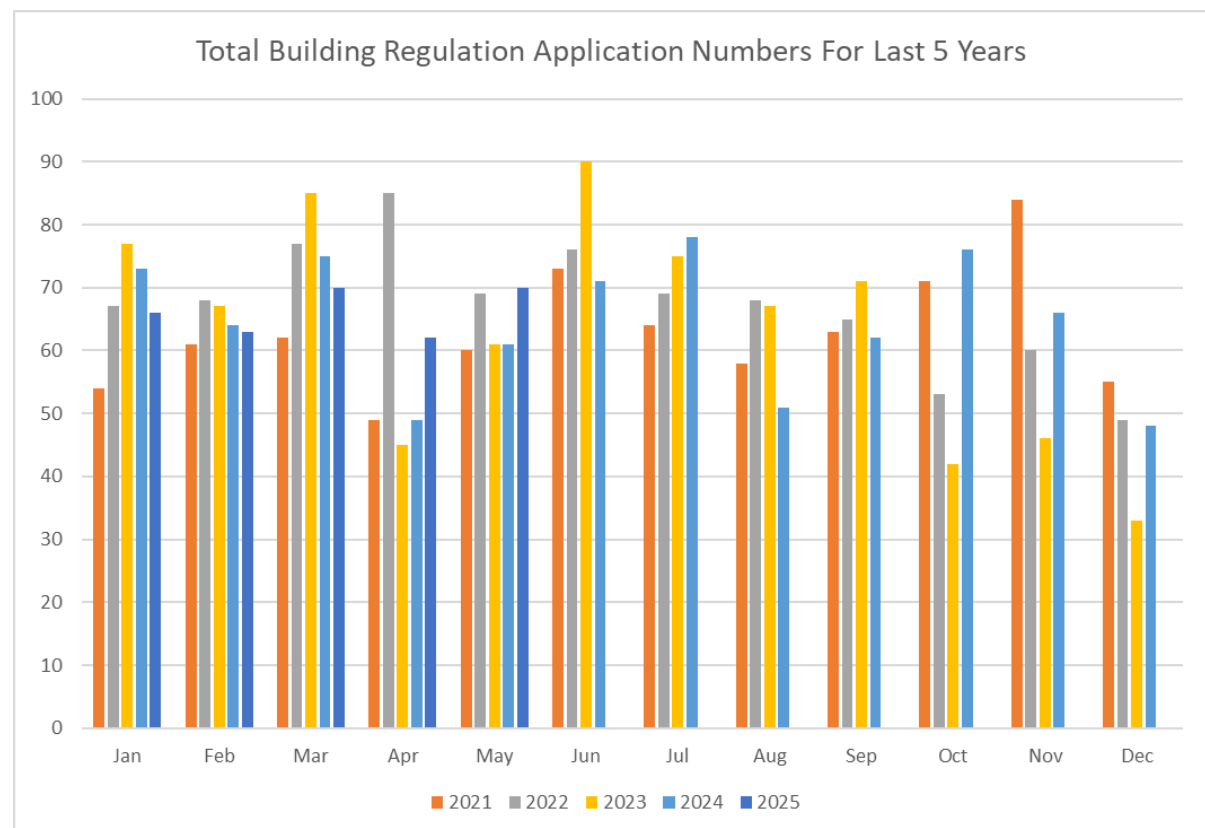
2. In offering this Building Regulation regulatory service within the City, the District Surveyor's Office is in direct competition with approximately 90 private firms operating as corporate Registered Building Control Approvers (RBCA) authorised by the Building Safety Regulator, to offer a building regulations approval service.
3. In addition, Dangerous Structures within Inner London are dealt with under the London Building Acts 1930-1939. Responsibility for dealing with them is delegated, by your committee to the District Surveyor. This service is provided on a continuous basis, 24 hours a day throughout the year to ensure public safety. A record of all calls is maintained on the IDOX Uniform software.
4. Other responsibilities placed upon the District Surveyor include:
 - Maintaining a register of all work under the control of RBCA's.
 - Registering certificates under the Competent Persons Schemes.
 - Processing and recording Demolition Notices.
 - Advice to the Community and Children's Services on Marriage Licence applications for the technical standards in relation to Health and Safety.
 - Advice to the Planning Service on major Planning Applications on the design of Sustainable drainage systems. This service was extended in April 2020, to include Fire Safety and Energy Statements, which are additional requirements for major planning applications under the Local Plan.
5. General advice and guidance on technical and procedural requirements are made freely available to other areas of the City of London Corporation and the public upon request.
6. The Engineering Team are responsible for the structural inspection and maintenance of approximately 80 Highway Structures, the City's 5 river Bridges and a number of Statutory Reservoirs on which they have reported separately to your committee, City Bridge Foundation Board and Natural Environment Committees respectively. The Engineering Team also provide advice on major Infrastructure Projects to protect the City's interests.
7. The Environmental Resilience Team, formed in June 2019, aims to improve the resilience of the City Corporation and the Square Mile to environmental impacts including flooding, and fulfilling the City Corporation's statutory duties as Lead Local Flood Authority under the Flood and Water Management Act 2010.
8. The District Surveyor is also responsible for monitoring delivery of projects within the Environment Department, designed to deliver the Corporate Climate Action Strategy.

Current Position

9. As referenced earlier in the report, the Building Regulations function of the District Surveyor's Office is open to extensive competition and is affected by the fluctuating extent of building work within the City. During 2024/25 workload has

generally been high with a number of large projects currently under construction and developments such as 22 Bishopsgate and 1 Leadenhall being fitted out by new tenants. The following bar chart (Table1) shows the number of applications and Initial Notices received by the District Surveyors Office over the last few years.

Table 1



10. Applications received by the Building Control Service for 2024/25 and the resulting market share are shown in Table 2.

Table 2

Market Share					
	Yr. 2020/21	Yr. 2021/22	Yr. 2022/23	Yr. 2023/24	Yr. 2024/25
City of London Applications	158	222	216	166	126
Initial Notices Received	418	574	590*	574	636
Total Number of Applications	576	796	824	740	762
City of London Market Share	27%	28%	26%	22%	17%

- 618 Initial Notices deposited, 20 Cancelled and 8 Rejected.

11. Market share was 17% and therefore below our target 22-30% range.

Table 3 below sets out the numbers of applications received by the top 6 building control providers within the City, and it demonstrates that the District Surveyors remain the highest provider of this service.

Table 3

Building Control market share		
Provider	Number of applications	Percentage of Market
City of London	126	17%
Shore Engineering	65	8.5%
Sweco Building Control Limited	109	14%
Stroma Building Control Limited	71	9%
Salus (Building Control & Fire Safety Consultants) Limited	80	10.5%
SOCOTEC Building Control, Ltd	70	9%

12. A summary of the all the Building Control Service workload for 2020/21 to 2024/25, is shown in table 4:

Table 4

	2020/21	2021/22	2022/23	2023/24	2024/25
Corporate Complaints	0	0	0	0	0
Jobs Commenced	151	210	191	198	108
Jobs Completed	121	164	146	163	100
Full Plans Applications Submitted	100	118	108	107	90
Building Notice Applications submitted	46	78	71	36	0
Partnership Applications	8	9	10	8	11
Regularisations	12	14	24	15	25

Cross Boundary applications	2	3	3	0	0
Total Number of Applications	158	222	216	166	126
Competent Person Notifications	554	508	366	504	370
Dangerous Structure Call Outs	12	22	18	28	14
Site Inspections	894	1256	1205	1415	1341
Income	£810,533	£1,028,099	£1,054,705	£1,144,404	£1,152,351
Market Share	27%	28%	26%	22%	17%

13. Other areas where Building Control services have been requested include:

- Special and Temporary and Special Structures- 40 applications.
- Approvals in Principle for the Engineering Team- 23 applications.
- Marriage Act applications to carry out a technical assessment for the premises prior to a Licence being issued- 4 applications.
- Sustainable Drainage Systems (SuDS) - providing the technical advice and assessment for major planning applications - 50 applications.
- Demolition Notices - 5
- Fire Safety Statement advice for major planning applications- 58 applications.

14. Income from Building Regulation applications for year 2024/25 was £1,152,351
This income and total Local & Central risk expenditure for delivering this service has been determined and included into the Building Control Financial Statement and be submitted to the Chamberlain for approval. The statement has determined that the Building Regulation service has made a financial surplus of £26,095 for 2024/25.

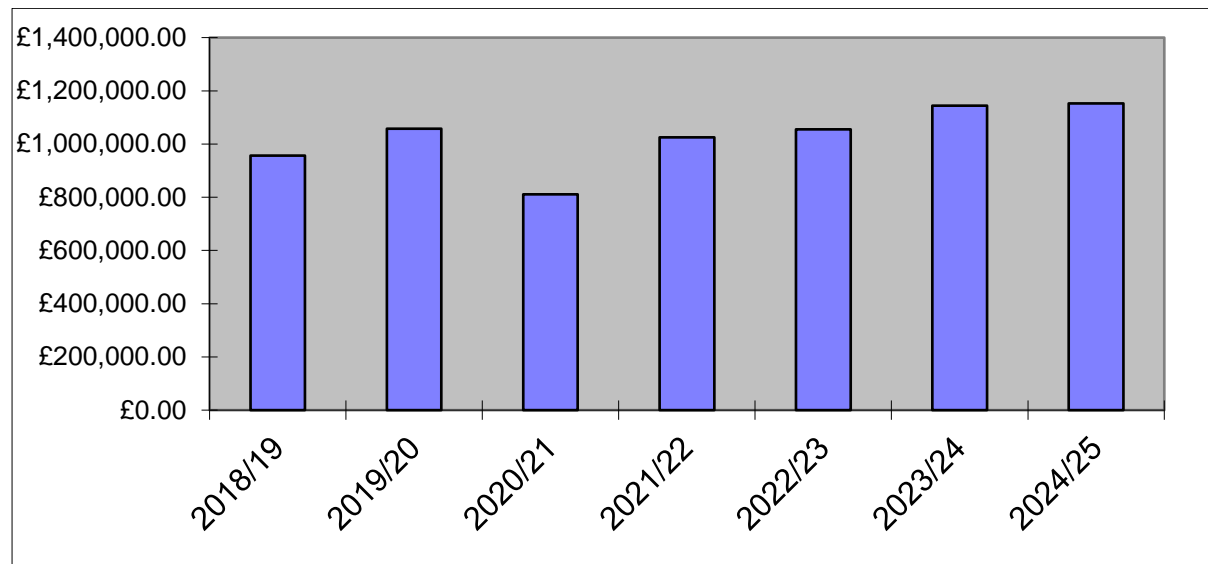
15. Tables 2 and 3, show the total number of Building Regulation applications received by the Building Control team, dropped during 2023/24 and further in 2024/25. This reduction is mainly in the number of Building Notices received, which reduced to zero in 2024/25 and this can be directly attributed to the introduction of the Building Safety Act 2022 and changes in the Building Control system.

16. Following the Grenfell tragedy, the government carried out a review into the construction industry, fire safety and the building control system, resulting in the introduction of The Building Safety Act 2022. This new legislation includes.

- The formation of the Building Safety Regulator (BSR) to oversee safety in the construction industry.

- Regulation of the Building Control profession through competency assessment and registration within Class bands of Building Control Surveyors, as Registered Building Inspectors (RBI's)
 - From 6th July 2024, all RBI's working within their class bands, under The Building (Restricted Activities & Functions) (England) Regulations 2023.
 - From 1st October 2023, the Building Safety Regulator acting as the Building Control Authority for all Higher Risk Buildings. (A higher risk building is defined as a building containing at least 2 residential units, a care home or a hospital and has a floor higher than 18 m or 7 storeys.) All applications for Building Regulation approval for works in HRB's must now be submitted to the BSR, hence the reduction in our applications.
17. The reduction in Building Notices being received, correlates to the introduction of the Building Safety Regulator becoming the building control authority for Higher Risk Buildings, as all building notices received were for alterations to residential flats, mainly in the Barbican, which have now transferred to the BSR.
18. In October 2023, with the introduction of the Building Safety Act 2022, The District Surveyors Office started to act as the London HUB for the Building Safety Regulator. All applications for Building Regulation submitted to the BSR for approval from this date, required the BSR to check and approve the building work. Under Section 13 of the legislation, the BSR can ask for assistance from Local Authorities. To help the BSR coordinate requests for assistance within London, The District Surveyors office set up the HUB to act as the London coordinator. During 2023/24 the HUB received 758 requests across London, with 53 requests for assistance for applications to properties within the City.
19. Of the 53 requests, the District Surveyors Office has accepted only 10, due to strict Conflict of Interest rules that the BSR are applying.
20. Of the 53 requests, 43 were for leasehold properties within the Barbican complex. All 43 requests were declined by building control as we were unable to comply with strict conflict of interest rules that the BSR were applying. The District Surveyor believed that the rules were being too strictly applied and therefore in March 2025, following a request to relax the conflict-of-interest rules on the Barbican residential flats, the BSR agreed that the City can start to assist the BSR on these buildings. This will result in our BSR assistance jobs increasing with associated increased fee income.
21. All other applications show a slight drop from last year but remain relatively stable.
22. Applications received over the past few years continues to be monitored, and the fees generated from those applications can be seen in Table 5. This shows that application activity in 2024/25 and associated income, remains high.

Table 5



23. The analysis of Tables 4 & 5 suggests that although application numbers have decreased, income generated from applications remains high. This is linked to large scale developments commencing and fit out applications to recently completed office developments continuing to drive construction activity within the square mile. The office has also received requests for pre application advice from a number of new large schemes, so the outlook remains extremely positive.

Major Projects that Completed in 204/25

24. During 2024/25, no major new buildings were completed but activity to fit out recently completed buildings continue. These included:

- Multiple fit out works for 22 Bishopsgate.
- Multiple fit out works for 8 Bishopsgate.
- Multiple fit out works for 40 Leadenhall.

25. Whilst no new large projects completed, works at 81 Newgate Street, Salisbury Square development, 1 Leadenhall, 1-2 Broadgate, 2-3 Finsbury Avenue, 50 Fenchurch Street, 14-21 Holborn Viaduct and the Museum of London are continuing.

Engineering Team

26. The Engineering team are continuing to work in collaboration with the development project team, for the Museum of London at Smithfield. Their projects to waterproof a number of bridges around Smithfield and Snow Hill, have

taken longer to complete due to access requirements for the building work, are now completed but have continued to delay strengthening to the bridge at Lindsey Street.

27. The waterproofing and joint replacement of London Wall Car Park commenced with the works scheduled in two phases starting at the western end in summer of 2024. Unfortunately, due to quality issues this was delayed, and defective works are being corrected at this time. The eastern half is deferred further to co-ordinate with adjacent building works and internal fire protection to the underground car park.
28. The team have been struggling to appoint an Inspecting Engineer for our statutory Reservoirs for S10 inspections but have ensured we remain compliant with the legislation and are reaching satisfactory resolution close to awarding a contract at the time of writing.

Environmental Resilience Team

29. The Environmental Resilience Team has continued to deliver work that increases the resilience of the City to the increasing risks we face from climate change (flooding, heat stress, water shortages, biodiversity loss, emerging pests & diseases and disruption to food, trade and infrastructure). The Team is responsible for the implementation of the Local Flood Risk Management Strategy (LFRMS), and two programmes within the Climate Action Strategy – Cool Streets and Greening, and Mainstreaming Climate Resilience.
30. Progression of the Local Flood Risk Management Strategy 2021-27 continues. These tasks contribute to fulfilling the City Corporation's duties as Lead Local Flood Authority for the Square Mile under the Flood and Water Management Act 2010. The City of London Flood Risk Asset has been reviewed and the approach updated to reflect industry best practice. Officers have continued to contribute to the development of a Joint Thames Strategy for flood defence raising for central London and have prepared an update of the Riverside Strategy. And have been engaging with the process to create a London Surface Water Strategy.
31. Cool Streets & Greening programme has delivered a number of pilot projects, and more are in development. This programme tests the suitability of climate resilience measures such as sustainable drainage (SuDS), climate resilient greening and tree planting. Delivering these schemes is also building capacity internally. Construction completed on a further 9 sites in 2024-25 bringing the total to 28. An additional Phase 5 of schemes has been allocated CAS funding these will focus on creating green-blue links across the City. 21 new street trees were planted this year bringing the total to 64 and a new round of site identification will take place in time for the 25/26 tree planting season with target of 100 street trees across the programme.
32. As part of Mainstreaming Climate Resilience project, the team have been working with colleagues from across the organisation to understand how climate will impact their services and staff. This included in the Environment Department to create a specifically tailored Climate Adaptation Action Plan. They are now working

on an innovative approach to embed resilient thinking at all levels. The Climate Champions staff group which was launched in February 2024 continues to grow and create opportunities for all staff to engage with climate action.

33. On Flooding, in addition to LFRMS activities, the team has installed externally funded leaky dams at Yardley Lane, Epping Forest and produced guidance on Natural Flood Management.
34. On Overheating, a City specific heat vulnerability map has been produced, which has been used to inform a focus item at the Health and Wellbeing Board and a joint heatwave exercise.
35. On Water Stress, there has been a joint project with the GLA and neighbouring boroughs to establish the local water-footprints and to investigate the impact of proposed water efficiency and management measures.
36. On Biodiversity, the team have been co-ordinating work on the emerging Local Nature Recovery Strategy for London and contributing to other initiatives including biodiversity monitoring with Friends of City Gardens, Pollinating London Together, and academic partners.
37. On Pest and Diseases, a horizon scanning report for current and future risks has been co-developed with colleagues from across the City Corporation. This included recommendations which are now being considered to be taken forward.
38. On impacts to Food, Infrastructure and Trade, working with the responsible procurement team the guidance on procuring for climate resilience has been enhanced.
39. The Environmental Resilience Team remain active within the climate resilience professional community, contributing to sharing best practice, remaining up to date with changes and demonstrating leadership across London. The team are co-ordinating the City Corporation response to the London Climate Resilience Review. Team members contribute to the steering group for the Thames Tidal Councils Forum, attend the London Climate Ready Partnership, London Drainage Engineers Group, London Borough's Biodiversity Forum, London Urban Forest Partnership, London Council's Green and Resilient Working Group, and other groups.

Staff

40. The overall team has increased to 36 from last year's total of 34. This includes 27 within the Building Control Team rising from last year's 25, 5 within the Engineering Team, and 4 within, the Environmental Resilience Team. The District Surveyors Office has officers of various seniority and specialisms to reflect the work we do. These include structural engineers, chartered surveyors, Chartered fire engineer, services engineers and environmental specialists. All members of the Engineering Team are civil engineers.

41. Over the last few years, the Building Control Team has been in transition with a number of staff members retiring. Recruitment to fill positions has been extremely difficult due to the national shortage of Building Control Surveyors, competition from Registered Building Control Approvers, and constraints due to corporate Grading structures, therefore the team has reduced in size over the past few years.
42. However, as set out in previous reports, we have undertaken recruitment to increase our establishment in targeted areas. This has resulted in the recruitment of 2 new graduate surveyors, to bring long term stability and resilience to the team.
43. In October 2023, new legislation required all Building Control surveyors to start to register with the Building Safety Regulator, and this process was completed in April 2024. From 6th July 2024, The Building (Restricted Activities & Functions) (England) Regulations 2023 took effect, that requires all building control surveyors to have their competence validated and recorded as part of their registration. Without the correct validation and registration, surveyors will not be able to work without supervision. All surveyors affected by this legislation have completed the process or are working under supervision.
44. We continue to actively seek out potential clients and win new work, with discussion continuing with major developers and landowners, such as British land. Pre application requests have been received regarding 1 Undershaft and British Library (in conjunction with Camden). Through our LDSA HUB, we are supporting the Building Safety Regulator with applications at Great Ormond Street Hospital and 122 Minories and a number of other smaller projects within the Square Mile. We will continue to support the Building Safety Regulator in their role as a building control body where we can.
45. The London District Surveyors Association (LDSA) represents the heads of Building Control in the 33 London authorities. The District Surveyor office continues to support the work of the LDSA and is represented on all its major committees, including its executive committee.
46. Regular reviews of our workload and performance are carried out and reviewed in the light of regular customer surveys.
47. Performance standards are measured by means of Key Performance Indicators which indicated in table seven, KPI's 2024. In April 2025, Building Control submitted their first set of KPI's to the BSR, as required by BSR Operational Standard Rules-Monitoring.

Table 7 KPI's

	LBC1	5 week apps 90% within 19 working days			LBC2	8 week apps 90% within 26 working days			LBC3	Completion Certificates Issued 85% within 10 working days		
		Apps.	Success	%		Apps.	Success	%		Final Inspections	Success	%
2023/24												
Apr		4	2	50%		2	2	100%		12	12	100%
May		2	1	50%		6	5	83%		10	10	100%
Jun		1	0	0%		7	6	86%		9	9	100%
Jul		3	3	100%		4	3	75%		7	7	100%
Aug		2	0	0%		6	4	67%		6	6	100%
Sept		6	3	50%		7	5	71%		16	16	100%
Oct		3	1	33%		5	3	60%		13	13	100%
Nov		5	3	60%		7	3	43%		11	11	100%
Dec		2	2	100%		3	2	67%		3	3	100%
Jan		5	3	60%		1	0	0%		12	12	100%
Feb		10	8	80%		1	0	0%		25	24	96%
Mar		8	5	63%		0	0	100%		26	26	100%
YEAR TOTAL		51	31	61%		49	33	67%		150	149	99%

48. The Building Control division operate a Quality Management System which was externally audited in July 2024 and received re-accreditation. This re-accreditation of the Building Control Quality Management System means that the division has been providing an accredited management system, continuously for 31 years.

49. The District Surveyor continues to work closely with other London Local Authority building control teams and the Building Safety Regulator on all building control matters to ensure our teams are adequately prepared for the challenges that new legislation, due to the Grenfell tragedy, are bringing to the construction industry.

Conclusion

50. This report describes the background of Building Control, the Engineering Team and the Environmental Resilience Team within the City of London and the work of the District Surveyor's office over the last year plus looks positively forward to the challenges ahead.

Gordon Roy
District Surveyor

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City of London Corporation Committee Report

Committee(s): Planning and Transportation Committee	Dated: 8/7/2025
Subject: Environment Department high-level Business Plan 2024/25 – Year-End Progress Report	Public report: For Information
This proposal: <ul style="list-style-type: none"> • delivers Corporate Plan 2024-29 outcomes • provides statutory duties • provides business enabling functions 	<ul style="list-style-type: none"> • Diverse engaged communities • Vibrant thriving destination • Providing excellent services • Flourishing public spaces • Leading sustainable environment
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of:	Katie Stewart, Executive Director Environment
Report author:	Joanne Hill, Environment Department

Summary

This report provides an end of year update on progress made in the delivery of the priority workstreams set out in the Environment Department's high-level Business Plan 2024/25. by the service areas which fall within the remit of your Committee.

Overall, good progress was made against the key workstreams, with associated performance targets met and planned outcomes achieved. The delivery of these workstreams has supported the Corporate Plan Outcomes and other cross-cutting strategies and programmes.

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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 provided a strategic overview of the key areas of work that would 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 related 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 every six months. This approach enables Members to ask questions and have an input into areas of particular importance to them.

Current Position

Key workstreams

3. The high-level Business Plan set out the 2024/25 priority workstreams for the 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 year, teams made good progress against all workstreams. A detailed update on this progress is provided at Appendix 1.

Key Performance Indicators

5. Each of the key workstreams had one or more associated Key Performance Indicators to measure progress against the target. These measures were monitored throughout the year and details of performance is provided at Appendix 2. The results show that progress towards achieving the workstream objectives was mostly on track. For any indicator which slipped or did not meet its target by the end of the year, an explanation is given.

Corporate and Strategic Implications

Strategic implications – Monitoring delivery of key workstreams and performance measures links to the achievement of the aims and outcomes set out in the Corporate Plan 2024-29.

Financial implications – Financial implications are addressed in the separate Chamberlain's Revenue Outturn Report.

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)

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Progress against key workstreams
End of Year 2024/25: 1 October 2024 – 31 March 2025

Ref:	Workstream	End of Year (1 October 2024 – 31 March 2025)
1.	City Plan Adopt the City Plan (By Autumn 2025).	<p>Examination hearings have begun, with a shift to timetable for some hearings to allow production of additional work on tall buildings and heritage.</p> <p>The delay to the timescale for the Plan will result in adoption of the City Plan occurring later than planned (in early 2026 rather than 2025). However, once the Plan is through examination, greater weight can be given to its policies in decision-making.</p>
2.	Development Management 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>PPA income has remained strong through Q4 comprising both pre-application and application stage PPAs.</p> <p>Both office and cultural floor space continue to be secure through the granting of planning permissions, with a number of major schemes on site including 2-3 Finsbury Avenue, 65 Fleet Street, 65 Holborn Viaduct, 65 Crutched Friars.</p>
3.	Building Control 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>All KPI's for that can be produced for the BSR are being compiled, and QMS has been changed where required. Notice has been received from BSR to submit KPI's in April 2025 and ready these are ready to be submitted.</p> <p>Yes, this is on track. However, several KPI's cannot be monitored as they require changes to the IDOX Uniform database. Government is currently working with software providers to implement necessary changes.</p>

Ref:	Workstream	End of Year (1 October 2024 – 31 March 2025)
4.	<p>Climate Action Strategy Cool Streets and Greening Programme (CS&GP) (completion March 2026). Mainstreaming Climate Resilience Programme (MCRP) (Completion March 2027). Square Mile Programme (SqMP).</p>	<p>Cool Streets and Greening: Two major projects have been completed; Jubilee Gardens and Finsbury Circus Western Arm were completed. Three are still in construction and nearing completion including Little Trinity; Finsbury Circus Gardens and London wall Moorgate, all due for completion in Apr 2025. Two replanting projects have been completed (St Mary Staining and St Anne St Agnes) with St Olave Silver Street due for completion in April 2025. Delivery of 21 successful tree locations across the Square Mile through the accelerated tree planting project. Traffic Management Order process in progress for three Phase Four Sustainable Drainage projects (St Andrews Hill, Ludgate Broadway, Knightrider Court). Lloyds Avenue to follow. St Andrews Undershaft received faculty and design was approved.</p> <p>Mainstreaming Climate Resilience: The major projects within MCR continue to be on-track for completion by the end of Q4. The Pests and Diseases Horizon Scanning work is now being socialised through engagement workshops. The Climate Resilience Capacity Review has now been compiled with only minor amendments now left. Upskilling and the Climate Champions engagement continues to build momentum, with a new year of events being planned. The team continues its work to improve climate resilience in the planning process and are supporting the planning policy team in the adoption of the Planning for Sustainability SPD and Local Plan and commenting on a total of 7 applications so far in 2025, reviewing climate resilience. The Climate Adaptation Action Plans have been rescoped and a new approach is planned for Year 5 of the project. Work continues with public health colleagues to fortify the public health programme with a focus on Water Stress.</p> <p>Square Mile Programme: The Corporation has been participating in the UK Government's Advanced Zoning Programme for heat networks. A Zonal Outline Business Case has been completed for a priority heat network area in the Square Mile. Also, the Supplementary Planning Document on Sustainability was adopted by Planning and Transport committee in January.</p>

Ref:	Workstream	End of Year (1 October 2024 – 31 March 2025)
6.	<p>Transport Strategy</p> <p>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.</p> <p>Forms part of a Local Implementation Plan for our delivery of the Mayor of London's Transport Strategy.</p> <p>Updated annually, the strategy includes a rolling 5-year delivery plan.</p>	<p>Annual report drafted, to be published in May 2025 following the 6 May meeting of the Planning & Transportation Committee. This highlights the key projects and initiatives delivered or progressed in 2024/25, including:</p> <ul style="list-style-type: none"> - All Change at Bank - King William Street - New Change Garden - Jubilee Gardens - Healthy Streets Minor Schemes at 6 locations <p>Good progress is being made towards delivery of Transport Strategy targets, with several interim targets for traffic reduction already met.</p>
7.	<p>Parking Service</p> <p>Deliver an effective, compliant and accessible Parking Service in accordance with Statutory guidelines and regulations.</p>	<p>Targets met. King William Street camera relocation completed. Working on camera coverage around Bank in line with Committee agreement to trial black cabs using east/west corridor. E-scooters on-line form completed. Trial by City Transportation for removing scooters during a blitz.</p> <p>One exceptional quarter. Workstream back on target by year end. Continue to work with colleagues to deliver Transport Strategy.</p>
8.	<p>Highways Management</p> <p>Deliver an effective, high quality, Highways Management Service.</p> <p>Ensure Highways, footways and carriageways are well maintained.</p> <p>Reduce carbon emissions by improving lighting efficiency and use.</p>	<p>The Highways Service is undertaking all mandatory duties to a suitable and sufficient level. All reactive and planned maintenance is meeting required standards. The corporate contract is passing all KPI's and the business plan KPI's are being met. All projects are designed, supervised and built which helps to meet their objectives in line with the Transport Strategy and Climate Action Plan. Event management is operating to the required levels to support Destination City and the Sport Strategy.</p>

Ref:	Workstream	End of Year (1 October 2024 – 31 March 2025)
9	<p>SME Delivery Strategy</p> <p>Implement the SME Delivery Strategy, subject to approval of the Policy and Resources Committee, February 2024. This strategy will provide a short-medium term set of objectives to build the foundations for future SME projects that will form part of the Inward Investment workstream.</p>	<ol style="list-style-type: none"> 1) The SME Tech report was launched, and the SME inaugural annual networking breakfast event took place on 6 Feb, with this one focussing on the tech sector, with several tech SMEs attending. 2) Access to Finance, SME Conference took place in the Livery Hall on 20 Feb, with just under 200 guests attending. The Conference was by over 25 partners, including the British Business Bank, Metrobank, NatWest, FSB, London Chamber of Commerce and Industry, Capital Enterprise, Newable, The Association of Business Mentors, and the Worshipful Company of Entrepreneurs. 3) We launched the new layout for the SME gateway on the website, with a dedicated SME Gateway email, managed by SBREC to signpost enquirers to the correct SME support service. We have started a conversation with some internal designers about the brand outline for the SME Gateway. 4) We are reviewing the relationship between OPC and Comms in relation to the SME strategy, with the aim of increasing exposure on CoL socials, such as the Responsible Procurement impact report, and the SME Conference. 4) We have connected with over 30 new partners this quarter, including key organisations in the SME support and start-up ecosystem such as Google Cloud, Barclays Eagle Labs, and Sustainable Ventures, along with our outreach for NFP organisations, eg Able Futures, Culture Mile BID, Uni of Greenwich, Middlesex Uni. Additionally, our recently established partnership with Markel has led to discounted access to the Markel Business Hub for SBREC members. This comprehensive toolkit for SMEs is created by qualified solicitors and experts. 5) There is a SME Strategy one year on factsheet in production, which will outline the successes of year one and be shared with our ideal audience and partners.

Progress against Key Performance Indicators

1 April 2024 – 31 March 2025

Performance Measure	Target 2024/25	Performance Mid-Year Result 2024/25	Performance End of Year Result 2024/25
Adopt the City Plan – Submission to Secretary of State	Aug/Sept 2024	Achieved: 29 August 2024	Achieved: 29 August 2024
Parking Service - Respond to 95% of PCN correspondence within 15 working days	15 working days	10 working days	12 working days
Parking Service - Car Park – EV Charging Utilisation	12%	5.36%	7.36%* ¹
Parking Service - Parking contract management – adherence across all five contracts	95%	100%	100%
Building Control Full plans assessed (or extension of time agreed) within 5 weeks	95%	96%	95%
Climate Action Plan - Number of pilot projects completed (CS&GP).	4-7 Projects	3 projects	8 projects
Climate Action Plan - Number of resilience measures incorporated (CS&GP).	6-8 measures	5 measures	22 measures
Climate Action Strategy - Number of upskilling sessions run (MCRP).	4-6 sessions	12 sessions	12 sessions
Climate Action Strategy - Number of projects completed (sqMP)	7 Projects	1 project completed. (6 in progress)	7 projects
Climate Action Strategy - Number of engagement sessions with Square Mile stakeholders (sqMP).	10 sessions	7 sessions	14 sessions
* ¹ 12% target was not met due to there being low uptake on usage, although a slight improvement was seen throughout the year. Part of the improvement plan for 2025/26 is for our new Parking Asset Manager to look at promoting the locations to attract new users.			

Performance Measure	Target 2024/25	Performance Mid-Year Result 2024/25	Performance End of Year Result 2024/25
Development Management - Planning Performance Agreement Income	£1.7m	Measured annually	£1.75m
Development Management - Square metres of office floorspace in the City	100,000 sqm	Measured annually	127,000 sqm ^{*2}
Development Management - Cultural and community floorspace secured	10,000 sqm	Measured annually	2,286 sqm ^{*3}
Transport Strategy - Number of people killed and seriously injured (KSI) on our streets, baseline 54 in 2017	16 (max) by 2030 0 by 2044	Measured annually (calendar year)	not available ^{*4}
Transport Strategy - Number of kilometres of pedestrian priority streets, baseline 25km (25%) in 2017.	35km / (35%) by 2030 55km / (55%) by 2044	Measured annually	27.8km/28%
Transport Strategy - Reduction in all-day motor vehicle traffic volumes, baseline 185K in 2017.	139k / (-25%) by 2030 93k / (-50%) by 2044	Measured annually	122k (-34%)
Highways Management – Reduce street lighting energy usage from the 2023/24 baseline of 1.85 kWh.	1.8m kWh	Measured annually	1.67m kWh
Highways Management - % of insurance claims awarded.	=<5%	Measured annually	0%
Highways Management - % of carriageway in need of repair.	=<10%	Measured annually	28% ^{*5}

^{*2} plus an additional 460,289 sqm with resolution to grant.

^{*3} plus an additional 13,177 sqm resolved to grant.

^{*4} This figure is not yet available, it is due to be published in Summer 2025.

^{*5} Various factors contributed to this result, including large developments, associated construction traffic and heavier use of alternate routes which exacerbated the condition of certain routes; and the unavailability of some streets for works. The % of our highest priority streets in need of repair is currently 18%, which has reduced from 25% over recent years.

City of London Corporation Committee Report

Committee(s): Planning & Transportation – For Information	Dated: 8 th July 2025
Subject: Revenue Outturn 2024/25	Public report: For Information
This proposal: delivers Corporate Plan 2024-29 outcomes provides statutory duties	Providing Excellent Services Flourishing Public Spaces
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	£0
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of:	Executive Director Environment Chamberlain
Report author:	Dipti Patel, Chamberlain

Summary

This report compares the revenue outturn for the services overseen by your Committee in 2024/25 with the budget for the year. Overall total net expenditure across all risks during the year was (£16.726m), whereas the total budget was (£19.297m), representing an underspend of £2.571m as set out below.

Summary Comparison of 2024/25 Revenue Outturn with Budget			
	Budget	Revenue Outturn	Variance Better/ (Worse)
	£'000	£'000	£'000
Direct Net Expenditure			
Executive Director Environment	(7,077)	(6,268)	809
The City Surveyor (including Cyclical Works Programme)	(1,570)	(680)	890
Total Direct Net Expenditure	(8,647)	(6,948)	1,699
Capital & Support Services	(10,650)	(9,778)	872
Overall Total	(19,297)	(16,726)	2,571

The Executive Director Environment has submitted a request to carry forward local risk underspendings within the Department, of which £147,000 relates to your Committee, and this will be considered by the Chamberlain in consultation with the Chairman and Deputy Chairman of Resource Allocation Sub Committee.

Recommendation(s)

Members are asked to:

- Note the report.

Main Report

Revenue Outturn for 2024/25

1. Actual net expenditure across all risks for your Committee's services during 2024/25 totalled (£16.726m), an underspend of £2.571m compared to the budget of (£19.297m). A summary comparison with the budget for the year is tabulated below. In this and subsequent tables, expenditure and adverse variances are presented in brackets. Only significant variances (generally those greater than £50,000) have been commented on.

Table 1 - Summary Comparison of 2024/25 Revenue Outturn with Budget			
	Budget £'000	Revenue Outturn £'000	Variance Better/ (Worse) £'000
Local Risk			
Executive Director Environment	(13,855)	(12,191)	1,664
The City Surveyor	(257)	(105)	152
Total Local Risk	(14,112)	(12,296)	1,816
Central Risk	6,778	5,923	(855)
Cyclical Works Programme	(1,313)	(575)	738
Capital and Support Services	(10,650)	(9,778)	872
Overall Total	(19,297)	(16,726)	2,571

2. Executive Director Environment local risk underspend of £1.664m comprises of the following most significant variances:

- (i) **Additional income £682,000** – mainly from extra Planning fees & Planning Performance Agreements £931,000; Traffic Management fees £619,000; Pipe-subway opening admin charges £276,000; Building Regulation fees £125,000 and other fees £89,000. These were partly offset by shortfalls in car parking income (£1,358,000).
- (ii) **Employees underspend £1,425,000** – staff vacancies during the year.
- (iii) **Transfers from reserve (£53,000)** – planned drawdown from On-Street Parking Reserve Account not required to cover Highway repairs & maintenance works (£1,255,000) due to overall Departmental underspends in other service areas. This was largely offset by increased transfers from reserves of £1,202,000 mainly required to cover shortfalls in off-street car parking fees.
- (iv) **Transfers to reserve (£519,000)** – lower On-Street Parking net local risk operating costs facilitated an increased transfer back to the On-Street Parking Reserve Account (£219,000), plus transfer to reserves of unspent (£300,000) Digital Local Plan Funding within Town Planning, which will now be spent in 2025/26.

3. Executive Director Environment central risk overspend of (£855,000) comprises of the following most significant variances:
 - (i) **Off-Street Parking overspend (£748,000)** – mainly due to lower Cyclical Works Programme costs, which facilitated an increased transfer of funding back to the On-Street Parking Reserve Account.
 - (ii) **Staff cost recharges to capital projects overspend (£305,000)** – due to shortfall in staff cost recharges to capital projects, mainly as a result of staff vacancies and reduced allocation of officer's time to projects.
 - (iii) **Town Planning underspend £207,000** - due to increased income for pre-application advice fees and land charges fees.
4. The Cyclical Works Programme (CWP) underspend of £738,000 was mainly due to works on Off-Street Car Parks deferred to 2025/26 after review by the City Surveyors Team. The CWP does not form part of the City Surveyor's local risk budget, and any variances will be carried over to 2025/26.
5. The underspend in the City Surveyors breakdown repairs maintenance works of £152,000 was due to reductions in reactive call outs on Highway Structures and at the Car Parks.
6. There was an underspend on capital and support services of £872,000 mainly relating to decrease in infrastructure asset depreciation costs on Highways capital works.
7. Appendix A and B provides a more detailed comparison of the local and central risk outturn against the budget, including explanation of significant variances.
8. Appendix C shows the movement from the 2024/25 opening budget of (£16.936m) to the closing budget of (£19.297m).

Local Risk Carry Forward to 2025/26

9. The Executive Director Environment had a local risk underspending of £1,664,000 on the activities overseen by your Committee. The Executive Director had net local risk overspends totalling (£1,425,000) on activities overseen by other Committees, after adjusting for unspent carry forwards from 2023-24. The Executive Director Environment has requested that £200,000 of her maximum eligible underspend of £239,000 be carried forward, of which £147,000 relates to activities overseen by your Committee for the following purpose:
 - £115,000 towards Decluttering Street Furniture
 - £32,000 for Riverside Lighting Renewal

10. Carry-forward requests will be considered by the Chamberlain in consultation with the Chairman and Deputy Chairman of Resource Allocation Sub Committee.

Corporate & Strategic Implications

Strategic implications – none.

Financial implications – none.

Resource implications – none.

Legal implications – none.

Risk implications – none.

Equalities implications – none.

Climate implications – none.

Security implications – none.

Report author

Dipti Patel, Chamberlain's Department

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Appendices:

Appendix A – Planning & Transportation Committee – Comparison of 2024/25 Local Risk Revenue Outturn with Budget

Appendix B – Planning & Transportation Committee – Comparison of 2024/25 Central Risk Revenue Outturn with Budget

Appendix C – Planning & Transportation Committee – Movement in 2024/25 Opening Budget to Closing Budget

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Planning & Transportation Committee

Comparison of 2024/25 Revenue Outturn with Budget – Local Risk

	Budget £'000	Revenue Outturn £'000	Variance Better/ (Worse) £'000	Notes
LOCAL RISK				
Executive Director Environment				
City Fund				
Town Planning	(2,699)	(1,630)	1,069	1
City Property Advisory Team	(582)	(758)	(176)	2
Planning Obligations	(2)	0	2	
Transportation Planning	(1,537)	(1,217)	320	3
Directorate	(2,287)	(2,069)	218	4
Road Safety	(292)	(209)	83	5
Street Scene	0	(32)	(32)	
Building Control	(1,060)	(636)	424	6
Structural Mtce/Inspections	(783)	(728)	55	7
Highways	(3,532)	(4,711)	(1,179)	8
Traffic Management	1,189	1,933	744	9
Off-Street Parking	1,697	1,697	0	10
On-Street Parking	(3,697)	(3,697)	0	11
Drains & Sewers	(425)	(134)	291	12
Committee Contingency	155	0	(155)	13
Total City Fund	(13,855)	(12,191)	1,664	
Total Executive Director Environment	(13,855)	(12,191)	1,664	
The City Surveyor*				
Town Planning	(5)	0	5	
Highways	(142)	(64)	78	
Off-Street Parking	(110)	(41)	69	
Total City Surveyor	(257)	(105)	152	14
TOTAL LOCAL RISK	(14,112)	(12,296)	1,816	

(*excludes the Cyclical Works Programme)

Reasons for significant Local Risk variances

1. **Town Planning** – underspend due to additional income from Planning fees, Planning Performance Agreements, and other contributions £931,000, reduced salary costs as a result of vacancies £414,000 and reduced Local Plan Costs £130,000. This has been partly offset by increased fees and services costs relating to professional & legal counsel fees (£305,000), General Development advertising costs (£53,000), subscriptions (£27,000), computing costs (£49,000) and other running costs (£21,000). Additionally, a £300,000 grant received for Digital Local Plan Funding in 2024/25 was

unused and was transferred to reserves to be spent in 2025/26, therefore having a net nil effect during the year.

2. **City Property Advisory Team** – overspend due to costs for attending events (New York and Munich trip, UKREiiF, Expo Real and MPIM Asia) and Opportunity London Partnership and LREF partner package costs.
3. **Transportation Planning** – underspend due to reduced salary costs as a result of vacancies £380,000, reduced spend on professional fees £55,000 and other running expenses £9,000. This has been partly offset by a shortfall in staff cost recovery from capital projects due to vacancies (£124,000).
4. **Directorate** – underspend due to reduced salary costs as a result of vacancies.
5. **Road Safety** – underspend due to reduced salary costs as a result of vacancies £45,000 and reduced spend on Traffic Order Notices and works £38,000.
6. **Building Control** – underspend due to reduced salary costs as a result of vacancies £291,000, increased income from Building Regulation fees £125,000 and other running cost savings £29,000. This has been partly offset by a shortfall in Approvals in Principle and other fee income (£21,000).
7. **Structural Maintenance** – underspend due to reduced highway structures breakdown maintenance works not required £44,000, reduced inspection contract costs £16,000 and other running cost savings £3,000. This has been partly offset by a shortfall in Approvals in Principle income (£8,000).
8. **Highways** – overspend due to:
 - Planned drawdown from On-Street Parking Reserve Account not required (£1,255,000) due to overall Department underspends in other service areas.
 - Increase in repairs & maintenance FM Conway contract costs (£158,000).
 - Increase in agency and recruitment costs (£54,000).
 - Increase in other running costs (£40,000).
 - Partly offset by reduced electricity costs £269,000 and admin charges £59,000.
9. **Traffic Management** – underspend due to:
 - Increase in road closure fees, hoarding & scaffolding fees and road permitting fees £619,000.
 - Reduced salary costs due to vacancies £125,000.
10. **Off-Street Parking** – whilst the overall variance was nil, there were a number of significant offsetting variances:
 - Shortfall in car parking fees (£1,358,000), rental income (£74,000), increase in contract costs (£34,000), rates costs (£41,000) and other running costs (£8,000).
 - Partly offset by reduction in electricity cost £313,000.
 - The above net overspends resulted in a deficit balance which was wholly funded from the On-Street Parking Reserve Account £1,202,000.
11. **On-Street Parking** – whilst the overall variance was nil, there were a number of significant offsetting variances:
 - Salary underspends £168,000.
 - Reductions in enforcement contract costs £26,000.

- Reduced printing costs and other running expenses £25,000.
 - Surplus balance transferred back to the On-Street Parking Reserve Account (£219,000).
12. **Drains & Sewers** – underspend due increase in pipe-subways openings and admin fee income £276,000 due to Holborn Lighting phased works and increase in Thames Water Sewerage Contract admin fees £30,000. These are partly offset by increase in running costs (£15,000).
 13. **Contingency** – overspend of (£155,000) due to a vacancy factor held for the Department which was managed within overall salary vacancies during the year.
 14. **City Surveyor** - underspend of £152,000 due to reduction in breakdown repairs maintenance quoted works required and reduction in reactive call outs.

Planning & Transportation Committee
Comparison of 2024/25 Revenue Outturn with Budget – Central Risk

	Budget £'000	Revenue Outturn £'000	Variance Better/ (Worse) £'000	Notes
CENTRAL RISK				
Executive Director Environment				
City Fund				
Town Planning	783	990	207	1
Transportation Planning	420	291	(129)	2
Directorate	0	2	2	
Street Scene	(384)	(383)	1	
Highways	2,260	2,084	(176)	3
Off-Street Parking	(227)	(975)	(748)	4
On-Street Parking	3,866	3,872	6	5
Structural Maintenance	60	42	(18)	
TOTAL CENTRAL RISK	6,778	5,923	(855)	

Reasons for significant Central Risk variances- amend numbering below

1. **Town Planning** – underspend due to increased income for pre-application advice fees and land charges fees £207,000.
2. **Transportation Planning** – overspend due to shortfall in staff cost overhead recharges to capital projects as a result of staff vacancies and allocation of officer's time to projects (£129,000).
3. **Highways** – overspend due to shortfall in staff cost overhead recharges to capital projects as a result of staff vacancies and allocation of officer's time to projects (£176,000).
4. **Off-Street Parking** – overspend due to increased transfer of funding back to the On-Street Parking Reserve Account mainly as a result of lower CWP costs incurred.
5. **On-Street Parking** – underspend due to a reduction in bad debt provision needed £3,681,000. This was largely offset by reduced suspension, pay & display and PCN income (£2,580,000) and an increased transfer of funding back to the Parking Reserve Account (£1,095,000).

**Planning & Transportation Committee Analysis of Movements 2024/25
Opening Budget to Closing Budget**

	£000
Opening Local Risk Budget (incl Cyclical Works Programme)	(13,630)
Adjustments (City Fund):	
Pay Award allocation from central pot	(431)
Backdated agency staff costs allocation from central pot	(11)
Central funding of apprentice posts	(70)
Supplementary revenue project adjustment	37
Increase in City Surveyor's CWP	(1,218)
Increase in Film Liaison Recharges	(102)
Closing Local Risk Budget	(15,425)
Opening Central Risk Budget	7,673
Adjustments (City Fund):	
Net transfer (to)/from Parking Reserve Account	(48)
Supplementary revenue project adjustment for:	(847)
• Environmental Enhancement Projects	
• Transport Projects	
Closing Central Risk Budget	6,778
Opening Capital & Support Services Budget	(10,979)
Adjustments (City Fund):	
Increase in recharges within fund	205
Increase in recharges across fund	191
Increase in central support services charges	(67)
Closing Capital & Support Service Budget	(10,650)
TOTAL Opening Budget	(16,936)
Movement in Local Risk Budget	(1,795)
Movement in Central Risk Budget	(895)
Movement in Capital & Support Services Budget	329
TOTAL Closing Budget	(19,297)

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City of London Corporation Committee Report

Committee: Planning and Transportation Committee	Dated: 08/07/2025
Subject: Risk Management Update Report	Public report: For Information
This proposal: <ul style="list-style-type: none"> • delivers Corporate Plan 2024-29 outcomes • provides statutory duties • provides business enabling functions 	<ul style="list-style-type: none"> • Providing Excellent Services • Vibrant Thriving Destination • Leading Sustainable Environment • Dynamic Economic Growth
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of:	Katie Stewart, Executive Director Environment
Report author:	Joanne Hill, Environment Department

Summary

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

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

This report considers the key business risks managed by the service areas of the Environment Department which fall within the remit of the Planning and Transportation Committee.

Recommendation

Members are asked to:

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

Main Report

Background

1. The Risk Management Framework of the City of London Corporation requires each Chief Officer to report regularly to Committee on the key risks faced by their department.
2. To fulfil this requirement, the key risks held by the service areas of the Environment Department which fall within the remit of the Planning and Transportation Committee are presented to you every four months.
3. Risk Management is discussed regularly by the Department's Senior Leadership Team and at the meetings of each service area's Senior Management Team.
4. Between Management Team meetings, risks are reviewed in consultation with risk and control owners, and updates are recorded in the corporate risk management system.

Current Position

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

Summary of key risks

6. The key risks held by the service areas which report to your committee are summarised below and the detailed Risk Register is presented at Appendix 2. The Register contains eight risks (two currently scored as RED, five as AMBER and one GREEN).
7. Since the date of the last report to your Committee, all risks have been reviewed and updated in the risk management information system.
8. The two highest risks remain:
 - **ENV-CO-TR 001: Road Safety** which is currently scored at Red 24 (possible likelihood, with an extreme impact) to reflect the risk of a fatal collision occurring. Officers are undertaking a range of projects, campaigns and engagement activities to deliver safe streets, as described in Appendix 2.

- **ENV-CO-HW 010: Car parks: Fire safety** which addresses the risk of a fire occurring in one of the City's car parks. This risk has a current score of Red 16 (unlikely to occur, but an extreme impact). A variety of actions are underway or planned to reduce the risk of fire, including a Gateway 5 report elsewhere on this Committee's agenda specifically intended to address fire risk at London Wall car park. Once complete, these works may enable a reduction in the Red risk rating. Further details are provided at Appendix 2.
9. The other key risks are as follows. Appropriate actions are in place to control each risk:
- **ENV-PD-DS-001: The District Surveyor's (Building Control) Division becomes too small to be viable** (*AMBER, 12*)
 - **ENV-CO-HW 009: Car parks: Repairs and maintenance** (*AMBER, 12*)
 - **ENV-CO-TR 003: Transport and public realm projects not delivered due to lack of funding** (*AMBER, 12*)
 - **ENV-PD-DS 003: Inspecting dangerous structures** (*AMBER, 8*)
 - **ENV-CO-HW 006: Working in confined spaces** (*AMBER, 8*)
 - **ENV-PD-PD 007: Adverse planning policy context** (*GREEN, 4*)
10. New and emerging risks are identified through a number of channels, the main being:
- Directly by Senior Management Teams as part of the regular review process.
 - In response to ongoing review of progress made against Business Plan objectives and performance measures, e.g., slippage of target dates or changes to expected performance levels.
 - In response to emerging events and changing circumstances which have the potential to impact on the delivery of services, such as availability of funding, new or amended legislation.

Corporate and Strategic Implications

11. Effective management of risk is at the heart of the City Corporation's approach to delivering cost effective and valued services to the public as well as being an important element within the corporate governance of the organisation.
12. The proactive management of risk, including the reporting process to Members, demonstrates that the department is adhering to the requirements of the City of London Corporation's Risk Management Policy and Strategy.

13. The risk management processes in place in the Environment Department support the delivery of the Corporate Plan, our Departmental and Divisional Business Plans and relevant Corporate Strategies.

Conclusion

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

Appendices

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

Contacts

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

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

(A) Likelihood criteria

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

(B) Impact criteria

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

(C) Risk scoring grid

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

(D) Risk score definitions

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

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

Contact the Corporate Risk Advisor for further information. Ext 1297

October 2015

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Environment Department Key Risks (Planning and Transportation Committee)



Rows are sorted by Risk Score

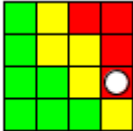
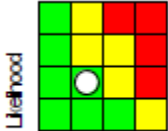

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Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
ENV-CO-TR 001 Road Safety 								

Appendix 2

Ian Hughes; Bruce McVean							
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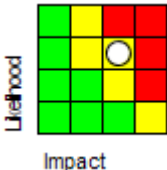


Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
ENV-CO-TR 0011	<p>A programme of projects to reduce road danger on the City's streets including:</p> <ul style="list-style-type: none"> • All Change at Bank • St Paul's Gyratory Transformation • Healthy Streets Minor Schemes. 	<p>Projects and programmes to reduce road danger include:</p> <ul style="list-style-type: none"> • Vision Zero Safer Streets Programme - investigating and delivering safer streets proposals at priority locations as identified in the Vision Zero Plan 2023 – 2028. • St Paul's Gyratory – Construction started in May 2025. • Pedestrian Priority Programme – Improvements to King William Street are expected to complete in summer 2025. Design for Threadneedle Street and Old Broad Street are in development. • City Cluster pedestrian priority and traffic reduction – Consultation on Leadenhall Street completed and project progressing the detailed design (subject to approval at P&T and CoCo), to be coordinated with new developments. • Healthy Streets Minor Schemes – a range of smaller scale projects at various locations. • Moorgate - walking and cycling improvements, including at the junction with Ropemaker Street • Cycle programme – Consultation on proposals for a cycle route between Aldgate and Blackfriars completed and update report due to go to the Streets and Walkways Sub Committee in September 2025. 	Ian Hughes; Bruce McVean	18-Jun-2025	31-Mar-2028
ENV-CO-TR 001m	<p>Campaigns and engagement activities to encourage safe behaviours and promote safe vehicles, including:</p> <ul style="list-style-type: none"> • Active City Network • User and stakeholder liaison • Partnership working with City of London Police 	<p>Campaigns and engagement activities are delivered in partnership with the City of London Police throughout the year, a spring/summer campaign is currently being delivered. We are continuing to provide cycle training, including professional cargo bike training. The Vision Zero Action Plan identifies a range of actions relating to Safer Behaviours.</p>	Ian Hughes; Bruce McVean	18-Jun-2025	31-Mar-2028

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
ENV-CO-HW 010 Car Parks: Fire Safety <div>Page 45</div>	Cause: Dilapidation of the car parks and the location of some car parks, e.g. London Wall car park is beneath the road where a fire or structural issue could have wider implications. Event: Fire risk is increased and there is a greater likelihood of accidents and near misses within the car parks. Effect: Serious injury or death; structural failure could have wider implications; vehicle damage; increased insurance claims; potential enforcement action and fines; reputational damage.	 Likelihood Impact	16	<p>We are aiming to improve the safety of the car parks by replacing lighting, undertaking redecoration and Facilities Management projects. A range of projects are underway or being considered for future implementation which should help to reduce this risk.</p> <p>We have received approval for our bid for circa £2.4 million from the On Street Parking Reserve for fire safety works for London Wall car park and this has started to be drawn down from November 2024. A contractor for the works has been sourced, but the work cannot now commence until surface work on London Wall has been completed - expected to be Summer 2025. For this reason, the target date of the risk has been extended to the end of the financial year.</p> <p>A bid for funding for additional fire doors on all car parks has been approved at the first stage of the Committee process.</p>	 Likelihood Impact	4	31-Mar-2026	
							Reduce	Constant
02-Sep-2022 David Morris				30 May 2025				

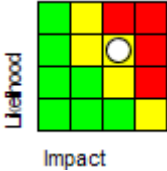
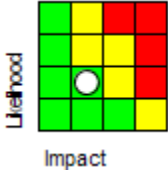

Appendix 2

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
ENV-CO-HW 010a	Monthly meetings are held with City Surveyor's Department (CSD) on the fire works project, and we request regular updates on progress.	London Wall ventilation works and sprinklers have been agreed by the Priority Board. A contractor has now been sourced but works cannot commence until surface works on London Wall are completed, which is expected to be in Summer 2025. The due date of this action has been extended to the end of the financial year to reflect this delay.	David Morris	30-May-2025	31-Mar-2026
ENV-CO-HW 010b	A Fire Risk Assessment is carried out at each car park by an external body every 18 months.	Fire Risk Assessments have recently been undertaken for all four car parks as part of the Cyclical Works Programme (CWP). Outcome reports are due to be received by the end of June 2025 and any actions will then be implemented.	David Morris	30-May-2025	30-Sep-2025
ENV-CO-HW 010c	Finalise the Fire Management Plan.	The Fire Management Plan has been drafted. Life Care Plans for the Car Parks were last drawn up in 2023 and incorporate the Fire Strategy and the Fire Management Plan. Life Care Plans will be updated during 2025 and will include development of revised Fire Management Plans. Bi-monthly meetings are held with the City Surveyor's Department to discuss the Life Care Plans. Governance and progress are kept under review by the Parking Asset Manager.	David Morris	30-May-2025	30-Sep-2025
ENV-CO-HW 010d	Improve lighting across all car parks to improve safety and reduce energy use.	<p>There is an ongoing project led by the Energy Team to change all lighting across CoL buildings to LED. This will include the car parks.</p> <p>Tower Hill (including coach park), Baynard and Smithfield are complete. London Wall will be picked up after the sprinkler system project has been completed (estimated to be December 2025). Funding for Minorities car park is not currently available, but this may be taken forward at a later date should there be unspent monies in the CWP backlog funds.</p>	David Morris	30-May-2025	31-Dec-2025

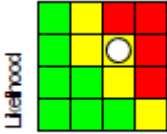
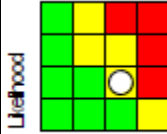

Appendix 2

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
ENV-PD-DS 001 The District Surveyor's (Building Control) Division becomes too small to be viable <div>Page 47</div>	Cause: Reduced income causes the service to be unviable. Event: Development market fails to maintain momentum or our market share shrinks. Effect: Reduced staffing levels do not provide adequate breadth of knowledge and experience.		12	<p>The City of London Hub is working well and the City is providing assistance to the regulator providing application stability.</p> <p>Current building control activity is buoyant, resulting in appropriate income.</p> <p>Recruitment and retention of building control staff remains a concern. All relevant staff have now registered with the Regulator, in accordance with the workforce plan, but recruitment of registered building inspectors is extremely difficult.</p> <p>The Grenfell Enquiry Report has been issued by government. Government is due to report back to Parliament in October/November 2025 regarding further recommendations which may affect building control delivery.</p> <p>05 Jun 2025</p>		8	31-Dec-2025	
							Reduce	Constant
25-Mar-2015 Gordon Roy								

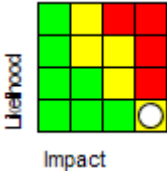
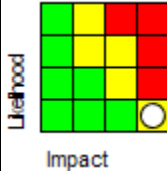

Action no	Action description	Latest Note			Action owner	Latest Note Date	Due Date
ENV-PD-DS 001c	Following approval by P & T Committee, a Business Plan is being developed and will be presented to Members for consideration in due course.	District Surveyor HUB for LDSA and the Building Safety Regulator continues to grow with over 800 requests being received. We will continue to monitor the situation, but the HUB is active.			Gordon Roy	05-Jun-2025	31-Dec-2025

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
ENV-CO-HW 009 Car Parks: Repairs and maintenance 16 Sep-2022 David Morris	Cause: The facilities management of the car parks is dependent upon action by City Surveyor's Department (CSD). Event: Required repairs and maintenance to the car parks is delayed. Effect: Increased possibility of structural and safety failure; greater likelihood of fire; serious injury or death of member of the public; our liability as the occupier increases; financial impact of insurance claims and increased premiums; reputational damage.		12	We are reliant on the City Surveyor's Department's (CSD) assistance with actioning our requests for facilities management (FM). On a continuous basis, we liaise with CSD to address outstanding issues. We have recently recruited a Parking Asset Manager who has taken control of facilities management, including monthly structural and safety checks which will be documented and monitored. This should help us to achieve the target score for the risk. 30 May 2025		4	31-Dec-2025	
							Reduce	

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
ENV-CO-HW 009a	The contractor responsible for each car park reports daily and weekly on any issues, including near misses. Issues are logged on the Concerto (CSD) system by CoL officers for action to be taken.	This is an ongoing action which is kept under review and continues to be monitored under the parking contract to ensure reports are received and issues logged appropriately.	David Morris	30-May-2025	31-Dec-2025
ENV-CO-HW 009c	Monthly site 'walk-arounds' of each car park are carried out with the FM Manager, car park management contractor and CoL staff to identify and review issues.	CoL staff ensure the monthly visits are carried out with appropriate attendees. The new Parking Asset Manager has taken control of facilities management, including the monthly structural and safety checks, which will be documented and monitored. This should contribute towards achieving the target risk score.	David Morris	30-May-2025	31-Dec-2025

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
ENV-CO-TR 003 Transport and public realm projects not delivered due to lack of funding 26 Jun-2023 Bruce McVean	Cause: Insufficient capital funding available or failure to secure sufficient capital funding through internal or external bidding processes. Event: Funding for capital programme ceases or is significantly reduced. Effect: <ul style="list-style-type: none"> • Unable to deliver transport and public realm improvement projects. • Reduced delivery of City of London Transport Strategy. • Reduced delivery of transport elements of Climate Action Strategy. • Reduced delivery of projects that support Destination City. 	 Likelihood Impact	12	Impact of 4 (Major) reflects the potential for failure or delay in delivering corporate strategies and initiatives, including the Transport Strategy, Climate Action Strategy and Destination City. Likelihood of 3 (Possible) reflects current lack of TfL or other external funding and competing demands for CIL and OSPR funding. Mitigating actions including maximising the potential to use S278 funding and bidding internally for CIL and OSPR funds. 18 Jun 2025	 Likelihood Impact	8	31-Mar-2029	 Constant
							Reduce	

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
ENV-CO-TR 003a	Submit prioritised OSPR and CIL bids for projects	Bids for Ironmonger Lane and Moorgate (north of London Wall) and for additional funding for the experimental traffic order to allow taxis through Bank Junction have been approved. Future bids will be submitted when the next bidding round is open.	Bruce McVean	18-Jun-2025	31-Mar-2029
ENV-CO-TR 003b	Submit bids for TfL and other external funds as opportunities arise	No current opportunities but we continue to keep this under review.	Bruce McVean	18-Jun-2025	31-Mar-2029
ENV-CO-TR 003c	Maximise the use of developer and other external (e.g. BIDs) contributions to support delivery of the Transport Strategy	Continuing to maximise benefits from s278 projects. BIDs are contributing funding to several projects. Continuing to explore potential for third party funding.	Bruce McVean	18-Jun-2025	31-Mar-2029

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
ENV-PD-DS 003 Inspecting Dangerous Structures 24-Nov-2015 Gordon Roy	Cause: Officers involved in inspecting a dangerous structure. Event: Any of the following: (a) structural failure or building collapse; (b) falling object(s); (c) fire; (d) live electrics; (e) toxic substances; and/or (f) trips and falls. Effect: Ranging from minor injury to death.		8	Risk is unchanged and remains valid. A range of mitigation measures are in place (as shown in the action) to control the risk. Target Date is a review date as risk is accepted. 05 Jun 2025		8	31 Oct 2025	 Constant
							Accept	

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
ENV-PD-DS 003a	Emergency Planning procedures in place - only authorised personnel to respond to Dangerous Structures call-outs and enter buildings. Take advice from Fire Brigade and emergency services. PPE issued and monitored. ISO9001:2015 Accredited (Quality Management Systems in place)	All mitigation measures in place.	Gordon Roy	05-Jun-2025	31-Dec-2025

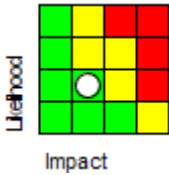
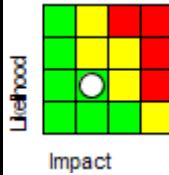

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
ENV-CO-HW 006a	Working in service pipe subways. Confined space working is avoided where possible. All PPE and other equipment required for a SSOW shall be suitable and sufficient for the tasks	This is an ongoing action. All mitigations are business as usual and are kept under regular review. They are all current and continue to work effectively.	Mo Sooruth	05-Jun- 2025	05-Aug- 2025

Appendix 2

	<p>identified. Suitable PPE and equipment shall be provided, as stated in the approved code of practice. All openings are controlled through a central booking system. A subway must not be entered if permission to do so has been refused.</p> <p>No booking will be granted to parties who are not on the database. If the contractor is not on the database, they must seek approval from CoL regarding their works. Once confirmed, the contractors will be added to the system before agreeing access.</p> <p>All works and operatives entering the pipe subway must comply with the code of practice for access and safe working in local authority subways.</p> <p>Regular inspections of the structure, covers, condition and asbestos surveys are undertaken.</p> <p>The Permit to Enter form must be completed and contractors checked to ensure they have suitable and sufficient equipment to enter a confined space.</p> <p>No smoking is allowed at any time.</p>				
ENV-CO-HW 006b	<p>Working in the sewers and managing access. The local authority and contractors if applicable will form RAMS for the works to be undertaken and forward this to Thames Water Utilities (TWU). The RAMS will include dates for the works. TWU will require 3 weeks prior knowledge of the dates for the works so that the RAMS can be agreed. The RAMS will be in accordance with the ATDA: Guidance on Health and Safety Procedures for Work on Sewerage Systems – ATDA Guidance Document. All CoL operatives and contractors if applicable equipment and competence will be self-checked before entering the sewer to ensure compliance with the RAMS and emergency procedures in place for such operations.</p> <p>An observer shall always remain on top of the opening at all times. Signing and barriers shall be provided around the opening in accordance with the safety at street works and road works – code of practice, as an absolute minimum.</p> <p>The sewers are deemed a confined space therefore all works must be carried out in accordance with the Confined Spaces Regulations 2006. A Safe System of Work and permit to enter, by all contractors</p>	<p>This is an ongoing action.</p> <p>All mitigations are business as usual and are kept under regular review. They are all current and continue to work effectively.</p>	Mo Sooruth	05-Jun- 2025	05-Aug- 2025

	entering the sewer must be in place and reviewed regularly. CoL operatives can ask to identify such documents as and when required. The contractor must comply with the confined space requirements on the booking form. CoL operatives must comply with the guidance set out by Thames Water when undertaking works on their behalf				
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Appendix 2

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
ENV-PD-PD 007 Adverse planning policy context	<p>Cause: A desire in Government and others to change the existing planning system in a way which may be detrimental to the City.</p> <p>Event: Changes detrimental to the City are implemented.</p> <p>Effect: Adverse changes cannot be prevented using local planning control.</p>		4	<ul style="list-style-type: none"> The Levelling Up and Regeneration Bill has received Royal Assent. Many aspects of the Act require secondary legislation and/or commencement; the Labour government have indicated that they do not intend to pursue many aspects of these changes. The Government has brought in a new National Planning Policy Framework (Dec 2024). These changes are unlikely to have a significant impact for the future development of the Square Mile. Officers will continue to monitor proposals, respond to consultations and work through the Remembrancer to promote the City's objectives. The risk impact has been assessed as 'unlikely', because we are confident that changes are unlikely in the coming years that would detrimentally impact the Square Mile. <p>The risk is accepted at the current level. The target date shown is the date of the next risk review.</p>		4	30-Sep-2025	
							Accept	Constant
06-Mar-2015 Rob McNicol				19 Jun 2025				

Appendix 2

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
ENV-PD-PD 007a	(1) Ongoing monitoring of government regulations; (2) continue to monitor progress of, and seek to influence, forthcoming legislation.	A consultation response has been submitted to the latest (and previous) government consultations.	Rob McNicol	19-Jun-2025	30-Sep-2025

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City of London Corporation Committee Report

Committee(s): Planning and Transportation Committee – For Information	Dated: 26/06/2025
Subject: Quarterly Public Lift & Escalator Report – April to June 2025	Public report: For Information
This proposal: <ul style="list-style-type: none"> delivers Corporate Plan 2024-29 outcomes 	Providing Excellent Services Flourishing Public Spaces
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	n/a
What is the source of Funding?	n/a
Has this Funding Source been agreed with the Chamberlain's Department?	n/a
Report of:	City Surveyor
Report author:	Matt Baker, Assistant Director – 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 April 2025 to 25 June 2025.

In this reporting period, publicly accessible lifts and escalators were available for **90%** of the time.

Recommendation(s)

Members are asked to:

- Note the report.

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 April 2025 to 26 June 2025.

Table 1.0

Asset Reference	Name	Quarterly
CL24	Duchess Walk Public Lift	100%
SC6458967	Little Britain	100%
SC6458963	Tower Place Scenic Lift	99%
SC6459146	Speed House Glass/Public Lift	99%
SC6462771	Blackfriars Bridge	99%
SC6458959	London Wall Up Escalator	99%
SC6458958	London Wall Down Escalator	99%
SC6458962	Tower Place Public Lift	99%
SC6458970	Wood Street Public Lift	97%
SC6458966	Atlantic House	95%
SC6458964	London Wall East	92%
SC6458969	Pilgrim Street Lift	91%
SC6458965	London Wall West	84%
SC6459244	Glass South Tower	84%
SC6462850	33 King William Street	77%
SC6458968	Moor House	20%

2. Moor House. Defective Main Lifting Traction Machine. A new traction machine was ordered on 20 May 25 with a lead time of six to seven weeks. Remedial work planning to commence 7 July 25.
3. 33 King William Street. Downtime caused by various unrelated faults. 2 Electrical faults which have been rectified, 1 fault following a lift entrapment and 3 faults caused by debris within the door tracks.
4. Glass South Tower. Downtime a result of remedial works required following insurance inspection. Lift in service.
5. London Wall West. Fault with monitoring equipment. Not lift fault and has remained in service.
6. Pilgrim Street. During planned maintenance it was identified that the lighting unit failed and required replacement. Downtime a result of remedial works being completed. Lift in service.

7. London Wall East. Downtime a result of 4 unrelated faults. 2 Autodialler faults, a mechanical fault and an obstruction to the doors. Lift in service.
8. 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

Category	No of call outs
External/Environmental factors	3
Equipment faults/failure	5
Planned Repairs	2
Resets following emergency button press or safety sensor activation	1
Damage/misuse/vandalism	1
Autodialler/Phone line faults	2
Total	14

9. There are currently no projects being conducted on public lifts or escalators.
10. The Transport Strategy team are continuing to progress the provision of signage at all City managed public lifts to provide people with step-free alternative routes in the event of lift faults. This is being completed alongside updates to Legible London signage. They have produced draft routes and signage design for all lifts (one for each side of the lift) and are now liaising with TfL to design the final signage artwork and procure a provider to produce and install the signage.
11. The new managing agent (Colliers) at 125 Alban Gate, have confirmed a programme of upgrade works to the escalators at 125 Alban Gate with an anticipated completion of August 2026.

Corporate & Strategic Implications

None

Appendices

- Appendix 1 – Public Lift & Escalator location map “1-C-40132 - City Map - Public Lifts - Rev E - A1 revised May 2022”

Matt Baker

Assistant Director – Head of FM, City Surveyors

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City of London Corporation Committee Report

Committee(s): Planning and Transportation Committee	Dated: 08 July 2025
Subject: Report of Action Taken	Public report: For Information
This proposal: <ul style="list-style-type: none"> • delivers Corporate Plan 2024-29 outcomes • provides statutory duties • provides business enabling functions 	7. We are a global hub for innovation in finance and professional services, commerce and culture 10. We inspire enterprise, excellence, creativity and collaboration
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	£
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of:	The Town Clerk & Chief Executive, Ian Thomas CBE
Report author:	Gemma Stokley, Principal Governance & Member Services Manager

Summary

This report provides details of decisions taken under Urgency procedures under Standing Order 40 (a) between Committee meetings.

Recommendation(s)

Members are asked:

- To note the report.

Decisions taken under Urgency under Standing Order 40(a)

Response to 'Towards a new London plan' Consultation Background

1. The Mayor of London consulted on a document 'Towards a new London Plan'. This high-level document outlines the process, content, key issues and potential policy options that may shape the new draft London Plan, which is expected in Spring 2026. The consultation period began on 9th May 2025.
2. Officers prepared the City Corporation's proposed response reflecting its role as the local planning authority for the Square Mile and as the owner and management organisation for significant open spaces and a provider of housing across sites in Greater London. This was circulated via email to all Planning & Transportation Committee members via email on 6 June alongside a link to the document itself. Comments were invited by close of business on 17th June, after which the proposed response was tweaked where necessary ahead of submission to the GLA by the consultation closing date of Sunday, 22nd June.
3. Two comments were received on the proposed submission from the wider membership of the Planning & Transportation Committee and, as a result, one amendment regarding reference to the specifications for affordable housing was made at para 2.13 of the proposed response.
4. The final, proposed submission was therefore presented to the Town Clerk, in consultation with the Chair and Deputy Chair of the Planning & Transportation Committee for final approval ahead of submission to the GLA.

REASON FOR URGENCY:

5. The consultation period concluded on Sunday, 22nd June however, there was no meeting of the Planning and Transportation Committee scheduled to take place within the consultation timeline. Officers therefore requested that a final decision as to the proposed response be taken under Standing Order 40(a) to ensure that the City of London Corporation can engage in the consultation process enacted by the Mayor of London.

Conclusion and Decision Made

6. Following consultation with the Chairman and Deputy Chairman of the Planning and Transportation Committee, the Town Clerk, as per urgency powers granted under Standing Order 40(a) agreed that the attached 'Towards a London Plan 2025 response' at Appendix A be signed off as the final submission to the Mayor of London's consultation.

Gemma Stokley

Principal Governance & Member Services Manager, Town Clerk's Department

E: gemma.stokley@cityoflondon.gov.uk

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Appendix A Towards a London Plan 2025 response

Paragraph number	Summary	Comment
Paragraph 1.1: What is the London Plan?	<ul style="list-style-type: none"> Explains what the London Plan is 	No comment
Paragraph 1.2: What years will the new London Plan cover?	<ul style="list-style-type: none"> Plan period of 2027 to 2050 For housing targets, the plan will run from 2026-27 for 10 years. Some delivery measures to increase housing supply will need to go beyond 10 years 	<p>Given the pace and scale of delivery required, in particular for housing delivery, the City Corporation supports taking a long-term approach to planning for growth. Given the importance of economic growth it would be helpful if the new London Plan were to place additional emphasis on this over the plan period. This could focus on the form, types and patterns of employment floorspace, reflecting latest demand, uptake, densities and trends. The City Corporation would like to work alongside the Mayor of London in preparation of key evidence to support the economic growth of London, with the Square Mile at the centre of the business function of the capital.</p> <p>Given anticipated adoption in 2028 and that the current London Plan housing targets expire in 2028/29 it would be useful to understand the selection of 2026/27 as the start of the 10-year period.</p>
Paragraph 1.3: How many homes will it plan for?	<ul style="list-style-type: none"> London Plan plans for 87,992 new homes per year. 	The City Corporation is working with the Mayor of London on the LAND4LDN to ensure that the Square Mile continues to contribute appropriately to housing delivery in the context of its primary business function.
Paragraph 1.4: Viability and delivery	<ul style="list-style-type: none"> LP will be informed by an assessment of the viability of development, and the delivery approaches that best support an increase in housing supply for London and the provision of sustainable development 	The City Corporation would be keen to ensure that viability work successfully addresses commercial development, particularly of the type that comes forward in the CAZ, and we can provide advice on this should it be useful.

Paragraph 1.5: What is this document about?	<ul style="list-style-type: none"> Sets out key new ideas that the new plan might include to consider and comment on. 	No comment
Paragraph 1.6: Legal and procedural requirements	<ul style="list-style-type: none"> Sets out the legal and procedural requirements of the London Plan and the tests of soundness 	No comment
Paragraph 1.7: Integrated Impact Assessment (IIA)	<ul style="list-style-type: none"> The London Plan will be supported by an Integrated Impact Assessment which will cover <ul style="list-style-type: none"> Sustainability Appraisal Equalities Impact Assessment Health Impact Assessment 	Welcome the London Plan being supported by an IIA.
Paragraph 1.8: Habitats Regulations Assessment (HRA)	<ul style="list-style-type: none"> Identifies the Special Areas of Conservation (SACs), Special Protection Areas (SPA) and Ramsar sites wholly or partly within London This includes Epping Forest and Burnham Beeches 	<p>It is likely that a full HRA will be required therefore the timing of the production of this would be helpful.</p> <p>The City Corporation owns and manages Epping Forest and Burnham Beeches SACs. The HRA and likely mitigation measures will be crucial in mitigating against likely adverse effects on the integrity of SACs/SPAs across London and beyond. The impact of increased recreation resulting from housing growth on Epping Forest is already well understood and has been considered for HRAs for local plans.</p>
Paragraph 1.9: Beyond London	<ul style="list-style-type: none"> There may be opportunities for joint work to plan for growth across London's boundary to 55% of England's needs in the southeast 	Support for joint working across London and the South east to deliver housing requirements but same emphasis should also be placed upon economic growth.
Paragraph 1.10: Good growth objectives	<ul style="list-style-type: none"> Continuation of the Good Growth Objectives of the current London Plan: <ul style="list-style-type: none"> Building strong and inclusive communities Making the best use of land Creating a healthy city 	Agree that the good growth objectives represent an appropriate balance for the emerging new London Plan. In particular, the City Corporation supports the continued emphasis in GG2 to intensify the use of land to support additional workplaces and to prioritise well-connected sites; and the emphasis in GG5 to enhance London's global economic competitiveness and to plan for sufficient employment space in the right locations.

	<ul style="list-style-type: none"> ○ Delivering the homes Londoners need ○ Growing a good economy ○ Increasing efficiency and resilience 	
Paragraph 1.11: The key diagram	<ul style="list-style-type: none"> • Shows the progress against the indicative capacities and transport infrastructure committed to in the current Plan 	Noted.
Section 2: Increasing London's housing supply	<ul style="list-style-type: none"> • Sets out the housing targets and the relationships between housing demand and the pace of housing delivery required to meet targets • Presents the opportunity for affordable housing to increase pace away from demand factors 	No comment.
Paragraph 2.1: A brownfield first approach	<ul style="list-style-type: none"> • Prioritising brownfield delivery within London's urban extent 	City Corporation supports the 'brownfield first' principle. It is vital that as London grows it continues to stimulate and direct growth and investment that leads to regeneration benefits and drives economic development.
Paragraph 2.2: London's call for sites - LAND4LDN	<ul style="list-style-type: none"> • Explains the new London 'digital Strategic Housing Land Availability Assessment'- LAND4LDN 	No comment.
Paragraph 2.3: Opportunity Areas (OAs)	<ul style="list-style-type: none"> • Demonstrates past delivery in the 28 current Opportunity Areas (OAs) and their groupings • London Plan will streamline and update the OAs • Investigate how the New Town's Taskforce could work within London • Adjacent OAs at London Bridge/Bankside proposed to be removed, and City Fringe/Tech City to 	No comment.

	‘maturing’ (for delivery between 2019 to 2024, all phases of development underway)	
Paragraph 2.4: Central Activities Zone	<ul style="list-style-type: none"> Proposes potential amendments to the CAZ boundary to better match areas with a concentration and mix of uses which is unique to the CAZ. This could exclude areas that are mainly residential in character to play a greater role in housing delivery CAZ currently delivers almost 1 in 10 homes in London, but scope to increase delivery in these locations are limited Recognises conflicts with residential and need to maintain a functioning CAZ 	Support for the continued focus and role of the CAZ in economic growth for central London and beyond. To provide informed comment the City Corporation would need to understand the methodology behind the potential boundary changes, what changes to boundaries would look like for the City and how it would impact different parts of the city in relation to the balance of uses. Decisions on boundary amendments need to be based on clear criteria applicable across the CAZ, and the implications for specialist clusters fully understood. As acknowledged, there is limited capacity within the CAZ for residential delivery therefore the intention behind any amendments needs to be fully understood. While any proposals will be carefully considered, the City Corporation’s initial expectation is that, as now, the entirety of the Square Mile would remain in the CAZ.
Paragraph 2.5: Town centres and high streets	<ul style="list-style-type: none"> Potential for town centres and high streets to increase their contribution to housing delivery 	City Corporation supports the role of town centres in delivering housing complementary to the town centre functions, and to maintain vitality and viability. It would be helpful if the London Plan could provide further clarity on the role of clusters of town centre activity within the CAZ and their suitability for residential, ensuring that this does not compromise the role of the economic functions of the CAZ. The CAZ is – effectively – one large city centre; should the boundaries be revised as proposed in this document then it is likely that the resultant CAZ would be even more focussed on commercial and other strategic functions. The operation of national policy regarding town centres isn’t a good fit for CAZ retail clusters, given that many other parts of the CAZ are suitable for retail and other town centre uses. It would be useful were the London Plan to provide further strategic guidance on this issue or to take this into account when considering relevant policies.

Paragraph 2.6: Industrial land	<ul style="list-style-type: none"> Explains the potential for industrial co-location with residential 	No comment.
Paragraph 2.7: Wider urban and suburban London	<ul style="list-style-type: none"> Identifies potential to assess improvements to public transport to support increased housing delivery in wider urban and suburban areas of London 	No comment.
Paragraph 2.8: Other sources of housing supply	<ul style="list-style-type: none"> In context of new national policy that green belt should be reviewed to meet housing need in full, the Mayor has commissioned a London-wide green belt review. 	<p>The City Corporation is aligned with the Mayor in relation to the need to support sustainable economic growth, which includes facilitating the delivery of the homes required over the plan period in the right locations. The right locations should be where sustainable development for the long term can most easily be achieved. Therefore, the London Plan needs to take a forward looking and long-term perspective in relation to the plan for growth. This will support the growth of the City as London's financial heart as well as providing the homes and services communities need. The City Corporation considers that it is possible to strike a balance between the desire for growth by speeding up the delivery of homes (and other uses) in the most suitable and sustainable locations and a need for protections against urban sprawl. However, this should not come at the detriment of London's key open spaces, green spaces and environmental designations. Not only are these green open spaces and parks central to the health and wellbeing of London's residents and its visitors, they also contribute vital ecosystem services in the form of clean air, flood risk mitigation, carbon sequestration and nutrient cycling</p> <p>The City Corporation understands that the new approach to 'grey belt' within the NPPF introduces new considerations to Green Belt policy in relation to the release of land. This means that land which does not "strongly contribute" to the purposes of the Green Belt could be released for development. The City Corporation supports this approach in terms of ensuring that any Green Belt release is focussed on the poorest performing parts of the Green Belt in relation to the 5 purposes of the Green Belt as set out in the NPPF. The City Corporation considers that in the context of</p>

		<p>the unique pressures of London and the need to make the most effective use of land, the assessment of what 'strongly contributes' should include assessment of the form and functionality of the land including (in the context of paragraph 152 of the NPPF) potential for upgrading the landscape for recreation and wildlife.</p> <p>Although it is understood that the Green Belt is not an environmental designation, it does include high value landscapes and environmental designations, including those within the City Corporation's management and ownership such as Epping Forest Special Area of Conservation (SAC). The effective protection of these open spaces also relies upon the protection of parcels of land near to the designated sites to form a buffer from development to the highly sensitive site. In the case of Epping Forest as an SAC it also relies upon effective mitigation measures to protect from the pressures of recreation from new development within a 15km buffer of the boundary of the SAC, as required by the Habitats Regulations. Therefore, further evidence in relation to presence of environmental designations may be required to supplement the Green Belt review and other considerations to provide strategic oversight into local decisions around any future Green Belt release.</p> <p>The City Corporation supports the production of London-wide Green Belt review to ensure that the key decisions are made at a strategic level. The consultation document highlights some of the principles for this study in relation to ensuring sustainable and liveable neighbourhoods, making the best and most efficient use of land and applying the principles of the 'grey belt' as set out in national policy. It is presumed (but not entirely clear within the document) that the study will be looking at parcels of Green Belt land within the confines of Greater London only. However as shown in Figure 2.4 there are likely to be locations where sites within London are being assessed in relation to their ability of constraining sprawl and merging of London and settlements outside. This needs to be considered in the detailed methodology and aligned with studies being produced by</p>
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		authorities in the South-East. This should also be considered in the context of meeting the overall housing demand of the South-East identified in section 1.9.
Paragraph 2.9: Beyond London's existing urban area	<ul style="list-style-type: none"> The Green Belt review will seek to understand the potential capacity from housing on London's grey belt, and other uses, as part of strategic planning for different land uses 	<p>As per above response the City Corporation considers that there is a role of Green Belt release in delivering the much-needed sustainable growth over the long term but this should be focussed on the locations performing least well against the purposes of the Green Belt, while also considering other locational and environmental considerations. The purposes of the Green Belt should be considered alongside the need to maintain appropriate environmental protection.</p> <p>The importance of building where good public transport connections can support non car-based travel is critical to support the Mayor's transport Strategy targets, and is supported by the City's Transport Strategy. This should be a consideration in the Green Belt review.</p>
Paragraph 2.10: Large-scale urban extensions in the green belt	<ul style="list-style-type: none"> Opportunities for large-scale development (10,000+ homes in each location) in London's green belt are being considered in areas with good public transport access. Explore at a strategic level potential new public transport that could unlock further housing capacity Recognises need to be careful not to divert the investment needed for transport improvements to support brownfield development 	<p>Support for exploration of all options to facilitate growth. However, there will be a need for clarity in relation to how a study assessing the purposes of the Green Belt within the boundaries of Greater London and studies within the London Green Belt are best aligned. Similarly, clarity is needed on how any housing delivery in these locations is considered against the housing requirements of London and the wider South-East.</p> <p>Large scale developments in close proximity to protected areas (such as SACs and SSSIs) could have significant impacts on the long-term viability and functionality of these valuable natural assets. Changes to hydrology, habitat loss, resource depletion, increased pollution, and increased visitor pressure are just some examples of the impacts that must be considered carefully, and in detail, before considering the location of any new developments.</p>
Paragraph 2.11: Metropolitan Open Land	<ul style="list-style-type: none"> Recognises that MOL includes environmental considerations and therefore will also consider public access and biodiversity value 	Support for making clear distinctions between MOL and Green Belt policy to ensure that MOL policy also considers public access and biodiversity considerations as well as the principle of openness. However, as per response above the approach to the Green Belt should also consider

		overlapping designations such as SACs, and the need to consider the wider setting of the environmental designation. This will result in a degree of environmental consideration to any future Green Belt release.
Paragraph 2.12: Affordable housing	<ul style="list-style-type: none"> Identifies past delivery patterns and constraints to delivery of: <ul style="list-style-type: none"> high interest rates and the increased cost of building homes regulatory uncertainty, such as fire safety requirements challenges around the quality, building safety and sustainability of existing homes 	Noted. The unique circumstances of the City mean that affordable housing can often be provided off-site in appropriate locations in neighbouring boroughs as well as in Corporation owned estates across London. This mechanism works with strong delivery track record, so the policy environment to allow this to continue should be maintained.
Paragraph 2.13: Planning for affordable housing	<ul style="list-style-type: none"> Places emphasis on delivering affordable housing, not simply building more market homes Affordable housing not limited by demand Will review the 35 and 50% affordable housing thresholds 10 unit threshold also to be reconsidered in relation to optimising sites A future approach could put more emphasis on social rented affordable homes, and potential for a key worker living rent 	<p>The City Corporation acknowledges that affordable housing is not as impacted by economic cycles and demand as other tenures, therefore a focus on affordable housing delivery will play a role in maintaining delivery levels in different economic conditions. However, viability and deliverability considerations are likely to impact at a local level, including the impacts of required specifications for affordable housing.</p> <p>The City Corporation delivers new affordable housing in single tenure schemes outside London. This approach is successful and helps deliver much needed affordable housing for London. Any new approach should enable this to continue.</p>
Paragraph 2.14: Estate regeneration	<ul style="list-style-type: none"> Will reconsider the re-provision of social rented floorspace rather than based on the right to return 	The City Corporation agrees that additional considerations in relation to the re-provision of social rented and other forms of affordable homes would be beneficial.
Paragraph 2.15: Build to rent	<ul style="list-style-type: none"> Potential to reconsider the 50 unit definition 	Given the expanding forms and tenures of housing products a set of clear principles for what developments should deliver would be helpful. Additionally clear guidance on the relationships and differences between

	<ul style="list-style-type: none"> Recognises the increased role and variety of BTR models 	different products would also be helpful. The statement that BTR addresses an intermediate housing need is potentially misleading, implying that it is a form of affordable housing. Given that BTR is usually rented at market rates, it would be useful for further evidence to demonstrate how BTR can have an intermediate function. However, it is acknowledged that BTR models are financed in a manner different to sale models which should be capitalised upon to increase delivery.
Paragraph 2.16: Other housing options	<ul style="list-style-type: none"> Market conditions and other factors can mean that some types of housing (such as co-living) dominate new supply in some areas, recognises a need to maintain the correct balance of delivery Recognises increasing role of specialist products in supply and freeing up space 	<p>Different forms of housing types have potential to offer variety in the market, contribute towards delivery and can free up conventional supply for other occupants. The London Plan together with local plan policies need to manage the identified issues in relation to local factors and considerations.</p> <p>Notes that housing for disabled people has not kept pace with demand. The London Plan could provide guidance on ways to accelerate or diversify supply to reduce this gap.</p>
Paragraph 2.17: Specialist and supported housing and housing London's older population	<ul style="list-style-type: none"> Considerations of options around addressing needs for specialist accommodation at strategic or local level Considerations around the definitions used 	London is considered a single housing market, therefore for specialist accommodation the City Corporation considers that need should be addressed at a strategic level. The London Plan could provide direction on the local circumstances where specialist older persons accommodation would be appropriate.
Paragraph 2.18: Purpose-built student accommodation and other forms of shared housing	<ul style="list-style-type: none"> Identifies issues of student housing crowding out conventional housing, but also can free up conventional housing Raises questions about setting quality expectations and potential changes to the approach to nominations for affordable student accommodation only 	Purpose built student accommodation in the right locations can inject much needed vitality to a local area as well as free up permanent residential for more permanent residential communities. The balance needs to be struck between the right types of uses, and the right forms of residential, having regard to the particular characteristic of the local area. However, it is important to ensure that boroughs are all playing a suitable role in supporting the delivery of student housing. The London Plan should explore ways in which a strategic approach to delivery can be taken, to avoid situations where applications are focussed on particular places that have less restrictive policies.

		<p>Student accommodation and other shared living has potential to strike an appropriate balance as part of wider residential communities. Connectivity to Higher Education Institutions should continue to be a factor in relation to location, with well-located and central locations contributing to the strategic demand for such accommodation.</p> <p>Current markets and viability appear to enable the delivery of student housing above other housing types. Viability work for the London Plan should explore this further, with the planning system potentially having a role to play in securing higher planning obligations from student housing development if this is justified by evidence.</p> <p>There is a need for more guidance on disabled persons' parking for purpose-built student housing, recognising that the transport infrastructure is not currently adequate to support step-free journeys to many locations, including those areas with high PTAL. In areas where there is a limited supply of on street disabled persons parking spaces, or limited hours for Blue Badge holders, greater clarity is needed.</p>
Paragraph 2.19: Gypsies, Travellers and Travelling Showpeople	<ul style="list-style-type: none"> Considers setting strategic London wide targets for gypsy and travellers and travelling showpeople, utilising the new national more inclusive definition 	No comment
Section 3: Growing London's Economy	<ul style="list-style-type: none"> Highlights that London's economy was worth almost £500bn in 2022, accounting for around 25 per cent of UK economic output, with strengths in finance, professional services, sciences, innovation, tech, health, education, social care, hospitality, creative and green industries 	<p>The City, falling entirely within the Central Activities Zone, as a major business and financial hub generates over £109 billion annually in economic output, equivalent to 4% of the UK's GVA. Approximately 678,000 people work in the City, representing one in every 48 British workers, with a 25% increase in workers since 2019. The London Plan as the spatial development strategy for London should fully recognise the role the City plays in central London and the driving force for the nation's economy. Policies need to recognise some of the unique challenges in delivering a minimum of 1.2m sqm (NIA)/1.6m sqm (GIA) of new office</p>

	<ul style="list-style-type: none"> The Central Activities Zone (CAZ) remains uniquely important to London and the country overall. 	<p>floor space as contained within the emerging City Plan 2040, and the relationships between the City's core financial sectors, other supporting industries and their supply chains across the whole of London. The City Corporation's Future of Office Use Study identifies qualitative and quantitative demand for new office space over the plan period, including consideration of different scenarios.</p> <p>London Plan policies should be grounded in a solid understanding of the broad range office and employment sectors, considering the connections between industries, their economic models, supply chains, spatial and locational requirements, as well as their links to logistics and infrastructure requirements.</p> <p>It is critical that London's employment projections continue to play their robust and highly respected role in identifying jobs growth for London's local authorities. While there is merit in continuing long-standing approaches to jobs projections, it would also be useful to explore some of the underlying methodological factors in relation to this, the closely related London Employment Sites Database, and the London Office Policy Review including:</p> <ul style="list-style-type: none"> Employment density assumptions, particularly for centrally located offices Whether previous projections predicted employment growth in recent years, which have continued to see high growth in the City (and CAZ more broadly) The extent to which job projections should continue to be constrained by capacity The extent to which demand may be shifting more centrally rather than to other locations Whether it remains appropriate to treat CAZ and NIOD in similar ways, given recent shifts in demand
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<p>Paragraph 3.1: The Central Activities Zone</p>	<ul style="list-style-type: none"> • Identifies the need to safeguard the unique concentrations of employment and other uses within the CA, but also ensure floorspace is provided • Highlights potential to identify key areas with high concentrations of economic activity, giving example of the new Mayoral Development Corporation for Oxford Street • Suggests potential amendments to the CAZ boundary to better reflect areas with the concentration and mix of uses that are unique to the CAZ • Options for strengthening the Agent of Change principle to be specific to London • Options for centrally located affordable workspace focussed upon types of uses critical to the CAZ, including culture and hospitality. 	<p>City Corporation supports the continuing focus on the CAZ and the need to safeguard land for employment and other uses appropriate to ensure the functioning of the city. The Square Mile is entirely located within the CAZ and the balance of uses needs to reflect the City's core business function. Office floorspace and other forms of employment is supported by other commercial sectors. The London Plan needs to ensure this focus is maintained. The City Corporation's emerging local plan seeks to deliver a minimum of 1.2m sqm NIA/1.6m sqm GIA of new additional office floorspace alongside an enhanced focus on uses which support the culture and visitor economies.</p> <p>The City Corporation is aware that there are parts of the CAZ with a more residential focus. While there are parts of the City that have concentrations of residential use, these are relatively small in area and are in very close proximity to and comingled with other uses, including strategic office sites and cultural centres. It is important that the CAZ remains a continuous whole, rather than having gaps within it, reflecting the long-standing approach of identifying and planning for London's centre. The City Corporation's initial view is that the entirety of the Square Mile should remain within the CAZ.</p>
<p>Paragraph 3.2: Specialist clusters of economic activity</p>	<ul style="list-style-type: none"> • Identifies that some clusters don't match with existing designations, so could identify all specialist clusters beyond the CAZ • Some clusters may need added infrastructure investment to fulfil their potential 	<p>The Square Mile, and the City Cluster is a specialist cluster of business and financial and professional services. The specialist financial and professional services sector in the City is a nationally important location competing on a global scale. The nationally and internationally significant office functions of the CAZ are supported and should continue to be supported and enhanced.</p> <p>Specialist clusters can span multiple boroughs in London. The London Plan legal cluster spans the City of London, Westminster and Camden.</p>

Paragraph 3.3: Town centres and high streets	<ul style="list-style-type: none"> • Could take a more flexible approach to ranges of businesses in town centres • Identifies that some town centre classifications in the CAZ may be considered differently in the future • Could designate active frontages for town centres and areas suitable for late night uses • Identifies potential for redefining town centre boundaries to release poor performing areas 	<p>The City Corporation agrees that the London Plan will need to reflect a more flexible approach to main town centre uses in the context of changes to the use class order. The focus should be on increasing footfall, pandemic recovery, continuation as town centres (including areas of town centre use concentration within the CAZ) as destinations.</p> <p>A more flexible approach should also look beyond class E, as many uses important for town centre vitality are not within this use order (night-time economy uses, public houses, music venues, hotels, visitor facilities etc). Specific designations within the CAZ should be used to protect specialist clusters where they could be outcompeted by the flexibility offered to class E uses. The growth in office floorspace and increased visitor numbers in the Square Mile will also create additional demand for supporting town centre uses.</p>
Paragraph 3.4: Industrial Land	<ul style="list-style-type: none"> • Options to set out at a strategic level what requires protection and targets for industrial capacity • Potential to releasing retail parks designated as industrial, and where poorly performing in terms of transport and strategic road network. • Could promote heavier industrial uses in industrial areas and promote light industrial in town centres- 	<p>Support in principle but need to recognise the role of all forms of employment and the supply chains. Industrial uses support the functioning of London as a whole but also the business function of the Square Mile. However, there should remain flexibility within the Plan to allow for release of industrial areas, where this can be achieved through relocation, co-location or intensification.</p>
Paragraph 3.5: London's night-time economy	<ul style="list-style-type: none"> • Potential to identify clusters of night time activity in CAZ and town centres as being suitable for night time uses • Aim to manage impacts on communities such as women, older Londoners and the LGBTQIA+ community 	<p>Any identified night time clusters would need to consider current and proposed conditions, i.e. recognising where some existing night time clusters may be more appropriate than others, and vice versa. Management of impacts on particular groups should be considered in the round and not only as a night time issue.</p> <p>The current London Plan identifies 'strategic areas of nighttime activity' (Figure 7.6 and Table A1.1) but leaves it to the boroughs to develop a vision</p>

		<p>for the night-time economy. Allowing boroughs to develop a vision suitable for their night-time economy is the right approach given the diversity of night-time economies across London.</p> <p>The introduction of Class E and the flexible approach to town centres suggested at paragraph 3.3 provides an opportunity to reset the framework for night-time uses. Many uses that can support the night-time economy (public houses, live music venues, cinemas, concert halls, nightclubs, theatres etc) are sui generis uses and do not benefit from the flexibility introduced by class E. The new London Plan could establish that such uses, where they would contribute to vitality and viability, and would not have a significant detrimental impact on amenity, are acceptable in principle in areas that the plan designates as important for the night-time economy. This would ensure that these Sui Generis uses are not sidelined by the flexibility given to all class E uses and can form part of varied and exciting town centres.</p> <p>In the context of increased housing delivery, potentially in or near town centres, designated areas with specific protections for night-time uses are important to ensure these uses with potential for noise have the space to flourish. This could form part of a bespoke, enhanced Agent of Change system where strategically important night-time economy areas are specifically highlighted and protected.</p> <p>The new London Plan could also be clearer as to why areas are designated nighttime areas. This would embed in the plan the idea that the night-time economy is more than just nightlife (as identified in the consultation document), and includes culture, healthcare, logistics, artistic/creative work, workers that service daytime uses such as office cleaners or street cleaners, and that for specific groups – such as the LGBTQIA+ community – night time uses play a particular role in facilitating community cohesion. An indication as to why an area is designated would help to focus local plans and planning decisions on the key strategic theme for that night-time area</p>
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		<p>and could enable the provision of the wider facilities noted in the document (late night cafes, toilets, safe routes/lighting). This could be incorporated in the night-time economy classification column in Table A1.1.</p> <p>Given that many small-scale night-time venues do not currently support step-free access including pubs, upstairs function rooms or basement bars, which excludes many people from participating in, and contributing to, the night-time economy, night time classifications could factor in the extent to which areas are accessible to all and seek to encourage greater accessibility.</p> <p>The City Corporation notes that many of the facilities that could support the night time economy (toilets, cafes, safe routes, lighting, shelter, public transport connectivity) also create a welcoming visitor environment during the day. There is an opportunity to tie the night time economy to the wider appeal of London, and the CAZ specifically, as a visitor/tourist destination that is inclusive of, and accessible to the greatest range of people</p> <p>The value and importance of maintaining and improving good public transport for the night time economy should be recognised, as many workers in the night time economy in London need to travel and feel safe doing so.</p>
Paragraph 3.6: Culture and creative industries	<ul style="list-style-type: none"> • Identifies threats to this space from rents, affordability issues, and loss to housing. • Suggests a London wide approach to AoC • Utilising Creative Enterprise Zones as the specialist clusters of economic activity 	<p>The national application of the Agent of Change principle indicates its general soundness as a universal mechanism for protecting cultural and creative uses from noise sensitive uses. However, in specific areas, such as specialist clusters of the CAZ, town centres, or nighttime economy areas, it may be appropriate to introduce tailored protections linked to the predominant land use theme. For example, restricting some forms of residential uses (or introducing stricter design standards) nearby to concentrations of night-time uses.</p>

		<p>The consultation document notes that cultural uses face challenges other than noise and nuisance (such as affordable rents and losing space to more commercial operators) and other mechanisms are needed to deal with these. The emerging City plan introduces a policy that requires developments >10,000sqm to deliver some form of onsite cultural use. Securing new, explicitly cultural spaces through planning is one way the pressure on cultural space can be mitigated as these new spaces are secured by s106 at peppercorn rent. Other boroughs have also introduced new policies and s106 obligations specifically for culture (Wandsworth, OPDC), and affordable workspace requirements can sometimes be used by cultural operators.</p> <p>This approach is still nascent across London. While the planning system cannot guarantee successful culture, it is in a strong position to leverage new spaces out of development proposals. The new London Plan should take a more interventionist approach that sets up a framework to enable boroughs to negotiate cultural spaces from the developments that can afford them. This would empower boroughs to more actively shape new development, particularly in town centres or cultural quarters, to deliver culture, rather than waiting on cultural uses to emerge out of what is acknowledged as a competitive and unaffordable marketplace.</p> <p>This could be geographically tied to strategic CAZ uses, town centres and/or the Creative Enterprise Zone/Thames Estuary Production Corridor. A threshold for when cultural obligations apply would have to be set (this may have to be set locally to better account for viability differences and therefore the London Plan's role is to set the strategic direction that gives boroughs the power to negotiate). This framework should also highlight the importance of cultural contributors and visitor facilities (public toilets, water fountains, restaurants, cafes, public realm etc...)</p> <p>It is understood that Creative Enterprise Zone (CEZ) designations were also based on other considerations outside the planning system, therefore</p>
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		<p>there may be other clusters which could also have similar characteristics or some CEZs that may not be suitable as a planning designation. Consideration would need to be given to how a CEZ overlaps with other designations and land uses (such as town centres, industrial land, residential) to ensure a co-ordinated approach. It seems likely that CEZs could be used as part of a reclassification of the town centre network as suggested in at paragraph 3.3.</p>
Paragraph 3.7: Visitor economy	<ul style="list-style-type: none"> Identifies some concerns about growth in short term let and impacts on housing supply Suggests could widen support for hotel accommodation, and support in CAZ, town centres and high streets. 	<p>The City Corporation recognises the role serviced accommodation plays in bringing people into the Square Mile across all times and days of the week. However, it is acknowledged that much of the demand relates to central London/the CAZ as a whole and therefore, serviced accommodation should be addressed at a strategic level.</p> <p>The City Corporation has seen a growing market for new hotels and serviced accommodation, often through the conversion of lower grade office buildings.</p> <p>In some circumstances the conversion of offices to hotel may be acceptable; however, the Corporation is closely monitoring the impacts of this on the strategic office function of the City Cluster. The commercial appeal of hotels is likely to be strong across the CAZ and so a more permissive approach across the whole of the CAZ needs to carefully balance the core strategic functions with the benefits serviced accommodation can bring. In short, over-concentrations of serviced accommodation can erode the qualities that attract tourists and visitors, whether this is office functions, culture/entertainment, or retail. Serviced accommodation is also not subject to the same standards in the Building Regulations and may be less accessible and inclusive as a result.</p> <p>Paragraph 3.7 does not discuss the need for other visitor infrastructure to support visitors and tourists. The importance of signage, accessible 24 hour public toilets, transport infrastructure, and good public realm to the visitor experience should not be overlooked. There are often opportunities for</p>

		developments to make a modest intervention that does not compromise their main use, but makes a big difference to the visitor experience. This could be a slightly more generous public realm or the inclusion of a public toilet or water fountains.
Paragraph 3.8: Digital infrastructure	<ul style="list-style-type: none"> Integrating digital connectivity infrastructure with broader utility planning could help develop more interconnected and effective solutions. 	Support.
Paragraph 3.9: Access to employment	<ul style="list-style-type: none"> Suggests additional use of planning obligations for employment opportunities in larger developments, but striking right balance with affordable housing etc. 	<p>Given the pressures on the built environment sector, and known skills shortages, it is important that a renewed emphasis is placed on the rapid delivery of a skilled workforce to deliver the development that we need to see, with a particular emphasis on skills related to sustainability. It is important that the London Plan places emphasis on ensuring planning obligations contribute towards construction skills, and that this is coordinated.</p> <p>Training, employment and skills strategies and the application of S106 agreements should also seek to secure a greater range of job types and apprenticeships within the building industry, and ensure that construction-related apprenticeships can be 'passported' to different sites, even if they are in different local planning authorities.</p> <p>Having noted that there is a disability employment gap of 21% further initiatives to address this could usefully be addressed here, including creating opportunities to access meaningful employment with clear pathways to progression for disabled people.</p>
Paragraph 3.10: Affordable workspace	<ul style="list-style-type: none"> Need for more consistent approaches for London Consideration for affordable workspace requirements from other 	Agreed in principle to setting of more consistent approaches to affordable workspace for London, however there many be viability reasons why different approaches are taken, with a focus on meeting the requirements of specialist sectors within the local area. The City Corporation also

	<p>commercial Class E uses (not just offices and industrial)</p> <ul style="list-style-type: none"> Identifies risks of diluting provision from traditional offices and light industrial, but could help hospitality sector. Consideration of off site provision and consolidation LP could set out scale of development and requirements, affordability rates and length of requirement. 	<p>supports affordable workspace and space for SMEs through measures outside the planning systems, such as through the its SME Strategy. The approach within London should allow for bespoke approaches to continue. Some consistency of approach to evidence on local rates and data sources in relation to what can be considered affordable may be helpful.</p>
Paragraph 4.1: Building height and scale	<ul style="list-style-type: none"> Could set out building heights acceptable in all locations across London that share characteristics This would reflect PTAL and national policy, heritage assets Potential to set London wide small site design code, which would include covering extensions and redevelopment of single homes for intensification 	<p>Although consistency across London in relation to approach to building heights would be helpful and ensure similar approaches to density and the townscape are applied across the capital, this should be underpinned by detailed characterisation evidence.</p> <p>It is recommended that this should be underpinned by further work on an accessible PTAL, as advocated by disabled people's groups including Transport for All, and noting that the standard PTAL assessment does not reflect a range of requirements e.g. step-free access, distance from platforms or noting that buses are not suitable for all people.</p>
Paragraph 4.2: Tall Buildings	<ul style="list-style-type: none"> Identifies that the plan could play a more active role in identifying locations for tall buildings to deal with cross boundary issues and capacity Could set different thresholds for tall buildings- eg referable to the Mayor, or a higher threshold of 20 storeys/60m 	<p>The definition of a tall building will depend on location and context, although there are inevitable merits for more consistency across London the definition should have a local context. The role of the London Plan in setting strategic locations for tall buildings should be considered and supported by detailed evidence.</p> <p>The identification of tall building zones does not need to be a binary matter done either by the Mayor or by the boroughs. The Mayor could identify a network of tall building zones of strategic importance to harness the benefits of co-ordinated transport investment, better reveal the hierarchy of place, ensure the most sustainable locations are optimised, and catalyse</p>

	<ul style="list-style-type: none"> • Could be clearer about how assess applications for tall buildings inside and outside of the clusters • Could remove the requirement for boroughs to identify tall building areas, but could choose to do so. 	<p>the step change in housing delivery that is required. Then through local plans local planning authorities would define the exact boundaries of the zone, the appropriate heights, and designate additional zones as appropriate.</p> <p>The identification of a tall building height threshold at a strategic level is likely to be cumbersome, as it is so dependant on local context and it is unlikely for there to be an acceptable uniform height range across London as a whole. This also is the case for the identification of appropriate heights within a tall building zone, which is why the boroughs are best placed to do this. It is important, however, that the London Plan focuses tall building policy on building proposals that are genuinely tall – not merely those that are somewhat taller than their surroundings.</p> <p>The process for assessing buildings outside tall building zones is the right one but it should be made clearer. All tall buildings should be assessed against a set of criteria and weighed in the planning balance like all other applications. One of the purposes of identifying tall building zones is that it is an indication that tall buildings within the zone are more likely to satisfy the criteria, or put the other way, tall buildings outside the zones would have to work harder to show that they are appropriate. This should be made clear within the new London Plan.</p> <p>The role of suicide prevention design measures for relevant buildings and structures should be recognised. This is a key public health issue which is often under-recognised; it is an area where good design can quite literally save lives, and it should be given greater importance in the London Plan.</p>
Paragraph 4.3: Supporting a denser London linked to transport connectivity	<ul style="list-style-type: none"> • Considers a new TfL connectivity metric to sit alongside PTAL and could use both to inform approach to density • Considers how planning for public transport connection improvements, 	<p>Noted. As per previous answer this should be developed alongside accessibility PTAL.</p>

	including metroisation can help facilitate for higher densities and make more viable	
Paragraph 4.4: London's heritage	<ul style="list-style-type: none"> Highlights the role of heritage in meeting net zero and potential for historic building retrofit Highlights the potential for national development management policies on heritage and should not duplicate these The London Plan would still include a policy for World Heritage Sites 	<p>Support the potential for using national development management policies on heritage. The application of the relevant NPPF policies is by now well-established and this is a key area where duplication in regional and local plans can be avoided.</p> <p>The City Corporation agrees that heritage has an important role to play in meeting net zero. It is important that the right balance is struck between heritage and sustainability measures. The City Corporation has developed the Historic Building Retrofit Toolkit, which has valuable guidance on how to approach these issues.</p> <p>Would welcome more positive guidance on how heritage assets can be made more inclusive of a greater range of people.</p>
Paragraph 4.5: Designing the homes we need	<ul style="list-style-type: none"> States need to strike a correct balance for design. 	Support.
Paragraph 4.6: Heat risk, ventilation and overheating	<ul style="list-style-type: none"> Highlights implications of dual aspect on less efficient layouts with impacts on density Could rely on national standards only or go further 	Support the continued prioritisation of the passive design and ventilation measures. The national Building Regulations are minimum standards of compliance and whilst Regulation O is currently only applicable to London a higher standard than that required for safety alone should be sought given the increased level of risk. Of particular concern is the impact on neighbouring residential accommodation of active cooling exhaust emissions and the hyper local consequences were these do not themselves have active cooling provision. The London Plan should seek to address this risk through tighter control of active cooling in the cooling hierarchy.
Paragraph 4.7: Homes for families	<ul style="list-style-type: none"> Could include specifics for housing for children and young people, including size and bedrooms Include a policy for loss of family accommodation 	<p>Agreed- need to ensure consistency in what 'counts' towards housing delivery numbers and incentivise this delivery. What is considered a family home will depend, and what form this takes eg flat or detached.</p> <p>Housing should be designed to be flexible and accommodate varying family configurations as people move through life cycles. Should include</p>

	<ul style="list-style-type: none"> Options for measures supporting higher density and making suitable for children and young people 	consideration of inter-generational housing and households caring for a disabled person with multiple or complex impairments.
Paragraph 4.8: Accessible housing	<ul style="list-style-type: none"> Identifies potential to require M4 3b for different tenures, and marketed to users first Identifies issues with over-provision in some non self contained accommodation with some affordability implications. 	Support the requirement for M4 (3b) to other tenures including private and private rental sectors, which is particularly under-served by accessible units. Further detail on the marketing approaches to disabled end-users would be helpful.
Paragraph 4.9: Space standards and other requirements	<ul style="list-style-type: none"> Potential to opt into the National Described Space Standards with some London-wide additional requirements 	Support
Paragraph 4.10: Designing for everyone	<ul style="list-style-type: none"> Could require large applications to demonstrate how meaningfully informed by range of lived experience Potential requirements for design review, accessibility review panels Making spaces more inclusive and designing out crime, after dark and 24 hour city tests 	Support. How spaces are used by different populations specific to that locality and surrounding area should be recognised e.g seating, toilet provision, play elements, shade etc in areas where large numbers of tourists visit. Disabled people are not routinely designed for. The London Plan should continue to focus upon the need to avoid separation, undue effort or special treatment.
Section 5: London's infrastructure , climate change and resilience	<ul style="list-style-type: none"> Potential to go further towards net zero with viability considerations. 	<p>Support for the ambition to speed up the transition to net zero and to increase London's resilience to heat risk and flood risk.</p> <p>Although it's important to recognise the positives, such as how per capital emissions have more than halved since 2000, the London Plan should recognise the direct impacts of the built environment on carbon emissions – in 2020, 67% of London's direct carbon emissions were attributable to buildings - and the significance of the challenge of reaching the targeted net zero city by 2030.</p>

		<p>Agree with alignment to national standards, with flexibility as further changes are to be expected. Agree that several requirements should go beyond national standards and push harder to drive sustainable outcomes. The future plan should provide guidance on the weight and importance of considering environmental sustainability outcomes, to ensure it is given appropriate weight in decision making.</p> <p>A more coordinated approach between boroughs on sustainability matters and requirements (carbon, circular economy etc) is important; there's an opportunity for the new London Plan to drive this.</p> <p>London's urban density means that private development sites will need to contribute to the delivery of sustainable infrastructure, not simply through financial contributions to offset carbon or as a planning obligation but by providing space, public realm upgrades or underground routes through sites for services/pipework. This could be introduced as part of a carbon offsetting mechanism as an alternative to offset payments where the provision of infrastructure would depend on onsite measures (as suggested under section 5.3).</p>
Paragraph 5.1: Energy efficiency standards	<ul style="list-style-type: none"> • Could rely on national standards or go further. • Or amend in terms of new thresholds, changing to smaller developments 	<p>Support for London Plan requirements to go beyond national building regulations. However, there are limitations in the building regulation Part L methodology. The regulations only include regulated energy and ignores a large proportion of energy streams associated with fixed building services such as lifts, ancillary systems, and end-user energy. It is based on the National Calculation Methodology (NCM) which often does not adequately reflect the complexity and real-world use of large commercial buildings in central London. This results in a large performance gap between Part L modelling and actual energy use. Further information on the performance gap is detailed in various reports by the Better Buildings Partnership.</p>

		<p>It's recommended that energy efficiency standards should move towards measuring Energy Use Intensity (EUI), modelled on the actual building and its uses rather than a notional building.</p> <p>The emerging City Plan 2040 introduces policy on NABERS UK to address the performance gap between planning stage energy modelling and in-use energy efficiency. The 'Design for Performance' (DfP) process is more thorough and certification requires reporting and validation of metered data. The policy requires major developments to commit to a minimum NABERS UK Energy rating (base-build) of 5 stars for new build projects or 4 stars for retrofit projects. Formal registration for a DfP can be submitted at planning or can be conditioned. NABERS UK commitments are becoming a marketing criterion which incentivises developers to achieve or exceed the rating they have committed to. As NABERS certification currently only applies to office developments, all major developments should conduct predictive energy modelling in accordance with CIBSE TM54 methodology.</p> <p>BREEAM v7 introduces a methodology for predictive energy modelling and predictive energy scores. The UKNRCBS also introduces EUI limits for various building types. The London Plan could consider alignment to or use of these standards or thresholds.</p> <p>Energy efficiency standards could be applied to buildings with a certain percentage uplift, rather than major developments, to catch all that propose significant building works.</p> <p>Since the current carbon offset price in the London Plan was introduced, more is known regarding the real-world costs of delivering equivalent carbon savings. The City Corporation would welcome robust evidence and data produced by the GLA that reviews the offset costs and policies that seek to ensure these are realistic. An embodied carbon offset could potentially be introduced, which could link to the WLC benchmarks discussed under section 5.3.</p>
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<p>Paragraph 5.2: Heat networks</p>	<ul style="list-style-type: none"> Remove duplication with national requirements but could refocus on optimising the amount of waste heat made available for use in low-carbon heat networks 	<p>The London Plan does not need to duplicate the Heat Network Zoning regulations, but should recognise the implications of the regulations, particularly in terms of heat zone designations, the requirement of buildings to connect and the role of a Zone Coordinator. The London Plan should consider whether requiring buildings to connect to heat networks within heat zones should be pursued if this is not finally adopted as part of the national regulations.</p> <p>The London Plan should also consider the direction set out in the Sub-regional Local Area Energy Plans developed by the GLA in 2024 which build on the national heat network zoning modelling but has sought to focus on more precise heat network zoning opportunities. The LAEP for Central, Inner East and North (CIEN) London identifies 5 priority areas for heat network development.</p> <p>The supply of heat is a critical issue for heat network development in London and is not directly addressed by the Heat Network Zone regulations. This is an area where the London Plan can play a role at two levels:</p> <ul style="list-style-type: none"> i) encouraging individual developments to capture and share waste heat, either with neighbouring buildings or through a wider network – example of 115-123 Houndsditch ii) the development of strategic heat mains across Greater London. The Waste Heat Strategic Areas report published by the GLA in 2024 identified a series of Strategic Areas. The London Plan should explore how these could be recognised as ‘critical infrastructure’ for heat network development. <p>The London Plan should facilitate a place-based approach that explores opportunities of a site or masterplan area for heat network incorporation,</p>
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		<p>or any other form of collective and more efficient energy system, as well as with regard to what type of energy/heat sources are available in any one area (e.g. ground source heat, water source heat, waste heat, PV systems) Building's MEP systems appear to be becoming more efficient in feeding waste heat back into their systems for use on site. It is recommended evidence looks into the amount of waste heat generated from individual commercial buildings, and whether this may be decreasing, and how and which systems would improve urban heat island effects and can be prioritised .</p>
<p>Paragraph 5.3: Whole life-cycle carbon (WLC) and Circular Economy (CE)</p>	<ul style="list-style-type: none"> • Could provide a framework for assessing different retention or demolition options for a site • Could include Whole Lifecycle Carbon and Circular Economy benchmarks, and reduce information submission requirements where met (similar to affordable housing threshold) • Could set out requirements for space for processing of materials 	<p>Support the further development of Circular Economy (CE) and Whole Life-cycle Carbon (WLC) policies. The London Plan should prioritise current demolition material reuse and require more detailed demolition data and information to facilitate material reuse. Further guidance and/or templates on pre-redevelopment and pre-demolition audits would help support the quality and consistency of submission material. Templates could support the consolidation of data which could be fed into a London wide platform that offers materials and building elements at scale. See the City's pre-deconstruction audit template, or templates from established material reuse platforms. The City Corporation applies the term pre-deconstruction audit (alternatively known as pre-demolition audit) to encourage deconstruction and material reuse over demolition and waste.</p> <p>The introduction of CE benchmarks is supported, however this would need evidence. Material or building element reuse is currently incidental, and fully dependent on the quality and age of current buildings on site, and on existing networks of industry players. Better demolition material data and information is required to establish benchmarks (as discussed above).</p> <p>Policies should incentivise reuse on site, material exchange and innovative initiatives to process demolition material and make them suitable for reuse (e.g. concrete, plasterboard.....), to support the industry's transition to a CE. Material passport and material exchange platforms are increasingly</p>

		<p>becoming available and could be encouraged in the London Plan. However, due to the growing number of platforms, open-source data sharing should be encouraged between platforms. Policies could also incentivise material exchange and reuse storage hubs, to support physical infrastructure requirements.</p> <p>The London Plan framework for assessing different retention or demolition options could build on the CoL Carbon Options Guidance, and should focus on reducing both demolition waste and carbon. A clear definition of 'retrofit' is recommended to improve clarity. In the Planning for Sustainability SPD, 'the City Corporation considers that a retrofit should retain and reuse at least 50% of the existing building's superstructure (by mass).'</p> <p>An update of embodied and WLC benchmarks and the inclusion of benchmarks in the London Plan is supported. Embodied carbon benchmarks would support consistency across planning authorities, as they introduce mandatory benchmarks for embodied carbon (planning stage). It's recommended the building typologies are expanded to include tall buildings, hotels, and student accommodation. A third party review mechanism is recommended to ensure planning stage results are accurate, consistent and of high quality (examples: WCC's Pacer platform; CoL's 3rd party review criteria framework). The policy could require WLC reporting at RIBA stage 4 (pre-commencement of development) and RIBA stage 6 (post-completion), as more detailed data becomes available throughout the design and construction process. This is successfully conditioned on CoL major applications.</p> <p>If benchmarks are introduced, consideration should be given to what will happen if the benchmarks are not met. Consideration could be given to embodied carbon offsets, or encouraging applicants to deliver other environmental sustainability benefits (e.g. creation or extension of heat</p>
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		networks, climate resilience initiatives etc – see p. 23 of the Planning for Sustainability SPD for further detail).
Paragraph 5.4: Waste	<ul style="list-style-type: none"> Update borough-level waste apportionment targets, ensuring they align with the latest data and policy reforms 	Support. However, it could be more efficient for the Mayor to employ a strategic approach to waste management across London.
Paragraph 5.5: Green and open spaces	<ul style="list-style-type: none"> Plan should recognise the area-wide priorities and opportunities identified in the London Green Infrastructure Framework (LGIF) and Local Nature Recovery Strategy (LNRS) to prioritise where greening should be protected, enhanced and/or connected Include other strategic opportunities for rewilding and nature restoration. 	<p>The City Corporation is committed to working with the Mayor on the LNRS and to date across its internal steering group has input into the supporting authority consultations. The City Corporation seeks to ensure its approach including the bespoke Biodiversity Net Gain policies in the emerging City Plan 2040 are complementary, and recognises the contributions the open spaces outside the Square Mile have towards the strategies 'Areas of Particular Importance for Biodiversity' (APIBs) and the opportunities in supporting the establishment of the Areas that Could Become of particular importance (ABCs). Further to this the City Corporation continues to be supportive and aims to align with relevant strategies and frameworks including the London Green Infrastructure Framework and the London Urban Forest Plan.</p> <p>Need further supporting practical guidance as to the requirements of species and habitats to survive in dense urban contexts, e.g. high-level green roofs (see Imperial college study) to make the best use and positive impact of urban greening on a variety of sites. Submission of survey data to GiGL also supports LAs to fulfil their statutory reporting duties.</p> <p>Note the importance of a connection to nature for many neurodivergent people and how this can be achieved in densely urban contexts like the City of London.</p>
Paragraph 5.6: London's open spaces	<ul style="list-style-type: none"> Could assess the quality, use and the level of demand, to understand and mitigate areas of open space deficiency 	Support for consistent approach to the assessment of open spaces in terms of demand, deficiencies and management issues to be addressed. As above, the City Corporation agrees that there is a need to make a distinction between policies for MOL and the Green Belt.

	<ul style="list-style-type: none"> • New measures requiring actions to take in areas where demand is greatest • Could include designating newly created open spaces in local plans and recognising contribution to addressing open space deficiencies • Policy could address issues related to management, access, and inclusiveness of open spaces • Ensuring policy distinguishes between MOL and Green Belt policy approaches • Plan to be more specific in relation to rural London 	<p>The Corporation supports the potential for newly created open spaces. This would help to offset the pressure placed on existing open spaces which is a direct consequence of an increasing population. Furthermore, there is the potential to connect existing isolated pockets of habitat, which aligns with the fundamental principles of the Lawton Review (2010) which details the ecological benefits of habitats being bigger, better and more joined up.</p>
Paragraph 5.7: Green infrastructure and biodiversity	<ul style="list-style-type: none"> • Seeks information on how Urban Greening Factor is applied and how this links with BNG 	<p>The City Corporation has developed its own bespoke approach to BNG in its emerging City Plan 2040. The plan also includes the UGF requirement for the London Plan. The City Corporation's research identifies a statistical relationship between these two separate requirements and that sites within the City are often exempt from the statutory requirements of the Environment Act 2021. Therefore there is an opportunity to develop an approach to BNG for London that also delivers the aspirations of UGF. . Alike the statutory BNG requirements the UGF should factor in existing habitats which could be lost. The City's approach to BNG is to deliver uplifts in greening onsite and will mainly be delivered through biodiverse (ideally) green roofs.</p> <p>In terms of evidence of experience of implementation the City of London worked with Greengage Environmental consultants in providing a BNG Study examining an appropriate BNG target for the Square Mile. This analysed a green:grey ratio analysis and also examined UGF scores.</p>

Paragraph 5.8: Water	<ul style="list-style-type: none"> Highlights how the London Climate Resilience Review looks at London's resilience to climate change in relation to water management, flood resilience, urban drainage, and ensuring sustainable water infrastructure for London's future 	<p>Support the London Climate Resilience Review recommendations that a sub-regional integrated water management strategy approach should be taken across the capital. The City Corporation's involvement in the SIWMS for East London has provided valuable insight on site-specific and local action whilst balancing the potential impact of these with the contribution required from wider London Water Resources works and the co-benefits to flooding and water scarcity of these actions. The London Plan should embed learning from the SIWMS for East London specifically on per-capita consumption requirements and reference the develop of future SIWMS recommendation to provide weight as these arise.</p>
Paragraph 5.9: The strategic importance of London's waterways	<ul style="list-style-type: none"> Potential for requiring improvements to water quality and improvements to waterways, including multi-functionality 	<p>Strongly support the integration of the emerging Joint Thames Strategies and the formalisation in these of flood defence raising requirements on riparian developments as a mechanism for providing statutory weight to this essential part of the Thames Estuary 2100 Plan. The City of London's Riverside Strategy piloted the use of the Riverside Strategy Approach from the TE2100 and is an exemplar of how the holistic principles can transform our riverside driven by the requirement to raise flood defences. The contiguity of the Thames flood defences is paramount. Incorporation of the Joint Thames Strategies would ensure a statutory requirement for well designed multi-functional flood defence raising across the capital within the time horizons set out in the plan. This is an appropriate regional approach to spatial planning that cannot be achieved through borough level plans alone.</p>
Paragraph 5.10: Flood risk management	<ul style="list-style-type: none"> New London Surface Water Strategy is being prepared to site alongside the updated Thames Estuary 2100 (TE2100) plan Could require new development to achieve Greenfield Runoff Rates (GRR), ensuring runoff matches natural levels Could also require use of permeable surfaces when sites are redeveloped 	<p>Support in principle the new London Surface Water Strategy.</p> <p>Concerned regarding the requirement for Greenfield Runoff Rates (GRR) rather than the current plan of aiming for it. The Lead Local Flood Authority for the City of London has reviewed many schemes that have achieved the aim of GRR under the current policy, however there are numerous occasions in which site constraints legitimately mean that this is unfeasible, particularly schemes which are primarily retrofit of existing buildings. Whilst not achieving the GRR these scheme regularly provide betterment over existing arrangements. A stronger requirement on all development</p>

	<p>or when impermeable surfaces are proposed to reduce flood risk</p>	<p>may discourage retrofit schemes from even aiming to achieve these benefits. Whilst an option to provide benefit offsite could mean that local drainage systems continue to be strained – the best place for SuDS is incorporated and delivered as part of wider site works.</p> <p>Similar concern for requiring permeable surfaces in all case, these should be encouraged where appropriate but should consider below ground constraints (such as geology) and the potential to worsen the risk of subsidence.</p>
Paragraph 5.11: Water management	<ul style="list-style-type: none"> Needs to address the risk of drought and flooding and water demand management Highlights need to reemphasise the potential of the catchment-based approach 	<p>Support for catchment-based approaches. As mentioned above the City Corporation's involvement in the Sub-regional integrated water management strategy for East London has provided valuable insight. The catchment-based approach needs to recognise the involvement of council officers who will not necessarily directly align with those attending similar catchments based on the London Surface Water Strategy. A full coverage of London into subregional catchments would be beneficial for identifying place specific actions and policy.</p> <p>That being said a new London Plan should incorporate and promote water management policies which will be beneficial across the capital and are already evidenced, such as lower limits for per capita consumption in residential development, enhanced water efficiency in commercial development, and the use of alternative water sources such as rainwater and greywater harvesting.</p>
Paragraph 5.12: Transport's role in London's growth	<ul style="list-style-type: none"> Need to minimise car use from new development and continue modal shift trends Transport and affordable housing will remain the Mayor's priorities 	<p>Support for approach to reducing car use and modal shift.</p> <p>The importance of strategic planning and building where good public transport connections can support non car-based travel is critical to support the Mayor's Transport Strategy targets, and is supported by the City's Transport Strategy.</p> <p>The City is a highly dense urban environment, and during the day freight and servicing vehicles make up 30% of motorised traffic in the Square Mile. However, this proportion increases to 39% between 7 - 10am, coinciding</p>

		<p>with the busiest times of day for walking and cycling. Traffic counts across the City show that overall motor traffic volumes have reduced by approximately two thirds since 1999, with the greatest reduction being in the number of cars and taxis. The emerging City Plan 2040 and the Transport Strategy both support the minimisation of freight vehicle trips in the City. Freight consolidation, cargo bikes and other innovations are minimising vehicles from new developments.</p> <p>Development in the City is already generally car free except for blue badge spaces. Improvements to City streets in reducing car traffic can help to facilitate essential vehicles such as emergency services and transport for people with access requirements. Need to recognise that there is an enduring lack of options for inclusive, dignified and independent travel by public transport including lack of step-free journeys between train and street. Current indications are that this will not be resolved within the lifespan of the new London Plan. The importance of disabled persons' parking spaces and drop-off points should be recognised with positive guidance, noting that restrictions apply to Blue Badge users in some parts of the CAZ.</p>
Paragraph 5.13: Sustainable transport networks to support	<ul style="list-style-type: none"> • Potential to unlock delivery of homes through large-scale rail projects • Scope also exists to strengthen the link between transport and housing at the borough level so could require local plans to set out clearly mapped transport interventions to enable and underpin sustainable growth. 	<p>The City of London Corporation supports the need to secure investment in large-scale rail projects to unlock growth across London. The importance of building where good public transport connections can support non car based travel is critical to support the Mayor's Transport Strategy targets, and is supported by the City's Transport Strategy.</p> <p>Support for detailed local transport interventions.</p> <p>The emerging local plan and the Transport Strategy both include principles for Healthy Streets. The emerging local plan and the Transport Strategy identify requirements from development and new interventions that align with the Healthy Streets principles to create enhanced places for everyone.</p>

Paragraph 5.14: Car parking, cycle parking and deliveries	<ul style="list-style-type: none"> • Potential expand locations where car parking is minimised • Highlights issues in industry of current cycle parking policy with significant costs and lower uptake, which will need consideration • Potential for further guidance on sustainable freight operations 	<p>The City Corporation is aware of the potential costs and carbon involved for sites in the Square Mile to deliver the current London Plan cycle parking requirements and would welcome a bespoke approach which takes account of the particular circumstances of the City, in particular tall buildings in office use. The London Plan standards will need to strike the correct balance between encouraging and supporting modal shift and the most efficient, sustainable and viable use of buildings.</p> <p>The current cycle parking requirements for offices is based on Gross External Area. This means that cycle parking requirements are calculated on all the floorspace within the building and are not directly related to how the building is used. By using Net Internal Area as the measurement instead would ensure that the space in a building is directly related to the number of workers within a building. This should also be considered in the light of decreasing densities from 8 sqm/employee density to 12 sqm/density for professional office uses in the City of London since the pandemic.</p> <p>Would like to understand more about the TfL metric and how this relates to the need for an APTAL as referenced above.</p>
Paragraph 5.15: Responding to transport trends and new technologies	<ul style="list-style-type: none"> • Potential to include information on say more on is 'advanced air mobility'. 	<p>This would require careful consideration in relation to detailed regulations.</p>
Paragraph 5.16: Fire safety	<ul style="list-style-type: none"> • Needs to reflect national policy but also consider policy requirements to all major developments where people sleep on the premises 	<p>No comment.</p>
Paragraph 5.17: Air quality	<ul style="list-style-type: none"> • Recognises air quality issues and inequalities in relation to suffering • Could introduce ambitious but achievable benchmarks 	<p><u>Benchmarks:</u></p> <ul style="list-style-type: none"> • The City Corporation, alongside many London boroughs, has set air quality targets that exceed the current London Local Air Quality Management (LLAQM) requirements. Updated Technical and Policy guidance, with revised targets would align the LLAQM with current

	<ul style="list-style-type: none"> • Could consider a wider range of air pollution sources, eg construction activities, which modelling indicates will contribute 8.3 per cent of PM2.5 emissions across London in 2025 • Could require construction sites to have connection to mains power to reduce the need to use polluting generators 	<p>Mayor of London aspirations of working towards the 2021 World Health Organisation Air Quality Guidelines.</p> <ul style="list-style-type: none"> • Rather than Air Quality Neutral or Positive requirements, the focus should be on zero emission development. • The implementation of the Air Quality Positive LPG has been challenging. In the City, the majority of measures provided are already integral to the design. There has been little innovation. A points-based mechanism, such as that undertaken for BREEAM, may be an option to ensure developments implement mitigation to a required standard. <p><u>Pollution sources:</u></p> <ul style="list-style-type: none"> • PM2.5 emissions from commercial cooking should be included as a priority when considering a wide range of air pollution sources. This is shown by the GLA to be a larger source of PM2.5 in many London boroughs. <p><u>Construction sites:</u></p> <ul style="list-style-type: none"> • Funding for the NRM LEZ should be increased, and the remit of the project extended further than solely construction sites. The connection to mains power for construction sites is currently not a prerequisite for works beginning, this is due to the amount of time it can take for a site to secure a temporary power connection through UKPN
Paragraph 5.18: Heat risk	<ul style="list-style-type: none"> • Policies need to recognise overheating risk in buildings alongside energy efficiency approaches • Need to tackle the effects of the Urban Heat Island effect 	<p>Support.</p> <p>Agree with policies specifically addressing the UHI effect. The City's Planning for Sustainability SPD includes guidance on design measures and considerations applicants are encouraged to integrate to support cool routes.</p> <p>Developments should be designed for future weather conditions to ensure they are resilient to changes in climate. UK Climate projections (UKCP18)</p>

		and CIBSE Future Design Summer Year (DSY) provide future weather data for London.
Paragraph 5.19: Healthy communities	<ul style="list-style-type: none"> • Could review requirements for health and care facilities, and other community spaces in particular in context of Use Class E and flexibility • Hot food takeaways now covered by national policy 	Support for more flexibility for community uses in town centres and in the CAZ as part of the aim for centres to become destinations as well as retail locations. Increased protection for essential health and inclusive community facilities welcomed.
Additional information	<ul style="list-style-type: none"> • Can submit evidence 	The City Corporation would like to work with the Mayor of London and have already drawn attention to the City Corporation's Future of Office Use Study.
Protected characteristics	<ul style="list-style-type: none"> • Any further comments on impacts of the proposals set out in this document on you or on anyone with a relevant protected characteristic 	See above comment in relation to the IIA. As the IIA has yet to be conducted it is unclear how these responses will feed into the iteration of the policies and the plan.

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